Regional Connector Transit Corridor
Draft Environmental Impact Statement/
Draft Environmental Impact Report

APPENDIX P

VISUAL AND AESTHETIC IMPACTS

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Regional Connector Transit Corridor
Visual and Aesthetic Impacts
Technical Memorandum

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Prepared for

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ACRONYMS

APE	Area of Potential Effects
CEQA	California Environmental Quality Act
LRT	Light Rail Transit
LTS	Less than Significant Impact
Metro	Los Angeles County Metropolitan Transportation Authority
MOCA	Museum of Contemporary Art
NEPA	National Environmental Policy Act
NHPA	National Historic Preservation Act of 1966
TBM	Tunnel boring machine
TSM	Transportation System Management
VMC	Visual Modification Class

1.0 SUMMARY

The findings of this visual and aesthetic impact assessment are based upon the California Environmental Quality Act (CEQA) Thresholds of Significance Criteria included in Appendix G. These thresholds are used to identify significant visual and aesthetic impacts associated with "substantial degradation of existing visual character or quality of a site and its surroundings." Significance is also determined by "the degree of contrast between proposed features and existing features that represent the valued aesthetic image of an area."

This technical memorandum evaluates proposed alternatives of the Regional Connector Transit Corridor Project. These alternatives include the No Build Alternative, Transportation System Management (TSM) Alternative, At-Grade Emphasis Light Rail Transit (LRT) Alternative, Underground Emphasis LRT Alternative, and Fully Underground LRT Alternative – Little Tokyo Variations 1 and 2.

Primary visual resources in the project area include historic buildings located along or near the proposed alignments. The alignments are located in or near (depending on the alternative) the Civic Center and the Little Tokyo Historic Districts. Table 7-1 summarizes visual and aesthetic impacts associated with each of the six alternatives.

The No Build Alternative would result in no visual impacts to these resources. The TSM Alternative would result in minor visual modifications to the existing environment due to construction of enhanced bus stops; potential impacts would be less than significant.

There would be permanent potential visual impact associated with the At-Grade Emphasis LRT Alternative because new tracks, an overhead contact system, catenary poles, train portals, and two at-grade platforms would be added to streets adjacent to historic buildings. However, this potential impact would be less than significant. Visual impacts associated with construction of the At-Grade Emphasis LRT Alternative would be temporary and less than significant.

Potential permanent visual impacts of the Underground Emphasis LRT Alternative would be less than significant because the only visible street-level features would be a single tunnel portal and pedestrian entrances to underground stations. Visual impact associated with construction of the Underground Emphasis LRT Alternative would be temporary and less than significant.

Potential permanent visual impacts of the Fully Underground LRT Alternative – Little Tokyo Variation 1 would be the same as for the Underground Emphasis LRT Alternative. Both alternatives follow the same alignment and configuration for most of the corridor. Portions of the corridor in the vicinity of Little Tokyo, along Alameda and east of Alameda, would have prominent, visible street-level features, including pedestrian entrances to an underground

station and a single tunnel portal in 1st Street. Visual impacts in this vicinity, including the area along the proposed train portal, would be less than significant. Visual impact associated with construction of the Fully Underground LRT Alternative – Little Tokyo Variation 1 would be temporary and less than significant.

Potential permanent and temporary visual impacts of the Fully Underground LRT Alternative – Little Tokyo Variation 2 would be the same as the Fully Underground LRT Alternative – Little Tokyo Variation 1. For most of the alignment, the two alternatives follow the same route and configuration. An exception is the portal location and arrangement in 1st Street.

Visual impacts in the vicinity of 1st Street would potentially occur because the portals are staggered and potential visual effects would extend farther along 1st Street than Fully Underground Alternative – Little Tokyo Variation 1. Impacts in this vicinity would be low to moderate and less than significant for about three blocks. In consultation with the Los Angeles Hompa Hongwanji Temple, the Reverend, indicated to the Los Angeles County Metropolitan Transportation Authority (Metro) that the portal's proximity to the temple would be visually intrusive.

Under all build alternatives, the visual character of the corridor would be altered; however, views would not be degraded to the extent that significant impacts would result from project implementation. There are no scenic highways or protected views near the proposed alignments, so these types of resources would be unaffected.

All build alternatives would provide new pedestrian-friendly street improvements, including landscaping as appropriate, in the vicinity of the alignments and stations, thereby enhancing the aesthetics of the project area. Addition of an enhanced pedestrian environment would offset the potential low to moderate levels of visual impacts described above. The build alternatives would create improved and safer settings from which pedestrians could view visual and aesthetic resources and create a streetscape that complements those visual and aesthetic resources.

2.0 INTRODUCTION

Downtown Los Angeles is known for its designated historic districts, buildings, and sites. The region's colorful history is captured in the downtown area's many historic buildings, several of which are located adjacent to the Regional Connector build alternative alignments.

Construction activities and potential changes to the streetscape could affect views of these historic resources. This technical memorandum evaluates the potential for visual and aesthetic impacts resulting from construction and operation of the proposed Regional Connector alternatives.

The portions of downtown Los Angeles near the proposed alignments lack broad views of mountains, water bodies, and other natural features. Therefore, there would be no impacts to such views. The significant visual resources currently along the proposed Regional Connector transit corridor are historic buildings, many of which are eligible for listing in the National Register of Historic Places and/or the California Register of Historic Resources.

Potential impacts to historic resources are evaluated in the Cultural Resources - Built Environment Technical Memorandum. The project would not impede views from any nationally recognized scenic highways, designated scenic routes, corridors, or parkways, nor would it affect any public viewing locations that are otherwise recognized or valued.

3.0 METHODOLOGY FOR IMPACT EVALUATION

Criteria used to evaluate the proposed alternatives are described below. Potential impacts have been evaluated according to CEQA guidelines. While there are other evaluation criteria for visual assessments, CEQA guidelines are most relevant to the Regional Connector Transit Corridor Project. Guidance and methodologies have been adapted to address the project's urban setting as appropriate.

Multiple federal agencies have developed analytical frameworks for visual resource management, including the U.S. Department of Agriculture, Forest Service (USFS 1974, 1995); U.S. Department of Interior, Bureau of Land Management (BLM 1978); and U.S. Department of Transportation, Federal Highway Administration (FHWA 1981). The methodology and assumptions presented here build on the guidance developed by these federal agencies and the extensive work of Lawrence Headley of LH&A for the Port of Los Angeles and other Los Angeles projects (Headley 2008, 2006, and 2005).

3.1 Regulatory Framework

3.1.1 Federal

The National Environmental Policy Act (NEPA) is an umbrella law that requires an evaluation and disclosure of potential impacts that might result from construction and operation of a project. As such, NEPA often does not have-topic specific requirements or guidance. There are no specific thresholds or evaluation criteria for potential visual and aesthetic impacts.

Compliance with other federal, state and local regulations is often used as a means of demonstrating that a proposed project would not have significant impacts under NEPA. Guidance for the Regional Connector Transit Project was found in the National Historic Preservation Act (NHPA) and CEQA, and is used to evaluate potential impacts under NEPA.

Section 106 of the National Historic Preservation Act (NHPA) as amended in 1966 [36 CFR § 800.5(a)(2)] regulates activities that could impact historic properties by "diminishing the visual integrity of the property's significant historic features." There are approximately 50 properties, including three historic districts, within the project area in downtown Los Angeles that are listed in, determined, or found eligible for the National Register of Historic Properties. Potential visual impacts on historic resources are evaluated in the Cultural Resources Built Environment Technical Memorandum.

3.1.2 State

The principal evaluation criteria used in this visual resource analysis come from Appendix G of the CEQA Guidelines; the methodology to evaluate visual resources also follows guidance from the *L.A. CEQA Thresholds Guide* (City of Los Angeles 2006), referred to in this document as the *Thresholds Guide*. This guide recommends that impacts and their

significance be evaluated on a case-by-case basis. Except for shadow impacts, the *Thresholds Guide* includes no absolute principles, rules, standards, criteria, or thresholds for assessing the degree or significance of visual and aesthetic impacts.

Aesthetic impact assessment generally deals with the issue of contrast, or the degree to which elements of the environment differ visually. Aesthetic features occur in a diverse array of environments, ranging in character from urban centers to rural regions and wildlands. Adverse visual effects can include a loss of natural features or areas, removal of urban features with aesthetic value, or introduction of contrasting urban features into natural areas or urban settings. The key applicable visual consideration for downtown Los Angeles would be "introduction of contrasting urban features into ... urban settings." Significant alteration of the visual character through the introduction of a proposed project can result in a visual impact.

This aesthetic impact assessment concentrates on urban features because the proposed project is located within an urban setting. Urban features that may contribute to a valued aesthetic character or image include structures of architectural or historic significance or visual prominence; public plazas, art, or gardens; heritage oaks or other trees or plants protected by the City; consistent design elements (such as setbacks, massing, height, and signage) along a street or district; pedestrian amenities; and landscaped medians or park areas (*L.A. CEQA Thresholds Guide* 2006). Additionally, CEQA guidelines require impacts to historic buildings within a state scenic highway be evaluated.

Visual and aesthetic findings can be highly subjective, making them difficult to analyze using rigid technical standards. The Regional Connector project is set in an urban context, where visual change is expected. Whether visual change in the downtown environment is adverse or beneficial remains a subjective matter. Different viewers may consider the same change in the visual environment as either beneficial or adverse. This analysis discusses potential impacts for public and agency consideration with as much objectivity as practical given the subjective nature of aesthetic perceptions.

3.2 Standards of Significance

This analysis examines whether the proposed Regional Connector alternatives have potential to cause significant visual impacts. Though NEPA offers no definition for "significance," CEQA Guidelines § 15382 define a significant impact as "... a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project, including ... objects of ... aesthetic significance." The methodology applied to this assessment expands upon the CEQA definition and draws from methodology recommendations included in the *L.A. CEQA Thresholds Guide*.

As outlined in Appendix G of the CEQA guidelines, determination of a significant impact to visual and aesthetic resources is based on the following thresholds:

- Would the project have a substantial, adverse effect on a scenic vista?
- Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within [view from] a state scenic highway?
- Would the project substantially degrade the existing visual character or quality of a site and its surroundings?
- Would the project create a new source of substantial light or glare that would adversely affect day or nighttime views in the area?

In addition to the thresholds identified in Appendix G of the CEQA guidelines, the *City of Los Angeles CEQA Thresholds Guide* includes the following criteria for identifying and evaluating potentially significant visual resources impacts from proposed actions occurring within the City:

- Would project-related structures result in the shading of shadow-sensitive uses for more than three hours between the hours of 9:00 a.m. and 3:00 p.m. Pacific Standard Time (between late October and early April), or for more than four hours between the hours of 9:00 a.m. and 5:00 p.m. Pacific Standard Time (between early April and late October)?

3.2.1 Definitions

According to the *L.A. CEQA Thresholds Guide*, urban features that may contribute to a valued aesthetic character may include, but are not limited to, structures of architectural or historic significance or visual prominence; public plazas, art, or gardens; heritage oaks or other protected trees; consistent design elements along a street or district; pedestrian amenities; and landscaped medians or park areas. Significant alteration of the visual character resulting from a proposed project can result in a visual impact.

According to Headley (2007), a visual impact on a visual or aesthetic resource occurs when:

- Features are altered, introduced, made less visible, or removed, and the resultant effect on the views is perceptibly inconsistent with the inherent, established character of the landscape; and/or
- Access to public views is diminished such that the affected view is limited to some degree and/or physical access to public viewing positions is impeded.

Headley (2007) further defines a significant visual impact as one that:

- Causes a substantial adverse change in the visual resources of the affected environment, and/or
- Would cause views from scenic highways, designated scenic routes, corridors, and parkways, or public views that are otherwise recognized or valued, to become substantially blocked or screened from view, and/or
- Would cause historically available public access to such views to become substantially diminished.

A substantial adverse change in visual resources occurs when visual quality has been noticeably reduced. The perception that visual quality has been noticeably reduced is influenced by public sensitivity to adverse visual impacts, including intensity and duration of the impacts, as qualified by the temporal viewing context. A highly sensitive public is more apt to notice adverse changes in visual resources of lesser intensity than a less sensitive public. A highly sensitive public is therefore more likely to regard the effects of adverse changes as "substantial" and significant.

For example, a highly sensitive public would likely react adversely to a large, contemporary sculpture placed on the sidewalk directly in front of a national historic landmark building. The two could be at cross purposes visually. On the other hand, the public may be less sensitive to changes in the urban landscape of downtown Los Angeles along the proposed Regional Connector build alignments due to the large number of urban structures, circulation systems, and activities already present.

3.2.2 Impact Intensity

Both NEPA and CEQA use the concept of "intensity" to help determine the significance of an impact. For potential visual impacts, the intensity is the degree to which visual conditions change adversely relative to existing (baseline) conditions.

Changes in visual conditions can be classified by Visual Modification Classes (VMC) as defined by Headley (2008). VMCs provide a useful framework for describing and evaluating visual conditions. Table 3-1 provides definitions for each VMC.

A change from one VMC to another provides a method to evaluate the intensity or magnitude (and thus potential significance) of a change in visual condition. For example, a reduction from existing (baseline) conditions of VMC 1 to VMC 2 is a level 1 impact intensity; a reduction from VMC 1 to VMC 3, or VMC 2 to VMC 4, is a level 2 impact intensity; and a reduction from VMC 1 to VMC 4 is a level 3 impact intensity. The intensity of a visual impact

is a function of how apparent the proposed project's features, or those of its alternatives, may be within their context (e.g., barely noticeable versus visually dominant) (Table 3-1).

Table 3-1. Visual Modification Class Definitions

VM Class 1	Not noticeable: changes in the landscape are within the field of view but generally would be overlooked by all but the most concerned and interested viewers; they generally would not be noticed unless pointed out (inconspicuous because of such factors as distance, screening, low contrast with context, or other features in view, including the adverse impacts of past activities).
VM Class 2	Noticeable, visually subordinate: changes in the landscape would not be overlooked (noticeable to most without being pointed out), they may attract some attention but do not compete for it with other features in the field of view, including adverse impacts of past activities. Such changes often are perceived as being in the background.
VM Class 3	Distracting, visually co-dominant: changes in the landscape compete for attention with other features in view, including adverse impacts of past activities (attention is drawn to the change about as frequently as to other features in the landscape).
VM Class 4	Visually dominant, demands attention: changes in the landscape are the focus of attention and tend to become the subject of the view; such changes often cause a lasting impression of the affected landscape.

Source: Headley 2008

3.3 Evaluation Methodology

This visual and aesthetic impact analysis used a multi-step process to evaluate potential aesthetic impacts associated with the proposed alternatives. The progressive steps of this analysis are described in the following paragraphs.

- An inventory that included field observations and photography was undertaken of the visual and aesthetic resources along each alternative alignment. The inventory focused primarily on relevant historic buildings. Photos of the project area are included in this technical memorandum.
- The City of Los Angeles Circulation Element was reviewed to determine the presence of any scenic highways or recognized and valued views.

- Significant views along the corridor that warranted further aesthetic impact evaluation were identified. Close attention was paid to views that were potentially significant based on the key evaluation criteria, which include: substantial damage to scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within [a view from] a state scenic highway (*Appendix G of the CEQA Guidelines*); and potential for substantial degradation of existing visual character or quality of a site and its surroundings.
- A site visit was conducted of the views identified in step 3 (selected photographs are included in Section 4 of this technical memorandum).
- Views of historic buildings were then highlighted and evaluated from the public right-of-way to assess potential impact of the proposed Regional Connector alternatives.
- Potential visual impacts of the build alternatives on historic features of the downtown streetscape were analyzed. Mitigation recommendations were made as appropriate.

4.0 AFFECTED ENVIRONMENT

4.1 Area of Potential Visual and Aesthetic Effects

The four build alternatives (At-Grade Emphasis LRT Alternative, Underground Emphasis LRT Alternative, and Fully Underground LRT Alternative – Little Tokyo Variations 1 and 2) were subjected to a cultural resource identification process to define the area of potential impact for the visual and aesthetic analysis. The process resulted in development of a Area of Potential Effect (APE) The APE used to evaluate indirect impacts to cultural resources includes the entire Los Angeles Civic Center Historic District (determined eligible for listing in the California Register) and the Little Tokyo Historic District, a National Historic Landmark. The visual impact analysis used a modified APE including only the portions of the historic districts within one city block of the build alternatives. The areas within one city block of the proposed alignments are the only portions visible from the proposed alternatives.

4.2 Existing Visual and Aesthetic Environment

The existing visual and aesthetic APE was surveyed on May 7 and 8, 2009. Multiple photographs were taken and reviewed. Research was completed to locate previously identified visual and aesthetic resources. These resources include, but are not limited to, structures of architectural or historic significance or visual prominence; public plazas, art, and gardens; heritage oaks or other trees or plants protected by the City of Los Angeles; consistent design elements (such as setbacks, massing, height, and signage) along a street or district; pedestrian amenities; and landscaped medians or park areas. The objective was to capture relationships between existing buildings and the streetscape/corridor alignment environment.

The build alternatives' existing visual and aesthetic environment is characterized by an established urban landscape. Based on site reviews, the predominant visual resources within the modified APE are recognized historic buildings. Figures 4-1 through 4-4 show the visual resources identified within the modified APE.

This analysis includes historic structures and visual resources in the following communities within the modified APE:

- Financial District
- Bunker Hill
- Historic Core
- Civic Center
- Little Tokyo

Each of these areas has unique visual and aesthetic qualities, as shown in Figures 4-5 through 4-27. The potential for visual intrusion, blockage of views, and visual incompatibility by the project alternatives is assessed in Section 5.

4.2.1 Scenic Vistas

The City of Los Angeles General Plan and the Scenic Highways Plan within the General Plan's Circulation Element were reviewed to determine whether the project would affect scenic vistas.

Based on this review, it was determined that no scenic highways are located in downtown Los Angeles. Though Objective 11 of the Circulation Element is to "preserve and enhance access to scenic resources and regional open space," there are no such features adjacent to the TSM or build alternatives.

4.2.2 Scenic Resources

The following buildings and open spaces have been identified as scenic resources along the proposed alignment corridors for the TSM and build alternatives.

4.2.2.1 Financial District:

- Fine Arts Building
- 818 Building
- Roosevelt Lofts
- Pegasus
- 811 Wilshire Boulevard
- Engine Company No. 28
- The Standard Hotel
- California Club
- Los Angeles Central Library and Maguire Gardens
- Arco Plaza
- Citigroup Center Plaza

4.2.2.2 Bunker Hill:

- Walt Disney Concert Hall
- 2nd Street Tunnel
- Grassy Open Space at General Thaddeus Kosciuszko Way

4.2.2.3 Historic Core:

- Los Angeles Law Center
- Times Annex
- Times Building
- Higgins Building
- St. Vibiana's Cathedral
- Redwing Shoes

4.2.2.4 Civic Center:

- City Hall South
- Los Angeles City Hall
- U.S. Courthouse
- Fletcher Bowron Square
- Parker Center
- Tinker Toy Parking Structure

4.2.2.5 Little Tokyo:

- Little Tokyo Historic District
- Los Angeles Hompa Hongwanji Temple

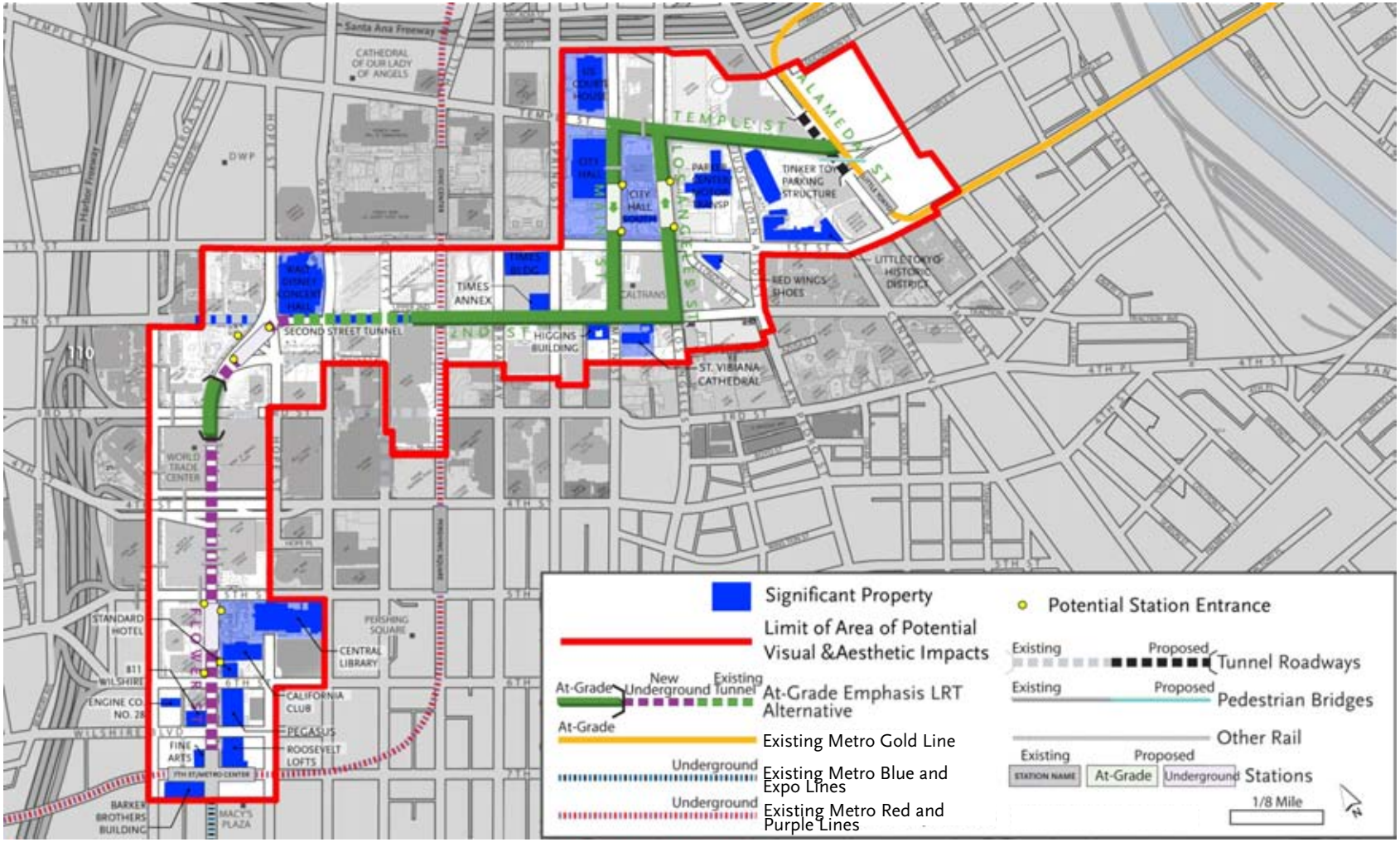

Figure 4-1. Visual Resources Associated with the At-Grade Emphasis LRT Alternative

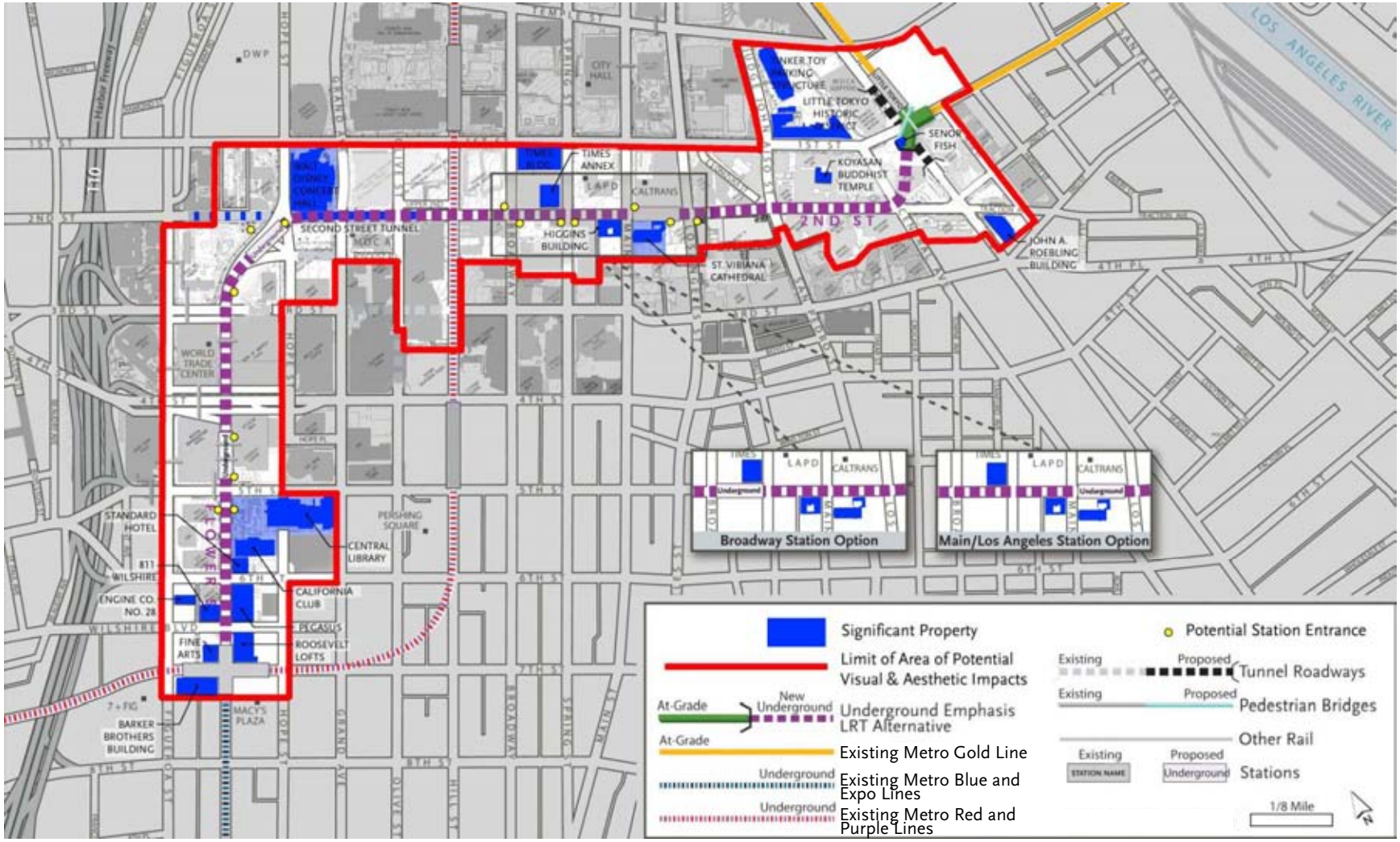

Figure 4-2. Visual Resources Associated with the Underground Emphasis LRT Alternative

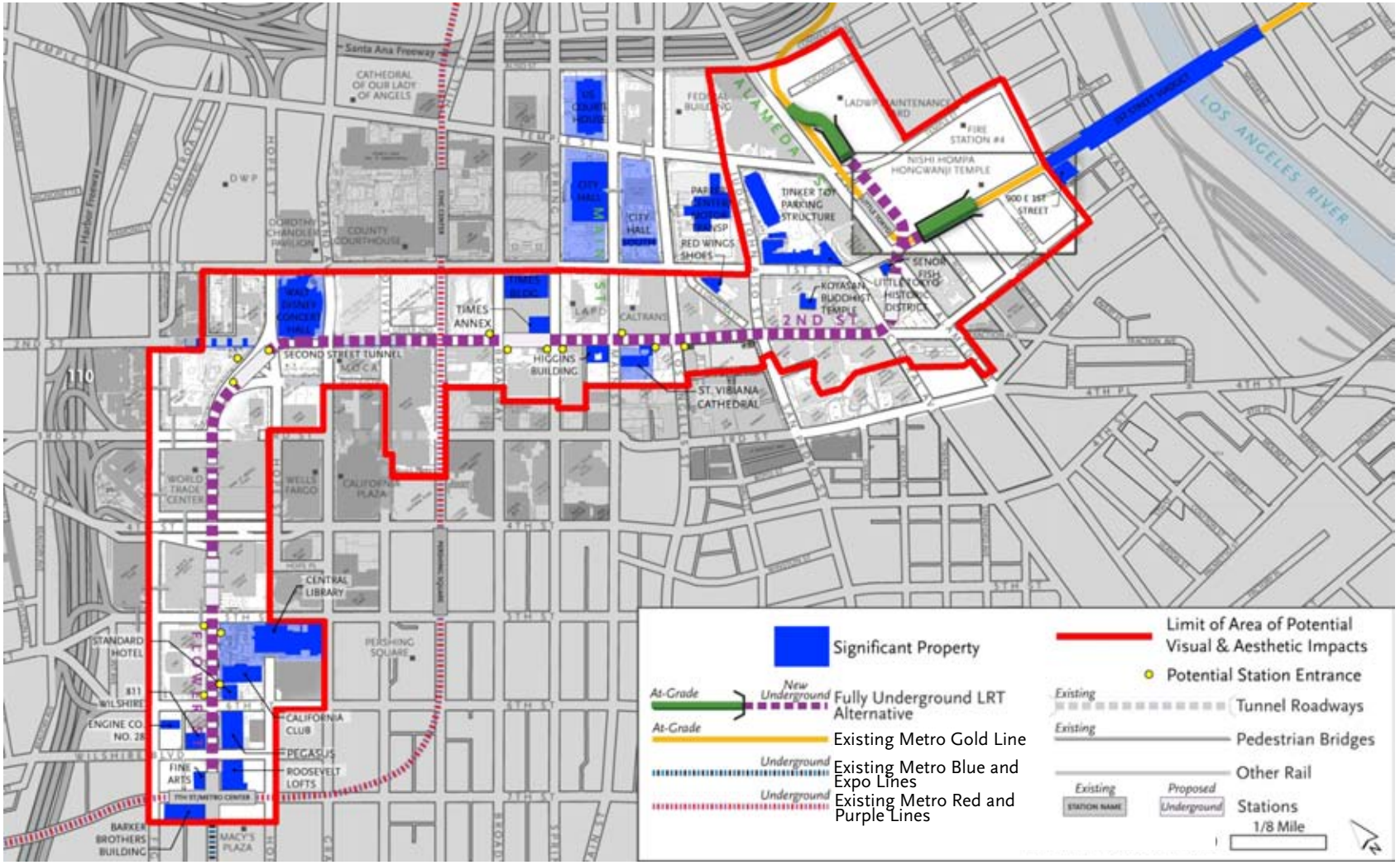

Figure 4-3. Visual Resources Associated with the Fully Underground LRT Alternative – Little Tokyo Variation 1

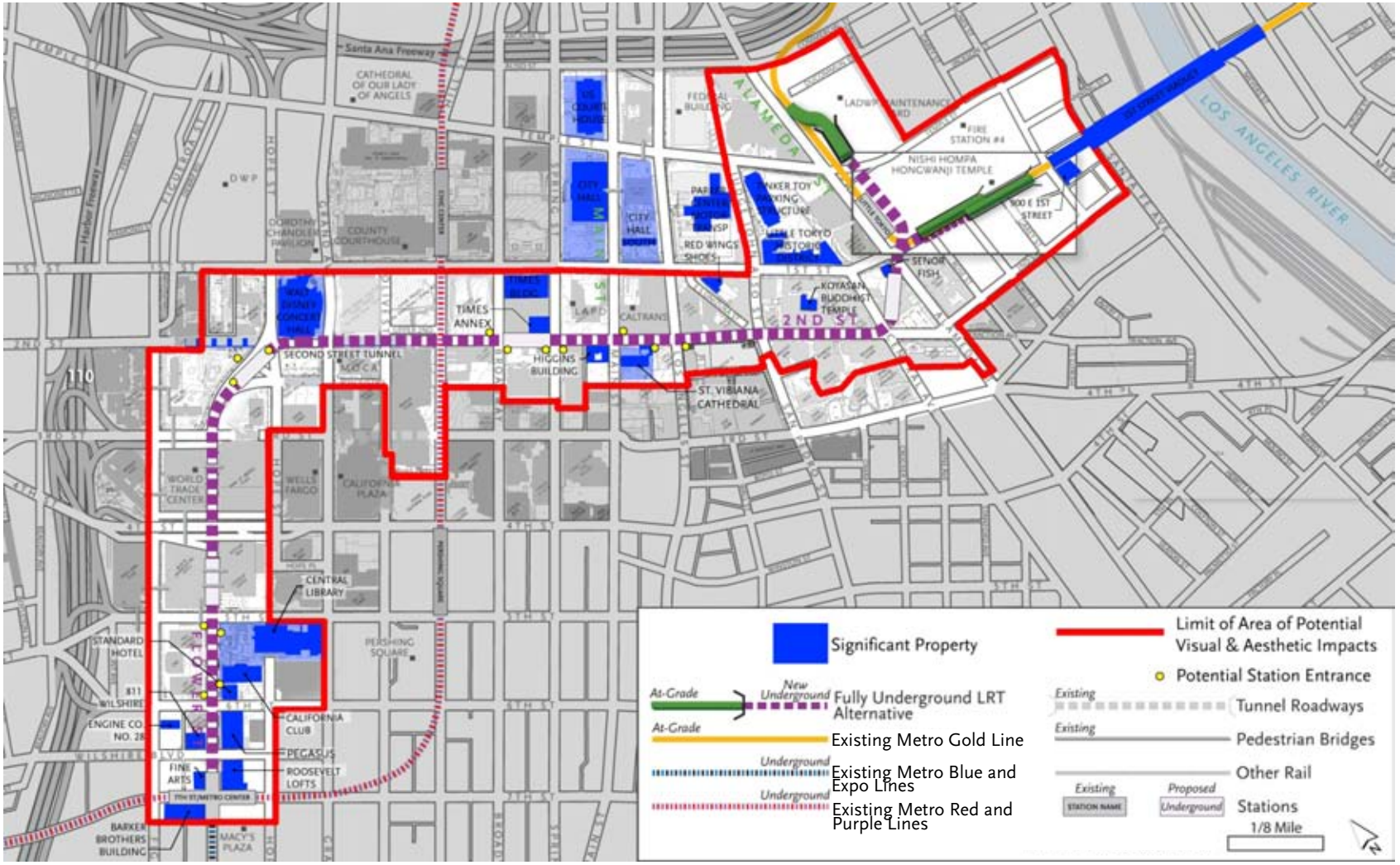

Figure 4-4. Visual Resources Associated with the Fully Underground LRT Alternative – Little Tokyo Variation 2

4.2.3 Visual Character

The visual context for the build alternatives consists of five distinct communities. Each is rich with a variety of buildings and public and private spaces that create an individual character. These communities include the Financial District, Bunker Hill, Historic Core, Civic Center, and Little Tokyo and are described in the following paragraphs.

4.2.3.1 Financial District

Located around Flower Street, the Financial District is characterized by predominantly high-rise institutional, hotel, and financial buildings, as shown in Figure 4-5. The area contains several open space areas of varying character. The Central Library's Maguire Gardens is located immediately west of the Central Library and south of 5th Street between the library building and Flower Street, as shown in Figures 4-6, 4-7, and 4-8.

Across the street and to the west of the Central Library is the City National Plaza, a paved private open space that serves as a forecourt to the Paul Hastings Tower, CNB, and City National Tower complex (shown in Figure 4-9). A paved plaza is located at the Citigroup Center on the northeast corner of the intersection of Flower and 5th Streets, as shown in Figure 4-10.

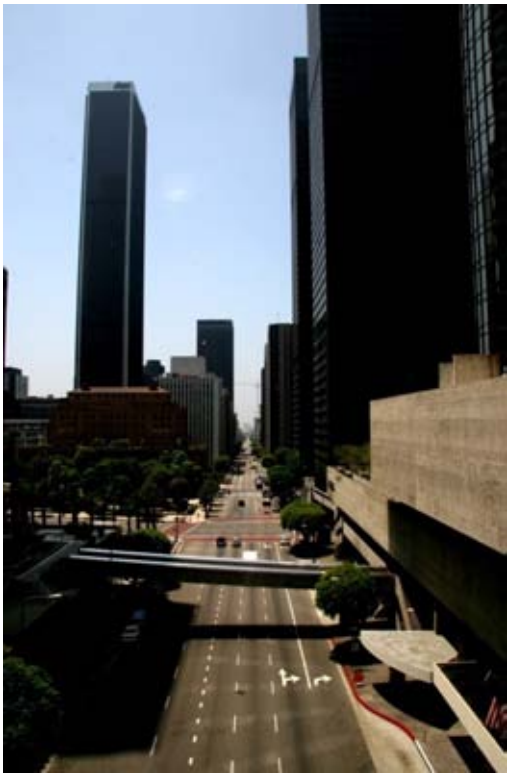

Figure 4-5. Financial District/Flower Street Corridor

Figure 4-6. Los Angeles Central Library

Figure 4-7. Central Library's Maguire Gardens - 1

Figure 4-8. Central Library's Maguire Gardens - 2

Figure 4-9. City National Plaza

Figure 4-10. Citigroup Center Plaza

4.2.3.2 Bunker Hill

Located approximately near the intersection of Flower and 2nd Streets, Bunker Hill includes several high-rise institutional and cultural buildings that interface with the Civic Center to the east and a residential complex to the west. The iconic Walt Disney Concert Hall (Figure 4-16), flanked by the Dorothy Chandler Pavilion to the north, is located in this neighborhood, as are the Colburn School for the Performing Arts and the Museum of Contemporary Art (MOCA).

Topographically, Bunker Hill is the highest point in downtown Los Angeles, with several viewpoints toward the northeast, southwest, and east. A grassy open space area on Bunker Hill (Figure 4-11) is located on the north end of Flower Street. Office towers located on the southern part of Bunker Hill are visible from various points in the downtown area. Crossing beneath Bunker Hill are the 2nd and 3rd Street tunnels, linking areas east and west of Bunker Hill. These tunnels are shown in Figures 4-12, 4-13, 4-14, and 4-15.

Figure 4-11. Open Space at West End of 2nd and 3rd Street Tunnels

Figure 4-12. West End of 2nd Street Tunnel