IV. ENVIRONMENTAL IMPACT ANALYSIS
B. AESTHETICS
1. VISUAL QUALITY

a. ENVIRONMENTAL SETTING

(1) Existing Visual Environment

(a) Land Use Context

The Project site is centrally located within the Downtown Center of the City of Los Angeles, as identified by the City of Los Angeles *General Plan Framework*. The Downtown Center encompasses an urbanized, densely developed area that serves as the central core of government, commerce, industry, culture, and entertainment for the City of Los Angeles. This area is bounded generally by the Hollywood Freeway and the Santa Monica Freeway on the north and south, respectively, the Los Angeles River on the east, and the Harbor Freeway on the west.

A mix of commercial facilities, wholesale/retail uses, light industrial uses and residential uses occupies properties surrounding the Project site to the north and east. Olympic Boulevard, which traverses the northern portion of the site, is a corridor of retail and commercial facilities and residential buildings. The downtown high-rise office towers are visually prominent to the north and east. A Holiday Inn Hotel, the historic Figueroa Hotel and Petroleum Building, and several new high-rise residential buildings are located adjacent to the northeastern edges of the site. The historic Variety Arts Center is located adjacent to the Figueroa Properties North. Adjacent to the Figueroa Properties on the east, on Flower Street, are various low- to mid-rise wholesale, retail, office, residential, institutional and commercial facilities.

West and south of the Project site are STAPLES Center and the Convention Center, which dominate the visual landscape in the area. STAPLES Center, which opened in October 1999, is located at the southwest corner of 11th Street and Figueroa Street. The facility includes over 950,000 square feet of building area and seats 20,000 persons, including approximately 160 luxury boxes and 2,500 club seats with office and retail uses concentrated along the Figueroa Street side to facilitate a pedestrian-oriented urban street edge. STAPLES Center is a curvilinear structure with its curved facade and walls of glass reflecting the curved glass and steel walls of the Convention Center's South Hall. Built with a massive supertruss, most of the exterior walls and roof are sloped. Sixty-

foot high walls of glass lean out over the sidewalks and adjacent plazas creating a dynamic contemporary look. The glass walls allow visual access to STAPLES Center's lobbies at night, which glow from interior lighting and exterior architectural lighting. The lobbies are especially visible from the pedestrian plaza in front of STAPLES Center at the southwest corner of 11th Street and Figueroa Street.

The Los Angeles Convention and Exhibition Center, is comprised of over 870,000 square feet of exhibit space, 64 meeting rooms, lobbies, restaurants and food courts. The Convention Center West Hall, which opened in 1971, and the Convention Center South Hall, completed in 1993 as part of a major expansion, are connected by a meeting room concourse that spans Pico Boulevard. The architectural firm of Gruen Associates/Pei Cobb Freed & Partners designed this expansion. It is comprised of two towering glass and steel pavilions and the connecting meeting room concourse. The contemporary building has an expansive, curvilinear, predominantly steel- and glass-sheathed exterior and a dramatic, multi-story glass pavilion marking the entry. The Convention Center and STAPLES Center are considered important architectural landmarks for the downtown area.

As shown in Section II.B., Project Location, the Project site consists of all or a portion of six City blocks located east and west of South Figueroa Street, between Olympic Boulevard on the north and Pico Boulevard on the south. The Olympic Properties, located to the north of STAPLES Center and the Convention Center, and the Figueroa Properties, located to the east of STAPLES Center and the Convention Center, are currently occupied by surface parking. Figueroa Properties Central is also occupied by three warehouse/mechanical buildings, one and two stories in height.

The Project site exhibits little topographic relief and there are no slopes or hillsides in the area. Existing landscaping on the site is limited to minimal ornamental landscaping. Landscaping in the general area is sparse and limited to periodic street trees lining the Project site along portions of Olympic Boulevard and Byram, Bixel and Georgia Streets; street trees along 11th and 12th Streets, 12th Drive and Gilbert Lindsay Drive; and street trees along Figueroa, Flower and Hope Streets. Trees are generally less than fully mature. The most extensively landscaped areas in the Project site vicinity are found in Gilbert Lindsay Plaza in front of the Convention Center and south of STAPLES Center. Each of the parking lots has fencing and extensive ground covering.

(b) Existing Visual Qualities

An evaluation of visual qualities encompasses the identification of visual resources in relation to the surrounding environment and in relation to the expected visual character of the area as articulated in applicable adopted City plans and policies. This evaluation recognizes that individuals respond differently to changes in the visual environment and that an adverse visual scene to one

person may represent an improved visual condition to another. As a result, this section is necessarily influenced by a degree of subjectivity.

(i) Visual Resources

Visual resources on and adjacent to the Project site may be characterized as urban features of the landscape, consistent with the location within a metropolitan setting. As such, existing visual resources include: the Los Angeles Convention and Exhibition Center; the historic Variety Arts Center, Petroleum Building and Hotel Figueroa; STAPLES Center; Gilbert Lindsay Plaza; and streetscaping and landscaping associated with buildings and public rights-of-way. Such elements of the landscape as the height and orientation of existing buildings, building setbacks, and sidewalks adjacent to the Project site may also be appropriately considered as integral components of the aesthetic character of the area, as they define the scale of the built environment at ground level and assist in defining visual access to the Project site.

STAPLES Center and the Los Angeles Convention and Exhibition Center, by virtue of their size and dramatic architectural design, are the most prominent buildings in proximity to the Project site and represent significant visual resources. These two buildings are also prominent at night, due to the spectacular architectural lighting and the glow from the building lobbies (see Section IV.B.2, Light and Glare, for further discussion of existing lighting conditions). The Variety Arts Center is listed in the National Register of Historic Places, the Hotel Figueroa is eligible for listing in the National Register and the Petroleum Building is designated as a Los Angeles Historic-Cultural Monument (see Section IV.L, Historic Resources). Although additional buildings and land uses throughout the Project area collectively contribute to the existing commercial and residential character of the neighborhood, Gilbert Lindsay Plaza constitutes the only other prominent visual resource present in the project area. The Plaza is the most highly landscaped area in the vicinity with a dense grove of adolescent willows that serves as a bus plaza and entryway to the Convention Center's West Hall and STAPLES Center. The surface parking lots and the warehouse/mechanical buildings found on the Project site do not possess unique or valuable aesthetic attributes, nor do they contribute demonstrably and positively to the local aesthetic character of the community.

(ii) Visual Access

Those landscape features that determine a viewer's line-of-sight from a vantage point define the available visual access, or viewshed within a given field of view. Existing views may be partially or substantially obstructed or wholly blocked by modification of the environment (e.g., grading, landscaping, etc). The State of California and the City of Los Angeles have formally

acknowledged the value of access to visual resources.[17] A distinction is drawn in this analysis between public and private vantage points in order to identify the different categories of viewers affected. Public vantage points are those that are publicly accessible, such as streets, freeways, parks and vista points. Private vantage points are those that are located on private property.

(iii) Public Vantage Points

Public vantage points in the vicinity of the Project site are generally associated with public street and freeway corridors approaching or adjacent to the site. These include: the Harbor and Santa Monica Freeways; the elevated freeway interchange to the south; and Figueroa Boulevard, Olympic Boulevard, Flower Street, 11th Street, 12th Street, and Pico Boulevard. Views from these vantage points may be characterized as urban in nature. Freeway views encompass the panorama of the downtown skyline to the north and east, expanses of predominantly industrial and commercial development surrounding the Project site, and mixed light industrial, commercial, and residential land uses immediately adjacent to the Project site. Figure 18 on page 123 shows mapped vantage points of photographs included in this section. Figure 19, Photograph 1, on page 124 shows a typical view from Cherry Street adjacent to the Harbor Freeway in the vicinity of the Project site. The downtown skyline to the north constitutes the primary visual resource in the vicinity, while STAPLES Center and the Convention Center serve as the predominant visual focus for the immediate area. Due to the proximity and the scale of the Convention Center's southern and western facades, the Convention Center is the dominant visual focus from Harbor and Santa Monica Freeways interchange to the south.

Views from the streets surrounding the Project site are largely confined by development lining the street corridors. Due to the flat, relatively undifferentiated topography of the area, few long-range views are available from vantage points along street corridors. Views from Figueroa Street and 11th Street, adjacent to the Project site, are largely dominated by STAPLES Center and the Convention Center, as shown in Photographs 2 through 4 in Figure 19 on page 124 and Figure 20 on page 126. Views across the Figueroa Properties and from Olympic Boulevard to the north and east are comprised of high-rise commercial and residential buildings on Olympic Boulevard and Flower Street, as shown in Photographs 5 through 8 in Figure 20 on page 126, and Figure 21 on page 127.

[17] *See California Government Code Section 65302, which permits the Land Use Element of a General Plan to make provision for protection of aesthetic resources and views; Nollan v. California Coastal Commission, 483 US 825 (1987), where view protection was identified as a legitimate government interest; and the City of Los Angeles 1979 Scenic Highway Plan, where views of aesthetic resources are identified as meriting protection and enhancement.*

Figure 18 Photograph Location Map

Figure 19 Photographs of Existing Project Site and Surrounding Area

(iv) Private Vantage Points

Commercial and residential uses north, south, and west of the Project site typically have short-range views of mixed-use development in the project area. As most surrounding development is one to two stories in height, existing views are dominated by STAPLES Center and the Convention Center. Long-range views exist from the commercial and residential properties along Olympic Boulevard, north of the Project site, from the upper floors of those building facades adjacent to Olympic Boulevard. Expansive views of STAPLES Center, Convention Center and dense urban development to the south are available from these buildings. Views of the Project site from high-rise structures located to the north and east are limited due to intervening development, however, the upper stories of the TCW building located at the corner of 9th Street and Figueroa Boulevard would have views of STAPLES Center, Convention Center and the Project site. Long-range views are available from land uses west of the Harbor Freeway and south of the Santa Monica Freeway including the downtown skyline to the north, which is partially obstructed by the Convention Center in the foreground.

(2) Policy and Regulatory Environment

The Project is located within the South Park Development Area of the Central Business District Redevelopment Project Area of the City of Los Angeles. All development activity on-site is subject to the development design regulations of the *Central Business District Redevelopment Plan* and the *City of Los Angeles Zoning Code*. The City's *General Plan Framework*, adopted in December 1996, the *Downtown Strategic Plan*, and the *South Park Development Strategies and Design Guidelines* also provide guidance on development design issues relating to potential site development. In general, adopted plans and policies for the downtown Los Angeles area encourage the development of regionally oriented attractions that serve to concentrate activities in the downtown core. These plans and policies identify the expected visual character of the project area resulting from the application of the following design standards.

(a) City of Los Angeles Urban Design Policies

The *General Plan Framework* provides the best indication of the City's vision for the future development of the Project site and vicinity. The Downtown Center is the principal government and business center of the region, with a worldwide market. It is intended to be the highest density district of the City as well as a hub of regional transportation. The Downtown Center is therefore intended to provide a broad range of goods and services supported by a variety of land uses, including industrial parks, corporate and professional offices, entertainment facilities, retail commercial centers, and other supporting uses to serve multiple communities.

Figure 20 Photographs of Existing Project Site and Surrounding Area

Figure 21 Photographs of Existing Project Site and Surrounding Area

The City has developed policies intended to promote distinct neighborhood and community identities and increase overall "liveability" for City residents through the development of attractive commercial corridors and visual amenities. These policies, contained within the Urban Form and Neighborhood Design Element of the *General Plan Framework*, address patterns of development intensity, building height, and other structural elements that determine the City's physical character and visually differentiate centers or districts, such as open space, transportation corridors, public facilities, activity centers, and focal centers. The primary aesthetic policy of the *General Plan Framework* applicable to the Project site acknowledges that the built form of regional centers will vary by location and specifies that regional centers should contain pedestrian-oriented areas and design elements.

The segment of the Harbor Freeway (I-110) between Martin Luther King, Jr. Boulevard and the Hollywood Freeway (US-101) interchange is designated as a Scenic Highway (city route) in the City's adopted Scenic Highway Plan, in acknowledgement of the views of the downtown high-rise urban core. The Project would be visible from a segment of this Harbor Freeway corridor, which passes immediately west of the Project site and is elevated adjacent to STAPLES Center and the Convention Center. However, views are of short duration due to automobile speeds and are intermittent in nature due to the presence of STAPLES Center, Convention Center, and other development along the freeway. According to the Scenic Highway Plan, designation of a highly urbanized Scenic Highway indicates that consideration should be given within the scenic corridor (i.e., the area visible from a scenic highway) to development-related design review, signage control, street lighting, landscaping, green median strips, walkway design, and amenities such as murals and fountains.

The *Downtown Strategic Plan*, which provides focused planning and development initiatives and programs for the geographic subareas comprising downtown, designates the Project site and area to the southwest as the Convention Center District. Land uses to the north and east are designated by the *Downtown Strategic Plan* as mixed use, including residential uses. The *Downtown Strategic Plan* recommends a series of landscaped, pedestrian-friendly streets around the Convention Center to eliminate the perception that the facility is isolated and to increase pedestrian activity and links to the “Financial Core” (the Downtown area characterized by the high rise office building concentration). Figueroa and 12th Streets are emphasized in this recommendation.

The Project is located within the Central Business District (CBD) Redevelopment Project Area. The CBD *Redevelopment Plan* has designated distinct Planning Areas and established general standards for development design. Accordingly, the Project is located within the South Park Development Area of the CBD Redevelopment Project Area. Standards include limitations on building height and size, provision of adequate light and privacy between buildings, the creation of open space, and use of landscaping.

The *South Park Development Strategies and Design Guidelines ("Guidelines")* are consistent with the Redevelopment Plan and are intended to serve as a catalyst for development in the area.[18] Relevant to aesthetic considerations, the *Guidelines* identify linkages, which are prominent streetscape segments targeted for improvements and gateways which are identifiable point-of-entry intersections leading into the South Park area of the CBD. Linkage improvements are intended to provide a continuous and pleasant environment for pedestrians through the use of such elements as landscaping, selective sidewalk widening, distinctive paving materials for sidewalks and crosswalks, street furniture, and information kiosks.

Linkages or prominent streetscape segments targeted for improvements identified in the *South Park Development Strategies and Design Guidelines* within and adjacent to the Project area include: the east side of Figueroa Street between Pico Boulevard and 11th Street, both sides of Figueroa Street between 11th and 9th Streets; along Olympic Boulevard between Francisco and Main Streets; 11th Street between Figueroa and Hope Streets; Hope Street between Olympic and Venice Boulevards; and Olympic Boulevard between Figueroa and Los Angeles Streets. Gateways or identifiable point-of-entry intersections, located along linkages, are suggested in the *Guidelines* as opportunities to reinforce South Park's pedestrian character, announce arrival into South Park, reflect the specific nature of their context, and provide images that will come to define South Park. The intersection of Figueroa Street and Olympic Boulevard, adjacent to the Project site, is identified as a gateway. Linkages along Figueroa Street and along Olympic Boulevard are identified to create a connection between this gateway and the gateway identified for Eighth Street and Hope Street.

Figueroa Street is further identified within the *Guidelines* as a view corridor, with the Convention Center serving as the predominant orientation landmark from which views of the downtown skyline are available. The Convention Center is also recognized as an activity center around which future development should be planned to enhance locations where people gather and disperse. The *Guidelines* express recommendations for the design of new development so as to maintain existing view corridors and activity centers.

The proposed Project would involve development of various elements that would be related to *The Figueroa Corridor Economic Development Strategy ("Corridor Strategy")* that was approved by the Community Redevelopment Agency (CRA) in March 1998 to define a means to

[18] *This is an advisory document developed by CRA in cooperation with the South Park Stakeholders Group. The South Park Development Strategies and Design Guidelines, while developed for consistency with the Central Business District Redevelopment Plan and Downtown Strategic Plan, are not adopted by the City or the CRA and are not binding requirements. The document is intended to serve as guidance for development and revitalization of the South Park Section of the City (see Section IV.A, Land Use for further discussion).*

improve the Figueroa Street corridor economically and physically, and to reinforce its regional importance.[19]

Further, the *Corridor Strategy* established six districts to focus attention upon the unique attributes of each that: 1) defines the prevailing character; 2) identifies desired anchor uses; 3) establishes design objectives; and 4) defines development priorities within open space and transportation uses. These districts extend along Figueroa Street from Vernon Avenue (Exposition Park) on the south, to Wilshire Boulevard on the north.

The proposed Project is situated within the Downtown Events Center District, which extends from Venice Boulevard (just north of the I-10 Freeway) to 9th Street (James M. Wood Boulevard). Other prominent development that is within the Downtown Events Center District includes STAPLES Center, the Convention Center, the Variety Arts Center, California Hospital Medical Center, the Hotel Figueroa, the Downtown Holiday Inn, the Fashion Institute of Design & Merchandising (FIDM), Grand Hope Park and several residential developments.

The *Corridor Strategy* identifies "strategic projects" within each district and also provides a "future vision" to serve as a guide to development planning. The *Corridor Strategy* emphasizes the importance of improving the walking experience within the Downtown Events Center District by implementing various strategic projects that establish linkages with the Metro Blue Line Pico Station and other transit facilities within the Figueroa Corridor. The intent of the Figueroa Corridor "vision" with respect to Figueroa Street character is to: (1) establish a physical character for the street that is commensurate with the significance of Figueroa Street to Los Angeles and, in particular, to the Central City; and (2) establish an overall continuity of physical form and, at the same time, a distinctive character in each district. The *Corridor Strategy* emphasizes the importance of developing a visual identity for the Corridor through the improvement of visual continuity along its entire length. The *Corridor Strategy* further states that implementation of streetscape improvements will achieve that end and benefit businesses, pedestrians and transportation users. These streetscape improvements include: installation of street banners; development of a signage program; engagement of local artists; and coordinating pedestrian amenities and transit elements.

(b) Signage Regulations and Policies

(i) City of Los Angeles Sign Regulations

The City of Los Angeles regulates the placement, construction, and modification of all exterior signs and sign support structures through Division 62 (Building Code) of the *City of Los*

[19] *Community Redevelopment Agency of the City of Los Angeles, Figueroa Corridor Economic Development Strategy-Final Draft, January 12, 1998, approved March 5, 1998.*

Angeles Municipal Code (*LAMC*). Building permits must be obtained from the Department of Building and Safety for any proposed signs, and electrical permits must be obtained for signs illuminated by electrical lighting. Specific *LAMC* requirements and restrictions are dependent upon signage type; however, general constraints on design, construction, materials, potential for hazard to traffic, and determination of such hazard are applicable. Specifically, signs located within 500 feet of a freeway that are perceptible by motorists shall be subject to road hazard evaluation by LADOT prior to issuance of applicable permits. In addition, signs located within 2,000 feet of a freeway shall be subject to review by the Department of Building and Safety to determine that the sign will not be viewed primarily from a freeway or an on-ramp or off-ramp. This determination is based upon whether the sign may be viewed clearly for a greater distance from the freeway than from an adjacent surface street. The Project site is also subject to specific State-mandated signage regulations due to its location in proximity to roadways and the Harbor and Santa Monica Freeways. The *CBD Redevelopment Plan* states that signs shall be permitted in the CBD Redevelopment Project Area only in conformity with State statutes and local codes and ordinances.

(ii) Community Redevelopment Agency Skyline Signage Policy

CRA has the authority to review and approve identification signs at or near the top of all buildings within the CBD Redevelopment Project Area. The CRA has therefore developed the Skyline Signage Policy Framework, incorporating flexible guidelines consistent with City ordinances governing signage.[20] The policy establishes the guidelines related to signage area, compatible materials, number of signs, identification symbol, nighttime identity, and adaptability. One of the guideline objectives is to contribute to a cohesive Downtown skyline image. Another objective states that while principal contributors to the skyline image should include a limited number of distinctive, articulated architectural landmarks, all buildings should contribute visual interest to the skyline and have a clear identity within the Downtown community. In addition, CRA encourages consideration of signage design during development of the architectural program, to assure that signage criteria are considered while building design is still flexible.

(iii) South Park Signage Recommendations

The *South Park Development Strategies and Design Guidelines* cite the tendency for uncontrolled signage to prioritize maximum visibility to motorists at the expense of the pedestrian environment and overall visual quality. Two categories of signage are addressed: municipal signs and private signs. Municipal signage standards suggest the provision of unified signage with designs for place identification and vehicular circulation, as well as orientation maps, directional signs and tourist information boards in areas of pedestrian concentration. Private signage standards include the integration of signage with building architectural elements, consideration of the

[20] *Community Redevelopment Agency of the City of Los Angeles, Skyline Signage Policy Framework, adopted January 13, 1986.*

pedestrian viewing environment, development of clear graphic signage for parking lots and integration with fencing and screening elements, and the elimination of billboards.

The plans and policies identified above provide the applicable design criteria and standards used to evaluate the Project's consistency with the expected visual character of the project area as defined by these plans and policies.

b. PROJECT IMPACT

(1) Significance Thresholds/Methodologies

A project would have a significant impact upon visual qualities if any of the following apply:

To visual resources:

- If the project introduces elements that would substantially detract from the existing visual character or primary visual resources of the area.
- If significant features or elements (such as structures, public plazas, art or gardens) that contribute positively to the visual character of an area are removed or demolished.

To visual access:

- If the project would obstruct significant views from public street and freeway corridors or private property vantages currently enjoyed.

To policies and regulations:

- If the project introduces elements that would substantially detract from the expected visual character of the area as articulated in applicable adopted City plans and policies:

(2) Analysis of Project Impact

(a) Project Characteristics

The Project includes the construction of: two hotels, a 1,200-room convention hotel and another 600-room hotel; retail/entertainment/restaurant uses, including a live theater; office space; health club; an open-air plaza to feature year-round venues; approximately 800 residential units; and combined structured and surface parking located throughout the Project site. As described in Section II, Project Description, the proposed Project site is located east and west of Figueroa Street, between Olympic Boulevard on the north and Pico Boulevard on the south and is bisected by Figueroa Street. Existing parking lots and structures on the Figueroa Properties Central would be removed to accommodate the Project. Figure 12 in Section II.C., Project Characteristics, depicts the conceptual plan for the proposed Project.

Because project design is presently in the conceptual stage, no specific project building design is available for evaluation. Conceptual plans have been prepared according to Project Design Guidelines discussed below (see also Section II.C., Project Characteristics). The Project Design Guidelines have been developed to: 1) create a special downtown sports and entertainment district; 2) provide a rich mixture of uses that supports a lively, round-the-clock environment; 3) focus activity on the street, creating a safe and vibrant pedestrian-oriented district; 4) encourage a public atmosphere with distinctive visual elements involving signage lighting and landscape/hardscape features; and 5) build strong linkages that connect the district to downtown and the surrounding urban fabric. Key elements of these Design Guidelines are listed below:

(i) Site Planning

a. Building-Street Relationship:

- Build a strong relationship between the ground level of a building and the street.
- Configure buildings to maintain a continuous edge along the street; define the street and other important public/common spaces.
- Orient buildings to the street and provide generous windows and openings at the street level.
- In particular, maximize retail store storefronts and entrances along the street and other important public/common spaces.

b. Open Space:

- Provide a diversity of outdoor spaces (size, shape, type, use) throughout the Specific Plan area; those spaces that are used as gathering spaces should emphasize public safety.
- Outdoor spaces may include plazas, courtyards, pedestrian walks (paseos), terraces, and planted gardens.
- In general, plazas and courtyards should be well-defined spaces that take on the character of outdoor rooms.
- Building architecture and landscape features should contain plazas and courtyards.

c. Circulation, Access & Parking:

- Locate pedestrian walks to provide convenient access to transit facilities.
- Minimize the number of sidewalk curb cuts that provide access to parking and service/loading facilities to facilitate pedestrian activity, make them safe where they are located, avoid blind corners and steep slopes of ramps approaching street level.
- Screen and buffer service/loading facilities.
- Screen adjacent public streets, open space and other sensitive uses from service/loading facilities; ideally service and loading facilities will be provided at the subterranean level.
- Locate access to service docks away from primary pedestrian walks and main building entrances.

d. Sun/Shade:

- Locate towers to maximize their exposure to light and air, as well as define view corridors.
- Locate building towers so as to minimize mid-day and afternoon shade upon streets and other important public/common spaces.
- Rely upon trees, canopies, arcades, and similar features to regulate the opportunity for sun and shade along public streets and within other important public/common spaces.

(ii) Architecture

a. Architectural Character:

- Buildings should be designed in a contemporary architectural style and character that is complementary to STAPLES Center and the Project as a whole.
- Residential, hotel, and mixed-use buildings along Flower Street should complement the South Park District.
- In general, building architecture should present a clean, contemporary style reflecting the sports and entertainment nature of the proposed Project.

b. Massing and Scale:

- Use building mass and orientation to define and place strong visual emphasis on the street and other important public/common spaces.
- Buildings should provide a "podium" that maintains the desired continuous building edge along the street, and shall not exceed the established maximum base height.
- Towers will rise above the podium, in accordance with the above-described Sun/Shade guidelines, and shall not exceed the established maximum tower height.
- A pedestrian-oriented scale should be maintained at the street level. Building articulation and detail, decorative elements, transparent glass, and the use of quality materials will minimize the scale of the architecture.

c. Articulation and Fenestration:

- Use fenestration (windows and doors) to unify a building's appearance and add to a street façade's interest and three-dimensional quality.
- Provide well-marked, articulated building entrances.
- Building entrances should be differentiated by use.
- Retail storefronts should be clear glazing, encourage use of awnings where appropriate.

***d*. Material and Colors:**

- Materials and colors should convey the special character, energy and ambiance of the overall Project.
- Storefronts should have clear transparent glazing; generally avoiding either tinted or reflective glass.
- Materials and colors should be compatible with the STAPLES Center and the Convention Center.

(iii) Landscape

***a*. Streetscape/Sidewalks:**

- Design streets and sidewalks for safe, comfortable and efficient movement on foot; protect and shade pedestrians.
- Provide landscape improvements such as street trees, street furniture, street lighting, and paving; street trees should be the primary landscape component.
- Plant street trees so as to define the street and sidewalk; provide consistency in species, size, and frequent spacing of trees along a street to create a pleasant rhythm and define the street and pedestrian environment.
- The design of street furniture and other street amenities should promote district identity and unify the area but avoid interfering with pedestrian flow.

The Project's streetscape and landscape concepts are based on reinforcing the hierarchy of streets as described below and shown in Figure 22 on page 137 and Figure 23 on page 138.

- *Grand Boulevard* - Figueroa Boulevard is designed as a grand boulevard with a formal design treatment. Street trees are to be palms planted as a processional colonnade alternating with large canopy trees to achieve an aura of grandeur. This street also operates as an important pedestrian corridor, and therefore provides a wide sidewalk (18 to 22 feet) that accommodates large crowds and significant sidewalk activity including outdoor café-style seating.

Figure 22 Streetscape Plan

Figure 23 Landscape Plan

- *Arterial Street* - Olympic and Pico Boulevards are significant avenues of vehicular traffic through the district. Large, spreading canopy trees without intervening palms are regularly spaced for a semi-formal appearance. A wide sidewalk (15 to 18 feet) is maintained to provide pedestrians with a comfortable distance from moving vehicles.

- *Collector Street* - Eleventh, 12th, Flower, Georgia and Francisco Streets are important pedestrian links to adjacent areas. Their design is to be pedestrian friendly with randomly planted canopy trees and sufficiently wide sidewalks (12 to 15 feet). Twelfth Street is realigned to create a safe and controlled intersection with the Convention Center drop-off road.

- *11th Street Temporary Closure* - Eleventh Street between Georgia and Figueroa Street permits temporary off-peak closure to vehicular traffic for special events and safe pedestrian flows. Closure is accomplished with attractive traffic barriers, removable bollards and/or special paving treatment that differentiate the portion of the street subject to temporary closure.

- *Service Street* - Cherry Street along the backside of the Convention Center and Figueroa East parking structure is primarily devoted to service and parking access. Narrower sidewalks are provided (10 to 12 feet) and columnar trees are irregularly spaced for an informal appearance.

b. Plazas/Courtyards/Paseos:

- Make plazas and courtyards comfortable for human activity such as standing, sitting, socializing, and eating.

- Plazas and courtyards should provide comfort in terms of shaded areas from summer sun and glare, and access to warming winter sunlight.

- Provide seating within plazas and courtyards with consideration given to noontime sun and shade; this may be a combination of permanent and temporary seats.

c. Roofscape/Terraces:

- Provide accessible outdoor building and rooftop terraces and congregation areas to augment the on-grade open space and landscape character of the site.

- Include trees and other plantings in permanent and temporary planters that will shade and add interest to the space.

- Outdoor furniture, including seating should be incorporated and placed with consideration to sun and shade and other factors contributing to human comfort.

***d*. Public Artwork:**

- Provide opportunities for the incorporation and installation of outdoor and publicly accessible artwork throughout the Project, consistent with CRA art policy.

(iv) Lighting

***a*. Streetscape:**

- Utilize streetlights and streetscape lighting to promote pedestrian safety and efficient circulation.
- Streetscape lighting should match the scale and character of district buildings and add to the identity of the area.

***b*. Architectural:**

- Locate architectural lighting to promote public safety and support the Project's vitality and nightlife.
- Architectural lighting should complement the building.
- Shield lighting to minimize impacts and glare upon adjacent sensitive uses and roadways.

***c*. Landscape:**

- Incorporate landscape lighting to promote public safety and support the Project's vitality and nightlife.
- Landscape lighting should be of a character and scale that relates to the pedestrian and highlights special landscape features.
- Shield landscape lighting to minimize impacts and glare upon adjacent sensitive uses and roadway.

d*. Special Lighting and Signage Zone*:

A Special Lighting and Signage Zone would establish signage and lighting standards and guidelines encompassing the frontage along Figueroa Street (between Pico and Olympic Boulevards), 11th Street (between Georgia and Figueroa Streets) and the intersections of Figueroa Street and Olympic Boulevard, Figueroa Street and 11th Street, and Figueroa Street and 12th Street. Lights sources permitted under the Special Lighting and Signage Zone would include:

- Billboard washes and spot lighting.
- Neon, cold cathode.
- Exposed Incandescent Lamps and Tivoli Lights.
- Search (xenon) Lights and Klieg Lights.
- Special Laser light shows.
- Jumbotron/LED/Electronic Readerboard lights.

(v) Signage

***a*. Wall Murals/Billboards/Jumbotrons/LED/Electronic Readerboards:**

- Accentuate the architecture of the Project and contribute to a lively and visually stimulating experience.

***b*. Way-finding Kiosks/Directories:**

- Locate directory signs to guide and orient pedestrians to the Project and local transit options and its surroundings.
- The appearance of directory signs should contribute to the identity of the Project.

***c*. Regulatory Signs:**

- Locate regulatory signs to clearly guide and direct visitors.
- Scale regulatory signs to motorists or pedestrians as appropriate.

***d*. Building Identification Signs:**

- The location, size, and appearance of building identification signs should complement the architecture of the building and overall character of the Project.

***e*. Tenant Identification Signs:**

- The location, size, and appearance of tenant identification signs should lend support to retail/street activity, complimenting the architecture of the building, and overall character of the Project.

***f*. Storefront Signs:**

- Complement the storefront design and building architecture, as well as contribute to the shopping/entertainment experience desired for the Project.

***g*. Special Lighting and Signage Zone Standards:**

- *Operating Hours*: Illuminated signs may be permitted to remain lit and operational from dusk to midnight.
- *Minimum Illuminated Sign Area:* A minimum aggregate surface area of 50 percent of an illuminated building sign shall be electronically animated, either by means of flashing borders, writing, pictorial representations, emblems or other figures of similar character or by means of a flashing sign surface serving as a field backdrop during operation.
- *Minimum Height for Illuminated Signs:* Signs shall not be located below a height of 10 feet, except illuminated storefront signs, and theater billboards.
- *Maximum Height for Illuminated Signs*: Signs shall not be located above a height of 150 feet, except building identity signs.

(vi) Special Features:

***a*. Central Plaza:**

- The Central Plaza should operate as the forecourt to the retail entertainment center, and as the central meeting/public gathering place for the Project.

- The Central Plaza should facilitate the connection with STAPLES Center Plaza, specifically, design elements should be continuous.

- Provide maximum flexibility in the use of the space, with a minimum of obstructions sited interior to the plaza.

- Employ lighting techniques that present a "high-tech" display and offer a unique and visually stimulating experience.

- Additionally, lighting should be of a character that accentuates the surrounding architecture, highlights special uses and activities, and contributes to the comfort and safety of the plaza's occupants.

- Minimize glare upon adjacent properties, sensitive uses, and roadways; shield the special event lighting as necessary

***b*. 11th Street Temporary Closure:**

- Articulate the design of the 11th Street temporary closure area to differentiate it from a standard street.

- The design and treatment of the 11th Street temporary closure area should unify this space with the central plaza and the entry plaza space ("Star Plaza") of STAPLES Center, with special emphasis given to the paving design, curb treatments, and temporary street closure/detour devices.

(b) Construction

Construction activity typically involves disturbance of existing natural and man-made features and development of structures that are temporarily devoid of external treatments designed to promote a pleasant visual appearance. Construction at the Project site would involve the construction of temporary barriers designed to screen much of this activity from view from adjacent streets and sidewalks. Construction activity may actually be a source of visual interest to pedestrians. Where feasible, the temporary barriers would provide view ports to view the on-going construction.

The corner of Figueroa and 11th Streets presently serves as a pedestrian gateway to the neighboring STAPLES Center and Convention Center for patrons who park in areas located to the north and east, including the Project site. As discussed in Section IV.F.3, Pedestrian Safety, a temporary covered pedestrian walkway would be provided along Figueroa Street and 11th Street, on the side of the streets adjacent to the proposed Project site, when needed, to ensure adequate

pedestrian access. However, this walkway, along with other temporary construction barriers, could also potentially serve as targets for graffiti and other unattractive visual features, if not properly monitored. If this occurs, a significant visual impact at an important gateway to STAPLES Center and the Convention Center would result from project construction. A mitigation measure has been included so that this potentially significant visual impact would be reduced to a less than significant level.

(c) Operation

(i) Visual Qualities

a. Visual Resources

The present character of the Project site and surrounding area is urban in nature and is dominated by the presence of STAPLES Center and the Convention Center, as previously discussed. The presence of the Project would serve to reinforce the role of this area as a center of activity, consistent with the *Downtown Strategic Plan* and the *CBD Redevelopment Plan*. The Project would connect the existing visual landmarks in this area. Due to the prominence of STAPLES Center and Convention Center relative to surrounding development, the focus of attention within the Project area would, therefore, expand to include the Project, thereby enhancing the image of the area as a unified activity center rather than individual buildings.

Development of the Project would alter the visual character of the site through replacement of the existing surface parking lots and warehouse buildings. The existing paved parking lots and warehouse buildings would be removed and hotels, entertainment, retail and residential buildings would be developed. While the Project would result in an intensification of development, Project Design Guidelines would ensure that the design of the Project would be contemporary in architectural style and character, complementary to STAPLES Center and the Convention Center. This would minimize potential for conflict between the architectural styles of the Project, STAPLES Center and the Convention Center and the potential for the Project to detract from STAPLES Center or the Convention Center. Unifying design elements to be employed for consistency among STAPLES Center, the Convention Center and the Project include architectural features, signage, lighting, landscaping and hardscaping. Service areas, parking garages above grade, and mechanical equipment would be situated out of view of adjacent roadways and buildings or would be screened by landscape or architectural barriers.

As described in the Project Design Guidelines and the Design Plan for the Project (see Section II.C., Project Characteristics), Project landscaping would promote a pedestrian-oriented environment, with activity focused on the street. This would be achieved through the proposed open spaces areas including streetscapes, entry forecourts, paseos, plazas/courtyards, roofscape terraces,

and the Central Plaza located across 11th Street from STAPLES Center. Deciduous canopy trees, tall rows of palms for special emphasis, flowers and plants, attractive paving and hardscape, and outdoor seating would be the primary landscape components of the Project's open space areas. The consistency of these features would further unify and define the area as a district.

The Project's streetscape concept would reinforce the hierarchy of streets by design and function, promote pedestrian safety and comfort, and build a strong interface between Project buildings and sidewalks. As shown in the hierarchy of streetscape design, presented in Figure 22 on page 137, Figueroa Boulevard would be developed as a "grand boulevard" with a formal streetscape. Less formal streetscaping, as proposed for the other surrounding streets, would also be design to promote pedestrian activity. The Project's streetscape plan would be consistent with the improvements to linkages or specific streetscape segments targeted for improvements in the *South Park Development Strategies and Design Guidelines.* The linkages defined by the *Guidelines* on the Project site along Figueroa Boulevard, Olympic Boulevard, and 11th Street would be visually enhanced and would provide a continuous, pleasant environment for pedestrians as recommended by the *Guidelines.*

All of the Olympic Properties are zoned General Commercial (C2-4D). This commercial zone and associated height district allows a maximum FAR of 6.0. The Project conforms (conditionally, in some cases) to the permitted uses within this zone designation. The Olympic West Properties, adjacent to the Harbor Freeway, will be developed within the permitted building height and massing with a proposed FAR of 1.5. This subarea would have a height overlay of 100 feet above grade, with a supplemental height limitation to 150-foot above grade over 20 percent of this subarea. The southern portion of this development area would accommodate the proposed extension of the Convention Center, thus creating a visual linkage between the existing and proposed convention facilities.

The Olympic East Properties will be developed to the maximum permissible FAR of 6.0, with a height overlay of 175 feet above grade and a supplemental height limitation of up to 600 feet over 15 percent of the subarea. The supplemental height or "tower" portion of the Olympic East Properties would be located on the northwest corner of the Property and would contain the proposed convention hotel. With the limited subarea application of the supplemental height, the tower would have a slender appearance giving the primary focus of development massing to the street level. The tower would be a dominant orientation landmark further "a beacon" identifying this area as a gateway to the South Park area. The height of the tower would also provide a visual linkage to the downtown high-rises to the north and east. This location also would accommodate a portion of the urban entertainment uses proposed for the Project. The central plaza, providing open space and the main visual focal point for the Project, would also be located in this portion of the Project site. Development of the Olympic North Properties will include office uses, possibly related to sports medicine. The proposed development will be within a FAR of 3.0, which translates into a height

overlay of 80 feet above grade and a supplemental height limitation of up to 200 feet above grade over 60 percent of the subarea.

The western half of the Figueroa Properties is zoned General Commercial (C2-4D), which allows development to occur up to a maximum 6.0 FAR. The eastern half of the Figueroa Properties is zoned Qualified Multiple Dwelling ([Q]R5-4D). Specified uses allowed under R5-4D zoning include single family dwellings, multiple family dwellings, hotels, museums, hospitals, and parking uses. The proposed hotel, office and residential uses within this subarea are consistent with existing zone designations. The development proposed for the Figueroa Central Properties shall not exceed a FAR of 4.5, and allow development per a height overlay of 100 feet above grade with a supplemental height limitation up to 350 feet over 25 percent of the subarea and 450 feet over 10 percent of the subarea. The Figueroa South Properties will also be developed within a FAR of 4.5 with a height overlay of 100 feet above grade and a supplemental height limitation up to 350 feet over 20 percent of the subarea. The Figueroa North Properties will accommodate office, retail and restaurant uses, with structured parking. The proposed development will not exceed a FAR of 3.0, with a height overlay of 90 feet above grade and a supplemental height limitation up to 350 feet over 60 percent of the subarea.

The development of the Project would represent FARs between 1.5 and 6.0, all within the maximum 6.0 allowed by the City for the Project site. Therefore, notwithstanding the increased height relative to STAPLES Center and the Convention Center, the Project would be well within the height district limitations associated with this commercial zone as determined by the *City of Los Angeles Zoning Code*. Therefore, the height and bulk of the Project is compatible with the height and bulk of buildings allowed under existing zoning and *CBD Redevelopment Plan* and *Downtown Strategic Plan* standards for proposed development, thus no significant impact upon visual resources would occur in this regard.

Although the height and bulk of the Project would present a contrast to some of the existing commercial and residential buildings located immediately to the north along Olympic Boulevard and east along Flower Street, the Project would be consistent with CRA/South Park residential redevelopment located one block to the north including the Metropolitan, Skyline, and Renaissance apartment developments. Additionally, the retail frontage and proposed street improvements along 11th and 12th Streets would promote a pedestrian connection to the east and the proposed residential uses would provide a linkage to the residential South Park neighborhood. The proposed Project development characteristics represent the development intensity and building heights expected of the area as articulated in applicable adopted City plans and policies. In addition, the extensive landscaping and walkways proposed around and through much of the Project would reflect the *Downtown Strategic Plan's* recommendation of a series of landscaped, pedestrian friendly streets around the Convention Center. The proposed streetscapes would enhance the existing aesthetic quality of the area and would place the emphasis on the street and other public/common spaces. This would soften the transition between the proposed Project and adjacent existing land uses. This

would represent a beneficial effect, as presently there is little transition between adjacent existing land uses and the surface parking lots, which do not contribute positively to the local aesthetic character of the community.

The front façade of the Variety Arts Center that faces Figueroa Street is considered the most important exterior building feature. The south and east faces of the building are currently utilized as advertising space (i.e., advertising walls) painted on architecturally unembellished facades. The advertisements are frequently changed. The proposed Project would include an office building located immediately south and east of the Variety Arts Center.

The proposed Project could result in an impact to the five-story Variety Arts Center if the proposed development were to tower above the Variety Arts Center, thereby resulting in a loss of visual access to the Variety Arts Center from the south and east. Even though a building podium and a building would be part of the same overall structure, only the podium could abut the Variety Arts Center. The potential building above the podium will be set back from the Variety Arts Center, thus minimizing any impact upon this historic five-story building. In addition, the front façade of the Variety Arts Center will not be blocked by the Project development or operation. The Variety Arts Center was originally designed to abut other buildings on all sides with the exception of the front façade facing Figueroa Street. In fact, until 1987, a hotel was located immediately south of the Variety Arts Center. Therefore, with the incorporation of Project design features, the loss of visual access to any of these three sides of the building, would not represent a significant impact to visual resources and no significant impacts are anticipated.

Potential development of the Figueroa North Properties would have a contemporary architectural style and character that is sympathetic to the Variety Arts Center building. The development of Figueroa Street as a "grand boulevard" will provide greater opportunities for pedestrians to view the Variety Arts Center in comparison with existing conditions. Although the proposed development would eliminate both commercial opportunities to advertise on the Variety Arts Center building walls and the visual interest generated by that advertising, the proposed development will recapture the original Variety Arts Center design approach and purpose by focusing views on the front façade of the building. The advertising, which is frequently changed, not only does not contribute to the historic context of the Variety Arts Center, but may actually detract or compromise some of the historic nature of this building. The proposed Project would not demolish or create incompatible uses that would result in a long-term loss of access to or substantial alteration of the Variety Arts Center during its operations. The design of the adjacent development would not result in buildings that are visually incompatible with the Variety Arts Center and, therefore, no significant impacts would occur.

As discussed above, unifying design elements would be employed for consistency among STAPLES Center, the Convention Center, and the Project further defining the area as a special downtown sports and entertainment district. The height and bulk of the Project would be compatible

with the height and bulk of buildings allowed under existing zoning and *CBD Redevelopment Plan* and *Downtown Strategic Plan* standards for proposed development. The Project would be consistent with planned development characteristics expected of the area and would provide pedestrian-oriented transitions between the Project and existing adjacent land uses. Design of the Project would not result in buildings that are visually incompatible with the Variety Arts Center. Therefore, the Project would not introduce elements that would substantially detract from the existing visual character or primary visual resources of the area and would not remove or demolish elements that contribute positively to the visual character of an area. No significant impacts to visual resources would occur.

(ii) Visual Access

The Project would be located within the viewshed of the Harbor Freeway and, to a lesser extent, the Santa Monica Freeway. Due to the elevation of the freeway and the height and mass of the Project relative to STAPLES Center and the Convention Center, the Project could become an equally prominent feature visible from the freeway, even considering that the Project would be within the foreground of the freeway viewshed only briefly. The construction of buildings on the existing surface parking lots within the Olympic Properties would reduce existing open views to the east, beyond the Project site. However, Project structures, especially the supplemental height or "tower" portions of the Olympic and Figueroa Properties would be dominant orientation landmarks visually defining the Project in the freeway viewshed. The towers would also provide a visual linkage to the downtown high-rises to the north and east.

The Project site would dominate views along Olympic Boulevard and Figueroa Street in the area, and would shift some of the prominent view of STAPLES Center and the Convention Center to the Project structures. STAPLES Center and Convention Center presently dominate views from Olympic Boulevard to the south and views to the west from Figueroa and Flower Streets in the few blocks adjacent to the proposed Project site. Construction of the proposed Project would reduce existing views of STAPLES Center and Convention Center from these locations. Although existing views of STAPLES Center and the Convention Center would be reduced, the Project would be consistent with height and zoning requirements and with the overall large-scale development pattern of STAPLES Center and Convention Center area. It would also be designed in an architectural style that would be complementary to STAPLES Center and Convention Center and the South Park District. In addition, views of STAPLES Center and Convention Center from the surrounding streets are limited to a few adjacent blocks due to surrounding development. Therefore, no significant impacts would result from the change in the visual environment.

The Project would be prominent in the viewshed of some commercial and residential properties immediately north of the Project site and would largely obstruct views to the south. However, STAPLES Center and the Convention Center currently block views to the south. Views of STAPLES Center and the Convention Center would be obstructed from northern vantage points

by the Project. Although the Project would be consistent with height and zoning requirements and with the overall large-scale development pattern of STAPLES Center and Convention Center area, the Project would potentially result in a significant impact to visual access. The actual extent of impact will be dependent on the final design of the Project. As the potential for a significant impact exists, it is conservatively concluded that the Project would result in a significant impact.

Development of the Project would increase the visibility of the site relative to the surrounding area. Views of the site would be available from a greater distance due to the building height of the Project. Project structures would be partly visible from surrounding streets, the Harbor and Santa Monica Freeways and other areas within a few miles in all directions. The heights of the Project structures would be consistent with the Downtown high-rise commercial development.

The Project would become part of the viewshed for the upper floors of surrounding high-rise buildings. Views from the upper stories of these structures would be disrupted by the Project. However, the view from these buildings provide a broad visual coverage of the area, and the Project site makes up only one element, or a small percentage, of that view. The Project would not entirely block any unique view from surrounding buildings. Also, the Project would be consistent with the urban character of this area and no substantial change in the character of views would be expected to result. Therefore, since the height and bulk of the Project is compatible with existing and planned development; and the Project would not remove a valued visual feature or largely obstruct a valued existing view; no significant impact on views from these buildings is expected.

(iii) Policy and Regulatory Compliance

City of Los Angeles Urban Design Policies

Proposed development is consistent with applicable General Plan Framework policies regarding the Downtown Center associated visual amenities and pedestrian accommodations. The overall development program would result in the elimination of existing paved parking lots and warehouse buildings which do not present exceptional visual qualities and is consistent with standards established by the Framework for high-quality development design. The unifying design features and landscaping would follow the *Downtown Strategic Plan 's* recommendation to create "pedestrian-friendly" streets, in particular by addressing pedestrian linkages along Figueroa, 11th and 12th Streets, and Olympic Boulevard. Project design features would also be compatible with the *South Park Development Strategies and Design Guidelines* regarding maintenance of view corridors, use of unifying design elements, improvement of pedestrian areas, and landscaping of street and building edges.

Signage Regulations and Policies

The Project would establish sign standards and guidelines encompassing the frontage along Figueroa Street (between Pico and Olympic Boulevards), 11th Street (between Georgia and Figueroa Streets) and the intersections of Figueroa Street and Olympic Boulevard, Figueroa Street and 11th Street, Figueroa Street and 12th Street, the Central Plaza and development facing the Central Plaza. Proposed signage associated with the Project may include a Jumbotron or LED monitor, an animated marquee, illuminated building identification, tenant identification, storefront signs, signs to aid wayfinding, and other graphic elements ranging from banners to interactive electronic displays. The Project may also include informational, directional or advertising signage. The analysis presented below discusses impacts associated with signage that can be perceived during daytime hours. The impacts associated with signage lighting are discussed in Section IV.B.2, Light and Glare.

Project Design Guidelines would be consistent with recommendations for private and public signage standards expressed in the *South Park Development Strategies and Design Guidelines*. Through application of the Project Design Guidelines signage design would be unified and contribute to the identity of the Project, would include integration of building architectural elements, would guide and orient pedestrians, and would be scaled to pedestrians or motorist as appropriate, as recommended by the *South Park Development Strategies and Design Guidelines*. The Project's proposed use of signage, graphics and lighting to define the Project as a distinctive place**,** emphasizing exciting and innovative expressions would be consistent with the *South Park Development Strategies and Design Guidelines* recommendations to establish a sense of place and reflect the unique identity of the Convention Center area.

Project signage would be subj4ect to design regulations included in the Specific Plan. Design features which may be appropriate for developments such as the Project include the following: use of consistent nomenclature; use of typefaces which are easy to read; use of type sizes that are readable from the desired distance, but not so large as to appear out of scale; selection of sign colors which enhance legibility; determination of appropriate sign height based on sight line visibility; and consideration of the appropriateness of sign information relative to the location of the sign in question (i.e., visible from the freeway versus only visible from local streets). Project signage at or near the top of all buildings would also be subject to design review under the CRA's Skyline Signage Policy Framework. CRA has the authority to review and approve identification signs at or near the top of all buildings within the CBD Redevelopment Project Area.[21] Project Design Guidelines would be consistent with recommendations for contributing to a cohesive Downtown skyline image and contributing distinctive, articulated architectural landmarks with visual interest and have a clear identity. The Project Design Guidelines designate the convention

[21] *Community Redevelopment Agency of the City of Los Angeles, Skyline Signage Policy Framework, adopted January 13, 1986.*

hotel (proposed for Olympic East Properties) to serve as an identifiable landmark and orienting element on the skyline with rooftop identity signage that is elegantly signed and lit. Signage throughout the Project site will identify and define the Project. Project-related signage is proposed as part of the larger program of lighting, hardscaping and other improvements to the pedestrian environment, which is intended to contribute to revitalized street-level activity throughout the area. In particular, on-site signage focused on the intersection of Figueroa and 11th Streets would lend an element of activity and animation appropriate to the area's growing role as a major entertainment destination. Project signage would be consistent with the applicable plans and regulations, would complement STAPLES Center and Convention Center and would contribute to a sense of place reflecting the unique identity of the area and the creation of a major public outdoor "gathering place." However, as the Project would introduce substantial signage to the visual environment, impacts to visual quality due to signage are significant.

c. MITIGATION MEASURES

(1) Construction

During construction the following mitigation measure would be implemented:

1. The Applicant shall ensure, through appropriate postings and daily visual inspections, that no unauthorized materials (such as graffiti or posters) would be posted on temporary construction barriers or temporary pedestrian walkways and that any such temporary barriers and walkways are maintained in a visually attractive manner throughout the construction period.

(2) Operation

Although no measures have been identified to mitigate significant impacts to visual quality during operations, urban design standards, defined in the Project's Specific Plan Design Guidelines (See Section II.C., Project Characteristics), have been incorporated into the proposed Project to ensure an appropriate aesthetic appearance. Project development plans will include specific siting of structures and facilities, structural design, signage design and landscaping measures. In addition, implementation of the design guidelines in the Project's Specific Plan would ensure consistency with the *General Plan Framework*, *Downtown Strategic Plan*, *CBD Redevelopment Plan*, and the *South Park Development Strategies and Design Guidelines.*

d. ADVERSE EFFECT

The proposed project is generally consistent with all applicable policies contained in the CBD *Redevelopment Plan*,[22] the *Downtown Strategic Plan*, the *South Park Strategic Development Strategies and Design Guidelines* and the City's *General Plan Framework*. The proposed Project development characteristics represent the development intensity and building heights expected of the area as articulated in applicable adopted City plans and policies. The height and bulk of the Project would present a contrast to some of the existing commercial and residential buildings located in the immediately vicinity. However, the extensive landscaping and walkways proposed around and through much of the Project would enhance the existing aesthetic quality of the area and would place the emphasis on the street and other common spaces throughout the Project. In addition, the building podiums would also reduce project scale, the greater articulation of form, material and color would give the taller project buildings an attractive pedestrian oriented base. This would soften the transition between the proposed Project and adjacent existing land uses. This would represent a beneficial effect, as presently there is little transition between adjacent existing land uses and the surface parking lots, which do not contribute positively to the local aesthetic character of the community. The proposed Project would not introduce elements that would substantially detract from the Project area or remove any significant features or elements that contribute positively to the visual character of an area. The proposed Project would be consistent with the expected visual character of the area as articulated in applicable adopted City plans and policies. Mitigation listed above would reduce any temporary impact associated with construction activities to less than significant. The Project would obstruct views of STAPLES Center and the Convention Center from vantage points north of the Project site. Although the Project would be consistent with height and zoning requirements and with the overall large-scale development pattern of STAPLES Center and Convention Center area, the Project would result in a significant impact to visual access. Project signage would be consistent with the applicable plans and regulations, would complement STAPLES Center and Convention Center and would contribute to a sense of place reflecting the unique identity of the area and the creation of a major public outdoor "gathering place." However, as the Project would introduce substantial signage to the visual environment, impacts to visual quality due to signage are significant.

e. CUMULATIVE IMPACT

The cumulative development analysis is based on the related projects plus background growth. The related projects that are currently planned in close proximity to the Project site are illustrated in the related projects map provided in Section III.B, Cumulative Development. These

[22] *As discussed in Section IV.A, Land Use, the Project is consistent with the CBD Redevelopment Plan. The parking lots, while not generally considered to be consistent with the CBD Redevelopment Plan on their own, are supportive of a land use that is consistent with the CBD Redevelopment Plan.*

related projects include office, residential, hotel and retail land uses. As with the proposed Project, these projects involve the redevelopment of existing land uses into new uses which would cumulatively convert the existing visual character from aging low rise buildings and vacant lots to an urban infill redeveloped live/work area with pedestrian accommodations, consistent with the planned vision for the area. This trend would be expected to continue implementation of *General Plan Framework* policies promoting view corridors and visual amenities in the South Park area, as well as *Downtown Strategic Plan* and *CBD Redevelopment Plan* planning and development design goals. Cumulative development would also contribute to increased building density in the area. As visual quality is a function of design and massing, and this information is not currently available for the related projects, there is the potential for adverse impacts to visual quality. Therefore, impacts to visual quality would be cumulatively significant.

IV. ENVIRONMENTAL IMPACT ANALYSIS
B. AESTHETICS
2. LIGHT AND GLARE

a. ENVIRONMENTAL SETTING

(1) Introduction

(a) Light

Artificial light may be generated from point sources, focused points of origin representing unshielded light sources, as well as from indirectly illuminated sources of reflected light. The effects of proposed modifications of nighttime light conditions are contextual and depend upon the existing lighting environment, light intensity, and proximity to light sources. Nighttime illumination of properties with sensitive receptors may adversely affect certain land use functions, such as those of a residential or institutional nature (e.g., a hospital). Such uses constitute sensitive receptors as they are typically occupied during evening hours and are subject to disturbance by bright light sources.

(b) Glare

Reflective light or glare is primarily a daytime phenomenon caused by the reflection of sunlight or artificial light by highly polished surfaces such as window glass or reflective materials and, to a lesser degree, from broad expanses of light-colored surfaces. Reflective light is common in urban areas, where it can be an annoyance for residents and pedestrians and create hazards for motorists. Instances of adverse glare generation are typically associated with buildings with exterior facades largely or entirely comprised of highly reflective glass or other mirror-like material from which the sun reflects at a low angle in the periods following sunrise and prior to sunset. Where it is a result of sunlight striking a reflective surface at a low angle, glare is a stationary, but potentially regularly occurring, phenomenon intensified at certain times of year. During evening and nighttime hours, glare effects may result from vehicle headlights reflecting off polished surface of buildings or other structures, affecting other motorists or nearby residents. Glare generation is essentially a transitory phenomenon, as it is related to either moving vehicles or sun angles that vary according to seasons and time of day. Similar to light impacts, glare impacts may adversely affect residences and motorists, both of which are considered sensitive receptors. As no adopted City policies exist

regarding measurement of glare impacts, the determination of significance is generally subjective and relative to existing conditions.

(2) Project Vicinity

(a) Light

The area surrounding the Project site supports a variety of land uses. To the south of the Olympic Properties and to the west of the Figueroa Properties are STAPLES Center and the Los Angeles Convention and Exhibition Center facilities. Commercial, retail, residential, and hotel uses are generally located to the north along Olympic Boulevard, and wholesale and retail uses are generally located to the east along Flower Street.

The Project area exhibits relatively high ambient nighttime light levels due to the densely developed nature of this part of downtown, which contribute to a perceptible "glow" in the night sky visible from a distance of several miles in all directions. Light sources include overhead light standards lining the Harbor Freeway, streetlights and stoplights along the major and secondary surface streets adjacent to the Project site, illuminated billboards and other signs, security lights associated with buildings and structures, light emanating from building interiors, pedestrian lights within Gilbert Lindsay Plaza and on STAPLES Center and Convention Center grounds, and automobile headlights. A distinctive glow emanates from STAPLES Center's exterior architectural lighting and from the interior lobby lighting, visible due to the exterior glass walls that allow visual access. The Variety Arts Center, directly north of Olympic Boulevard, between Figueroa Street and Flower Street provides another source of nighttime lighting. Two of the Variety Arts Center building sides are currently utilized as advertising space (i.e., advertising walls) painted on architecturally unembellished facades. A bank of spotlights from the adjacent surface parking lot sometimes lights these advertisements. Light levels are typically highest surrounding STAPLES Center and Convention Center and in proximity to intersections of major streets such as Figueroa Street and Olympic Boulevard. These light sources currently contribute to increased ambient nighttime illumination levels that spill over onto and illuminate adjacent sensitive uses.

(b) Glare

Glare generation within the project area is typically caused by light reflected off expanses of glass and polished facades of buildings. Due to the denser development and higher concentration of multi-story buildings along Figueroa Street (particularly north of the Project site) and, to a lesser degree, Olympic and Pico Boulevards (particularly east of the Project site), greater potential for the generation or reflection of daytime or nighttime glare would be expected along these major arterial roadways and at intersections than along secondary roadways. STAPLES Center and the Convention Center buildings, represent moderate sources of glare potential due to the glass façades

and pavilions and the broad, undifferentiated expanses of concrete and metal panels forming the façades. The sloped and curved features of the STAPLES Center glass walls reduces glare generation. Glass façades with low-reflectivity and setbacks from surrounding roads, however, prevent glare generation from causing substantial adverse impacts to surrounding land uses or motorists.

(3) Project Site

(a) Light

The Project site is predominately occupied by surface parking with two warehouse/mechanical buildings located on a portion of the Figueroa Properties. The Olympic and Figueroa Properties are primarily illuminated during evening and nighttime hours by parking lot lighting, security lights, pedestrian walkway lights and incidental landscape lighting; illumination is also contributed by the illuminated pavilions, exteriors, and grounds of STAPLES Center and the Convention Center. One distinctive source of lighting found on the Project site is the STAPLES Center marquee located on the southwest corner of the Olympic West Properties. The electronic message board is easily visible at night from the Harbor Freeway and surrounding areas. The Figueroa and Olympic Properties are less brightly illuminated than STAPLES Center or Convention Center.

Several land uses adjacent to the Project represent the primary sensitive receptors of nighttime lighting and are already exposed to high ambient lighting levels from adjacent streetlights and existing buildings. These sensitive receptors include the occupants of apartment buildings adjacent to the north end of the Olympic Properties along the north side of Olympic Boulevard and the south side of 9th Street; the Holiday Inn located on the southeast corner of the Olympic Boulevard/Figueroa Street intersection; the Figueroa Hotel located on the northwest corner of the same intersection; the Inn Towne Hotel located just north of the Figueroa Hotel; and the apartment building on the northeast corner of the Olympic Boulevard/Flower Street intersection.

(b) Glare

There are no buildings, structures or facilities on the Project site that presently generate substantial adverse glare. The existing warehouse buildings on the Figueroa Properties are constructed of non-reflective materials and pose no potential for glare generation. In addition, the presence of deep building setbacks accompanying the warehouse/service buildings further reduces any potential for glare generation from these buildings. The presence of numerous surface parking lots within the Figueroa and Olympic Properties represent moderate potential for glare conditions reflected off vehicle windows and surfaces in some locations during daytime and nighttime hours. Sensitive receptors to glare generation include motorists in the project area and, as with light

impacts, residential uses and (to a lesser degree) hotel and motel uses along Figueroa Street and Olympic Boulevard. However, as glare is a transitory phenomenon, receptors other than motorists are somewhat less sensitive to glare impacts than to light impacts.

(4) Policy and Regulatory Environment

The City of Los Angeles *General Plan Framework* contains policies relating to street lighting within the Infrastructure and Public Services Element. These policies describe guidelines related to lighting on private streets and pedestrian-oriented areas, ensuring quality lighting to minimize or eliminate the adverse impact of lighting, and placement of street trees.

The *City of Los Angeles Municipal Code* (*LAMC*) contains a list of lighting-related requirements including illumination restrictions, street lighting requirement and illuminated signage restriction. In addition, the City of Los Angeles Bureau of Street Lighting maintains a list of general street lighting issues which would be applicable to the proposed Project, addressing the need for determination of roadway and sidewalk illumination levels in accordance with Illuminating Engineers Society (IES) standards and adopted City standards; the necessity for equipment testing and approval by the Bureau of Street Lighting; mandatory street tree placement at least 20 feet from existing or proposed streetlights; the presence of potentially historic streetlights in the project area; and the minimization of glare and light impacts upon private off-site property.

As discussed in Section IV.B.1, Visual Quality, building permits must be obtained from the Department of Building and Safety for any proposed signs, and electrical permits must be obtained for signs illuminated by electrical lighting. Specific Municipal Code requirements and restrictions are dependent upon signage type, however, general constraints on design, construction, materials, potential for hazard to traffic, and determination of such hazard are applicable.

The *South Park Development Strategies and Design Guidelines* contain suggested functional and decorative lighting recommendations. Lighting treatment is considered both a desirable unifying element and a means for distinguishing separate districts and neighborhoods. Recommendations for lighting include incorporation of three distinct lighting fixtures, utilization of historic streetlights, if any, and utilization of Convention Center lighting fixtures along Figueroa Street, adjacent to the Convention Center.

b. PROJECT IMPACT

(1) Significance Thresholds/Methodologies

A project would have a significant light or glare impact if the following apply:

- **Light:** The project would result in an increase in ambient illumination levels that would be disruptive to sensitive uses; e.g., residences.

- **Light:** The project generates a nighttime spill-over of light onto adjacent sensitive receptors (i.e., occupants of residential uses, some institutional uses) significantly affecting occupant vision, sleep, and privacy;

- **Glare:** The project generates glare that would cause a hazard or clear visual nuisance by serving as a distraction or interference to vision or concentration.

(2) Analysis of Project Impact

(a) Light

(i) Construction

Any Project construction activities involving nighttime activities would require lighting of work areas. This lighting would be necessarily focused downward or shielded, oriented toward Project property, and away from adjacent sensitive residential receptors. Furthermore, construction hours within the project areas would be restricted in accordance with *LAMC* requirements.[23] Therefore, no significant lighting impacts are anticipated during project construction.

(ii) Operation

The proposed project would introduce new sources of nighttime illumination on the Project site. The existing illumination sources associated with the parking lots present on the Figueroa and Olympic Properties and the warehouse buildings present on the Figueroa Properties would be removed. These light sources currently contribute to increased ambient nighttime illumination levels, which spill over onto and illuminate adjacent sensitive uses. Light associated with the Project would include illumination associated with the hotels, retail, commercial, entertainment and residential facilities. This may include entertainment concept lighting, illuminated signage, or architectural lighting to highlight elements or details of the buildings. Lighting sources may include; billboard washes and spot lighting, neon, incandescent lamps, searchlights, electronic readerboards, special laser light shows and Jumbotron/LED screens. Additional light associated with the Project would include illumination of public walkways and plazas and parking lot light standards. The Jumbotron screens would be used for broadcasting live sporting and entertainment events and would be located in the central plaza.

[23] *Construction activities, which make loud noise to the disturbance of persons occupying sleeping quarters in a place of residence, are prohibited between the hours of 9:00 P.M. and 7:00 A.M.*

As part of the Project's Specific Plan, Design Guidelines, (See Section II.C., Project Characteristics) lighting standards and guidelines would be established encompassing the frontage along Figueroa Street (between Pico and Olympic Boulevards), 11th Street (between Georgia and Figueroa Streets) and the intersections of Figueroa Street and Olympic Boulevard, Figueroa Street and 11th Street, and Figueroa Street and 12th Street. The standards related to lighting include the following:

a. **Streetscape:**

- Utilize streetlights and streetscape lighting to promote pedestrian safety and efficient vehicular circulation.

- Streetscape lighting should match the scale and character of Project buildings and add to the identity of the area.

b. **Architectural:**

- Locate architectural lighting to promote public safety and support the Project's vitality and nightlife.

- Architectural lighting should complement the building, highlighting unique defining features.

- Shield lighting to minimize impacts and glare upon adjacent sensitive receptors and roadways.

c. **Landscape:**

- Incorporate landscape lighting to promote public safety and support the Project's vitality and nightlife.

- Landscape lighting should be of a character and scale that relates to the pedestrian and highlights special landscape features

- Shield landscape lighting to minimize impacts and glare upon adjacent sensitive receptors and roadway.

In addition specific guidelines related to the Central Plaza have been proposed as follows:

d. **Central Plaza:**

- Employ lighting techniques that present a "high-tech" display and offer a unique and visually stimulating experience.

- Additionally, lighting should be of a character that accentuates the surrounding architecture, highlights special uses and activities, and contributes to the comfort and safety of the plaza's occupants.

- Minimize glare upon adjacent properties, adjacent sensitive receptors, and roadways; shield the special event lighting as necessary.

The Project would substantially increase ambient light levels on the project site and in the vicinity. State and city permit review would insure that proposed lighting would not pose hazards to motorists. Nighttime illumination, particularly special-event related lighting, associated with the convention hotel and entertainment facilities could be visible from the neighboring motels, apartment buildings, and Holiday Inn and Figueroa Hotels.

The additional nighttime illumination from the Project would replace existing ambient nighttime illumination associated with the parking lots on the Figueroa and Olympic Properties with illumination levels that are generally appropriate to the downtown location. Project structures would also block some of the lighting associated with STAPLES Center and the Convention Center presently visible from the neighboring motels, apartment buildings, and Holiday Inn and Figueroa Hotels. In addition, Project lighting design dictates that Project lighting would be shielded to minimize lighting impacts upon adjacent sensitive uses and roadways.

The proposed use of a variety of light sources and illuminated signage elements is consistent with recommendations for outdoor lighting as proposed by the *South Park Development Strategy and Design Guidelines*. Project illumination would provide unifying elements, as recommended by the *Guidelines*, throughout the Project site. The Project's proposed use of signage, graphics and lighting to define the Project as a distinctive place**,** emphasizing exciting and innovative expressions, would be consistent with the *Guidelines* recommendations to establish a sense of place and reflect the unique identity of the Convention Center area.

Project-related light sources would also be consistent with policies contained within the *General Plan Framework*. As discussed previously, under the Project's Specific Plan Design Guidelines, architectural and signage lighting would be designed to promote public safety and support the Project's vitality and nightlife. This would be consistent with the goal of the *General Plan Framework* for Downtown Centers, that nighttime uses should be encouraged and public safety enhanced to meet the needs of residents and visitors. Project-related light sources would be complementary to STAPLES Center's and the Convention Center's use of illumination and are

intended to further unify the light environment surrounding the Project. The Project's illumination would contribute to creating a major public outdoor gathering place for special downtown events. It would also help foster a rich and vibrant pedestrian environment with retail, restaurant, entertainment, and cultural venues that appeal to residents and visitors at all hours. In addition, the Project's Specific Plan Design Guidelines define specific characteristics for central plaza lighting. Central plaza lighting, in particular lighting for signage, would employ techniques that present a "high-tech" display and offer a unique and visually stimulating experience. Also, lighting for the central plaza would be of a character that accentuates the surrounding architecture, highlights special uses and activities, and contributes to the comfort and safety of the plaza's occupants. These lighting techniques would be consistent with the *General Plan Framework* in promoting the function, scale, and identity of the area as a Downtown Center, which would distinguish itself as a unique place of regional and national importance and as a primary destination for business and leisure visitors to Los Angeles. Project-related light sources would be required to be in conformance with City lighting-related requirements contained in the Municipal Code and with the proposed Specific Plan. Project light sources would be consistent with these policies.

Illumination emanating from the Figueroa and Olympic Properties would be perceptible from adjacent sensitive receptors. Project lighting sources that would potentially make the greatest contribution to increases in nighttime illumination would include; billboard washes and spot lighting, neon, incandescent lamps, searchlights, electronic readerboards, special laser light shows and Jumbotron/LED screens. Light associated with the Project illumination of public walkways, plazas, and parking lots would contribute to a lesser extent. Nighttime illumination from the proposed Project would be most apparent to the occupants of the Holiday Inn, Figueroa and Inn Towne Hotels, and the apartment buildings on the north side of Olympic Boulevard and on the northwest corner of 9th and Georgia Streets. These land uses are already exposed to and have adjusted to a high level of urban lighting. In addition, it is expected that occupants of the adjacent hotels would choose those locations to purposely be near this center of activity. However, the Project would involve an increase in ambient nighttime illumination levels that could potentially affect the vision, sleep, and privacy of sensitive receptors. Therefore, although Project illumination would be consistent with applicable plans and regulations, would contribute to the Project objective of creating a rich and vibrant environment, and would contribute to pedestrian safety through lighting of public walkways, plazas, and parking lots, the increase in illumination from the proposed Project would result in a significant impact to adjacent sensitive receptors. Project illumination would also be apparent to the residential uses proposed as part of the Project for the Figueroa Central Properties. However, the Project illumination would be part of the existing environment chosen by the future residents.

(b) Glare

i. Construction

Construction heavy equipment and building materials would not generate glare that would cause a hazard or clear visual nuisance. In addition, construction activity would be screened from view by temporary barriers. No significant glare impacts are anticipated during project construction.

ii. Operation

The intensity of glare and reflectivity would depend on the types of building materials that are used and the ultimate design of the approved project. The Project is not expected to create unusual or isolated glare impacts since the proposed Project buildings would be constructed of materials with minimal potential for glare generation. Any glass or reflective surface to be used on the facade would either have low-reflectivity or accompanied by a non-glare coating, or would be sufficiently screened to prevent off-site glare impacts. New landscaping, paving, and other ground surface areas associated with the Project would not increase or create reflective conditions. Furthermore, Project lighting design standards dictate that Project lighting shall not create glare upon nearby roadways, freeways, residences and other sensitive uses.

The conversion of existing surface parking uses on the Figueroa and Olympic Properties to hotel, commercial, and residential buildings presents the potential to moderately decrease glare conditions, due primarily to the indirect reflection of sunlight by parked vehicles and the direct glare generated from vehicle headlights during nighttime use of facilities or special events. Reduction of such glare could potentially diminish this visual nuisance to the occupants of the Holiday Inn, Figueroa and Inn Towne Hotels, and the apartment buildings on the north side of Olympic Boulevard and on northwest corner of 9th and Georgia Streets. Glare impacts upon other surrounding properties would be less than significant. Thus, the project would not generate glare that causes a hazard or clear visual nuisance resulting in a significant impact.

c. MITIGATION MEASURES

Project development plans will include detailed specifications regarding light fixture types and locations, as well as glare-reducing or screening elements. In addition to the following mitigation measures, urban design standards will be incorporated into the proposed Project's Specific Plan to ensure an appropriate Project illumination.

1. The Applicant shall prepare a Lighting Plan in coordination with the Department of City Planning to establish lighting standards and guidelines.

2. To the extent feasible and consistent with the functions and uses of the Project, the following mitigation measures shall be addressed in the design of the Project's facilities:

   a. Pedestrian-level lighting shall be used adjacent to Olympic Boulevard and Figueroa, 11th, 12th, and Flower Streets.

   b. Floodlights shall be located so as to minimize impacts onto sensitive receptors.

   c. The Applicant shall coordinate with the Bureau of Street Lighting as to whether the streetlights shall be refurbished and/or reinstalled to preserve the character of the community, in addition to providing adequate lighting to motorists and pedestrians.

   d. All new lighting shall be designed to minimize glare and to prevent light impacts upon adjacent sensitive receptors.

   e. The use of highly reflective building materials for the exterior walls of the Project structures shall be minimized.

   f. Use high performance glass with high shading coefficient and low reflectivity, such as Heat Mirror or Low E type glass.

   g. Architectural and/or landscape screening elements shall be incorporated into project design so as to minimize glare impacts on adjacent sensitive receptors.

   h. Parking facilities exits shall be located and designed so as to minimize glare impacts from vehicle headlights on adjacent sensitive receptors.

d. ADVERSE EFFECTS

The Project would be consistent with City street lighting policies contained within the *General Plan Framework*, as well as lighting-related requirements contained in the *LAMC*. However, significant light impacts would occur as the result of the development of the proposed Project. Even with implementation of the mitigation measures listed above, light sources associated with the Project, including building and signage lighting, would contribute to increased ambient nighttime illumination levels that would spill over onto and illuminate adjacent sensitive receptors, producing significant impacts that could not be mitigated. The project would not generate glare, caused by light reflected off expanses of undifferentiated expanses of glass or polished surfaces, that would cause a hazard or clear visual nuisance by serving as a distraction or interference to vision or concentration.

e. CUMULATIVE IMPACT

The cumulative development analysis is based on the related projects plus background growth of eight percent (one percent per year from 2000 to 2008). As illustrated in Section III.B, Cumulative Development, related projects are currently planned in close proximity to the Project site. These related projects include office, residential, hotel, and retail land uses. As with the Project, these projects involve the redevelopment of existing land uses into new uses. Cumulatively, the related projects and background growth would continue to redevelop existing land uses and contribute to increased nighttime illumination levels in the project area. This would be consistent with policies of the *City of Los Angeles General Plan Framework* and *South Park Development Strategy and Design Guidelines* for the area. In addition, such increased illumination levels would continue the trend established throughout the downtown area. Cumulative development would be subject to additional assessment of lighting impacts at the time of project proposal. Ambient nighttime light levels would likely increase in the project area, which could spill over onto, illuminate and/or visually distract neighboring residential, motel, and commercial uses and their occupants. Mitigation of impacts on a project-by-project basis would help reduce light and glare impacts resulting from related projects, however, significant cumulative impacts may be unavoidable. Likewise, illumination emanating from the Project would create significant unavoidable light impacts that could not be fully mitigated. Although increased light and glare in the area is consistent with the urban character of downtown, cumulative light and glare impacts would be significant.

IV. ENVIRONMENTAL IMPACT ANALYSIS
B. AESTHETICS
3. SHADE/SHADOW

a. ENVIRONMENTAL SETTING

The issue of shade/shadow pertains to the blockage of direct sunlight by on-site buildings, which affects adjacent property. Shading is an important environmental issue because the users or occupants of certain land uses, such as residential, recreational, churches, schools, outdoor restaurants, and pedestrian areas have expectations for direct light and warmth from the sun. These land uses are termed "shadow-sensitive."

Shadow patterns were calculated for the following periods in this analysis:

- Winter Solstice: December 21 9:00 A.M. to 3:00 P.M.
- Summer Solstice: June 21 9:00 A.M. to 5:00 P.M.

These periods were selected to represent the portion of the day during which maximum seasonal shading occurs and could be expected to be of concern to most people. Collectively, the seasonal shadow patterns identified above define an annual shadow pattern that can be attributed to existing and future development under the Project. The shadow exhibits included in this section identify the maximum extent of winter and summer shadows from this development. When the shadows appear to shade off-site shadow-sensitive uses, the shadow exhibits also identify the extent of shadow coverage between morning and afternoon hours (composite shadow), and the movement of the shadows throughout the day (shadow arc).

The area around the proposed Project site was surveyed in July 2000. Adjacent shadow-sensitive uses noted during this survey consisted of Gilbert Lindsay Plaza, the Convention Center West Hall entry pavilion, lobby and concourse, the Holiday Inn Hotel, the Figueroa Hotel, the First United Methodist Church, California Hospital Medical Center, and a number of motels and apartment buildings located primarily along Hope and Flower Streets south of Pico Boulevard, and north of Olympic Boulevard south of 9th Street. These uses are identified in the exhibits provided in this section. As shown in Figure 24 on page 166 and Figure 25 on page 167, neither winter or summer shadows from the existing warehouse/mechanical buildings found on the Project site currently shade any of these uses.

Figure 24 Existing Winter Shadows

Figure 25 Existing Summer Shadows

As shown, the winter or summer shadows from the existing warehouse/mechanical buildings barely extend off-site. In comparison, the winter and summer shadows from some of the land uses located near the Project site do extend off-site. Winter shadows cast by adjacent off-site land uses shade seven (7) adjacent shadow-sensitive uses including the Gilbert Lindsay Plaza, one multi-family residential structure, three hotels and the United Methodist Church. Of these uses, one multi-family residential structure (adjacent to Flower Street), two hotels, and the United Methodist would be shaded for three hours or more in the winter. Summer shadows cast by adjacent land uses shade four (4) adjacent shadow-sensitive uses including two hotels, Salvation Army, and United Methodist Church. None of these uses would be shaded for more than four hours in the summer.

b. PROJECT IMPACT

(1) Significance Thresholds/Methodologies

A project would have a significant shade/shadow impact if it would shade currently unshaded off-site shadow-sensitive uses for more than three hours between the hours of 9:00 A.M. and 3:00 P.M. between late October and early April ("winter"), or for more than four hours between the hours of 9:00 A.M. and 5:00 P.M. between early April and late October ("summer").[24]

(2) Analysis of Project Impact

(a) Construction

No significant shade/shadow impacts are anticipated during construction.

(b) Operation

The Project includes a 1,200-room convention hotel; retail/entertainment/restaurant uses, potentially including a live theater; office space; health club; an open-air plaza to feature year-round venues; a second hotel; residential uses; and combined structured and surface parking located throughout the Project site. Figure 12 of Section II.C., Project Characteristics, depicts the illustrative plan for the proposed Project.

Project design guidelines dictate the following standards in regards to shade and shadow:

- Locate towers to maximize their exposure to light and air, as well as define view corridors;

[24] *City of Los Angeles, Draft L.A. CEQA Thresholds Guide, May 14, 1998.*

- In addition, site building towers so as to minimize mid-day and afternoon shade upon streets and other important public/common spaces; and

- Rely upon trees, canopies, arcades, and similar features to regulate the opportunity for sun and shade along public streets and within other important public/common spaces.

Specific architectural plans have not yet been prepared for the proposed Project. Therefore, this shade/shadow analysis assumes a development envelope for the proposed Project. This envelope covers approximately 27 acres over all or portions of six city blocks. This approach is conservative in that it is unlikely that the Project structures would actually fill this entire envelope. This analysis also assumes the "maximum supplemental" building height proposed for each Project subarea individually.

For example, the Olympic West Properties would have a maximum height overlay of 100 feet above grade, with a maximum supplemental height limitation to 150-feet above grade over 20 percent of this subarea. For this analysis the maximum supplemental height limitation of 150 feet above grade is applied to the whole subarea. This conservative approach analyzes the shadows potentially created by the tallest portion of the subarea no matter where the maximum supplemental height limitation is ultimately applied. For the Olympic West Properties, the maximum supplemental height limitation would only be applied to up to 20 percent of the subarea, the shadows created in this subarea would be expected to be significantly smaller than shown in the analysis. Further, the Olympic East Properties, which would accommodate the tallest Project structures, would have a maximum height overlay of 175 feet above grade, with a maximum supplemental height limitation of up to 600 feet above grade over 15 percent of this subarea. For this analysis, the maximum supplemental height limitation of 600 feet above grade is applied to the desired location of the proposed convention hotel (15 percent of the subarea at the southeast corner of Olympic Boulevard and Georgia Street), and the balance of the Olympic East Properties would retain a height limitation of 175 feet.

Figure 26 and Figure 27 on pages 170 and 171, respectively, identify the maximum extent of winter and summer shadows that could be cast by the proposed Project built to the maximum potential development envelope. Winter shadows cast by the maximum supplemental building height from the proposed Project could potentially shade 26 off-site shadow-sensitive uses including the Convention Center West Hall entry pavilion, Gilbert Lindsay Plaza, 15 multi-family residential structures, six hotels, three Salvation Army buildings, United Methodist Church, and Our Lady Chapel. Of these uses, four multi-family residential structures (two adjacent to Georgia Street and two adjacent to Francisco Street), Gilbert Lindsay Plaza and the three Salvation Army buildings would be shaded for three hours or more. The Project could thus result in significant shading impacts on adjacent sensitive uses during winter.

Figure 26 Maximum Future Winter Shadows

Figure 27 Maximum Future Summer Shadows

Summer shadows cast by the maximum supplemental building height from the proposed Project could potentially affect the Convention Center West Hall entry pavilion, four multi-family residential structures, two hotels, and the United Methodist Church. One of the multi-family residential structures (adjacent to Francisco Street) would be shaded for more than four hours. The Project could thus result in significant shading impacts during summer.

For further analysis, the shading cast by the Project has been identified for each of the Olympic and Figueroa Properties in Figure 28 through Figure 33 on pages 173 through 178. These figures show the shadow cast by the maximum height proposed for the subarea, in addition to those cast by the maximum supplemental height for each subarea. The shadows cast by buildings constructed within the height overlay would represent a more likely scenario than those cast by the maximum supplement height. As shown in Figure 30, neither the shadows cast by the maximum height nor those cast by the maximum supplemental height for Olympic West Properties would shade a sensitive use for more than three hours in the winter or for more than four hours in the summer.

The approximate location of the tower, to which the maximum supplemental height would be applied, has been identified for the Olympic East Properties. Therefore, as shown in Figure 29, for the shadow analysis for this property, the maximum supplemental height has been applied to only a portion of the property with the maximum height applied to the remainder of the property. Of the summer shadows cast by the Olympic East Properties, no sensitive uses would be shaded for more than four hours, as shown in Figure 29. With the winter shadows cast by the Olympic East Properties, the maximum height would shade two multi-family residential structures (adjacent to Francisco Street) for more than three hours, as shown in Figure 29.

Of the summer shadows cast by the Olympic North Properties, no sensitive uses would be shaded for more than four hours, as shown in Figure 30. With the winter shadows cast by the Olympic North Properties, the maximum supplemental height would shade two multi-family residential structures (adjacent to Georgia Street) for more than three hours, as shown in Figure 30. The maximum height would also shade one of these multi-family residential structures for more than three hours. Neither the shadows cast by the maximum height nor those cast by the maximum supplemental height for Figueroa North and Central Properties (Figure 31 and Figure 32, respectively) would shade a sensitive use for more than three hours in the winter or for summer for more than four hours in the summer. Only the winter maximum supplemental height shadows cast by the Figueroa South Properties would shade a sensitive use (Gilbert Lindsay Plaza) for more than three hours, as shown in Figure 33.

The Project would result in significant shading impacts to five off-site shadow-sensitive uses during the winter, including two multi-family residential structures (adjacent to Francisco Street) shaded by the Olympic East Properties; two multi-family residential structures (adjacent to Georgia Street) shaded by Olympic North Properties; and the Gilbert Lindsay Plaza shaded by the Figueroa

Figure 28 Summer and Winter Shadows – Olympic West Properties

Figure 29 Summer and Winter Shadows – Olympic East Properties

Figure 30 Summer and Winter Shadows – Olympic North Properties

Figure 31 Summer and Winter Shadows – Figueroa North Properties

Figure 32 Summer and Winter Shadows – Figueroa Central Properties

Figure 33 Summer and Winter Summer and Winter Shadows – Figueroa South Properties

South Properties. The significance of the potential shading described above is predicated on any existing shading. If the sensitive uses described above were currently shaded by other existing uses, no significant impact would occur. However, as shown in Figure 24 and Figure 25, the off-site buildings do not shade the four above-mentioned multi-family residential structures during the winter or summer. Gilbert Lindsay Plaza is briefly shaded during the winter by the Convention Center. However, this shading would occur at a different time than Project shading.

The Project impacts could be reduced by application of Project design guidelines related to shade, reducing the height of the Project structures, setting the maximum height portion of the Project structures away from the shadow-sensitive uses, or stepping back the roofs for the Olympic East, Olympic North and Figueroa South Properties. The result would be to reduce, where feasible, anticipated shading of those uses to less than three hours between the hours of 9:00 A.M. and 3:00 P.M. between late October and early April, or for less than four hours between the hours of 9:00 A.M. and 5:00 P.M. between early April and late October.

c. MITIGATION MEASURES

The following mitigation measure is required to reduce significant shade-shadow impacts:

1. To reduce shading from the Project structures on the Olympic East, Olympic North and Figueroa South Properties, design elements, including roof form, setback, building height and massing, shall be implemented (to the extent feasible and consistent with the functions and uses of the Project) to avoid shading currently unshaded off-site shadow-sensitive uses for more than three hours between the hours of 9:00 A.M. and 3:00 P.M. between late October and early April, or for more than four hours between the hours of 9:00 A.M. and 5:00 P.M. between early April and late October.

d. ADVERSE EFFECT

The Project would result in significant shading impacts to five off-site shadow-sensitive uses during the winter. No off-site shadow-sensitive uses would be impacted during the summer. These impacts would be reduced with implementation of the Project design guidelines and the recommended mitigation measure. However, it may not be feasible to reduce all shading impacts to less than significant and still be consistent with the functions and uses of the Project. In this case, a significant shading impact would remain.

e. CUMULATIVE IMPACT

The cumulative development analysis is based on the related projects plus background growth of eight percent (one percent per year from 2000 to 2008). Shading could potentially increase in the vicinity of the Project site as a result of cumulative development. Although the height and specific location of the related projects is not precisely known, existing off-site shadow-sensitive uses along Olympic Boulevard could potentially be shaded by such development. The nearest related projects are located along Figueroa and Flower Streets between the Figueroa North and Figueroa South Properties. The shadows cast by these structures could potentially shade adjacent off-site shadow-sensitive uses during the winter and the summer. In such a case, the Project would contribute to cumulative shading to the shadow-sensitive uses north of Olympic Boulevard. Cumulative development would thus increase shading in the area, and shading impacts would be cumulatively significant.