

Chapter 4

Environmental Impact Analysis

CHAPTER 4

Environmental Impact Analysis

4.1 Aesthetics

4.1.1 Introduction

Senate Bill (SB) 743, enacted in 2013, changes the way in which environmental impacts related to transportation and aesthetics are addressed in an EIR. Specifically, Section 21099(d)(1) of the Public Resources Code (PRC) states that a project's aesthetic impacts shall not be considered a significant impact on the environment if:

1. The project is a residential, mixed-use residential or employment center project; and
2. The project is located on an infill site within a transit priority area.

City of Los Angeles Zoning Information File ZI No. 2452 provides that projects meeting these criteria are exempted from evaluating visual resources, aesthetic character, shade and shadow, light and glare, scenic vistas or any other aesthetic impact in a CEQA document as defined in the City's current, 2006 CEQA Thresholds Guide (L.A. CEQA Thresholds Guide). Because of the mixed-use character of the Project and its location within a designated urban transit priority area (TPA),¹ the Project qualifies for exemption under SB 743 and ZI No. 2452. As such, the evaluation of the Project's aesthetic impacts in an EIR is not required pursuant to CEQA and therefore, no findings of significance are provided in this section. Nonetheless, for disclosure purposes only, this section provides information relative to aesthetic effects that could result from the Project based on use of City thresholds with regard to visual quality, views, light, glare, and shading.

Visual quality refers to the overall aesthetic character of an area or a field of view. Aesthetic features often consist of unique or prominent natural or man-made attributes or several small features that, when viewed together, create a whole that is visually interesting or appealing. The focus of the visual quality analysis is on the loss of aesthetic features or the introduction of contrasting features that could substantially degrade the visual character of the Project area.

The analysis of views focuses on the effects that the Project could have due to obstruction or partial obstruction of existing recognized and valued public views of scenic resources, including focal or panoramic views.

¹ City of Los Angeles, Department of Planning, Zimas Search for 688 S. Alameda Street, Planning and Zoning, ZI-2452. <http://zimas.lacity.org>, accessed February 21, 2017.

Artificial light impacts are typically associated with light that occurs during the evening and nighttime hours, and may include streetlights, illuminated signage, vehicle headlights, and other point sources. Uses such as residences and hotels are considered light sensitive because they are typically occupied by persons who have an expectation of privacy during evening hours and who are subject to disturbance by bright light sources. The analysis of lighting impacts focuses on whether the Project would substantially increase the effects of light on light sensitive uses.

Glare is primarily a daytime occurrence caused by the reflection of sunlight or artificial light from highly polished surfaces, such as window glass or reflective materials, and to a lesser degree, from broad expanses of light-colored surfaces. Glare can also be produced during evening and nighttime hours by artificial light directed toward a light sensitive land use. The analysis of glare focuses on whether glare effects would interfere with glare sensitive activities.

Shading from buildings and structures has the potential to block sunlight. Although shading is common and expected in urban areas, and is considered a beneficial feature when it provides cover from excess sunlight and heat, it is analyzed as it can have adverse impacts if it interferes with activities or uses that benefit from solar access.

4.1.2 Environmental Setting

Existing Conditions

Visual Character

The Project Site is located within the Arts District, an area generally bounded by 1st Street to the north, the Los Angeles River and train tracks to the east, 7th Street to the south, and S. Alameda Street to the west.² Over the past two decades, the area in the vicinity of the Project Site has been transforming from a predominately industrial area to one that is primarily made up of old warehouses converted to artists' lofts and studios, and commercial uses. Recently the area has been experiencing an increase in unique and creative commercial uses such as creative spaces, retail shops, galleries, studios, museums, restaurants, and bars that blend well with the existing industrial and manufacturing uses and serve the growing residential population. However, even with these changes, the visual character of the Project Site and immediate surrounding area continues to have a strong industrial aspect with large, low-rise manufacturing buildings, warehouse facilities, loading docks, surface parking lots, and overhead transmission lines on both Alameda and Industrial Streets. Although predominantly low-rise, building style and period of construction varies widely. The older, approximately 7-story, 98-year-old ROW DTLA buildings at the southwest corner of S. Alameda Street and 7th Avenue and the approximately 6-story (in addition to approximately 30-foot-high cooling tower) ETO building to the north of the Project Site on Mill Street, just south of E. 6th Street represent the few multi-story buildings in the area.

The Project Site is currently developed with the one- and two-story Showa Marine & Cold Storage facility, which comprises three buildings with a total area of approximately 131,350 square feet (sf). The buildings range from one- to two-stories in height (approximately 35 feet to

² Southern California Association of Governments, Downtown Los Angeles Neighborhood Council, *Your Downtown Vision Plan*, page 7 at <http://www.dlanc.org/sites/dlancd7.localhost/files/Vision%20Downtown.pdf>, accessed February 21, 2017.

54 feet in height) and were constructed between 1984 and 2001. On-site operations include shipping/receiving, storage of frozen food products, as well as associated office and administrative activities. The Project Site also includes a surface parking lot and an abandoned railroad right-of-way that connects S. Alameda Street and Mill Street in an east-west direction. The Project Site includes one existing tree to be removed as part of the Project. In addition, the Project would result in the removal of two existing street trees within the S. Alameda Street right-of-way. No street trees or other plantings are located on the Project Site's Industrial Street frontage. On the Industrial Street frontage, above-ground utility poles and several transformers figure prominently in views of the Project Site. The existing buildings are surrounded by chain link/barbed wire fencing and the street-facing walls along Industrial and Alameda Streets are large and generally featureless. The existing buildings have two small, upper-story windows along the Alameda Street frontage; however, the general appearance of the buildings conveys an impenetrable blank façade without articulation that does not promote a visually attractive or pedestrian friendly environment.

The surrounding area is distinctly industrial, with land uses to the west of the Project Site consist of Los Angeles County Metropolitan Transportation Authority – Division 1 Natural Gas Fueling Station and bus yard and the ROW DTLA, a 30-acre site of historic structures recently converted to include creative office and studio space, retail shops, and restaurants.

Uses to the north across Industrial Street include Union Central Cold Storage warehouse, which is proposed for demolition for the potential development of the Industrial Street Lofts (a proposed mixed-use project with 344 units and ground floor commercial), and other industrial/warehouse and commercial uses. Wholesale food and produce warehouses, recently converted live/work spaces, and small-scale restaurant/café spaces are located in the vicinity of 6th Street.

Directly east of the Project Site and west of Mill Street, are wholesale food warehouses. Northeast and east of Mill Street are one- to two-story industrial uses, and adaptive reuse structures now occupied by retail shops, restaurants, bars, and creative offices and studios. To the south of the Project Site are low-rise commercial uses, including a McDonald's restaurant with a drive-through service, the Para Los Niños Charter School, the Institute of Contemporary Art Los Angeles Museum, and a vacant eight-story structure. South of 7th Street is a Greyhound bus terminal, a produce market, and Metropolitan High School. Older industrial buildings in the area have a distinct aesthetic value, although many of these are in a state of disrepair or underutilized compared to their original purposes. However, adaptive reuse of buildings, such as that occurring at the ROW DTLA site and to the northeast and east of Mill Street have retained the aesthetic value of many of the original buildings.

Views

The Project Site and surrounding area are characterized by flat topography, with elevations dropping less than two feet from the west to the east between S. Alameda Street and Mill Street, a distance of approximately 0.24 mile. The same flat topography continues throughout the surrounding blocks, with a very gradual drop toward the east. Because of the area's flat terrain and low-rise buildings, long range views of Downtown are available across the area from elevated areas, such as the I-10 Freeway to the south and the 7th and 6th Street Bridges over the

Los Angeles River to the east. However, the Project Site and surrounding area are developed with broad low rise industrial buildings across which long-range views from adjacent streets of cityscape or other aesthetics features are not available. Because of the area's flat topography and intervening buildings, the Project Site is not visible from the edge of the Los Angeles River, railroad tracks along the river, or from street corridors with the exception of adjacent streets. Although views are not currently available across the Project Site, views of the high-rise cluster in the City's Financial District and Bunker Hill and specific views of City Hall are available from northbound S. Alameda Street, across Metro's bus yard to the northwest of the Project Site. Vistas of the Financial District's high-rise clusters are also available via west-facing views through the E. 7th Street corridor.

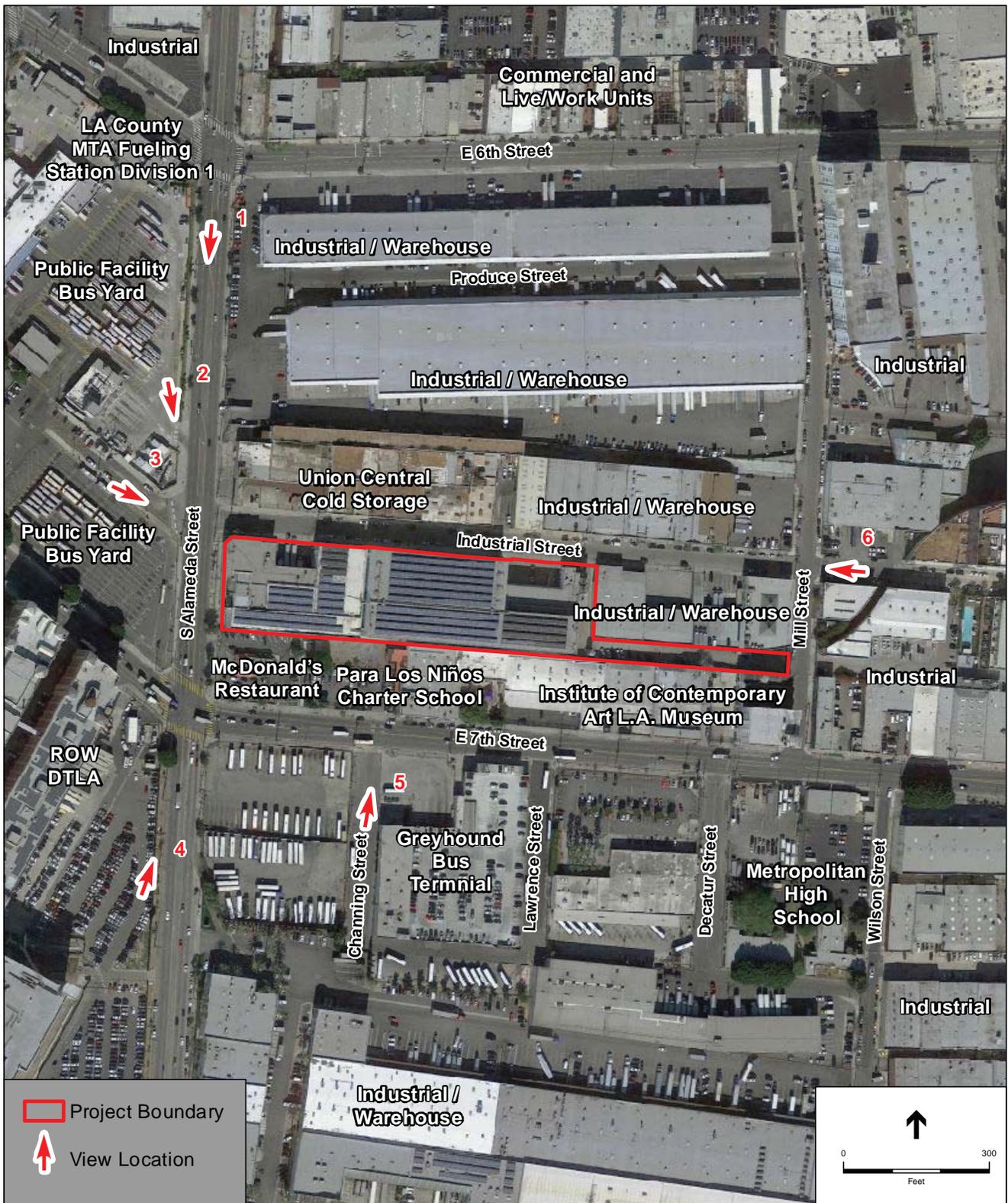
Views Toward the Project Site from the North

Figure 4.1-1, *View Location Map*, illustrates key views locations in the area that have views or partial views of the Project Site from surrounding areas. **Figure 4.1-2**, *South-facing View of the Project Site from S. Alameda Street*, illustrates the current appearance of the Project Site from S. Alameda Street. Figure 4.1-2, *View Location 1*, illustrates views of the Project Site from the vicinity of Produce Street. As shown in the View Location 1 photo, the Project Site is visible in the background on the east side of S. Alameda Street and the hedges for Metro's bus yard are visible along the west side of the street, as well "No Parking" signs indicating that no curb parking is permitted along S. Alameda Street. The 7-story brick buildings in the distance on the east side of S. Alameda Street comprise the ROW DTLA project. Existing warehouses, which largely block views of the Project Site are visible along the east side of S. Alameda Street in View Location 1. The proposed Industrial Street Lofts, a 6- and 7-story mixed use project at 360 S. Alameda Street and 1525 Industrial Street would be located directly across Industrial Street from the Project Site at the existing warehouse and would further block views of the Project Site. Much of the view represented in View Location 1 is dominated by the complex of transmission lines along the east side of S. Alameda Street in the left and center of the photo. Also, there are no street trees visible along the east side of S. Alameda Street looking toward the Project Site. With the exception of the historic ROW DTLA buildings, no aesthetic resources are visible in the photo.

Figure 4.1-2, *View Location 2*, illustrates the existing Project Site as viewed from S. Alameda Street at approximately Wholesale Street, located between Produce Street and Industrial Street. Because the view is near to the Project Site, the existing Showa Building is more prominent. As in View Location 1, the view is dominated by a mix of crossing transmission lines at S. Alameda Street and Industrial Street. Views of visual or aesthetic resources, including horizon views of hills or cityscape are not available from this location or across the Project Site.

View Toward the Project from the South

Figure 4.1-3, *North-facing Views of the Project Site from S. Alameda and E. 7th Streets*, illustrates the current appearance of the Project Site as viewed from E. 7th Street. Figure 4.1-3, *View Location 4*, shows the Project Site as viewed from S. Alameda Street to the south of E. 7th Street. As shown in View Location 4, the Project Site's existing building would be visible beyond the McDonald's sign, located at the northeast corner of S. Alameda Street and E. 7th Street. As shown in the View Location 4 photo, the area is industrial in character, with overhead



SOURCE: Google Maps, 2016 (Aerial).

668 S. Alameda Street

Figure 4.1-1
View Location Map



VIEW LOCATION 1: The Project Site as viewed from S. Alameda Street near Produce Street is visible in the background. Much of the view represented in Photo 1 is dominated by the complex of transmission lines along the east side of S. Alameda Street in the left and center of the figure. With the exception of the nearby ROW DTLA buildings to the southwest, no important aesthetic resources are visible in the photo.



VIEW LOCATION 2: The Project Site as viewed from S. Alameda Street near Wholesale Street. The existing on-site building is prominent in this photo. The view is dominated by a mix of crossing transmission lines at S. Alameda Street and Industrial Street. No important aesthetic resources are visible in the photo.

SOURCE: Avalon Bay, 2017

668 S. Alameda Street

Figure 4.1-2

South-facing Views of the Project Site from S. Alameda Street



VIEW LOCATION 4: The Project Site as viewed from S. Alameda Street just south of E. 7th Street, approximately one and a half blocks south of the site. The view is typical of generic industrial districts, with overhead transmission lines, truck activity, large utilitarian buildings, and surface parking lots.



VIEW LOCATION 5: The Project Site as viewed from Channing Street immediately south of E. 7th Street. The continuous south wall of the existing on-site building dominates the background. The brick building in the foreground is the Para Los Niños Charter School fronting on E. 7th Street.

SOURCE: Avalon Bay, 2017

668 S. Alameda Street

Figure 4.1-3

North-facing Views of the Project Site from S. Alameda and E. 7th Streets

transmission lines, truck activity, large utilitarian buildings, and surface parking lots. Figure 4.1-3, View Location 5, illustrates the Project Site as viewed from Channing Street to the south of E. 7th Street. As shown in View Location 5, the continuous south wall of the existing on-site building dominates the background. The brick building in the foreground is the Para Los Niños Charter School fronting on E. 7th Street. The surface parking lot for the school is to the left of the school building. No scenic vistas or views are within the line of sight across the Project Site as viewed from either S. Alameda Street or E. 7th Street.

East and West Views toward the Project from Industrial Street

Figure 4.1-4, Views of the Project Site from Industrial Street, illustrates the current Project Site from Industrial Street to the east and west of the Project Site. Figure 4.2-4, View Location 3, illustrates the Project Site as viewed from the vicinity of Mill Street. The Project Site is visible in the background to the left of the street. An off-site, two-story industrial building is visible in the left foreground. Uses to the right of the street are low rise and afford small views of high-rise towers in the City's Financial District and Bunker Hill. No vistas of high rise buildings, hills, or other aesthetic features are available across the Project Site from this location. Figure 4.1-4, View Location 6, illustrates the current appearance of the Project Site from S. Alameda Street at Industrial Street. As shown in this photograph, no visual resources are apparent. A portion of the Project Site's existing locating dock on Industrial Street is partially visible. The only landscaping visible along Industrial Street and S. Alameda Street is one small tree fronting the Project Site on S. Alameda Street.

Light and Glare

Existing lighting conditions in the Project area are primarily associated with street lights, security lighting on industrial buildings, vehicle headlights, and surface parking lot lights. In addition to street lights, the vicinity's most prominent light sources include illuminated signs and parking lot pole lights at the McDonald's Restaurant adjacent to the Project Site and flood lights in Metro's bus yard, directly across S. Alameda Street from the Project Site. Light spill from the ROW DTLA complex and other uses, such as restaurants on E. 6th Street, east and west of S. Alameda Street, and on E. 7th to the west of S. Alameda Street, also contribute to the ambient night lighting. With the exception of the McDonald's sign at S. Alameda Street and E. 7th Street, illuminated signage near the Project Site is limited.

Shading

With the exception of the 7-story, approximately 80-foot-high ROW DTLA buildings to the southeast of the Project Site at S. Alameda Street and E. 7th Street, the Project area is comprised of low-rise industrial buildings. Existing low-rise and mid-rise buildings in the area create minimal overall shading effects. At the ROW DTLA site, maximum shading occurs to the north of the buildings on E. 7th Street. Maximum shading from the latter touches the border of Metro's bus yard but does not encroach on any existing land uses.



VIEW LOCATION 3: The Project Site as viewed from Industrial Street at Mill Street, with the Project Site being visible in the background to the left of the street. An off-site, two-story industrial building is visible in the left foreground. Uses to the right of the street are low rise and afford limited views of high-rise towers in the City's Financial District and Bunker Hill. No vistas of high rise buildings, hills, or other aesthetic features or important aesthetic resources are visible across the Project Site from this location.



VIEW LOCATION 6: The Project Site as viewed from the intersection of Industrial Street at S. Alameda Street. No important aesthetic resources are visible in the photo.

SOURCE: Avalon Bay, 2017

668 S. Alameda Street

Figure 4.1-4

Views of the Project Site from Industrial Street

4.1.3 Regulatory Framework

State

Senate Bill No. 743

On September 27, 2013, Governor Brown signed Senate Bill (SB) 743, which became effective on January 1, 2014. The purpose of SB 743 is to streamline the review under CEQA for several categories of development projects including the development of infill projects in transit priority areas. The bill adds to the CEQA Statute, California Public Resources Code Chapter 2.7, Modernization of Transportation Analysis for Transit-Oriented Infill Projects, Section 21099. Pursuant to Section 21099(d)(1) “Aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment.” The provisions of SB 743 apply to projects located on a “... lot within an urban area that has been previously developed, or on a vacant site where at least 75 percent of the perimeter of the site adjoins, or is separated only by an improved public right-of-way from, parcels that are developed with qualified urban uses...and it is located within one-half mile of a major transit stop.” As discussed in the Introduction to this Section, the Project would meet the criteria set forth in SB 743 because it is located within one-half mile of a major bus line, Metro Rapid Bus Line 720 at S. Alameda Street and E. 7th Street, and (2) comprises a mixed-use residential project within an established urban area. Under SB 743, the Project is exempt from findings of significance related to aesthetic effects, including view, visual quality, light and glare, and shade impacts that may exceed City of Los Angeles CEQA thresholds. For the purpose of this EIR, aesthetic effects are voluntarily disclosed for informational purposes only.

California Code of Regulations, Title 24

Title 24 of the California Code of Regulations (CCR), also known as the California Building Standards Code, consists of regulations to control building standards throughout the State. The following components of Title 24 include standards related to lighting:

California Building Code (Title 24, Part 1) and California Electrical Code (Title 24, Part 3)

The California Building Code (Title 24, Part 1) and the California Electrical Code (Title 24, Part 3) stipulate minimum light intensities for safety and security at pedestrian pathways, circulation ways, and paths of egress. All Project lighting will comply with the requirements of the California Building Code.

California Energy Code (Title 24, Part 6)

The California Energy Code (CEC) stipulates allowances for lighting power and provides lighting control requirements for various lighting systems, with the aim of reducing energy consumption through efficient and effective use of lighting equipment.

CEC Section 130.2 sets forth requirements for Outdoor Lighting Controls and Luminaire Cutoff requirements. All outdoor luminaires rated above 150 watts shall comply with the backlight, up light, and glare “BUG” in accordance with IES TM-15-11, Addendum A, and shall be provided

with a minimum of 40 percent dimming capability activated to full on by motion sensor or other automatic control. This requirement does not apply to street lights for the public right-of-way, signs or building façade lighting.

CEC Section 140.7 sets forth outdoor lighting power density allowances in terms of watts per area for lighting sources other than signage. The lighting allowances are provided by Lighting Zone, as defined in Section 10-114 of the CEC. Under Section 10-114, all urban areas within California are designated as Lighting Zone 3. Sports Athletic field lighting is exempt from this energy limit, and additional allowances are provided for Building Entrances or Exits, Outdoor Sales Frontage, Hardscape Ornamental Lighting, Building Façade Lighting, Canopies, Outdoor Dining, and Special Security Lighting for Retail Parking and Pedestrian Hardscape.

CEC Section 130.3 stipulates sign lighting controls with any outdoor sign that is ON both and day and night must include a minimum 65 percent dimming at night. Section 140.8 of the CEC sets forth lighting power density restrictions for signs.

California Green Building Standards Code (Title 24, Part 11)

The California Green Building Standards requires that non-residential outdoor lighting must comply with the minimum light level requirements of the CEC; backlight, uplight, and glare ratings for outdoor lights defined by IESNA; light ratings consistent with the CalGreen Code; or light and glare requirements set forth in a local ordinance, whichever is more stringent.

City of Los Angeles

General Plan Framework

The Citywide General Plan Framework Element (General Plan Framework), adopted in December 1996 and readopted in August 2001, establishes the conceptual basis for the City's General Plan. The General Plan Framework provides direction regarding the City's vision for growth and includes an Urban Form and Neighborhood Design chapter to guide the design of future development. Although the General Plan Framework does not directly address the design of individual neighborhoods or communities, it embodies broad neighborhood design policies and implementation programs to guide local planning efforts. The General Plan Framework also clearly states that the livability of all neighborhoods would be improved by upgrading the quality of development and improving the quality of the public realm (Objective 5.5).

Chapter 5 of the General Plan Framework, Urban Form and Neighborhood Design, establishes a goal of creating a livable city for existing and future residents with interconnected, diverse neighborhoods. "Urban form" refers to the general pattern of building heights and development intensity and the structural elements that define the City physically, such as natural features, transportation corridors, activity centers, and focal elements. "Neighborhood design" refers to the physical character of neighborhoods and communities within the City. The land use forms and spatial relationships identified in the General Plan Framework are discussed in Section 4.8, *Land Use and Planning*, of this Draft EIR. To the extent the policies included therein affect the appearance of development, they have been incorporated into Community Plans and Urban Design Guidelines that implement the policies at the local level.

Central City North Community Plan

The Project Site is located within the Central City North Community Plan area of the City of Los Angeles. The Community Plan is one of the 35 community and district plans established throughout the City, which collectively comprise the Land Use Element of the City's General Plan and which are intended to implement the policies of the General Plan Framework. Community Plans include, among other provisions, guidelines regarding the appearance of development and the arrangement of land use. Community Plan provisions that deal with urban design and aesthetics are addressed below. Those policies that deal with the form of the urban environment are discussed in Section 4.8, *Land Use and Planning*, of this Draft EIR.

Citywide Design Guidelines

The City's General Plan Framework Element and each of the City's 35 Community Plans promote architectural and design excellence. The Citywide Design Guidelines provide guidance for applying policies contained within the General Plan Framework and the City's 35 Community Plans. The Citywide Design Guidelines are particularly applicable to those areas within the City that do not currently have adopted design guidelines contained in a Community Plan Urban Design chapter, specific plan, redevelopment plan, or other community planning documents. They provide guidance for new Community Plan updates. In cases where the Citywide Design Guidelines conflict with a provision in a Community Plan Urban Design chapter or a specific plan, the community-specific requirements prevail. The Citywide Design Guidelines are discussed and analyzed in the impact analysis section below.

Mural Ordinance

The City's Mural Ordinance (Ord. 182706), codified in LAMC Section 14.1 (Original Art Murals) was adopted in August 2013, to allow for the creation of new original art murals (OAM) on private property. An OAM is a one-of-a-kind, hand-painted, hand-tiled, or digitally printed image on the exterior wall of a building that does not contain any commercial message. The underlying intent of the Mural Ordinance is to produce new murals that re-engage communities, especially youth; create new opportunities for muralists; and support mural documentation, presentation, and engagement activities that are interactive, educational, or lead to cultural tourism.³ Under the City's Mural Ordinance, the creation of an OAM, or designation of a vintage original art mural (VAM) requires registration with and approval by the City's Cultural Affairs Commission. Once registered, a mural is entered into the Department of Cultural Affairs' Murals Database. The registration of an OAM requires a two-year covenant to be filed with the County Recorder to ensure that the mural remain for a minimum of 2 years. According to LAMC Section 14.1.1, OAMs have purposes distinct from signs and confer different benefits. Such purposes and benefits include: improved aesthetics; avenues for original artistic expression; public access to original works of art; community participation in the creation of original works of art; community-building through the presence of and identification with original works of art; education about the history of communities depicted in original works of art; and a reduction in the incidence of vandalism. Murals are considered to increase community identity and foster a

³ City of Los Angeles, Murals website, <http://culturela.org/murals/>, accessed February 17, 2017.

sense of place if they are located in a manner visible to pedestrians, are retained for substantial periods of time, and include a neighborhood process for discussion.⁴ Under LAMC Section 14.1.3, requirements applicable to murals include the minimum period of time a mural shall remain in place, maximum heights relative to building size, and distance of the murals from the face of the wall to which the mural is affixed.

River Improvement Overlay District Ordinance

The River Improvement Overlay (RIO) District Ordinance (Ord. Nos. 183144 and 183145, adopted August 20, 2014) applies to the construction of any project within a RIO district. At Mill Street, the Project Site is located approximately 0.4 mile from the Los Angeles River and is considered to be within a RIO district. The purpose of RIO districts is to support the goals of the Los Angeles River Revitalization Plan; contribute to the environmental and ecological health of the City's watersheds; establish a positive interface between river adjacent property and river parks and/or greenways; promote pedestrian, bicycle and other multi-modal connection between the river and its surrounding neighborhoods; provide native habitat and support local species; provide an aesthetically pleasing environment for pedestrians and bicyclists accessing the river area; provide safe, convenient access to and circulation along the river; promote the river identity of river adjacent communities; and support the Low Impact Development Ordinance, the City's Irrigation Guidelines, and the Standard Urban Stormwater Maintenance Program. Development regulations applicable to the RIO District are set forth in LAMC Section 13.17 and apply to landscaping according to Watershed Wise or the Los Angeles County River Master Plan Landscaping Guidelines and plant species. Specific regulations also require screening or fencing of loading and off-street parking, building equipment (such as electrical transformers, mechanical units, water meters, etc.), trash enclosures, and fencing for any street that crosses the river or terminates at the river, or a river frontage road. Regulations also apply to exterior site lighting.

Los Angeles Municipal Code

Applicable regulations for the Project Site include the following:

- Chapter 1, Article 2, Sec. 12.21 A 5(k). All lights used to illuminate a parking area shall be designed, located and arranged so as to reflect the light away from any streets and adjacent premises.
- Chapter 1, Article 7, Sec. 17.08 C. Plans for street lighting shall be submitted to and approved by the Bureau of Street Lighting for subdivision maps.
- Chapter 1, Article 4.4, Section 14.4.4.E. No sign shall be arranged and illuminated in a manner that will produce a light intensity of greater than three foot-candles above ambient lighting, as measured at the property line of the nearest residentially zoned property.
- Chapter 9, Article 3, Sec. 93.0117(b). No exterior light may cause more than two foot-candles of lighting intensity or generate direct glare onto exterior glazed windows or glass doors on any property containing residential units; elevated habitable porch, deck, or balcony on any

⁴ Los Angeles Municipal Code Section 14.4.1, cityplanning.lacity.org/Code_Studies/Misc/MuralOrdinance_DiscussionDraft_LADCP.pdf, accessed February 21, 2017.

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

- Chapter 9, Article 9, Division 5, Sec 99.05.106.8. Comply with lighting power requirements in the California Energy Code, California Code of Regulations, Title 24, Part 6. Meet or exceed exterior light levels and uniformity ratios for lighting zone 3 as defined in Chapter 10 of the California Administrative Code, Title 24, Part 1.
- Chapter I, Article 3, Section 13.11 of the City's Municipal Code contains regulations for the establishment of Sign Districts within the City, to permit the development of unique sign regulations that enhance the theme or unique qualities of a property or to eliminate blight through sign reduction. Sign Districts are permitted on commercially or industrially zoned property and must be less than one block or three acres in size and include contiguous parcels of land separated only by public streets, ways or alleys, or other physical features; Precise Sign District boundaries are required to be defined at the time of application for an individual district. The Sign District defines the location, number, square footage, height, light illumination, hours of illumination, sign reduction program, duration of signs, and design and types of signs permitted, as well as other characteristics.

4.1.4 Environmental Impacts

Methodology

Visual Character

The evaluation of visual character is focused on whether implementation of the Project would alter existing conditions in a manner that would substantially degrade visual quality on the Project Site and in its vicinity. The existing visual quality of the Project Site and vicinity are compared to the expected (future) appearance of the Project in order to determine whether the visual character of the area would be substantially degraded. Factors such as building heights, massing, setbacks, materials, landscaping and other features of the Project's architectural and landscape design are taken into account. The analysis of visual character is based in part on the evaluation of simulated composite photographs showing existing and future conditions for representative locations within a range of distances and variety of directions from the Project Site.

Views

The analysis of view impacts is also based in part on the evaluation of simulated composite photographs showing existing views and future views of the Project within the vicinity of the Project Site. The evaluation is focused on determining if public views of valued scenic resources exist in the Project vicinity and whether such views would be blocked or substantially obscured as a result of Project development.

The L.A. CEQA Thresholds Guide provides that an analysis of Project impacts to visual resources should include analysis of views from such public places as designated scenic highways, corridors, parkways, roadways, bike paths and trails. A viewing location must include views of scenic resources that are available to the public. Under the L.A. CEQA Thresholds Guide, an office building or private residence would not be considered a viewing location since views of broad horizons, aesthetic structures, and other scenic resources would not be available to the public. In addition, the California courts have routinely held that "obstruction of a few private

views in a project's immediate vicinity is not generally regarded as a significant environmental impact." *Banker's Hill, Hillcrest, Park West Community Preservation Group v. City of San Diego*, 139 Cal.App. 4th 249, 279 (2006). Nonetheless, effects on private views are discussed in this section for disclosure purposes.

Light and Glare

The analysis of light and glare identifies the location of light-sensitive land uses and describes the existing ambient conditions on the Project Site and in the vicinity. The analysis describes the Project's proposed light and glare sources, and the extent to which Project lighting, would be directed toward or spill from the Project Site onto light-sensitive areas. The analysis also considers the potential for sunlight to reflect off building surfaces (glare) and the extent to which such glare would interfere with the operation of motor vehicles or other activities or adversely affect the character of an area.

Shading

The consequences of shadows on land uses can be positive, including cooling effects during warm weather; or negative, such as loss of warmth during cooler weather and loss of natural light for landscaping, solar power installations, and human activities where sunlight is valued. In order to determine whether shading impacts would have a significant impact on the physical environment, shading diagrams have been prepared that show the adjacent off-site, shade-sensitive uses that would receive shadows and the nature of shading that would occur. The shading diagrams reflect sensitive uses, shading time durations, and shading threshold limits established for purposes of CEQA compliance in the L.A. CEQA Thresholds Guide. Sensitive uses include residential uses and routinely usable outdoor spaces associated with recreational or institutional uses (i.e., hospitals), commercial uses such as pedestrian-oriented outdoor spaces or restaurants with outdoor eating areas, nurseries, and existing solar collectors. These uses are considered sensitive because sunlight is important to function, physical comfort, or commerce. The evaluation includes shading that would occur on the winter solstice between 9:00 A.M. and 3:00 P.M. Pacific Standard Time (PST) and on the spring equinox, summer solstice, and fall equinox between 9:00 A.M. and 5:00 P.M. Pacific Daylight Time (PDT). The duration of shading is compared to threshold limits that are considered significant.

Consistency with Regulatory Plans and Policies

The evaluation of aesthetic resources also compares the Project to the standards and policies set forth in existing plans. These include the General Plan Framework, Central City North Community Plan, Citywide Design Guidelines, and Los Angeles Municipal Code. Related aesthetic policy documents, such as the City of Los Angeles Walkability Checklist are evaluated in Section 4.8, *Land Use and Planning*, of this EIR.

Thresholds of Significance

Aesthetic Character

Appendix G of the State CEQA Guidelines provides a set of screening questions that address impacts with regard to aesthetics. These questions are as follows:

Would the project:

- Have a substantial adverse effect on a scenic vista; or
- Substantially damage scenic resources, including but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway; or
- Substantially degrade the existing visual character or quality of the site and its surroundings.

The L.A. CEQA Thresholds Guide incorporates the screening questions contained in Appendix G of the CEQA Guidelines. In accordance with the City's thresholds the determination of significance with respect to aesthetics and visual character shall be made on a case-by-case basis, considering the following factors:

- The amount or relative proportion of existing features or elements that substantially contribute to the valued visual character or image of a neighborhood, community, or localized area, which would be removed, altered or demolished;
- The amount of natural open space to be graded or developed;
- The degree to which proposed structures in natural open space areas would be effectively integrated into the aesthetics of the site, through appropriate design, etc.;
- The degree of contrast between proposed features and existing features that represent the area's valued aesthetic image;
- The degree to which a proposed zone change would result in buildings that would detract from the existing style or image of the area due to density, height, bulk, setbacks, signage, or other physical elements;
- The degree to which the project would contribute to the area's aesthetic value; and
- Applicable guidelines and regulations.

Based on these factors, a Project would normally have potentially significant impacts with respect to aesthetic character if it:

AES-1 Substantially alters or degrades the existing visual character of an area, including valued existing aesthetic features or resources.

Views

The L.A. CEQA Thresholds Guide indicates that the determination of significance with respect to views shall be made on a case-by-case basis, considering the following factors:

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

Based on these factors, a project would normally have potentially significant impacts with respect to views if it would:

AES-2 Substantially obstruct or degrade an existing recognized and valued public view.

Light and Glare

Appendix G of the State CEQA Guidelines provides one screening question that addresses impacts with regard to light and glare. This question is as follows:

Would the project:

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

The L.A. CEQA Thresholds Guide indicates that the determination of significance with respect to light and glare shall be made on a case-by-case basis, considering the following factors:

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

Based on these criteria, a project would normally have a significant impact on light and glare if it:

AES-3 Includes lighting or glare (during either construction or operations) that would substantially alter the character of off-site areas surrounding the project site, or result in substantial light spill/or glare onto adjacent light-sensitive receptors.

Shading

Appendix G of the CEQA Guidelines does not provide screening questions that address impacts with regard to shading. However, the L.A. CEQA Thresholds Guide considers the screening question above regarding visual character or quality of a site and its surroundings as including shading impacts. According to the Guide, a Project would normally have a potentially significant impact if:

AES-4 Shadow-sensitive uses would be shaded more than three hours between the hours of 9:00 A.M. and 3:00 P.M. Pacific Standard Time (PST), between early November and mid-March or more than four hours between the hours of 9:00 A.M. and 5:00 P.M. Pacific Daylight Time (PDT) between mid-March and early November.

Consistency with Adopted Plans

The L.A. CEQA Thresholds Guide also indicates that the determination of significance with respect to aesthetics and visual character shall be made on a case-by-case basis including, among other factors, applicable guidelines and regulations.

Based on this factor, a Project would normally have potentially significant impacts with respect to consistency with applicable guidelines and regulation if it:

AES-5 Substantially conflicts with applicable guidelines and regulations related to aesthetics and visual quality.

Project Characteristics and Project Design Features

Design and Architecture

The Project would feature a high level of architectural design that incorporates public art and utilitarian building materials that blend with the warehouse and industrial buildings in the immediate neighborhood. The Project's conceptual approach is characterized as "Buildings on a Building," respecting the long-standing tradition of using industrial building rooftops for new development, and the adaptability of expansive warehouse and factories found throughout the Arts District.

The Project design introduces a plaza, paseos, varied rooflines, compatible building materials, and a retail storefront, including a grocery store at the corner of S. Alameda Street and Industrial Street that would encourage pedestrian activity. The building features an architectural style that is designed to be complementary of the surrounding industrial, commercial, and residential uses. The Project would include one building atop a two-story podium, for a total of seven stories above grade and a maximum building height of 85 feet. The general character of the structure would be similar to the area's larger industrial buildings by forming a continuous street front, with an even roof line and standard window sizes along a single frontage. The Project would feature façade setbacks created by sections of open space and plaza entrances including The Lookout and a second recessed retail/restaurant entrance along the north frontage (Industrial Street).

Along the south frontage, The Hub and pool deck, set at the top of the parking podium, would provide a setback to further open the south elevation and allow for a "stepped" articulation of building façade. Facades would be articulated with color changes so that the farthest wall from the street would be lighter in shade, as well as provide balconies on the "inside" walls to create variation. The variety of setbacks, alternating dark and light colors, and use of balconies on the "inside" units would contribute to the three-dimensional character and depth of street-facing walls.

Board formed concrete and fiber cement paneling would reinforce the podium portion of the Project and provide a solid platform for lighter white and black metal panel clad upper buildings that are terraced with setbacks from adjacent streets. The podium level along Industrial Street would be faced with retail, grocery store, and restaurant uses. With the variety of colors, setbacks, and uses, the Project would represent an assemblage versus a single, monolithic building while simultaneously anchoring itself in the Arts District through a sensitive approach to fenestration and massing. A conceptual rendering of the Project from Industrial Street is depicted in Chapter 2, Figure 2-9, Conceptual Rendering of Project from Industrial Street, in this Draft EIR.

Open Space and Landscaping

The Project would include open space, some of which would be publicly accessible, and other open space area that would serve solely as recreational amenities for the residents. The Project

would provide 44,623 sf of open space, of which 14,537 sf would be open space accessible to the public; 23,974 sf would be common open space for Project residents, including 4,612 sf recreation room and fitness center. The publicly-accessible and common open space areas would provide a wide range of indoor and outdoor amenities that would be located in several distinct nodes along with paseos and a plaza on the ground floor. Some of the publicly-accessible open space amenities would include a plaza fronting Industrial Street and two intersecting paseos on the ground level providing a public connection (The Mews) between Industrial Street and Mill Street. The Project would also provide public art/façade treatments, such as murals on several walls within the Project Site. Private open space and recreational amenities for Project residents would include three distinct outdoor lounge areas on the second level, a fitness facility and clubhouse on the second level, as well as terraces, and private balconies. The Project would also include sidewalk “bump-out” extensions into Industrial Street across from The Lookout plaza and the paseo accessing Industrial Street that would enhance and demark these open space areas.

The Project would provide 5,580 sf of publicly-accessible and common open space landscaping. As shown in the Figure 2-10, Conceptual Landscape Plan – Level 1, and Figure 2-11 Conceptual Landscape Plan – Level 2, in Chapter 2, of this Draft EIR, landscaping would be provided along Industrial Street, S. Alameda Street, the public walkways, and within the publicly-accessible and common open space areas used by the Project’s tenants, described below (i.e., The Lookout, The Mews, The Well, The Hub, and The Foundry). Several distinct outdoor nodes are as follows:

- The Lookout, on Level 1 would be approximately 2,630 sf and provide publicly-accessible open space. This plaza on Industrial Street would be located opposite a sidewalk “bump-out” extension that would have landscaping, seats, tables, and an artistic focal point and provide a staircase with secured access to the live/work terraces on Level 2 that overlook it.
- The Hub, on Level 2 would be approximately 9,569 sf and provide common open space for Project residents. The Hub would include the pool deck, several shade trees, and lounge areas.
- The Well would be approximately 3,280 sf and provide a smaller enclave of shaded, landscaped seating, and grassy areas toward the west end of Level 2 for Project residents.
- The Foundry would be approximately 3,928 sf and provide additional shaded, landscaped seating, and grassy areas toward the east end of Level 2 for Project residents.
- The Mews would be approximately 11,907 sf and consist of two intersecting paseos on the ground level that provide a key connection that would be accessible to the public between Industrial Street and Mill Street. The Mews would also include shaded, landscaped walkways that would incorporate art of different mediums, seating areas, and kiosks.
- The remaining 3,657 sf consists of common amenity decks overlooking The Hub and The Foundry for common open space for the Project residents.

As shown in the Tree Assessment, included as an appendix to the Initial Study contained in Appendix A of this Draft EIR, the one existing tree on the Project Site (currently located in the future area of The Mews) would be removed as part of the Project; however, the Project would substantially increase the number of trees providing 123 trees (one 24” box tree for every four dwelling units) per LAMC Section 12.21.G. In addition, the Project would result in the removal

of two existing street trees within the S. Alameda Street right-of-way that would be replaced at a 2:1 ratio within the S. Alameda Street and Industrial Street rights-of-way in accordance with the City's Street Tree Ordinance and Department of Public Works, Bureau of Street Services, Urban Forestry Division requirements (i.e., four trees). Therefore, in addition to other landscaping provided throughout the Project Site, the Project would provide a total of 123 trees, resulting in a net increase of 120 trees compared to existing conditions. As shown on Figure 2-11, four street trees are proposed within the S. Alameda Street right-of-way and 17 street trees are proposed within the Industrial Street right-of-way for a total of 21 street trees. This would exceed the Bureau of Street Services tree removal and replacement requirements. The remaining 102 trees would be planted within the Project Site.

Public Art

In addition to publicly-accessible and common open space landscaping, the Project would provide public art/façade treatments, such as murals on several walls within the Project Site. A monumental piece would be located on the building at the corner of S. Alameda and Industrial Streets facing northwest and extending horizontally along the first two levels of the building facing S. Alameda Street. The piece would be approximately 65 feet in height at the tallest point and approximately 18-inches in height at the shortest point. Public art façade treatment could also be provided on the east wall of the building along the paseo facing Mill Street, which would be approximately 70 feet in height, from the second floor to the roof. Another public art façade opportunity would be along the first floor of the building's south wall facing the south access drive, which would be approximately 18 feet in height and approximately 205 feet in length just west of the north/south paseo of The Mews. A new south wall, approximately 392 feet in length along the south property line, would provide a physical and visual buffer between the Para Los Niños Charter School and the access drive. The north side of the wall facing the access drive would be another public art façade opportunity. In addition, the Project is planning to engage with the Para Los Niños Charter School to participate in an annual public art installation. All murals would conform to the requirements of the Mural Ordinance, LAMC Section 14.1, which regulates the size, height, spacing, materials, and location of original art murals. As mentioned above, public art space could be provided within The Mews and The Lookout. As a component of the Project, 15,815 sf of arts and production space and 608 sf of live/work gallery space would be provided.

Signage and Lighting

Project Site signage would include building identification, wayfinding, and security markings. Commercial and residential signage would be similar to other signage in the Project vicinity and no off-site signage is proposed. All proposed signage would conform to the size, type, and placement requirements of the LAMC Article 4.4 (Sign Regulations), which limits light encroachment and certain types of signage. Original art mural signage would conform to the Mural Ordinance which prohibits commercial advertising. Pedestrian and publicly accessible areas would be well-lit for security. Project lighting would also include ground level commercial lighting, common and private open area lighting, interior and outdoor lighting from commercial and residential areas, accent lighting, and mural lighting. Lighting fixtures on the Project Site would be shielded and directed toward the areas to be lit and away from any adjacent sensitive

areas, such as residential uses. Furthermore, the Project would be required to comply with LAMC Section 93.0117(b) which limits exterior lighting to no more than two foot candles of lighting intensity at the windows, balconies, patios, and other gathering spaces associated with residential uses.

Project Design Features

PDF AES-1: Construction Fencing: The Applicant shall provide and maintain a construction fence for safety and to screen views to the Project Site during construction to the extent feasible. The fence shall be located along the north, south, east and west perimeters of the Project Site with a minimum height of 8 feet. The Applicant shall ensure through appropriate postings and regular visual inspections that no unauthorized materials are posted on temporary construction barriers or temporary pedestrian walkways, and that such temporary barriers and walkways are maintained in a reasonable manner throughout the construction period.

PDF AES-2: Screening of Utilities and Loading Areas: The Project would visually screen utilities, such as rooftop and ground-level mechanical equipment and utilities (HVAC systems, antennas, satellite dishes, etc.) from public view. All loading areas will be conducted interior to the buildings or screened from public view.

PDF AES-3: Glare: Glass and other building materials used in exterior façades shall be low reflective and/or treated with a non-reflective coating in order to minimize glare. Prior to issuance of a building permit, the Department of Building and Safety shall review the exterior building materials to confirm that they do not exceed the reflectivity of standard building materials, and would not cause significant glare impacts on motorists or nearby residential uses.

PDF AES-4: Lighting. Construction and operational lighting will be shielded and directed downward (or on the specific on-site feature to be lit) in such a manner as to preclude light pollution or light trespass onto adjacent use that would cause more than two foot-candles of lighting intensity or generate direct glare onto exterior glazed windows or glass doors, elevated habitable porches, decks, or balconies of adjacent residential units.

PDF AES-5: Façade and Signage Materials. Prior to the issuance of building permits, the proposed types of Project façade and signage materials (e.g., glass, metal panels, etc.) will be submitted to the Department of Building and Safety for review and approval to ensure that highly reflective materials are not utilized.

Project Impacts

As noted in the Regulatory Framework section above, Section 21099(d)(1) of the CEQA Statute (SB 743) provides pursuant to State Law that the Project's aesthetic impacts are not considered significant impacts on the environment. Therefore, the analyses in this section are being provided for informational purposes only.

The analyses determine whether the Project would exceed thresholds normally used by the City for analyzing the significance of impacts on aesthetics. The below analyses indicate that the Project's impacts would fall below the standards normally used by the City for determining

significant aesthetic impacts in regards to: visual character, views, light and glare, shading and consistency with adopted plans.

Visual Character

Threshold AES-1: A potentially significant impact would occur if the Project would substantially alter or degrade the existing visual character of the Project area by damaging valued scenic features or resources, or introducing elements that substantially detract from the visual character of the Project area, including valued existing aesthetic features or resources.

Construction

Impact Statement AES-1a: Project construction activities and associated equipment and materials would be screened by temporary fencing and barriers. Public sidewalks would be inspected to remove unauthorized materials and to ensure that the public right-of-way is maintained in a reasonable manner throughout the construction period. The Project would not exceed the City's visual character threshold and impacts would be less than significant.

Construction activities would entail the demolition of the three, one- and two-story existing cold storage buildings comprising a total area of approximately 131,350 sf. Other construction activities include excavation for three levels of subterranean parking and grading of the lot to provide for two levels foundations, staging of construction vehicles, storage of materials, and building construction. It is anticipated that excavation would generate approximately 185,000 cubic yards of soil. In addition to site disturbance and hauling, construction activities typically result in movement of construction equipment, delivery of materials, concrete pours, views of incomplete buildings and other activities that generally contrast with the aesthetic character of an area would occur. The use of cranes would be required for the construction of the Project's components. Demolition, grading and construction of new buildings, sidewalk improvements, and installation of landscaping would be temporary in nature. Construction activities would be primarily visible from S. Alameda Street and Industrial Street, although taller construction equipment such as cranes would be visible from a greater radius of street networks.

Construction of the Project is expected to be completed in a single phase anticipated to begin in 2018, with full buildout of the Project anticipated for 2022. Because of the temporary nature of construction, related activities would not substantially alter or degrade the visual character of the surrounding area or the existing Project Site. In addition, construction fencing would be provided for safety, and would also serve to screen views of grading and other site disturbance from adjacent streets and sidewalks. The fence would be located along the north, south and west perimeters of the Project Site with a minimum height of 8 feet (Project Design Feature AES-1). Construction fencing and other temporary barriers have the potential to attract graffiti or posting of unauthorized materials if not appropriately monitored. Therefore, Project Design Feature AES-1 would also provide for regular visual inspection of the fence, temporary barriers, and sidewalks and removal of any observed graffiti or unauthorized materials. Although Project impacts on visual character would not exceed the threshold of significance, no significance finding is required under CEQA pursuant to SB 743 and ZI No. 2452.

Operation

Impact Statement AES-1b: The Project would replace an existing cold storage facility with new development including live-work units, street-front retail uses, sidewalk and streetscape improvements, and landscaping compatible with the character of the Arts District. These changes, as well as undergrounding of transformers and powerlines, would improve visual conditions at the Project Site. The Project would not exceed the City's visual character threshold and impacts would be less than significant.

As described under Project Characteristics, above, the Project would introduce new mixed-use development on an industrial property currently occupied by three one- and two-story cold storage buildings. As discussed above, the Project would be constructed in a contemporary architectural style, complementary of, but distinct from, industrial uses in the surrounding neighborhood and the Arts District, in which industrial uses have been repurposed for art related activities. In addition, Project Design Feature AES-2 requires that utility and loading areas be screened from public view. All loading areas will be conducted interior to the buildings or screened from public view.

Figure 4.1-5, *Existing and Simulated Views toward the Project Site from the S. Alameda Street near Produce Street*, shown as Location #1 on the View Location Map (Figure 4.1-1, above), illustrates the appearance and effects of the Project on the visual character of the area from this location. As shown in the simulated future view, the Project would replace the existing cold storage building with a taller structure. The building height, profile, and color variation would be similar in character to the historic ROW DTLA buildings to the right of S. Alameda Street. The glazing for the Project's ground level grocery store at the corner of S. Alameda Street and Industrial Street would be visible, as well as the prominent mural at the corner of the building, and rows of new street trees. The Project would not change the open aspect of the S. Alameda Street corridor and the mural and street trees would upgrade the visual character of the street.

Figure 4.1-6, *Existing and Simulated Views toward the Project Site from S. Alameda Street near Wholesale Street*, shown as Location #2, and **Figure 4.1-7**, *Existing and Simulated Views toward the Project Site from S. Alameda Street at Industrial Street*, shown as Location #3 on the View Location Map illustrate the appearance and effects of the Project on the visual character of the area. Figure 4.1-6 shows more of the S. Alameda Street corridor, and Figure 4.1-7 is closer to the Project Site and shows more detail (retail or other commercial windows along the Industrial Street frontage). As shown in the simulated future views, the Project would replace the existing cold storage building with a distinctive structure. The power lines along the Project's street frontage, including a set of transformer boxes on Industrial Street would be relocated underground, improving visual quality in the area. Although modern, the Project design would have aspects of older industrial buildings in the area, such as uniformly set and sized windows, step backs to create articulation along Industrial Street and other features that simulate components of an industrial building. The street front along both Industrial Street and S. Alameda Street would be activated with commercial uses, restaurants, and a grocery store, all accessible from the sidewalk.



EXISTING VIEW



SIMULATED FUTURE VIEW

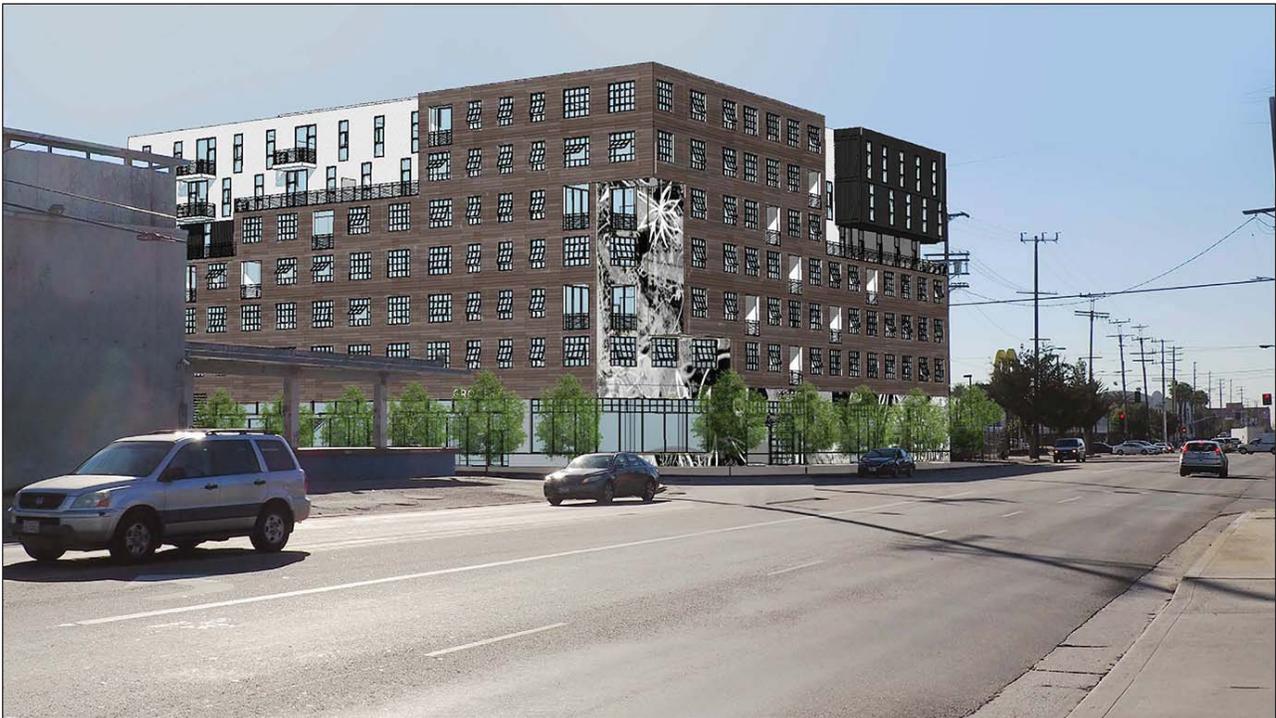
SOURCE: Avalon Bay, 2017

668 S. Alameda Street

Figure 4.1-5
Existing and Simulated Views Toward the Project Site
from S. Alameda Street near Produce Street



EXISTING VIEW



SIMULATED FUTURE VIEW

SOURCE: Avalon Bay, 2017

668 S. Alameda Street

Figure 4.1-6
Existing and Simulated Views Toward the Project Site
from S. Alameda Street near Wholesale Street



EXISTING VIEW



SIMULATED FUTURE VIEW

SOURCE: Avalon Bay, 2017

668 S. Alameda Street

Figure 4.1-7
Existing and Simulated Views Toward the Project Site
from S. Alameda Street at Industrial Street

Artwork at the Project's northwest corner and along S. Alameda Street would characterize the theme of the Art District and be consistent with the objectives of the City's Mural Ordinance to create new murals that re-engage communities, create new opportunities for muralists, and support interactive, educational, or cultural tourism. Street level windows and street trees would also upgrade the visual character of the intersection. Compared to existing visual conditions, the removal of the transformers and powerlines, the introduction of high quality architecture incorporating a mix of materials, public art, articulation of the façade, and the introduction of trees, would represent a notable overall improvement in the visual quality of the area.

Figure 4.1-8, *Existing and Simulated Views toward the Project Site from S. Alameda Street, South of E. 7th Street*, shown as Location #4 on the View Location Map, illustrates the appearance and effects of the Project on the visual character of the area as viewed from a block and a half to the south of the Project Site. As shown in the simulated future view, the Project south façade would extend along the block and appear to be a very large structure, not unlike the buildings associated with the ROW DTLA buildings, located to the west of S. Alameda Street, but not visible in the simulation. The Project's mass would be broken up by the step backs at the different stories and the contrasting use of colors, with the light color dominating the upper stories where it would blend with the lighter sky tones. From this perspective, the balcony units and step back of the upper stories has the aspect of a residential loft building on top of an industrial building; thus, emulating converted industrial buildings in the area in which building roofs are utilized for residential or work/live lofts and lower stories maintain their original or repurposed industrial appearance.

Figure 4.1-9 *Existing and Simulated Views toward the Project Site from Channing Street*, shown as Location #5 on the View Location Map, illustrates the appearance and effects of the Project on the visual character of the area from Channing Street. As shown in the simulated future view, the Project would extend along the block and appear to be a very large structure, not unlike other repurposed industrial buildings in the area. The Project's mass would be broken up by the step backs of the different stories and the alternating colors, with the light color dominating the upper stories where it would blend with the lighter sky tones. From this perspective, the balcony units and step back of the upper stories has the aspect of a building on top of a building emulating the use of building roofs for additional lofts, where the lower stories would maintain a higher industrial appearance. The Project would increase the height of the current development behind the Para Los Niños Charter School, from an approximately 56-foot-high structure with an approximately 85-foot high structure; however, the existing development is a currently a solid wall of buildings already taller than the existing school and the Project would implement a deep, approximately 45-foot setback at the ground level occupied by the service driveway and The Mews, and well as provide an approximately 110-foot step-back at the 2nd floor landscaped pool deck. The setbacks for The Mews and pool deck would exceed the maximum 20-foot rear yard setback required under the LAMC. The setbacks from the south boundary, design components, step backs, and landscaping at the pool deck would provide a backdrop with visual interest compared to existing conditions and would reduce the Project's sense of increased scale and mass relative to the Para Los Niños Charter School and the neighborhood along E. 7th Street. As such, the Project would not substantially detract from the visual character of the Project area as viewed from Channing Street at E. 7th Street.



EXISTING VIEW



SIMULATED FUTURE VIEW

SOURCE: Avalon Bay, 2017

668 S. Alameda Street

Figure 4.1-8
Existing and Simulated Views Toward the Project Site
from S. Alameda Street, South of E. 7th Street



EXISTING VIEW



SIMULATED FUTURE VIEW

SOURCE: Avalon Bay, 2017

668 S. Alameda Street
Figure 4.1-9
Existing and Simulated Views
Toward the Project Site from Channing Street

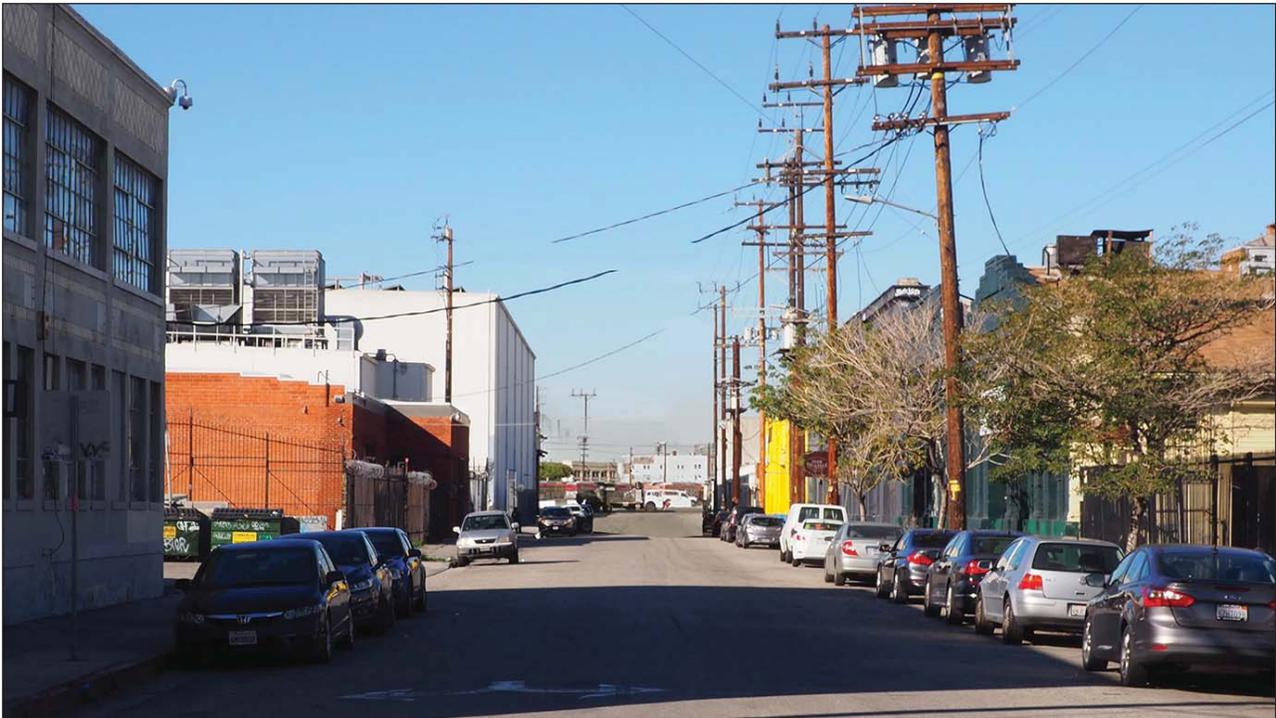
Figure 4.1-10 *Existing and Simulated Views toward the Project Site from Industrial Street*, shown as Location #6 on the View Location Map, illustrates the appearance and effects of the Project on the visual character of the area from Industrial Street at Mill Street to the east of the Project Site. As shown the simulated future view, the Project would extend along the block in a manner not unlike other repurposed industrial buildings in the area. The east wall would feature a large mural in keeping with the Arts District theme. The new building would provide greater visual interest than the current warehouse building, and the public art component of the building, street trees and other landscaping, and removal of power lines crossing Industrial Street would all benefit visual quality along Industrial Street. No visual resources, such as Downtown skyline or hills are visible across the Project Site or through the street corridor. Because the existing uses along Industrial Street are industrial in character, and the Project would complement an industrial theme as viewed from this location, the Project would not substantially detract from the visual character of the Project area.

As shown in the simulations and described above, the existing Project Site is a large, featureless structure, removed from the street interface by chain link and barbed-wire fencing. No landscaping, street trees, or other aesthetic features are provided along the street edge that would make the Project Site welcoming to pedestrians or cyclists in the area. The Project would substantially improve the visual character of the Project Site and the pedestrian environment through the removal of transformers and power lines; chain line/barbed wire fencing; and massive, blank walls along the street interface and replacement of these uses with street trees, street furniture, street-oriented retail uses and restaurants, pedestrian lighting, the interconnected paseos, and introduction of residents to generate sidewalk activity. In addition, the Project would introduce high-quality architecture and public art to the Project Site and establish the relationship of the Project Site to the Arts District. These changes would improve the aesthetic character of the Project Site while complementing the architectural quality of the surrounding neighborhood. With the incorporation of proposed architectural and landscaping features, the Project would not degrade the existing visual character of the Project area by damaging valued scenic features or resources or introducing elements that substantially detract from the visual character of the area. Although Project impacts on visual character would not exceed the threshold of significance, this evaluation is provided for informational purposes only and no significance finding is required under CEQA pursuant to SB 743 and ZI No. 2452.

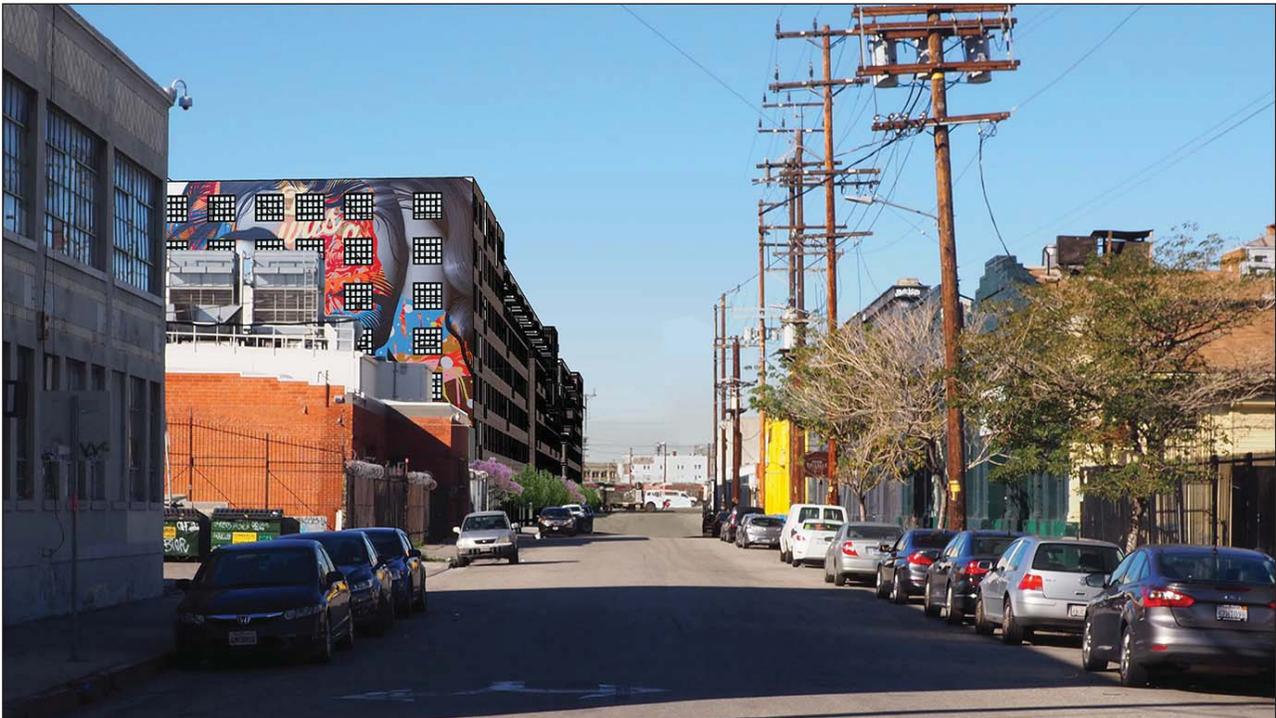
View Impacts

Threshold AES-2: A potentially significant impact would occur if the Project would substantially obstruct or degrade and existing recognized and valued public view.

Impact Statement AES-2: No scenic vistas or other visual resources are visible across the Project Site from adjacent streets or other public areas, nor is the Project Site a component of a scenic resource. The mid-rise Project would not block existing vistas of the Downtown skyline from S. Alameda Street or the I-10 Freeway. The Project would not substantially obstruct or degrade an existing view resource and, as such, would not exceed the City's view impacts threshold and impacts would be less than significant.



EXISTING VIEW



SIMULATED FUTURE VIEW

SOURCE: Avalon Bay, 2017

668 S. Alameda Street

Figure 4.1-10
Existing and Simulated Views
Toward the Project Site from Industrial Street

The Project Site is situated in an urbanized area of North Central Los Angeles on flat terrain. Public vantage points available in the Project vicinity are blocked by existing development and largely limited to street corridors. Scenic vistas in the area primarily comprise the Downtown skyline, which is currently visible from west-facing views from S. Alameda Street or from areas to the east of S. Alameda Street, not currently obstructed by buildings. In the Project area, views of the high-rise cluster in the City's Financial District and Bunker Hill are available from northbound S. Alameda Street, across Metro's bus yard to the west of the Project Site and west-facing views through the E. 7th Street corridor, to the southwest of the Project Site. Views of the Downtown skyline across the Project area are also available from the I-10 Freeway. However, as a mid-rise, 7-story building, the Project would not block long-range views of Downtown from the I-10 Freeway. In addition, west-facing views of Downtown from S. Alameda or through the E. 7th Street corridor occur to the west of the Project Site and would not be affected by any development of the Project Site.

Existing and simulated future views across the Project Site from S. Alameda Street, E. 7th Street, and Mill Street are illustrated in Figures 4.1-5 through 4.1-10. As shown in views of the Project Site, the Project Site's existing 2- and 3-story industrial buildings form a solid wall and prevent any existing views across the Project Site of high-rise clusters or other cityscape, natural features such as mountains, or views of the Los Angeles Basin or other scenic resources from surrounding streets. Because existing views of scenic resources are not available within the Project Site or in the field of view across the Project Site, the development of the Project would not substantially obstruct or degrade an existing recognized and valued public view. Although Project impacts on views would not exceed the threshold of significance, this evaluation is provided for informational purposes only and no significance finding is required under CEQA pursuant to SB 743 and ZI No. 2452.

Light and Glare

Threshold AES-3: A significant impact would occur if the Project would include light or glare that would substantially alter the character of off-site areas surrounding the Project Site, or result in substantial light spill/or glare onto adjacent light-sensitive receptors.

Impact Statement AES-3: With implementation of Project Design Features AES-3, AES-4, and AES-5, and given the infill nature of the Project within a developed area of the City, the Project's lighting would not alter the character of off-site areas surrounding or cause substantial light glare and spillage. As such, the Project would not exceed the City's light and glare threshold and impacts would be less than significant.

Construction

Lighting needed during Project construction could generate visible light in the vicinity of the Project Site, which include residential uses located approximately 0.31 mile or greater to the west. However, construction activities would occur primarily during daylight hours and any construction-related illumination would be used for safety and security purposes only, in compliance with LAMC light intensity requirements. In addition, Project Design Feature AES-4 would require that construction lighting be shielded and directed downward (or on the specific

on-site feature to be lit) in such a manner as to preclude light pollution or light trespass onto adjacent properties. Construction lighting also would last only as long as needed in the short-term construction process. Thus, with the implementation of existing LAMC regulations, artificial light associated with construction activities would not significantly impact off-site residential uses or other sensitive receptors in the area, substantially alter the character of off-site areas surrounding the construction area, or interfere with the performance of an off-site activity. Construction activities are not anticipated to result in large expanses of flat, shiny surfaces that would reflect sunlight or cause other natural glare. Therefore, the Project would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area. Although Project impacts on construction light and glare would not exceed the threshold of significance, this evaluation is provided for informational purposes only and no significance finding is required under CEQA pursuant to SB 743 and ZI No. 2452.

Operation

Project Site signage would include building identification, wayfinding, and security markings. Commercial and residential signage would be similar to other signage in the Project vicinity and no off-site signage is proposed. Light sources would also include vehicles traveling to and from the Project Site. All proposed signage would conform to the size, type, and placement requirements of LAMC Article 4.4 (Sign Regulations). Original art mural signage would conform to the Mural Ordinance which prohibits commercial advertising. Pedestrian and publicly accessible areas would be well-lighted for security. Project lighting would also include ground level commercial lighting, common and private open area lighting, interior and outdoor lighting from commercial and residential areas, accent lighting, and mural lighting. Lighting fixtures on the Project Site would be shielded and directed toward the areas to be lit and away from adjacent areas and, thus, eliminate glare associated with directed visible light. Light sources from the Project's residential upper stories would be primarily associated with light from windows or lighting in the area of the pool deck. Security lighting would be provided along The Mews paseos, The Lookout plaza, and other pedestrian areas, and the Project may implement some architectural lighting for effect. Because parking would be contained within the subterranean garage or parking podium, the Project would not require the use of exterior parking lot lights or other floodlights. The Project's first story along Industrial Street and S. Alameda Street would introduce retail, including a grocery store, and restaurant uses, some of which would incorporate illuminated signs. Although no residential uses or other light sensitive receptors are presently located within the vicinity of the Project Site, the Project must comply with LAMC Section 14.4.4.E, which disallows signage that would increase light by three foot-candles at the nearest residentially zoned property and with LAMC Section 93.0117(b) that prohibits any exterior light source to cause more than two foot-candles of lighting intensity or generate direct glare onto exterior glazed windows or glass doors, elevated habitable porch, deck, or balcony on any property containing residential units.

In addition, Project Design Feature AES-4 would also require that operational lighting be shielded and directed downward (or on the specific on-site feature to be lit) in such a manner as to preclude light pollution or substantial light trespass onto adjacent properties.

New lighting generated by the Project's retail or restaurant uses would not be out of character with the active industrial neighborhood or with lighting currently generated by the existing McDonald's restaurant, which is adjacent to the south edge of the Project Site, or by other restaurants on E. 6th and 7th Streets. The pool deck, which is near the Para Los Niños Charter School would implement lighting for nighttime use. However, this light source would be directed onto the Project Site, would not generate a high level of light spill, and would not affect the Charter School, which is closed during evening hours. The Project would not introduce lighting that would be out of character with the area or have a substantial adverse effect on sensitive receptor sites. Although Project impacts associated with operational lighting would not exceed the threshold of significance, this evaluation is provided for informational purposes only and no significance finding is required under CEQA pursuant to SB 743 and ZI No. 2452.

Glare

Daytime glare can result from sunlight reflecting from a shiny surface that would interfere with the performance of an off-site activity, such as the operation of a motor vehicle. Reflective surfaces can be associated with window glass and polished surfaces, such as metallic or glass curtain walls and trim. The Project would not introduce new sources of glare that would be out of character with existing surrounding uses, including the adjacent McDonald's Restaurant. In accordance with the requirements of Project Design Feature AES-4 and the Central City North Community Plan, all exterior lighting would be shielded and directed onto driveways and walkways, and away from off-site areas. This would reduce nighttime glare potential that, otherwise, could occur when a light source is directly visible. Regarding daytime glare from reflected sunlight, Project Design Feature AES-3 requires that glass and other building materials used in exterior façades shall be low reflective and/or treated with a non-reflective coating in order to minimize glare. Prior to issuance of a building permit, the Department of Building and Safety would review the exterior building materials to confirm that they do not exceed the reflectivity of standard building materials, and would not cause significant glare impacts on motorists or any sensitive uses. Project Design Feature AES-5 requires commercial signage to utilize glare-free fixtures to complement architectural features and reduce the potential for light spillover. With the implementation of Central City North Community Plan policy requirements and Project Design Features AES-3, AES-4, and AES-5, the Project is not expected to create a new source of substantial light and glare that would affect daytime or nighttime viewing conditions. Although Project impacts associated with glare would not exceed the threshold of significance, this evaluation is provided for informational purposes only and no significance finding is required under CEQA pursuant to SB 743 and ZI No. 2452.

Shading

Threshold AES-4: A potentially significant impact would occur if the Project would shade shadow-sensitive uses more than three hours between the hours of 9:00 AM and 3:00 PM Pacific Standard Time (PST), between early November and mid-March or more than four hours between the hours of 9:00 AM and 5:00 PM Pacific Daylight Time (PDT) between early mid-March and early November.

Impact Statement AES-4: The Project’s shadows would extend to the north of Industrial Street during the winter months and would exceed the threshold of significance for a future residential use, however, pursuant to SB 743 and ZI No. 2452, this impact is not considered significant under CEQA.

The Project would replace the existing cold storage buildings, which range in height from approximately 35 feet to 56 feet, with a 7-story, maximum 85-foot-high building. The Project building would occupy approximately 750 feet along the Industrial Street frontage. Shading would occur along the north edge of the building throughout the day and to the west and east of the building during the morning and afternoon hours, respectively. According to the L.A. CEQA Threshold Guide, an 85-foot-high building would result in a maximum shadow of 258 feet during the Winter Solstice and 113 feet during the Summer Solstice.⁵ Shadow length multipliers and bearings for Los Angeles are shown in **Table 4.1-1, Shadow Length Multipliers and Bearings**, below.

**TABLE 4.1-1
SHADOW LENGTH MULTIPLIERS AND BEARINGS**

Time	Shadow Length Multiplier ^a	Project Height	Shadow Bearing	Project's Shadow Length
Winter Solstice				
9:00 AM	3.03	X 85 feet	45/West	258 feet
Noon	1.60	X 85 feet	0/North	136 feet
3:00 PM	3.03	X 85 feet	45/East	258 feet
Spring/Fall Equinox				
8:00 AM	2.18	X 85 feet	73/West	185 feet
Noon	0.72	X 85 feet	0/North	61 feet
4:00 PM	2.18	X 85 feet	73/East	185 feet
Summer Solstice				
9:00 AM	1.33 ^b	X 85 feet	85/West	113 feet
Noon	0.16	X 85 feet	0/North	14 feet
5:00 PM	1.33 ^b	X 85 feet	85/East	113 feet

Notes:

^a The shadow length multiplier for the Winter Solstice, Spring/Fall Equinox, and Summer Solstice at noon are derived from Exhibit A.3-1 of the City of Los Angeles CEQA Thresholds Guide, 2006

^b The shadow length multiplier for the Summer Solstice morning and afternoon is based on Exhibit A.3-3 of the City of Los Angeles CEQA Thresholds Guide, 2006.

As shown in Table 4.1-1, the Project would produce the longest shadows during the Winter Solstice, which would arc from west to east changing incrementally throughout the day from a maximum of 258 feet to a minimum of 136 feet. During seasons that generate longer shadows, it

⁵ City of Los Angeles CEQA Thresholds Guide, Exhibit A.3-2, *Maximum Shadow Length Generated for Given Source Heights during Winter Solstice*, and Exhibit A.3-3-2, *Maximum Shadow Length Generated for Given Source Heights during Summer Solstice*. <http://www.environmentla.org/programs/Thresholds/Complete%20Threshold%20Guide%202006.pdf>, accessed February 22, 2017.

is anticipated that the Project's shadow would cross Industrial Street, which has a 50-foot right-of-way. Shading evaluations for the Winter Solstice, Spring Equinox, Summer Solstice, and Fall Equinox for four time periods throughout each of these days are provided in Appendix B, Shade/Shadow Models, of this Draft EIR. As shown in the evaluations of the Winter Solstice, the shadows from the Project would extend onto portions of the property located to the north of Industrial Street. In the evaluation figures, the dashed line called "shadow line at ground level" represents the full extent of the shadow.

The anticipated mixed-use project to the north would incorporate a swimming pool deck at the top of a three-story podium, anticipated to be approximately 41 feet above street level. The swimming pool deck, which would be located in the east sector of the future off-site project, is considered a shade-sensitive use because it anticipates the enjoyment of the sun by recreational users. As such, the shadows (not the dashed line) illustrate the extent of shading relative to the 4th story pool deck. As shown in the analysis of the Winter Solstice, the Project would shade the south section of the pool deck during early morning (9:00 A.M.), mid-morning (11:00 A.M.), early afternoon (1:00 P.M.) and late afternoon (3:00 P.M.), with the longest shadows occurring in the late afternoon and the shortest shadows (covering only a portion of the pool deck) during the mid-day hour. However, because shading of a portion of the pool deck would occur for more than three consecutive hours between 9:00 A.M. and 3:00 P.M. at the Winter Solstice, the Project would exceed the City's threshold for the period from early November and to mid-March.

The shading analysis in Appendix B for the Spring Equinox, Summer Solstice, and Fall Equinox illustrate that the Project's shadows would not cross Industrial Street during the Spring Equinox and Fall Equinox and would be minimal during the Summer Solstice.

According to the L.A. CEQA Thresholds Guide, consequences of shadows upon land uses may be positive, including cooling effects during warm weather, or negative, such as the loss of natural light necessary for solar energy purposes or the loss of warming influences during cool weather. Shadow effects are dependent upon several factors, including the effects on facilities and operations sensitive to the effects of shading. These include routinely useable outdoor spaces associated with residential, recreational, or institutional uses, such as schools and convalescent homes. Commercial uses such as pedestrian-oriented outdoor spaces or restaurants with outdoor eating areas, nurseries, and existing solar collectors are also considered shade-sensitive. These uses are considered sensitive because sunlight is important to function, physical comfort, or commerce. The Project would not shade the adjacent Para Los Niños Charter School, which is located directly to the south of the Project Site. Existing land uses to the north are industrial uses that do not meet any of the criteria applicable to sensitive uses. Because no existing sensitive uses would be shaded, the Project would not exceed the threshold criteria during any times of the year. Although the Project would not cause shading of any shade-sensitive uses under existing conditions, future land uses to the north may contain sensitive uses that would experience shading in excess of the L.A. CEQA Threshold Guide's threshold. However, as discussed above, the Project would be located within a designated transit priority area and pursuant to SB 743 and ZI No. 2452, shadow effects are not considered significant under CEQA.

Consistency With Regulatory Framework

Threshold AES-5: The Project would have a potentially significant impact if it would substantially conflict with applicable guidelines and regulations related to aesthetics and visual quality where significant impacts on the environment are involved.

Impact Statement AES-5: The Project would be substantially consistent with applicable guidelines or regulations related to aesthetics or visual quality. Impacts would be less than significant.

City of Los Angeles General Plan Framework

An evaluation comparing the Project to applicable policies of the General Plan Framework is provided in **Table 4.1-2, Comparison of the Project to Applicable Policies of the General Plan Framework**, below. As shown in Table 4.1-2, The Project would be consistent with Objective 5.5 to enhance the livability of the neighborhood by upgrading the quality of development at the Project Site and improving the quality of the Project Site with new development that contains positive visual elements. The Project would also encourage pedestrian activity through its introduction of a residential population; grocery store, restaurant, and retail uses; incorporation of public art; and potential for art-related activities and shows. The proximity of exterior walls to the sidewalk, pedestrian entrances to retail/restaurant and entrance(s) from adjacent sidewalks, well-lit exteriors along the sidewalks, transparency between ground level retail uses and the sidewalk, screened parking within the podium and subterranean parking structure that would not be visible from public areas would meet Objective 5.8 of the General Plan Framework to reinforce or encourage a strong pedestrian orientation within regional centers. Also, the Project would provide 581 bicycle spaces, including 77 short-term spaces term and 504 long-term spaces, as well as a workspace (i.e., Bike Shop or Bike Spa) for bicycle maintenance. The provision of bicycle facilities would encourage bicycle use in lieu of motor vehicles. The Project would also be consistent with the General Plan policy to 5.8.4 to integrate signage with the architectural character of the Project. The Project would provide 14,537 sf of ground level open space, including landscaped paseos and a plaza, accessible to the public. As such, the Project would be consistent with Policy 6.4.8 regarding enhancement of the open space resources of the neighborhood because the Project would comply with the applicable urban design policies of the General Plan Framework.

**TABLE 4.1-2
COMPARISON OF THE PROJECT TO APPLICABLE POLICIES OF THE GENERAL PLAN FRAMEWORK**

Policy	Analysis of Project Consistency
Objective 5.5: Enhance the livability of all neighborhoods by upgrading the quality of development and improving the quality of the public realm.	Consistent. The Project would upgrade the livability of the area by providing a high-quality new development featuring positive visual elements, active street-oriented retail uses, public paseos (The Mews), landscaping, and street scape improvements.
Objective 5.8: Reinforce or encourage the establishment of a strong pedestrian orientation in designated neighborhood districts, community centers, and pedestrian-oriented subareas within regional centers, so that these districts and centers can serve as a focus of activity for the surrounding community and a focus for investment in the community.	Consistent. The Project would encourage pedestrian activity through its public plaza (The Lookout), paseos (The Mews), landscape improvements, sidewalk-oriented windows, and street level commercial uses.

Policy	Analysis of Project Consistency
<p>Policy 5.8.1: Buildings in pedestrian-oriented districts and centers should have the following general characteristics:</p> <ol style="list-style-type: none">An exterior building wall high enough to define the street, create a sense of enclosure, and typically located along the sidewalk;A building wall more-or-less continuous along the street frontage;Ground floor building frontage designed to accommodate commercial uses, community facilities, or display cases;Shops with entrances directly accessible from the sidewalk and located at frequent intervals;Well lit exteriors fronting on the sidewalk that provide safety and comfort commensurate with the intended nighttime use, when appropriate;Ground floor building walls devoted to display windows or display cases;Parking located behind the commercial frontage and screened from view and driveways located on side streets where feasible;Inclusion of bicycle parking areas and facilities to reduce the need for vehicular use; andThe area within 15 feet of the sidewalk may be an arcade that is substantially open to the sidewalk to accommodate outdoor dining or other activities.	<ol style="list-style-type: none">Consistent. The exterior walls of the Project would be aligned with the sidewalk along Industrial Street and S. Alameda Street, thus, defining the street edge along these streets.Consistent. The Project would provide a continuous building wall along Industrial and S. Alameda Streets.Consistent. The Project would provide ground level retail and restaurant uses along the street frontage.Consistent. Entrances to the Project's retail/restaurant uses and grocery store uses would be directly accessible from the adjacent sidewalks.Consistent. The Project would provide well-lit exteriors fronting on the sidewalk that provide pedestrian safety and comfort, commensurate with the intended use.Consistent. Ground floor commercial uses would provide display windows.Consistent. Parking would be located within the podium and subterranean structure that would not be visible from public areas.Consistent. The Project would provide 581 bicycle spaces, including 77 short-term spaces term and 504 long-term spaces, as well as a workspace (i.e., Bike Shop or Bike Spa) for bicycle maintenance.Consistent. Restaurants and uses along Industrial Street would have individual entrances from the street and would be complemented by a plaza and sidewalk "bump-out" extensions with landscaping, tables, and patio seating.
<p>Policy 5.8.4: Encourage that signage be designed to be integrated with the architectural character of the buildings and convey a visually attractive character</p>	<p>Consistent. Signage would be attractively designed and integrated into the architecture of the buildings. The Project would also comply with the applicable provisions of the LAMC..</p>
<p>Policy 6.4.8: Maximize the use of existing public open space resources at the neighborhood scale and seek new opportunities for private development to enhance the open space resources of the neighborhoods.</p>	<p>Consistent. The Project would provide public open space, including The Lookout plaza on Industrial Street. This plaza would be opposite a sidewalk "bump-out" extension that would have landscaping, seats, tables, and an artistic focal point and provide a staircase with secured access to the live/work terraces on Level 2. The Mews consists of two intersecting paseos on the ground level that provide a key connection that is accessible to the public between Industrial Street and Mill Street. A bump-out extension would be provided at the Industrial Street entrance to the paseos, demarking the entrance and enhancing landscaped open space. The Mews would include shaded, landscaped walkways that would incorporate art of different mediums, seating areas, and kiosks. Therefore, the Project would enhance the open space resources of the neighborhood.</p>

Source: ESA PCR 2017.

Central City North Community Plan

The Project Site is located within the boundaries of the Central City North Community Plan, which was updated by City Council on December 15, 2000. The Central City Community Plan area includes seven districts, of which the Project Site is nearest the Artists-in-Residence District, defined as situated between E. 1st Street, the Los Angeles River, E. 6th Street, and S. Alameda Street. More recent local plans, such as the Downtown Los Angeles Neighborhood Council's *Your Downtown LA Vision Plan (2015)* identifies the Artists-in-Residence District, or "Arts District," as extending south to E. 7th Street. The Community plan encourages the continued and expanded development of a thriving artists-in-residence community. Chapter V, Urban Design, of the Community Plan is to ensure that residential, commercial, and industrial projects and public

spaces and rights-of-way incorporate specific elements of good design. The intent is to promote a stable and pleasant environment. In commercial corridors, the emphasis is on the provision and maintenance of the visual continuity of streetscapes and the creation of an environment that encourages pedestrian and economic activity. An evaluation comparing the Project to applicable policies of the Central City North Community Plan is provided in **Table 4.1-3, Comparison of the Project to Applicable Policies of the Central City North Community Plan**, below.

**TABLE 4.1-3
COMPARISON OF THE PROJECT WITH THE APPLICABLE AESTHETIC POLICIES OF THE CENTRAL CITY NORTH
COMMUNITY PLAN**

Goals and Objectives	Analysis of Consistency
<p>Open Space Goal 5 – A community with sufficient open space with development to serve the recreational, environmental and health needs of the community and to protect environment and aesthetic resources.</p>	<p>Consistent: The Project would include approximately 14,537 sf of public open space. Areas accessible to the public include The Lookout, which is approximately 2,630 sf. The Lookout plaza on Industrial Street is opposite a sidewalk “bump-out” extension that would have landscaping, seats, tables, and an artistic focal point and provide a staircase with secured access to the live/work terraces on Level 2. The Mews is approximately 11,907 sf and consists of two intersecting paseos on the ground level that provide a key connection that is accessible to the public between Industrial Street and Mill Street. The Project would provide a bump-out sidewalk extension to the Industrial Street entrance to the paseos that would extend landscaping and open space. The Mews would include shaded, landscaped walkways that would incorporate art of different mediums, seating areas, and kiosks.</p>

Chapter V Urban Design

Design Policies for Individual Projects:

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

2. Height and Building Design: The mass, proportion, and scale of all new buildings and remodels shall be at a pedestrian scale. The design of all proposed projects shall be articulated to provide variation and visual interest, and enhance the streetscape by providing continuity and avoiding opportunities for graffiti.
 Building materials shall be employed to provide relief to bland untreated portions of exterior buildings facades. The purpose of these provisions is to ensure that a project avoids large sterile expanses of building walls, is designed in harmony with the surrounding neighborhood, and creates a stable environment with a pleasant and desirable character.
 Accordingly, the following policies are proposed:
 - a. Requiring the use of articulations, recesses, surface perforations, and porticoes to break up long, flat building facades;
 - b. Providing accenting, complimentary building materials to building facades;

Consistent: The Project is oriented toward Industrial Street, the primary street serving the Project Site. Vehicle access for residents and visitors is limited to one driveway on Industrial Avenue to reduce potential pedestrian/vehicle conflicts.

Consistent: The Project would be designed at a pedestrian scale and articulated with street-oriented retail, grocery store, and restaurant entrances at the sidewalk level. The facades would be articulated with upper story step backs and open space areas, the use of color variations to create patterned design, entrance plaza, such as The Lookout entrance plaza off Industrial Street.

- a. **Consistent.** The Project would implement articulations, recesses, surface openings to break up long, flat building facades;
- b. **Consistent.** The Project would use color variations/patterns, high quality building materials, and well-placed murals to accent building facades;
- c. **Consistent.** A variety of architectural features, including step backs, creative use

Goals and Objectives	Analysis of Consistency
<p>c. Maximizing the applications of architectural features or articulations to building facades;</p> <p>d. Designating architecturally untreated facades for signage;</p> <p>e. Screening of mechanical and electrical equipment from public view;</p> <p>f. Requiring the enclosure of trash areas for all projects;</p> <p>g. Requiring freestanding walls to use articulation, recesses, surface perforations, porticoes to break up long freestanding walls.</p>	<p>of open space and balconies would articulate building facades;</p> <p>d. Consistent. Signage would be incorporated into the building design;</p> <p>e. Consistent. Mechanical and electrical equipment would be screened from public view;</p> <p>f. Consistent. Trash collection areas would be located within the building interior.</p> <p>g. Not Applicable. The Project design does not include freestanding walls.</p>
<p>3. PARKING STRUCTURES: Parking structures shall be integrated with the design of the buildings they serve through:</p> <p>a. Designing parking structure exteriors to match the style, materials and colors of the main building;</p> <p>b. Maximizing commercial uses, if appropriate, on the ground floor;</p> <p>c. Landscaping to screen parking structures not architecturally integrated with the main building;</p> <p>d. Utilizing decorative walls and landscaping to buffer residential uses from parking structures.</p>	<p>Consistent. Parking would be provided in a four-level parking structure with three levels below grade and one level at grade.</p> <p>a. Consistent. The podium parking levels would be incorporated into the building design.</p> <p>b. Consistent. The ground level of the podium along Industrial Street and S. Alameda Street would be faced with retail, grocery store, and restaurant uses.</p> <p>c. Not applicable. The parking structure is architecturally integrated with the main building;</p> <p>d. Not applicable. There are no adjacent residential uses.</p>
<p>4. SURFACE PARKING LANDSCAPING</p>	<p>Not Applicable. No surface parking lots are incorporated into the Project design.</p>
<p>5. LIGHT AND GLARE</p> <p>a. Installing on-site lighting along all pedestrian walkways and vehicular access ways;</p> <p>b. Shielding and directing of on-site lighting onto driveways and walkways, directed away from adjacent residential uses.</p>	<p>a. Consistent. Lighting would be provided along all pedestrian walkways, including The Mews paseos, entrances and ingress/egress driveways.</p> <p>b. Consistent. All exterior lighting would be shielded and directed onto driveways and walkways, directed away from off-site areas.</p>
<p>6. MIXED USE: Maximize commercial uses on the ground floor by requiring 10% of commercial development to serve needs of the residential portion of the buildings.</p>	<p>Consistent. The Project would provide 61,200 sf of commercial floor area. Of this 15,815 sf would be used for arts and production, which would serve residents in live/work units. The grocery store, occupying 15,102 would also serve on-site residents. As such, resident-serving commercial uses would comprise approximately 51 percent of commercial floor area and exceed the minimum requirement of 10 percent.</p>
<p>Community Design and Landscaping Guidelines</p>	
<p>A. ENTRYWAY IMPROVEMENTS</p> <p>1. Provide improvements along principal streets, at major identified intersections and edges which clearly distinguish these as major entries to the City. Such improvements may include elements such as signage, landscaping, vertical pylons and/or distinctive treatments.</p>	<p>Consistent. The Project would incorporate public art, including a tall mural at the corner of S. Alameda Street and Industrial Street that would distinguish this intersection and identify the relationship of this location to the surrounding Arts District.</p>

Goals and Objectives

Analysis of Consistency

B. STREETScape

1. Provide for a coordinated streetscape design at identified entries to the Plan Area that includes street lighting, street furniture, and sidewalk/crosswalk improvements in the public right-of-way.
2. Establish a comprehensive streetscape and landscape improvement program for identified corridors and districts that will set standards and priorities for the selection and installation of, but not limited to the following:
 - A. Street Trees
 - B. Street Lighting
 - C. Streetscape Elements
 - D. Public Signage
3. Identify locations for, and develop landscaped median strips within commercial streets, provided that there is adequate space, traffic flow, site access, and the proper street cross section to insert medians.

C. STREET TREES

1. Select species which; (a) enhance the pedestrian character, and convey a distinctive high quality visual image for the streets, (b) are drought and smog tolerant, fire resistant, and complement existing trees.
2. Establish a hierarchy for the street trees which shall include:
 - a. MAJOR ACCENT TREES. These trees should be located at entry locations, intersections, and activity centers.
 - b. STREET TREES. Select specific species to be the common tree for street frontages. A single flowering species may be selected for all residential neighborhoods and commercial districts or different species selected to distinguish one neighborhood, district, or street from one another. In residential neighborhoods, the trees should be full, to provide shade and color. In commercial districts, the trees should provide shade, but be more transparent to promote views of store fronts and signs.
 - c. ORNAMENTAL OR SPECIAL PLANTINGS. At special areas along the street frontages, such as linkages to pedestrian walkways and plazas and outdoor dining areas, ornamental trees providing shade and color should be utilized to emphasize and focus attention to those places.
3. Provide for the installation of street trees along public sidewalks defining the types and spacing in accordance with a Street Tree Master Plan.

D. STREET FURNITURE

1. Install street furniture that encourages pedestrian activity or physical and visual access to buildings and which is aesthetically pleasing, functional and comfortable, including such elements as bus and pedestrian benches, bus shelters, trash receptacles, newspaper racks, bicycle racks, public telephones, landscaped planters, drinking fountains, and bollards. Priority should be given to pedestrian oriented areas.
2. Provide for the use of kiosks or other street furniture.

Not Applicable. The intersection of S. Alameda Street and Industrial Street is not an identified entry to the Plan Area. However, the Project would upgrade the area with distinctive new development that would complement the industrial architectural theme of the nearby historical industrial buildings, and incorporate street trees, public art, and street-oriented commercial uses.

Consistent. At present, the Project Site's S. Alameda Street frontage contains two street trees that would be replaced at a 2:1 ratio in accordance with the City's Street Tree Ordinance and Department of Public Works, Bureau of Street Services, Urban Forestry Division requirements (i.e., four trees). No street trees are currently located on Industrial Street. The Project would include planting 17 trees within Industrial Street right-of-way for a total of 21 street trees, which would exceed the Bureau of Street Services tree removal and replacement requirements. An additional 102 trees would be planted within the Project Site.

Consistent. The Lookout plaza on Industrial Street is opposite a sidewalk "bump-out" extension that would have landscaping, seats, tables, and an artistic focal point. The Mews consists of two intersecting paseos that would also incorporate seating areas and kiosks. The Project would provide 581 bicycle spaces, including 77 short-term spaces term and 504 long-term spaces, as well as a workspace (i.e., Bike Shop or Bike Spa) for bicycle maintenance. The provision of bicycle facilities would encourage bicycle use in lieu of motor vehicles

Goals and Objectives	Analysis of Consistency
<p>E. STREET LIGHTING</p> <ol style="list-style-type: none">1. Install new street lights in commercial districts which are pedestrian oriented, attractively designed, compatible in design with facades and other street furniture, to provide adequate visibility, security, and a festive night time environment.2. Establish a consistent street lighting type in the different neighborhoods utilizing a light standard that is compatible with the historic commercial fabric and coordinated with an overall street furniture and graphics/signage program.3. Any new street lighting or pedestrian lighting system built in the public right-of-way must be designed to currently adopted City standards. Equipment must be tested and approved by the Bureau of Street Lighting.4. New lighting systems will be designed to minimize glare and "light trespass".5. No new or replacement street tree shall be planted closer than 20 feet from an existing or proposed streetlight. Exceptions will be considered by the Bureau of Street Lighting after reviewing mature tree characteristics.6. All new or replacement lighting systems require due process. Street lighting is installed through the formation of special assessment districts. Where any increase in special assessment is anticipated, public hearings are required.7. Ornamental or historic poles cannot be removed without the prior approval of the City's Cultural Affairs Commission.	<p>Consistent. All new lighting would be pedestrian oriented to ensure safety along the Project's commercial frontage, entrances along Industrial Street, and within the publicly-accessible The Mews, The Lookout plaza, and sidewalk bump-outs. All replacement of existing light standards would be conducted in accordance with the requirements of the Bureau of Street Lighting and replacement and new street trees will be planted on the City's right-of-ways as directed by the Department of Public Works, Bureaus of Street Services and Street Lighting.</p>
<p>F. SIDEWALKS/PAVING</p> <ol style="list-style-type: none">1. Re-pave existing sidewalks and crosswalks in principal commercial districts such as Chinatown with brick pavers, concrete, or other safe, non-slip materials to create a distinctive pedestrian environment and, for crosswalks, to visually and physically differentiate these from vehicle travel lanes and promote continuity between pedestrian sidewalks.2. Develop sidewalk "pull-outs" at intersections, where they do not adversely impact traffic flow or safety, by extending the sidewalk to the depth of a parking stall, to accommodate landscaping and street furniture and reduce the width of the crosswalk.	<p>Consistent. Sidewalk improvements would be made commiserate with the new development. Special pavement treatment would be provided at building entrances and sidewalk "bump-out" extensions into Industrial Street opposite The Lookout open space and the Industrial Street entrance to the paseos, which would enhance the Project's open space and street frontage.</p>
<p>G. SIGNAGE</p> <ol style="list-style-type: none">1. Establish a consistent design for all public signage, including fixture type, lettering, colors, symbols, and logos designed for specific areas or pathways.2. Provide for distinctive signage which identifies principal entries to unique neighborhoods, historic structures and districts, and public buildings and parks.3. Ensure that public signage complements, and does not detract from adjacent commercial and residential uses and that it enhances designated historic sites and districts.4. Provide for signage which uniquely identifies the principal commercial areas of the plan area including but not limited to Chinatown.	<p>Consistent. Project signage would include building identification, wayfinding, and security markings. Commercial and residential signage would be similar to other signage in the Project vicinity and no off-site signage is proposed. All proposed signage would conform to the size, type, and placement requirements of the LAMC.</p>

Goals and Objectives

Analysis of Consistency

H. PUBLIC OPEN SPACE AND PLAZAS

1. Establish public open space standards that will guide the design of new public plazas and open spaces; including the consideration of the siting of open space (to maximize pedestrian accessibility and circulation, solar exposure or protection), adjacency to pedestrian routes and other open spaces, and appropriate plant and hardscape materials.

Consistent. The Project would include open space accessible to the public, including The Lookout plaza along Industrial Street and The Mews. The Lookout plaza would be approximately 2,630 sf and would be opposite a sidewalk "bump-out" extension that would have landscaping, seats, tables, and an artistic focal point and provide a staircase with secured access to the live/work terraces on Level 2. The Mews would be approximately 11,907 sf and consist of two intersecting paseos on the ground level that provide a key connection that is accessible to the public between Industrial Street and Mill Street. The Project would provide a bump-out sidewalk extension to the Industrial Street entrance to the paseos that would extend landscaping and open space. The Mews would also include shaded, landscaped walkways that would incorporate art of different mediums, seating areas, and kiosks.

Source: ESA PCR, 2017.

The Project would conform to the applicable urban design goals and objectives of the Central City North Community Plan. Specifically, the Project would provide a modern, arts-oriented use that would be complementary to the industrial setting and objectives of the Arts District. The Project would activate the pedestrian environment, provide new open space and pedestrian amenities, and include bicycle parking to reduce vehicle dependency. As shown in Table 4.1-3, the Project would be consistent with the applicable urban design policies set forth in the Central City North Community Plan.

Citywide Design Guidelines

The Project would be consistent with the applicable policies of the Commercial Citywide Design Guidelines for Pedestrian-Oriented/Commercial & Mixed-Use Projects (Design Guidelines). As summarized in **Table 4.1-4, Comparison of the Project to Applicable Policies of the Citywide Design Guidelines**, the Project would be consistent with applicable Site Plan policies related to site planning and neighborhood linkage by providing a strong wall along the street front, landscaped open space, and primary entrances along the street front. The Project would also enhance neighborhood linkage with the provision of intersecting paseos that connect Industrial Street with Mill Street. The Project would be consistent with Design Guideline policies regarding entrances by providing entryways into ground level grocery store, retail and restaurant uses from adjacent sidewalk. The Project would also be consistent with policies addressing the relationship of the Project to surrounding buildings and would be consistent with the scale and theme of the adjacent ROW DTLA complex, an adaptive reuse of 98-year-old historic industrial buildings.

**TABLE 4.1-4
 COMPARISON OF THE PROJECT TO APPLICABLE POLICIES OF THE CITYWIDE DESIGN GUIDELINES**

Policy	Analysis of Project Consistency
Objective 1. Consider Neighborhood Context and Linkages in Building and Site Design	
Site Planning	
<p>1. Create a strong street wall by locating building frontages at the required setback or, where no setback requirement exists, at the front property line. Where additional setback is necessary or a prevailing setback exists, activate the area with a courtyard or "outdoor room" adjacent to the street by incorporating pedestrian amenities such as plazas with seating or water features, for example.</p>	<p>Consistent. The Project would form a strong wall along the adjacent street frontages. The deep setback on Industrial Street would accommodate The Lookout plaza, a public open space area. The Lookout would be opposite a sidewalk "bump-out" extension that would have landscaping, seats, tables, and an artistic focal point.</p>
<p>2. Provide direct paths of travel for pedestrian destinations within large developments. Especially near transit lines, create primary entrances for pedestrians that are safe, easily accessible, and a short distance from transit stops</p>	<p>Consistent: The Project would provide multiple pedestrian entrances into the Project Site. Retail, restaurant, and grocery store uses would be aligned with the adjacent sidewalks and would allow for direct access to these uses from the street. Two intersecting paseos (The Mews) on the ground level that provide a key connection that is accessible to the public between Industrial Street and Mill Street.</p>
<p>3. Maintain existing alleys for access. Avoid vacating alleys or streets to address project-specific design challenges.</p>	<p>Not Applicable: The Project does not include or remove alleys and, as such this policy is not applicable.</p>
<p>4. In dense neighborhoods, incorporate passageways or paseos into mid-block developments, particularly on through blocks, that facilitate pedestrian and bicycle access to commercial amenities from adjacent residential areas. Maintain easy access to commercial areas from adjacent residential neighborhoods to avoid unnecessary or circuitous travel.</p>	<p>Consistent. Two landscaped, intersecting paseos (The Mews) on the ground level that provide a public connection between Industrial Street and Mill Street.</p>
<p>5. Activate mid-block passageways, pedestrian walkways, or paseos using water features, pedestrian-level lighting, murals or artwork, benches, landscaping, or special paving so that they are safe and visually interesting spaces</p>	<p>Consistent. The Mews (two intersecting paseos) would include shaded, landscaped walkways that would incorporate art of different mediums, seating areas, and kiosks.</p>
<p>6. Place buildings around a central common open space to promote safety and the use of shared outdoor areas. In mid- and high-rise buildings, podiums between buildings and rooftop areas can be used as common areas.</p>	<p>Consistent. The Lookout, a proposed plaza on Industrial Street, would provide common and publicly-accessible open space with landscaping, seats, tables, and an artistic focal point. A staircase with secured access will lead to the live/work terraces on Level 2.</p>
<p>7. Place public use areas such as restaurant seating, reception and waiting areas, lobbies, and retail, along street-facing walls where they are visible to passersby.</p>	<p>Consistent. The design of the Project emphasizes pedestrian scale features such as landscaping, restaurant and retail and storefronts or lobby entrances along Industrial Street that would be highly visible to passersby.</p>
<p>8. Place drive-thru elements away from primary site corners and adjacent primary streets.</p>	<p>Not Applicable: The Project does not include a drive-thru and, as such, this policy is not applicable.</p>
<p>9. At gas stations, car washes, and drive-thru establishments, ensure that separate structures on the site have consistent architectural detail and design elements to provide a cohesive project site.</p>	<p>Not Applicable: The Project does not include a car wash or gas station and, as such, this policy is not applicable.</p>

Policy

Analysis of Project Consistency

10. Install bicycle racks and lockers, especially in multi-tenant commercial or mixed-use buildings located on Major or Secondary highways where bike routes are existing or planned. Ensure bicycle racks are placed in a safe, convenient, and well-lit location to encourage alternative modes of transport for employees and consumers with small purchases.

Consistent. No bike routes are planned on the adjacent S. Alameda Street and Industrial Street. However, the Project would provide 581 bicycle spaces, including 77 short-term spaces term and 504 long-term spaces, as well as a workspace (i.e., Bike Shop or Bike Spa) for bicycle maintenance. The provision of bicycle facilities would encourage bicycle use in lieu of motor vehicles.

11. Orient the long side of large-format retail establishments parallel to the public street to physically define the street edge. Large format retail with multiple tenants should provide distinct entrances and storefronts to improve site design flexibility for future retail uses at the same location.

Not Applicable. The Project does not incorporate large format retail uses and, as such, this policy is not applicable. However, the design of the commercial component would allow for access to restaurant, grocery store, or retail uses directly from the street level.

Entrances

1. Provide a logical sequence of entry and arrival as part of the site's design. Special entry treatments such as stamped or colored concrete and special planting and signage can be used to enhance entries and guide pedestrians.

Consistent. Entry treatments include the distinctive The Lookout plaza at the main entrance. Landscaping and sidewalk bump-outs, with art, shade, and seating, would create a logical sequence of entry and arrival as part of the Project Site's design.

2. Entries should be designed according to simple and harmonious proportions in relationship to the overall size and scale of the building. Ensure that pedestrian entries provide shelter year-round.

Consistent. Pedestrian entrances to ground level retail, restaurant, and grocery store uses would be at the street level would be proportional to the size and scale of the Project. Multiple entrances to live/work units would also be available throughout the Project Site. Entrances would be designed to provide shelter commiserate with the overall design of the building.

3. Ensure that the main entrance and entry approach can accommodate persons of all mobility levels.

Consistent. All entrances would be designed to accommodate persons of all mobility levels in accordance with ADA standards.

4. Promote pedestrian activity by placing entrances at grade level and unobstructed from view from the public right-of-way. Avoid sunken entryways below street level. Where stairs are located near the main entrance, highly visible and attractive stairs should be placed in a common area such as an atrium or lobby and integrated with the predominant architectural design elements of the main building.

Consistent. The main entrances to street level retail, restaurant, grocery store, and live/work units would be at grade level and unobstructed from view from the public right-of-way.

5. Ground floor retail establishments in mixed-use projects should maintain at least one street-facing entrance with doors unlocked during regular business hours to maintain an active street presence.

Consistent. The ground floor retail, restaurant, and grocery store would be directly accessible from adjacent streets during business hours.

6. Ensure that commercial ground floor uses provide clear and unobstructed windows, free of reflective coatings and exterior mounted gates and security grills. Ensure that landscaping does not create a barrier between pedestrians and the building frontage, nor views into buildings at the ground floor.

Consistent. The retail and restaurant components of the Project would provide clear and unobstructed windows, free of reflective coatings and exterior mounted gates and security grills. Landscaping would not create a barrier between pedestrians and the building frontage, or obstruct views into buildings at the ground level.

Policy	Analysis of Project Consistency
7. Install electronic security to avoid the need for unsightly security grills and bars. If such security measures are necessary, ensure that security grills and bars recess completely into pockets at the side or top of storefronts so as to conceal the grills when they are retracted.	Consistent. The retail, restaurant, and grocery store components of the Project would provide clear and unobstructed windows, free of exterior mounted gates and security grills.
Relationship to Adjacent Buildings	
1. Ensure that new buildings are compatible in scale, massing, style, and/or architectural materials with existing structures in the surrounding neighborhood. In older neighborhoods, new developments should likewise respect the character of existing buildings with regard to height, scale, style, and architectural materials.	Consistent. The Project would be consistent in style, scale, height and architectural aspect with the historic, approximately 7-story, 98-year-old ROW DTLA buildings at the southwest corner of S. Alameda Street and 7th Avenue, just across S. Alameda Street from the Project Site. Other taller buildings in the area include the approximately 6-story (in addition to approximately 30-foot-high cooling tower) ETO building to the north of the Project Site on Mill Street.
2. Soften transitions between commercial districts and immediately surrounding residential neighborhoods with respect to building height, massing, and negative impacts of light and noise. Plant trees, shrubs, or vines to grow between property lines.	Not Applicable. No residential neighborhoods immediately surround the Project Site and, therefore, this policy is not applicable.
3. Where commercial or multi-family projects are adjacent to single-family zones, provide a sensitive transition by maintaining a height compatible with adjacent residential buildings. Mitigate negative shade/shadow and privacy impacts by stepping back upper floors and avoiding direct views into neighboring single-family yards.	Not Applicable: No residential neighborhoods immediately surround the Project Site and, therefore, this policy is not applicable.
4. In pedestrian-oriented commercial areas with predominantly smaller storefronts (especially when a project is built over two or more lots), apply vertical breaks and pedestrian-scaled storefront bays to prevent monolithic "box-like" buildings and maintain a storefront rhythm consistent with surrounding buildings.	Not Applicable: The Project Site is not located in an area concentrated with smaller storefronts and, therefore, this policy is not applicable. However, the Project includes street-oriented commercial uses, paseos, and a street-oriented plaza on Industrial Street that would maintain a storefront rhythm along the street front.
5. Break up the floor space in large retail developments to add variety, interest, and built-in flexibility to accommodate future uses of differing scales.	Not Applicable: The Project is not a large scale retail development but a mixed live/work, mixed use incorporating retail, restaurant, and grocery store uses and, therefore, this policy is not applicable.

Objective 2. Employ High Quality Architecture to Define the Character of Commercial Districts

Pedestrian Scale

1. Maintain a human scale rather than a monolithic or monumental scale. High-rise buildings in particular should take care to address pedestrian scale at the ground floor.	Consistent. The building is designed to create a pedestrian scale with ground level entrances to retail/restaurant and grocery store uses, street-oriented retail and restaurant uses, paseos, street trees and other dense landscaping.
2. At entrances and windows, include overhead architectural features such as awnings, canopies, trellises, or cornice treatments that provide shade and reduce daytime heat gain, especially on south-facing façades.	Consistent. Dense landscaping along Industrial Street and in The Mews at the south edge of the building would provide shade and reduce daytime heat gain. The building would meet the requirements of CCR Title 24, Section 120.7 to reduce heat transfer exterior walls.

Policy	Analysis of Project Consistency
<p>3. Differentiate the ground floor from upper floors. Changes in massing and architectural relief add visual interest and help to diminish the perceived height of buildings.</p>	<p>Consistent. The Project's ground level would be highly differentiated from upper stories with street level retail, restaurant, grocery store, plaza and paseos.</p>
<p>Building Façade and Form</p>	
<p>1. Vary and articulate the building façade to add scale and avoid large monotonous walls.</p>	<p>Consistent. As described above, the use of step backs, street oriented plaza, variation in surface treatment such as balconies, incorporation of murals, and the distinctive use of varied colors and color patterns would vary and articulate the building façade.</p>
<p>2. Architectural elements such as entries, porticoes, cornices, and awnings should be compatible in scale with the building massing and should not be exaggerated or made to appear as a caricature of an historic architectural style.</p>	<p>Consistent. Street level pedestrian entrances would be integrated into the overall, unique design of the building. The architectural style of the building would not emulate any other architectural style.</p>
<p>3. Layer building architectural features to emphasize certain features of the building such as entries, corners, and the organization of retail or office spaces.</p>	<p>Consistent. The building's architectural design, variety of materials, and placement of public art and murals would emphasize the function of the buildings as component of the Arts District.</p>
<p>4. Incorporate and alternate different textures, colors, materials, and distinctive architectural treatments that add visual interest while avoiding dull and repetitive façades.</p>	<p>Consistent. The Project design incorporates different textures, colors, materials, and distinctive architectural treatments that would add visual interest.</p>
<p>5. Incorporate windows and doors with well-designed trims and details as character-defining features to reflect an architectural style or theme consistent with other façade elements.</p>	<p>Consistent. The ground floor's retail, restaurant, and grocery store would have direct entrances from the street and uniform style consistent with the architectural theme of the building.</p>
<p>6. Treat all façades of the building with an equal level of detail, articulation, and architectural rigor.</p>	<p>Consistent. All building facades, including the east and south walls that face existing off-site land uses, would be design and articulated to maintain architectural vigor.</p>
<p>7. Integrate varied roof lines through the use of sloping roofs, modulated building heights, stepbacks, or innovative architectural solutions.</p>	<p>Consistent. The building height would be generally level and consistent with the pervasive industrial theme of the community. Other innovative features complementary to the industrial setting, such as a distinctive architectural feature that evokes a "cooling tower" element at the southwest corner of the building fronting S. Alameda Street represents an architectural solution consistent with the setting.</p>
<p>8. Reinforce existing façade rhythm along the street where it exists by using architectural elements such as trim, material changes, paved walkways, and other design treatments consistent with surrounding buildings.</p>	<p>Consistent. The Project's façade treatment would be enhanced by murals and other public art, landscaping, color variations, step backs and other material changes consistent with the surrounding industrial setting.</p>
<p>9. In mixed-use projects, orient windows in street-facing units toward public streets, rather than inward, to contribute to neighborhood safety and provide design interest.</p>	<p>Consistent. Retail, restaurant and grocery store uses would be oriented to adjacent Industrial Street and S. Alameda Street.</p>
<p>10. In mixed-use buildings, ensure that balconies are sized and located to maximize their intended use for open space. Avoid "tacked on" balconies with limited purpose or function.</p>	<p>Consistent. Balconies would be sized and located to enhance the Project's design theme.</p>

Policy	Analysis of Project Consistency
Building Materials	
1. Approach character-defining details in a manner that is true to a style of architecture or common theme.	Consistent. Primary exterior building materials have been selected to define a modern architectural theme.
2. Apply trim, metal- and woodwork, lighting, and other details in a harmonious manner, consistent with the proportions and scale of the building(s).	Consistent. All trim, metal- and woodwork, lighting, and other details in would be incorporated in a harmonious manner, consistent with the proportions and scale of the building.
3. Select building materials such as architectural details and finishes that convey a sense of permanence. Quality materials should be used to withstand the test of time regardless of architectural style	Consistent. Building materials would be high-quality and consistent with the theme and architectural style of the building, which is intended to convey distinction and a sense of permanence.
4. Apply changes in material purposefully and in a manner corresponding to variations in building mass.	Consistent. Building materials would applied purposely and would be consistent with the Project's architectural character and building mass.
5. Use white or reflective paint on rooftops and light paving materials to reflect heat away from buildings and reduce the need for mechanical cooling.	Consistent. As discussed in the Draft EIR Section 4.5, <i>Greenhouse Gas Emissions</i> , the Project would be designed to meet the standards of the USGBC LEED Silver level and compliance with Title 24 California Green Building Standards related to insulation and reductions in heat exchange in high-rise buildings. The Project's energy reduction features include a "cool" roof, also known as reflective roofs that are designed to reflect radiation from the sun, reducing heat transfer into the building.
6. Use exterior surface materials that will reduce the incidence and appearance of graffiti.	Consistent. Exterior surface materials and art would reduce the incidence and appearance of graffiti.
7. Fences should incorporate changes in materials, texture, and/or landscaping to avoid solid, uninterrupted walls. Avoid materials such as chain link, wrought iron spears, and cyclone.	Consistent. Any protective fencing along the south edge of the Project Site and The Mews paseos would be consistent with the architectural and landscape theme of the Project.
8. Utilize landscaping to add texture and visual interest at the street level. Where limited space is available between the building and the public right-of-way, incorporate climbing vegetation as a screening method.	Consistent. The Project would provide new landscaping along S. Alameda Street, Industrial Street, and along the interconnected paseos.
Objective 3. Augment the Streetscape Environment with Streetscape Amenities	

Storefront Character

1. In multi-tenant buildings, ensure that storefronts convey an individual expression of each tenant's identity while adhering to a common architectural theme and rhythm.	Consistent. The Project would not be primarily a retail use but mixed use that incorporates retail, restaurant, and grocery store uses along an active street front. Individual uses would be consistent with the overall architectural and functional purpose with individual expression of each tenant's identity.
2. Design storefronts with a focus on window design to create a visual connection between the interior and exterior.	Consistent. All storefronts incorporated into the Project would include glazing to promote openness and allow visibility of indoor spaces and activities.
3. Incorporate traditional storefront elements in new and contemporary commercial buildings by including a solid base for storefront windows. Use high quality durable materials such as smooth stucco or concrete, ceramic tile, or stone for the window base.	Not Applicable. The Project is a mixed-use live/work development with ground level commercial uses and is not primarily a retail use with traditional storefronts and, as such, this policy is not applicable.

Policy	Analysis of Project Consistency
4. Provide shelter from the sun and rain for pedestrians along the public right-of-way where the buildings meet the street. Extend overhead cover across driveways or provide architecturally integrated awnings, arcades, and canopies.	Consistent. The Project would incorporate landscaping and standard entrance covers to provide shelter from sun or rain. Driveways would be internal to the Project.
5. Align awnings with others on the block, particularly the bottom edge of the awning. Coordinate the awning color with the color scheme of the entire building front. 6 Ensure that store entrances are recessed, not flush, with the edge of the building façade to articulate the storefront and provide shelter for persons entering and exiting	Not Applicable. No other commercial uses or use of awnings occurs along Industrial Street and S. Alameda Street in the Project vicinity and, therefore, this policy is not applicable.
6. Ensure that store entrances are recessed, not flush, with the edge of the building façade to articulate the storefront and provide shelter for persons entering and exiting.	Consistent. Entrances would be defined by moderately recesses in keeping with the architectural design of the building.
Sidewalks	
1. Where a sidewalk does not currently exist, establish a new predominantly straight sidewalk along the length of the public street frontage. Create continuous and predominantly straight sidewalks and linear open space. Reconstruct abandoned driveways as sidewalks. 1.	Not Applicable. Sidewalks currently exist around the perimeter of the Project and, therefore, this policy is not applicable.
2. On Major and Secondary Highways, provide a comfortable sidewalk and parkway; at least 10 feet in width to accommodate pedestrian flow and activity, but wider if possible. Sidewalks and parkway widths on Local and Collector streets may be narrower, but generally not less than nine feet wide.	Consistent. New sidewalks on S. Alameda Street would be consistent with Secondary Highway standards.
3. Plant parkways separating the curb from the sidewalk with ground cover, low-growing vegetation or permeable materials that accommodate both pedestrian movement and car doors. Brick work, pavers, gravel, and wood chips are examples of suitable permeable materials.	Consistent. Street fronts would include street trees and landscaping in compliance with City of Los Angeles Urban Forestry requirements. Vegetation would include native and drought tolerant vegetation and water efficient irrigation systems would be implemented.
4. Create a buffer zone between pedestrians, moving vehicles, and other transit modes by the use of landscaping and street furniture. Examples include street trees, benches, newspaper racks, pedestrian information kiosks, bicycle racks, bus shelters, and pedestrian lighting.	Consistent. Street trees would provide a buffer between the adjacent streets and the sidewalk. Other features, such as sidewalk bumps-outs into the right-of-way, would include landscaping, seats, tables, and an artistic focal point to emphasize the human/roadway buffer. The Project would include 77 short-term bicycle parking spaces.
5. Plant street trees at the minimum spacing permitted by the Division of Urban Forestry, typically one tree for every 20 feet of street frontage, to create a consistent rhythm. Broadleaf evergreen and deciduous trees should be used to maintain a continuous tree canopy. Shade producing street trees may be interspersed with an occasional non-shade tree.	Consistent. The provision of street trees would exceed City of Los Angeles Urban Forestry requirements and provide a continuous canopy along the street front.
6. In high pedestrian use areas, install tree guards to protect tree trunks from damage.	Consistent. New street trees would exceed City of Los Angeles Urban Forestry requirements. If required, the Project would install tree guards.

Policy	Analysis of Project Consistency
7. Ensure that new developments adjacent to transit stops invest in pedestrian amenities such as trash receptacles and sheltered benches or seating areas for pedestrians that do not intrude into the accessible route.	Consistent. Amenities provided along adjacent sidewalks would be located to not intrude into the accessible route.
8. Provide path lighting on sidewalks to encourage and extend safe pedestrian activities into the evening.	Consistent. Lighting would be provided in the Project Site's open space and paseo areas to extend pedestrian activities into the evening.
Objective 4: Minimize the Appearance of Driveways and Parking Areas	
Off-Street Parking and Driveways	
1. Place on-site parking to the side or rear of buildings so that parking does not dominate the streetscape.	Consistent. Parking for the Project would be located within the subterranean garage and podium.
2. Maintain continuity of the sidewalk by minimizing the number of curb cuts for driveways and utilizing alleys for access and egress. Where alleys do not exist, concentrate curb cuts at side streets or mid-block.	Consistent. The Project would minimize curb cuts by locating a primary two-way access driveway for tenants and visitors on Industrial Street and a single one-way driveway for deliveries along the south edge of the property between Mill Street and S. Alameda Street.
3. Where alternatives to surface parking are not feasible, locate parking lots at the interior of the block, rather than at corner locations. Reserve corner locations for buildings.	Not Applicable. Parking for the Project would not be located in surface parking lots and, therefore, this policy is not applicable.
4. Where the parking lot abuts a public sidewalk, provide a visual screen or landscaped buffer between the sidewalk and the parking lot.	Not Applicable. The Project does not include surface parking or parking lots and, therefore, this policy is not applicable.
5. When driveway placement on a front façade cannot be avoided, locate the driveway at the edge of the parcel rather than in the center. Ensure that the street-facing driveway width is minimized to 20 feet or less.	Consistent. The driveway for tenants and visitors would be located in the east sector of the Project's frontage on Industrial Street, and located avoid the paseo at the east edge of the Project Site. The two-way single driveway would be approximately 26-feet wide (compared to the Project's 750-foot-long street frontage) to allow two individual 13-foot-wide driveways. The driveway would be primarily interior to the building. The use of a single, combined driveway for both ingress and egress would reduce curb cuts and pedestrian/vehicle conflicts.
6. Wrap parking structures with active uses such as retail spaces or housing units on the ground floor.	Consistent. The podium containing parking uses would be wrapped by grocery store, retail, and restaurant uses.
7. Blend parking structure façades with nearby buildings by incorporating architectural treatments such as arches or other architectural openings and varied building materials, decorative screening, climbing vines, or green walls to provide visual interest.	Consistent. Parking would be primarily underground. However, the podium parking level would be incorporated into the design of the building.
8. Mitigate the impact of parking visible to the street with the use of planting and landscaped walls tall enough to screen headlights.	Not Applicable. Parking for the Project would be located underground in a subterranean parking structure or interior to the podium and not visible from the street or adjacent uses and, as such, this policy is not applicable.
9. Illuminate all parking areas and pedestrian walkways to improve safety. Avoid unintended spillover impacts onto adjacent properties.	Consistent: All pedestrian walkways including sidewalks would be well lit for pedestrian safety. Pursuant to Project Design AES-4, all exterior lights would be shielded to avoid light spillage and glare on adjacent uses.

Policy	Analysis of Project Consistency
<p>10. Use architectural features, such as decorative gates and fences, in combination with landscaping to provide continuity at the street where openings occur due to driveways or other breaks in the sidewalk or building wall.</p>	<p>Partially Consistent. Landscaping would be provided along street fronts and at the driveway entrance.</p>
<p>Objective 5. Include Open Space to Provide Opportunities for Public Gathering</p>	
<p>On-Site Landscaping</p>	
<p>1. Retain mature and healthy vegetation and trees when developing a site, especially native species.</p>	<p>Consistent. Two existing, nonnative trees within the S. Alameda Street right-of-way and one at the rear of the existing building would be removed to allow for new sidewalk development and construction of The Mews. The northerly street tree on S. Alameda Street is stunted by drought and in extremely poor condition. The existing trees would be replaced by healthy, new trees, consistent with Department of Urban Forestry requirements and, overall, the Project would result in a net increase of 120 trees on the Project Site. Because the removed trees are not native species or in good health, the Project would not be inconsistent with the purpose of this policy to retain healthy native species.</p>
<p>2. Design landscaping to be architecturally integrated with the building and suitable to the functions of the space while selecting plant materials that complement the architectural style, uses, and form of the building.</p>	<p>Consistent. According to the Project's Landscape Plan, substantial landscaping would be incorporated into the Project's architectural design and layout, including screening in paseo areas.</p>
<p>3. Design open areas to maintain a balance of landscaping and paved area.</p>	<p>Consistent. All open space areas would be substantially landscaped to create a balance between landscaping and pavement.</p>
<p>4. Select drought tolerant, native landscaping to limit irrigation needs and conserve water. Mediterranean and local, climate-friendly plants may be used alongside native species.</p>	<p>Consistent. Plant species will be specifically selected for drought tolerance.</p>
<p>5. Facilitate sustainable water use by using automated watering systems and drip irrigation to irrigate landscaped areas.</p>	<p>Consistent. The Project would use a low-demand drip watering system to irrigate landscaped areas.</p>
<p>6. Facilitate stormwater capture, retention, and infiltration, and prevent runoff by using permeable or porous paving materials in lieu of concrete or asphalt. Collect, store, and reuse stormwater for landscape irrigation.</p>	<p>Consistent: The Project would comply with the City's Low Impact Development (LID) stormwater management requirements, which include the collection and filtration of surface runoff for irrigation purposes.</p>
<p>7. Provide canopy trees in planting areas in addition to street trees for shade and energy efficiency, especially on south and southwest facing façades.</p>	<p>Consistent. The Project would provide a total of 123 trees, resulting in a net increase of 120 trees compared to existing conditions. The resulting canopy would increase shading and improve energy efficiency at the Project Site.</p>
<p>8. Use landscape features to screen any portion of a parking level or podium that is above grade. Trees, shrubbery, planter boxes, climbing plants, vines, green walls, or berms can be used to soften views from the public right-of-way</p>	<p>Not Applicable. Parking levels would not be visible or require screening and, therefore, this policy is not applicable.</p>
<p>Open Space and Plazas</p>	
<p>1. Incorporate shaded open space such as plazas, courtyards, pocket parks, and terraces in large scale commercial buildings. Design open areas to be easily accessible and comfortable for a substantial part of the year.</p>	<p>Not Applicable. The Project is not a large-scale commercial building but does include commercial uses at the street level. However, it would provide approximately 14,537 sf of public open space including The Lookout, containing approximately 2,630 feet of open space, and The Mews containing approximately 11,907 sf of open space. Public open space areas are designed to be open and comfortable for a substantial part of the year.</p>

Policy	Analysis of Project Consistency
2. Orient open spaces to the sun and views. Create a sense of enclosure while maintaining safety, so that open spaces and plazas feel like outdoor rooms.	Consistent. The Project's open spaces, including The Lookout plaza, the sidewalk bump-out areas, and The Mews, would be oriented to view off-site areas to the north and south of the Project Site.
3. Connect open spaces to other activity areas where people gather to sit, eat, or watch other people.	Consistent. The Project's open spaces would be interconnected and allow a range of functions. The Lookout plaza on Industrial Street is opposite a sidewalk "bump-out" extension that would have landscaping, seats, tables, and an artistic focal point that would allow people to gather, sit, eat, and watch other people.
4. Locate sidewalk restaurants or outdoor dining areas on or adjacent to open spaces and pedestrian routes. Connect shops or office entrances directly to places where people gather or walk.	Consistent. Areas for outdoor dining would be provided in The Lookout area.
5. Landscape all open areas not used for buildings, driveways, parking, recreational facilities, or pedestrian amenities. Landscaping may include any practicable combination of shrubs, trees, ground cover, minimal lawns, planter boxes, flowers, or fountains that reduce dust and other pollutants and promote outdoor activities, especially for children and seniors.	Consistent. All open areas not used for buildings, driveways, parking, recreational facilities, decorative paving, or pedestrian amenities would be landscaped to enhance the enjoyment of the space.
Objective 6. Improve the Streetscape by Reducing Visual Clutter	
Building Signage Placement	
1. In general, a maximum of one business identification wall sign should be installed per business frontage on a public street. Rarely should more than one business identification wall sign be utilized per storefront.	Consistent. Signs would be consistent with and incorporated into the Project's architecture and business signs would be installed per the City's sign regulations (LAMC Sec. 14.4).
2. Locate signs where architectural features or details suggest a location, size, or shape for the sign. Place signs so they do not dominate or obscure the architectural elements of the building or window areas.	Consistent. Project signage would be used to advertise on-site uses and would not dominate the architectural character of the building.
3. Include signage at a height and of a size that is visible to pedestrians and facilitates access to the building entrance.	Consistent. All identification and wayfinding signs would be designed to be visible to pedestrians and facilitate access to the building entrance.
4. In commercial and mixed-use buildings with multiple tenants, develop a coordinated sign program establishing uniform sign requirements that identify appropriate sign size, placement, and materials.	Consistent. The signage program for the Project would be part of the approved Site Plan Review and consistent with the theme and purpose of the Project.
Building Signage Materials	
1. At large retail developments, provide maps and signs in public spaces showing connections, destinations, and locations of public facilities such as nearby transit stops.	Not Applicable. The Project is not a large retail development, such as a shopping center and, therefore, this policy is not applicable. However, retail areas of the Project would front public streets and public areas.
2. Limit the total number of colors used in any one sign. Small accents of several colors make a sign unique and attractive, but competition of many different colors reduces readability	Consistent. Project related signs would be regulated by the City's Sign Regulations (LAMC Section 14.4) and consistent with the architectural design and purpose of the Project as a component of the City's Arts District.

Policy	Analysis of Project Consistency
3. Limit text on signs to convey the business name or logo. Eliminate words that do not contribute to the basic message of the sign.	Consistent. Project related signs would be regulated by the City's Sign Regulations (LAMC Section 14.4) and consistent with the architectural design and purpose of the Project as a component of the City's Arts District.
4. Select sign materials that are durable and compatible with the design of the façade on which they are placed.	Consistent. Sign materials would be durable and compatible with the design of the façade on which they are placed.
5. Illuminate signs only to the minimum level required for nighttime readability.	Consistent. The Project is not intended for the off-site advertisement and, as such, illuminated signs would not exceed levels necessary for nighttime readability.
Lighting and Security	
1. Use ornamental lighting to highlight pedestrian paths and entrances to contribute to providing for a comfortable nighttime strolling experience while providing security by including after-hours lighting for storefronts.	Consistent. The Project would feature a variety of lighting types that would enhance the pedestrian experience, including street lights, security lighting, and after-hour lighting for ground-level restaurant, retail, and grocery store uses.
2. Install lighting fixtures to accent and complement architectural details. Shielded wall sconces and angled uplighting can be used at night to establish a façade pattern and animate a building's architectural features.	Consistent. Lighting fixtures, such as security lighting, would be installed to complement the Project's architectural character.
3. Utilize adequate, uniform, and glare-free lighting, such as dark-sky compliant fixtures, to avoid uneven light distribution, harsh shadows, and light spillage onto adjacent properties.	Consistent. The Project would utilize adequate, uniform, and glare-free lighting, such as dark-sky compliant fixtures, to avoid uneven light distribution, harsh shadows, and light spillage onto adjacent properties.
Utilities	
1. Place utilities in landscaped areas and out of the line-of-sight from crosswalks or sidewalks. Utilities such as power lines, transformers, and wireless facilities should be placed underground or on rooftops when appropriately screened by a parapet; otherwise, any mechanical or electrical equipment should be buffered by planting materials in a manner that contributes to the quality of the existing landscaping on the property and the public streetscape.	Consistent. All utility lines would be installed below ground and would not be visible from adjacent streets and sidewalks. Rooftop equipment would be appropriately screened.
2. Screen views of rooftop equipment such as air conditioning units, mechanical equipment, and vents from view from the public right-of-way.	Consistent. All mechanical equipment would be located within the podium structure and would not be visible to the public.
3. Hide trash enclosures within parking garages so that they are not visible to passersby. Screen outdoor stand-alone trash enclosures using walls consistent with the architectural character of the main building, and locate them so that they are out of the line-of-sight from crosswalks or sidewalks.	Consistent: Refuse collection areas would be located within the parking garage interior.

Source: ESA PCR, 2017.

As shown in Table 4.1-4, the Project would be consistent with pedestrian scale policies related to building materials, architectural character, off-street parking, open space, landscaping, signage,

lighting and security, and other policies related to visual character. The Project would be substantially consistent with the applicable urban design policies of the Citywide Design Guidelines.

Mural Ordinance

The Project anticipates the incorporation of public art/façade treatments, such as original art murals (OAMs), on the Project's street-facing walls, as depicted in Project simulations in Figures 4.1-6 and 4.1-7, above. Murals located on the Project's exterior walls would be registered with the City's Department of Cultural Affairs in compliance with the City's Mural Ordinance (Ord. 182706). As such, the Project would serve the purpose of the Mural Ordinance to increase public access to and community participation in the creation of original works of art and with the underlying intent of the Mural Ordinance is to produce new murals that re-engage communities, especially youth; create new opportunities for muralists; and support mural documentation, presentation, and engagement activities that are interactive, educational, or lead to cultural tourism. Because the Project would incorporate registered OAMs, the Project would be consistent with the requirements of this Ordinance.

River Improvement Overlay District

The Project would be required to comply with the RIO District Overlay Zone Ordinance. At Mill Street, the Project Site is located approximately 0.4 mile from the Los Angeles River and is considered to be within a RIO district. The purpose of RIO Overlay districts is to support the goals of the Los Angeles River Revitalization Plan, particularly on streets leading to the river or interfacing the river. The east edge of the Project Site at Hill Street is located approximately 0.4 mile from the Los Angeles River. Industrial Street and S. Alameda Street do not interface with the river or meet or cross the river and as such, the Project would not affect pedestrian or bicycle access or views of the river. In accordance with the Overlay Zone Ordinance, the Project would submit a landscaping and other plans, as required under the Ordinance. The Project would also meet the LID requirements and other SUSMP requirements of the Overlay Zone (please see Section 4.7, *Hydrology and Water Quality*, of this Draft EIR). Because the Project would comply with the requirements of the RIO District Overlay Zone Ordinance the Project would be consistent with the requirements of this adopted plan.

Cumulative Impacts

Chapter 3.0, *General Description of Environmental Setting*, of this Draft EIR provides a list of 163 projects that are planned or are under construction in the Project's transportation study area (related projects). Figure 3-1, Related Projects Map, in Chapter 3.0, illustrates the geographic extent of the total related projects, the majority of which are clustered to the west of Main Street, to the north of E. 6th Street, or in vicinity of Santa Fe Avenue. For the purpose of evaluating aesthetics, related projects are projects near enough to the Project Site to share the same field of view or related projects that are located within several blocks of the Project Site or along the same streets in the vicinity of the Project Site, so that viewers along a street, bicycle lane, or sidewalk would experience the cumulative visual experience of the Project combined with related projects. As indicated in Figure 3-1, six related projects within the related projects study area would meet the proximity criteria for the aesthetics analysis. These include the following:

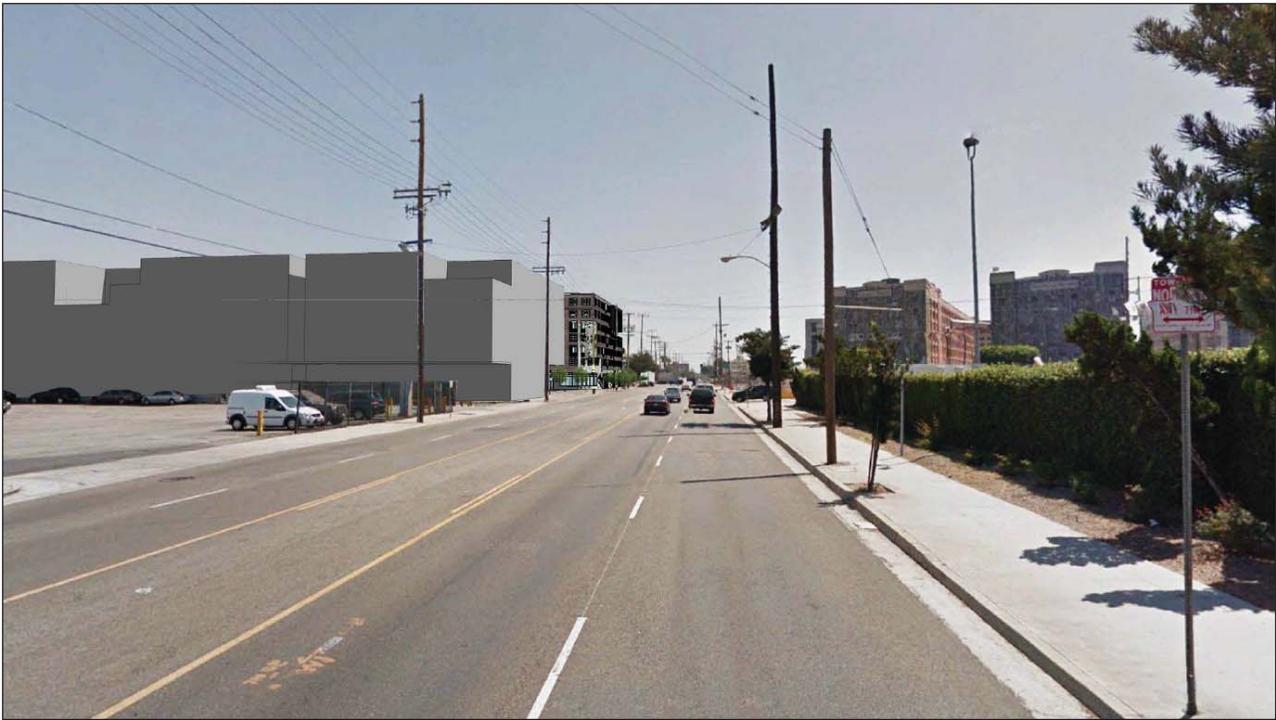
- Related Project No. 36 – Camden Arts Mixed Use/Industrial Street Lofts at 1525 E. Industrial Street: 6 and 7 stories, 240 apartment units; 7,165 sf retail and 4,110 sf restaurant uses.
- Related Project No. 84 –Mixed Use at 1800 E. 7th Street: 122 apartment units; 13,600 sf office uses in a 7-story building.
- Related Project No. 106 - SunCal at E. 6th Street and S. Alameda Street: Two 58-story towers, 1,305 apartments, 431 condominiums, 265,000 sf retail, 64,000 sf retail, 18,000 sf school, and 295 hotel rooms.
- Related Project No. 122 – ROW DTLA at E. 7th street and S. Alameda Street: 1,300,000 sf of offices in existing 3- to 7-story buildings.
- Related Project No. 135 –Mixed Use at 676 Mateo Street: 172 apartment units; 14,975 square restaurant feet uses, 8,050 sf of retail/office/art production uses in existing 7-story building with additional penthouse section.
- Related Project No. 139 –Mixed Use at 1745 E. 7th Street: 57 apartment units; 6,000 sf commercial uses in existing 7-story building.

Other projects in the related projects study area do not meet these criteria or have the potential to contribute to cumulatively significant aesthetic impacts when considered together with the Project.

Visual Character

All of the related projects in the Project vicinity (listed above) are located within an existing industrial area characterized by older and, in some cases, underutilized industrial buildings. Few existing buildings in the surrounding neighborhood exceed 7 or 8 stories. The development of the Project, together with the 6- and 7-story Camden Arts related project (Related Project No. 36) directly to the north of the Project Site and proposed 7-story mixed use buildings on 7th Street and Mateo Street (Related Projects No. 84, 135, and 139) would be in scale with existing development. Figures 4.1-11 and 4.12-, illustrate the effects of the combined Project and Related Project No. 36. **Figure 4.1-11**, *Cumulative Simulated Views of the Project Site from S. Alameda Street at Produce and Wholesale Streets*, illustrated two views of the Project Site from the north (Locations #1 and #2, respectively, in Figure 4.1-1, View Location Map, above). As shown in Figure 4.11-1, Simulations 1 and 2, Related Project No. 36, which appears in the foreground of the Project would block part of the Project’s Industrial Street frontage, but not the mural or streetscape along S. Alameda Street. It is anticipated that Related Project No. 36 would also add street trees along S. Alameda Street and Industrial Street, thus, in combination with the Project, improving the appearance of the street frontages. Also as shown in Figure 4.11, Simulation 1, the Project in combination with Related Project No. 36 would be consistent in scale with the existing ROW DTLA buildings to the west of S. Alameda Street.

Figure 4.1-12, *Cumulative Simulated Views of the Project Site from S. Alameda Street and Mill Street* (Locations #4 and #6, respectively, in Figure 4.1-1, View Location Map, above), show the combined Project and Related Project No. 36, as viewed from the south and east. As shown in Simulation 1, which illustrates the Project Site as viewed from the south, Related Project No. 36 would be barely visible beyond the Project.



SIMULATION 1: View from Produce Street.



SIMULATION 2: View from Wholesale Street.

SOURCE: Avalon Bay, 2017

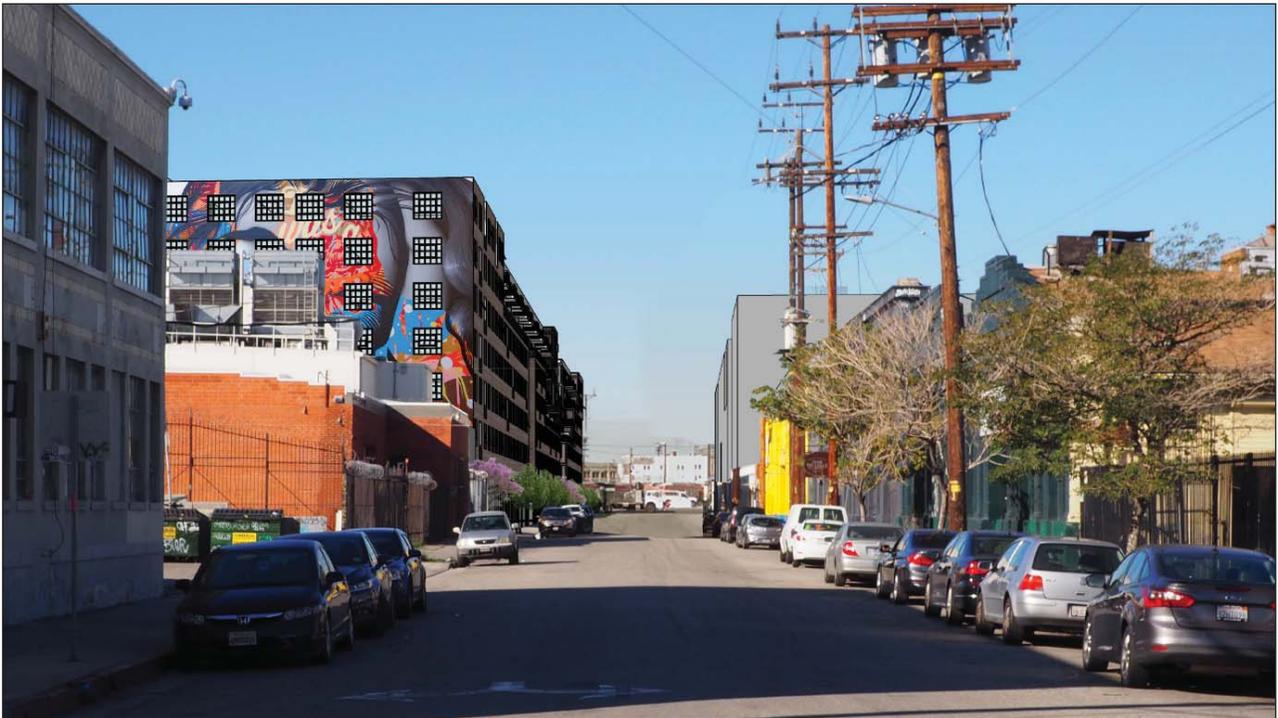
668 S. Alameda Street

Figure 4.1-11

Cumulative Simulated Views of the Project Site from
S. Alameda Street at Produce and Wholesale Streets



SIMULATION 1: North-facing View from S. Alameda Street.



SIMULATION 2: East-facing View from Mill Street.

SOURCE: Avalon Bay, 2017

668 S. Alameda Street

Figure 4.1-12
Cumulative Simulated Views of the Project Site
from S. Alameda Street and Mill Street

The combined projects would not be out of scale with the surrounding area (including the 7-story ROW DTLA development at S. Alameda Street and E. 7th Street, not visible in the simulation) or background structures. The combined projects would not block view existing, distant views through the corridor or adversely change the aesthetic character of the surrounding area. Figure 4.1-12, Simulation 2, illustrates the combined effects of the Project and Related Project No. 36 as viewed from the east near Mill Street. As shown in this simulation, the Project in combination with the related project would not alter industrial character of the street or encroach upon views through the street corridor. It is anticipated that, as with the Project, Related Project No. 36 would provide landscaping along the Industrial Street frontage and, thus, improve the visual quality of the street compared to existing conditions.

The ROW DTLA project (Related Project 122), at S. Alameda Street and E. 7th Street, across from the Project Site includes the re-use of historic, 98-year-old 7-story buildings within a 30-acre site. The re-use of these historic buildings would not change the scale or mass of structures in the Project area. It is also similar in scale to the Project and related projects on 7th Street, Industrial Street, and Mateo Street, listed above (with the exception of Related Project No. 106 – SunCal). The new development or improvements associated with the Project and Related Projects No. 26, 122, and other related projects would improve the visual character of the neighborhood with new or upgraded buildings, improved sidewalks, street-oriented retail and other commercial uses, new landscaping and street trees, and improved lighting and pedestrian amenities. The SunCal project, however, would result in an unusually tall building (58 stories) within the context of the existing low-rise and mid-rise industrial setting. However, because the Project and other related projects listed above are mid-rise in scale, they would not, in combination with the SunCal project, result in an extreme change from low- and mid-rise to the visual aspect of towering structures that would strongly change the visual character of the surrounding area. Related Projects providing live/work units and production space, including the Camden Arts project (Related Project No. 36) and the Project, would energize the immediate area with new residents, including working artists and visitors, consistent with the character and purpose of the Arts District. Although the Project and the related projects would change the visual character of the immediate Project area, the Project in combination with moderate-scale related projects on Industrial Street, E. 7th Street, and Mateo Street would not degrade the existing visual character or valued existing aesthetic features of the area. Cumulative impacts with respect to visual character would not exceed the City’s visual character threshold, however, this analysis is provided for informational purposes only, and no significance finding for cumulative impacts is required under CEQA pursuant to SB 743 and ZI No. 2452

Views

The related projects are located throughout the Central City North Community Plan area, with the six related projects listed above located within the same field of view as the Project Site. With the exception of the Camden Arts Mixed Use (Related Project No. 36), the related projects are not located within the same line of sight as the Project as viewed from surrounding streets. As shown in Figures 4.1-11 and 4.1-12, the Project in combination with Related Project No. 36 would not block existing views through street corridors. They would also not affect existing views of the City’s skyline from S. Alameda Street or from west-facing street corridors. Views of valued view resources are not available in the field of view across either the Project Site or the Related Project

No. 36 site. Therefore, the combined Project and Related Project No. 36 would not substantially obstruct or degrade existing or recognized valued public views. Cumulative impacts with respect to views would not exceed the City's view impacts threshold, however, this analysis is provided for informational purposes only, and no significance finding is required under CEQA pursuant to SB 743 and ZI No. 2452.

Light and Glare

The Project and the related projects are located within a highly urbanized area characterized by moderate ambient nighttime light levels and moderate daytime and nighttime glare. The Project and the nearest related projects in the immediate vicinity (e.g., Industrial Street, 7th Street, and Mateo Street) would add incrementally to this existing urban light and glare environment through the provision of improved pedestrian lighting, light spillage from windows, street lights, increased nighttime vehicle activity. Compliance with City regulations, most notably LAMC Section 93.0117(b), which limits the maximum amount of illuminance from an exterior light source window, balconies, patios, and other usable areas associated with a residential use, as well as illuminated sign limitations under LAMC Section 14.4.4E. As with the Project, the Project and other related projects in the vicinity would be subject to the applicable light and glare policies and design guidelines of the Central City North Community Plan, which requires shielding or direction of exterior lights to avoid spillover or glare.

With the exception of the SunCal Towers (Related Project No. 106), related projects are not of a scale or height that would normally result in glare from reflected sunlight as long as highly reflective surface materials are not used in building design. Because of a larger exposed surface and glazing for residential and hotel units, the 58-story SunCal towers have a greater potential to result in glare as viewed from public streets to the east, west, and south of the Project Site. Under Project Design Feature AES-3, the Project's glass and other building materials used in exterior façades would be low reflective and/or treated with a non-reflective coating in order to minimize glare. As such, the Project would not contribute to a cumulative glare impact associated with reflected sunlight. Therefore, the Project in conjunction with related projects would not result in light levels that would substantially alter the character of the area or result in substantial light and glare onto the area's light sensitive uses and, as such, cumulative impacts would not exceed the City's light and glare threshold. However, this analysis is provided for informational purposes only, and no significance finding is required under CEQA pursuant to SB 743 and ZI No. 2452.

Shading

The Project would not cast shadows onto any existing off-site shade sensitive uses. With the development of Related Project No. 36, the Project would shade portions of the latter's future pool deck from approximately early November until approximately mid-March in excess of the City's threshold levels. Related Project No. 36 would be a similar scale and height as the Project and cast similar shadows to the north, thus resulting in cumulative shading. However, no sensitive uses are located to the north of Related Project No. 36 and, as such, shading impacts would not be cumulative. The potential 58-story SunCal project (Related Project No. 106) would be located to the north of Related Project No. 36, at the east side of S. Alameda Street. Related Project No. 106 would result potentially greater shading impacts than other related projects in the Project vicinity. However, it would not shade similar uses as the Project and, as such, shading impacts of the

Project in combination with the SunCal Project would not be cumulative. Although no cumulative shading effects would occur, this analysis is provided for informational purposes only, and no significance finding is required under CEQA pursuant to SB 743 and ZI No. 2452.

Consistency with Regulatory Plans and Policies

The ability of the Project to provide site and building designs that do not conflict with, but support the applicable aesthetics provisions of the General Plan Framework, Central City North Community Plan, Citywide Design Guidelines, River Improvement Overlay Zone, and LAMC is evaluated above. As discussed therein, the Project would be substantially consistent with applicable plans and regulations. It is expected that related projects, in the event they conflict with these guidelines and regulations, would include mitigation measures to the extent feasible to ensure consistency or compliance. As described above, non-compliance would indicate adverse visual character impacts. Because the Project would be substantially consistent with the applicable provisions and regulations of set forth in the design guidelines, it would not contribute to cumulatively considerable aesthetics effects related to conflicts with such plans.

4.1.5 Mitigation Measures

The analyses provided above for aesthetic impacts are for informational purposes only and no significance finding is required under CEQA for the Project pursuant to SB 743 and ZI No. 2452. Therefore, no significant impacts have been identified and no mitigation measures are required.

4.1.6 Level of Significance After Mitigation

Not applicable.