APPENDIX I

VISUAL AND AESTHETIC RESOURCES

VENICE PUMPING PLANT

DUAL FORCE MAIN PROJECT EIR
Appendix I

VISUAL/AESTHETIC RESOURCES

1.0 Overview

This report assesses the potential for the construction of the Venice Pumping Plant Dual Force Main (the Proposed Project) to adversely impact the Visual/Aesthetic Resources (Visual Resources) in the project vicinity and the significance of such impacts. The analytical approach to addressing these concerns is compliant with the requirements of CEQA and addresses the City of Los Angeles Draft CEQA Threshold Guide for determining impact significance. Accordingly, the visual resources assessment:

- Identifies those views potentially affected by the Project over which the public is most likely to express concern (critically sensitive public views);
- Describes the existing character and quality of those potentially affected critically sensitive views;
- Estimates the intensity of possible adverse visual impacts on those views;
- Evaluates the significance of the possible impacts; and
- As applicable, considers possible mitigation measures that could lessen the impacts to negligible levels of intensity.

2.0 Environmental Setting

2.1 Visual Sensitivity

2.1.1 Technical Approach

The technical approach to this visual impact assessment is presented in detail in Attachment A. The following is a summary of the approach to assessing Visual Sensitivity, the first attribute of the affected landscape to be addressed. Sensitivity is the social setting for visual resources. As applied to visual impact analyses, sensitivity refers to public attitudes about specific views, or interrelated views, and is the key to assessing how important a visual impact may be and whether or not it represents a significant
impact. To assess visual sensitivity, indicators of public concern were identified and sensitivity rated accordingly. The indicators are listed in Table K-1 of Attachment A and reflect the concepts and methods of several federal agencies that treat sensitivity as a function of viewer activity, awareness, values, and goals.

The four levels of sensitivity are high, moderate, low and no sensitivity.

- **High Sensitivity.** High sensitivity suggests that at least some part of the public is likely to react strongly to a threat to visual quality. A highly concerned public is assumed to be more aware of any given level of adverse change and less tolerant than a public that has little concern. A small modification of the existing landscape may be visually distracting to a highly sensitive public and represent a substantial reduction in visual quality.

- **Moderate Sensitivity.** Moderate sensitivity suggests that the public would probably voice some concern over substantial visual impacts. Often the affected views are secondary in importance or are similar to others commonly available to the public. Noticeably adverse changes would probably be tolerated if the essential character of the views remains dominant.

- **Low Sensitivity.** Low sensitivity is considered to prevail where the public is expected to have little or no concern about changes in the landscape. This may be because the affected views are not “public” (not accessible to the public) or because there are no indications that the public values the affected views.

- **No Sensitivity.** There is no sensitivity where the potentially affected views are not “public” (not accessible to the general public) or because there are no indications that the affected views are valued by the public.

### 2.1.2 Sensitivity of Project Locale

By definition (Table K-1, Attachment A), views from areas serving residential, recreational and tourism land uses, as well as from the transportation routes serving those land uses, are considered to be highly sensitive. The public is expected to value such views and potentially to react strongly to adverse changes in the visual character and quality of their surroundings.

The Coastal Commission’s primary concern over visual resources within the Coastal Zone is:

> “...the protection of ocean and coastal views from public areas such as highways, roads, beaches, parks, coastal trails and accessways, vista points, coastal streams and waters used for recreational purposes, and other public preserves rather than coastal views from private residences where no public vistas are involved.”

The last statement notwithstanding, this assessment considers the collective views from homes within residential areas and those from the roads serving as primary access to them to be highly sensitive and important to the consideration of the significance of visual impacts.

The Proposed Project Alternative Alignments are, with one exception, located in the City of Los Angeles within what are primarily residential areas in the communities of Venice, Westchester and Playa del Rey. The exception is an alternative alignment which would
pass through Marina del Rey, an unincorporated area within Los Angeles County. The Venice, Westchester, Playa del Rey and Marina del Rey areas also feature commercial, industrial, and tourism/recreation land uses. Views from residential and recreation land use areas are highly sensitive (Table K-1, Attachment A), and such areas flank, or are near, the Venice and Marina del Rey Alternative Alignments, as well as the Westchester/Playa del Rey Alignment Alternative.

Large Diameter (Mined) Tunnel alignment alternatives would primarily present limited areas of disturbance above ground, these being the Starter and Extraction Shaft sites. These sites are within view of beach recreation sites and residential areas. Also, some aspects of the Project Alternatives would be within the field of view of recreation marine traffic passing along the Marina del Rey Entrance Channel. Further, certain roads within the marina area and one in Playa del Rey are part of routes that have been designated as Scenic Highways and, in one case, also as a Scenic Drive.

Marina Del Rey Alignment

Marquesas Way/Via Marina

Sensitivity. Figure 1 shows the viewing positions used in this assessment. There are numerous highly sensitive viewing positions within and around Marina del Rey, given its scenic, recreation and tourist-oriented attractions. Foremost among these are views from Via Marina, Admiralty Way and Fiji Way, which form a route designated as a Scenic Highway and also to be designated as a Scenic Drive (Scenic Highway Element, Los Angeles County General Plan; see Section 3.1, Coastal Plan Policies). Of specific importance to the Proposed Project is Via Marina, from its intersection with Marquesas Way to where it turns sharply to the southwest to parallel the entrance channel for the marina. Along this stretch of road there would be cut-and-cover pipeline installation, as well as the construction of receive and Push Sites for micro-tunneling.

A number of recreation and tourist attractions are to be found in the marina: Burton Chace Park, Fisherman’s Village, Admiralty Park, Mother’s Beach, and the picturesque marina itself. Views from these locations, however, are not important to the analysis, as they do not include Project construction activities and sites. On the other hand, at the southeast end of Via Marina, where it turns to the southwest, there is a small park called Aubrey E. Austin Park. There, too, is the northeastern end of the North Jetty Promenade, a popular walk along the scenic Marina del Rey Entrance Channel. Views from Aubrey Park and the Promenade are also, by definition, highly sensitive, and the receive site for the micro-tunneling connection to the Marina del Rey Alignment would be within full view of these recreation resources across Via Marina.

A moderately high-density multi-family residential area lines both sides of Marquesas Way and the west side of Via Marina. Both of these roads serve as the primary access to the residential areas flanking Ballona Lagoon and the Grand Canal to the west. The collective views from the residences on Via Marina and Marquesas Way are highly sensitive. Because these roads are part of the primary access to these residential areas, road-based views would be considered to be highly sensitive. As noted, Via Marina is also highly sensitive due to its Scenic Highway/Scenic Drive status.

Also, some aspects of the Project Alternatives would be seen from boats passing along the Entrance Channel, and such views, being recreation oriented, are highly sensitive.
Critical Views. Critical views are partly defined as those that are the most sensitive, as described in the previous section. Where the public is considered to be potentially moderately to highly sensitive to changes in visual quality, there is likely to be a substantial concern over noticeably adverse visual impacts.

Critical views also are defined as being those which would be most affected by the subject action (e.g., the greatest intensity of impact due to viewer proximity to the project, duration of the affected view, the frequency of viewing, etc.). Consideration is also given to having the views be representative of the public experience; i.e., that they be from viewing positions frequently used by the public and readily located, based on the description and photographs presented in the visual impact assessment. The views critical to the analysis of visual impacts due to the Marina del Rey Alternative Alignment are those from Via Marina, a scenic highway and scenic drive, from Marquesas Way to where it turns to the southwest to flank the channel; from the residences bordering this road and Marquesas Way; from the residences lining the east side of the Grand Canal near the Venice Pumping Plant; from the Grand Canal in this vicinity; from the residences at the northeast end of Hurricane St., next to the Pumping Plant; from Aubrey E. Austin Park; from the east end of North Jetty Promenade; and from the Marina del Rey Entrance Channel. The proposed construction activities would be in the foreground of these views.

Figures 2 and -3, show representative views of Marquesas Way and Via Marina, in the vicinity of the two optional Push Sites for micro-tunneling under Ballona Lagoon to the receive site opposite the Venice Pumping Plant. Also shown in these figures are optional construction/laydown areas that would support the construction and operation of the two alternative Push Sites. Figure 4 shows the receive site at the Venice Pumping Plant, which is in the vacant lot opposite the Plant, as well as Push Site Option 2, in the vacant lot on the east side of the canal. These sites would be within full view from the residences lining the east side of Ballona Lagoon/Grand Canal across from the Plant, as well as those walking along the lagoon/canal or boating on it.

Figure 5 is a panoramic view from a residence along the east bank of the Grand Canal across from the Venice Pumping Station. This view shows the point where the canal becomes “Ballona Lagoon,” which is at the left corner of the Plant, in the upper image. Recreationalists walking along the canal and the lagoon, or boating on these waters, would be expected to be highly sensitive to visual impacts. As noted above, the receive site for the Marquesas Way/Via Marina alignment alternative would be in the vacant lot shown in Figure 5.

Figure 6 shows the view from Aubrey E. Austin Park, looking to the northwest along Via Marina. This view shows the location of one option for the receive site for the under-channel micro-tunneling construction alternative. The site is within the parking lot shown in the upper image, and the construction/laydown area would also be within this parking lot. The view shown also represents that from the North Jetty Promenade and Via Marina.

Figure 7 is a panoramic view from the Entrance Channel that includes the Via Marina receive site as well as Aubrey E. Austin Park. Views from the channel would not be the most critical, as they would be comparatively distant, relative to views from Via Marina, Aubrey E. Austin Park, and the North Jetty Promenade. While boats may pass along the northwest side of the channel and be within about 240 ft of the nearest Project feature, the North Jetty would block such views. From points nearer the center of the Channel but
Figure 2

Panorama Showing Site for Push Option 2 for Marquesas Way/Via Marina Cut-and-Cover Alternative, Seen from Marquesas Way/Via Dolce Intersection (VP 1).

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Views of Via Marina/Marquesas Way Intersection, the Site for Site Push Option 1 for Marquesas Way/Via Marina Cut-and-Cover Alternative, Seen from, and near, Marquesas Way/Via Dolce Intersection (VPs 2 and 3).

Figure 3
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(Top): View along the Grand Canal Showing Residences from Which Receive and Push Sites, Cut-and-Cover, or Extraction Shaft Construction Activities Would Be Seen (VP 4). (Bottom): Hurricane St. at the Venice Pumping Plant, Showing Receive and Alternative Extraction Shaft Sites (VP 5).
Figure 5

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View from Residence on East Side of Ballona Lagoon/Grand Canal
Showing the Venice Pumping Plant, a Receive Site for Micro-
Tunneling, and Optional Mined Tunneling Extraction Site (VP 6).
A Panoramic View from the Marina del Rey Entrance Channel, Showing the Locations of the Receive Sites at Pacific Ave. and Via P. E. Austin Park.

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(Top): Looking Northwest along Pacific Ave. from the Intersection with Via Marina (VP 9). (Bottom): Looking Southeast along Ballona Lagoon and Pacific Ave. from the Pedestrian Bridge at Lighthouse St. (VP 10).
within the ocean-bound lane, points from which the Project could be seen, the viewing positions would be not closer than about 350 ft or more. By contrast, from Aubrey E. Austin Park and Via Marina, one is only about 80 - 90 ft from where the receive site may be within the parking lot northwest of the park. Consequently, views from the Entrance Channel would not be considered further, as the focus of the assessment is on the most critical views.

**Venice Alignment Alternatives**

**Pacific Avenue Alignment.**

**Sensitivity.** In general, the Pacific Avenue Alignment Alternative would be within highly sensitive public views that include the collective residential views along the alignment, along Hurricane St. and Pacific Ave., from Ballona Lagoon/Grand Canal, and those from a pedestrian trail lining the east side of the lagoon.

The Pacific Avenue Alignment runs west along Hurricane St. to Pacific Avenue and then south to Via Marina where it would meet with a receive site for the micro-tunneled alignment under the Marina del Rey Entrance Channel and Ballona Creek. The collective residential views along these two streets are treated in this analysis as highly sensitive, as noted. Cut-and-cover activities would be visible from residences lining the east side of the Grand Canal across from the Venice Pumping Plant and those along Hurricane St. As well, residents along Pacific Avenue south of Hurricane St. to Via Marina would view cut-and-cover construction activities while approaching their homes and from their residences as construction progresses along the street.

Concerning recreation, most of the highly varied recreation opportunities within the community of Venice occur to the north of the Project site, including the famous Venice Beach, bike path and Ocean Front Walk. In general, public recreation use of area of the Project is less intensive than that of the North Venice Beach portion. Uses are primarily sunbathing, swimming, picnicking, active recreational uses on the sand, and fishing from the Marina Channel jetty. The walkways and waterways along the Venice Canals and Ballona Lagoon provide opportunities for more passive recreational and educational uses, such as birdwatching, nature study, strolling, and sightseeing. A Class II Bikeway runs along Pacific Ave. (See Section 4.2 of the EIR, Figure 4.2.5-4), and non-motorized boating is permitted in the Venice Canals. Potentially, the Project activities would be seen by boaters along the Lagoon, those walking along the beach access trail in the vicinity, and bicyclists using Pacific Avenue. Also, where Pacific Avenue intersects with Via Marina, there is the North Jetty Promenade, a frequently used walkway featuring observation decks from which the Entrance Channel may be appreciated. Fishing is a popular activity below the Promenade.

Finally, the south terminus of the subject alignment may be seen from the numerous pleasure craft that use the Entrance Channel.

**Critical Views.** The critical views would be any of those from along the alignment from Ballona Lagoon/Grand Canal, pedestrian beach access, Hurricane St. and Pacific Ave. and their adjoining residences, the bikeway along Pacific Ave., the North Jetty Promenade, and from the Entrance Channel.

Figure 4 shows the route for the Pacific Ave. Alignment along Hurricane St., within view of residences lining this street. Figure 5 shows the proximity of Ballona Lagoon/Grand Canal.
Canal to the Venice Pumping Plant and the north end of the Pacific Ave. Alignment Alternative. Figure 8 shows the length of Pacific Ave. from the pedestrian bridge at Lighthouse St. southeast to Via Marina, as well as Ballona Lagoon flanking it on the northeast side. The latter figure also shows that residences line both sides of Pacific Ave. at its southeast end where it meets Via Marina.

Figure 7 discloses the view of the receive site area as seen from the Entrance Channel, while Figure 9 shows the southeast terminus of this alignment alternative and the receive site for micro-tunneling under the Marina del Rey Entrance Channel and Ballona Creek. The Receive site would be close to the observation platform overhanging the revetment (upper image).

Dockweiler Beach to Pacific Avenue Alignment.

This alternative was considered in the EIR but was deemed not to be viable and will not be dealt with further in this assessment.

Dockweiler Beach Alignment.

As is the case for the previous alignment alternative, this alternative was considered but deemed not to be viable and also will not be dealt with further in this assessment.

Westchester/Playa del Rey Alignment Alternatives.

Pacific Avenue/Vista del Mar Alignment

Sensitivity. At the northerly end of this alignment, the alignment extends to a Push Site for micro-tunneling under the Entrance Channel to either the Pacific Avenue or the Via Marina Alternative Alignments on the north side of the Entrance Channel. Here there is a boat launch ramp that may be affected due to construction of the Push Site, a bicycle path, a fishing bridge, and a residential area. The construction/laydown area that would support the micro-tunneling activities would be in the parking lot along the southwest side of the bridge. Views from areas of recreation and residential land uses, including the associated access routes are highly sensitive.

The parking lot for Del Rey Lagoon Park provides access not only to the park, but also to Dockweiler Beach via a path that leads from the parking lot. Views from Pacific Avenue, the residences along it, Del Rey Lagoon Park, the parking lot at the park, and the beach access path, are all highly sensitive.

To the southwest of the Del Rey Lagoon Park parking lot, Pacific Avenue intersects with Vista del Mar. From here this alignment alternative follows Vista del Mar to the junction with the existing C.I.S. near Waterview St. As has been noted, Vista del Mar is a designated scenic highway, and in the vicinity of Waterview St. motorists have an elevated and panoramic view of Dockweiler Beach and the Pacific Ocean. Views from this road are of the highest sensitivity. As well, the collective views from the residences lining Vista del Mar are also highly sensitive, many of which include panoramic ocean views.

Critical Views. All of the views noted would be considered critical, as they are of the highest sensitivity and would include the Proposed Project construction activities within the foreground. Perhaps the most critical of these along Pacific Ave. would be the ones from the bicycle path, the fishing bridge, the residential area along Pacific Ave., Del Rey
Figure 9

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(Top): View of Receive Site and Construction/Laydown Area from the Corner of Pacific Ave. and Via Marina, Looking Northeast (VP 9). (Bottom): View along the North Jetty Promenade from Observation Platform at End of Pacific Ave. and Via Marina (VP 11).
Panoramic Views of Del Rey Lagoon Park (Top): Looking to the Northwest, and (Bottom): Looking to the Southeast (VP 14).
Lagoon Park, and the beach access path. Figure 10 shows views from the bridge over Ballona Creek, looking southeast. The upper image shows the Push Site area to the north of the bridge (left). The lower image is a better view of the residential area along Pacific Avenue. The bridge links the bicycle path, which is along the jetty separating the Entrance Channel and Ballona Creek and the stretch of Dockweiler Beach south of the channel and creek.

Figure 11 shows the scene from the intersection of 66th Ave. and Pacific Ave., looking northwest and north, which includes the residential area along Pacific Ave., with a glimpse of Del Rey Lagoon Park. Figure 12 presents two panoramas of this park, which abuts Pacific Avenue and from which details of Project construction activities would be visible. Along Vista del Mar, there are multi-story residential residences, as seen in Figure 13, which presents photographs from the intersection at Waterview St. and a representative view from the Vista del Mar. These street-based views are considered to generally represent those from the residences.

**Channel Crossing**

The Push Site, and the two alternative receive sites associated with micro-tunneling under the Marina del Rey Entrance Channel and Ballona Creek would be within public view. These sites are addressed relative to the cut-and-cover alternative alignments.

**Large Diameter (Mined) Tunneling Alignment Alternatives**

There are four Mined Tunnel Alignment Alternatives, which would present noticeable disturbance above ground at the sites for the Starter and Extraction Shaft sites. These sites are within highly sensitive views from beach recreation sites, residential areas, and, within view of a designated scenic highway (Vista del Mar). Alternatives 1 and 2 call for cut-and-cover construction as well, which would also be within recreation oriented and/or residential views.

**Alternative 1: Dockweiler Beach Alignment**

Alternative 1 has been considered not to be a viable alternative in the EIR and therefore is not addressed in detail in this assessment.

**Alternative 2: LAX - Dockweiler Beach**

Sensitivity. This alternative calls for a Mined Tunnel connection from the LAX property Starter Shaft to the Extraction Shaft on Dockweiler Beach and cut-and-cover connections between the Venice Pumping Plant and the Extraction Shaft. The views affected by Starter Shaft and associated laydown area would be from Vista del Mar (scenic highway) and residences lining the northeast side of Napoleon St. As noted earlier, residential views and those from designated scenic highways are highly sensitive. The sensitive views potentially affected by the Extraction Shaft and the cut-and-cover part of the alignment were described relative to Alternative 1.

Critical Views. Figure 14, upper image, shows the general area for the Starter Shaft and laydown area for this alternative. Foreground views from the designated scenic highway (Vista del Mar) and residences shown are of the greatest sensitivity and are highly critical. Critical views including the Extraction Shaft site for this alternative and the cut-and-cover part of the alignment are the same as for Alternative 1.
Alternative 3: Direct Mined Tunnel Connection from LAX Property to Venice Pumping Plant Via Dockweiler Beach

Sensitivity and Critical Views. This alternative alignment would be a mined tunnel construction alternative from the Starter Shaft on the LAX property direct to the Extraction Shaft in the vacant lot northwest of Hurricane St. and opposite the Venice Pumping Plant, via Dockweiler Beach. Views of the Starter Shaft have been discussed relative to Alternative 2. As for Alternative 2, there would be as much as 300 ft of cut-and-cover construction from the Starter Shaft to the junction with the existing C.I.S. under Vista del Mar to the southwest.

The Extraction Shaft would be in the vacant lot across Hurricane St. from the Venice Pumping Plant, as shown in Figure 5. The sensitivity and critical nature of the affected views potentially affected by the Extraction Shaft have been discussed relative to the Via Marina/Marquesas Way cut-and-cover alignment alternative.

Alternative 4: Direct Mined Tunnel Connection from LAX Property to Venice Pumping Plant Under Ballona Lagoon

Sensitivity and Critical Views. This alternative alignment would be a continuous Mined Tunnel construction alternative from the Starter Shaft on LAX property to the Extraction Shaft in the vacant lot on the northwest side of Hurricane St., across from the Venice Pumping Plant. The tunnel would be inland from the beach and generally under Vista del Mar, Pacific Ave. and Ballona Lagoon. The Starter Shaft site and associated laydown site areas are shown in Figure 14, and sensitive and critical views relative to it have been described regarding Alternatives 2 and 3. Figure 15 shows the area within which the Extraction Shaft would be constructed. The laydown area is also expected to be within this vacant lot. The sensitivity and criticality of views from residences and the Grand Canal have been discussed relative to the Marquesas Way/Via Marina Alignment and the Pacific Avenue Alternative Alignments.

2.2 Visual Character and Existing Visual Condition

2.2.1 Introduction

To address the most important impacts, in conformance with CEQA, detailed descriptions of the existing visual character and quality of the Project vicinity are limited to those views deemed to be “critical,” as defined in Section 2.1. Accordingly, attention is directed primarily to those moderately to highly sensitive views that would be most affected by a Proposed Action. Where the greatest of impact intensity may occur, low sensitivity views will also be considered. The assessment of visual character and existing visual condition serves as the baseline for the quality of Visual/Aesthetic Resources. The estimated visual impacts of the Project will be compared with the baseline conditions to assess the degree of adverse change (intensity) and significance of the potential impacts.

Visual Character: Features and Their Patterns of Distribution.

The landscape is described in terms of the features inherent to the “character type” which lend it its distinctive character. Project features are described in terms of their degree of contrast, if any, with those that are part of the affected views. Typically addressed are landforms, vegetation, water features and the built environment. As relevant, the form, line, color and texture of the features are described. The scale (apparent size) of features,
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Views from the Vista del Mar-Napoleon St. Intersection; (Top):
LAX Site, Looking East to Southeast; and (Bottom): Dockweiler
Beach and Vista del Mar, Looking Northwest (VP 16).

Figure 14
Figure 15

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(Top): Extraction Shaft Alternate Sites at Dockweiler Beach near Hurricane St. (VP 17); and (Bottom): at Venice Pumping Plant (VP 6).
Clockwise from Top: Construction Equipment for Typical Cut-and-Cover Construction. Sound Barriers, Seen from Street and from within Shaft Construction Area. Shaft, within Sound Barrier.
the composition of the affected view, and the breadth of the view (panoramic versus focal) often are aspects of some importance. Features of the landscape which make it vulnerable to adverse impacts are important too, such as focal point sensitivity (where features frame a view or direct attention to a particular area), or proximity to highly sensitive viewing positions. The arrangement of landscape features may be important to consider, as a Project can disrupt the pattern of their distribution. For instance, ecotones might define the distribution of vegetation in a natural setting. Architectural styles or density of housing might be defining attributes of a residential area.

Existing Visual Condition.

Key to assessing baseline environmental conditions of visual/aesthetic resources is "existing visual condition," which is used in this assessment to mean "visual quality." The existing visual condition is described as the degree to which past actions have noticeably changed the landscape in ways that appear inconsistent with the inherent visual resources of the affected lands. Existing visual conditions serve as the baseline for evaluating the magnitude and intensity of potentially adverse changes in the landscape. They vary with how noticeable incongruous features may be within current public views and are defined in terms of four Visual Modification Classes (VMC), defined in Table K-1, Attachment A. Landscapes where all features appear compatible with the inherent visual resources of the area are of the highest existing visual condition, while those where incompatible features dominate the scene are of the lowest condition.

2.2.2 Landscape Character and Existing Visual Conditions within Critical Public Views

Marina del Rey Alignment Alternatives

Marquessas Way/Via Marina Alignment

Character. The critical views relative to this alternative alignment are those from Via Marina, Marquessas Way, the residences bordering these roads, the residences lining the east side of the Grand Canal and Hurricane St. near the Venice Pumping Plant, Aubrey E. Austin Park, the North Jetty Promenade, and the Marina del Rey Entrance Channel, as described in Section 2.1. Figures 2 - 6 show representative views from these locations.

The character of the subject views is entirely that of a "built" environment of residences and infrastructure serving those residences, urban landscaping along Via Marina and Marquessas Way, and the water feature alternately referred to as Ballona Lagoon (southeast of the pumping plant) and the Grand Canal (from the pumping plant to the northwest). The latter is the most striking feature within the potentially affected landscape and arguably the most memorable.

Regarding the views from residences along Marquessas Way and Via Marina, the views from these roads are deemed to represent those from the residences, albeit they are from ground level and those from the residences include elevated positions on the second stories of the homes and apartments. The vegetation along these streets is highly varied in species and type (trees, shrubs, groundcover) and presents an interestingly irregular pattern as one drives along these roads. The street trees are mature and stately, and, in places, represent the visual signature of the area. For instance, the tree in the island shown in the lower image of Figure 2 (Marquessas Way/Via Dolce intersection) is the focus of attention. Those shown in the island and along Via Marina in Figure 6 present
memorably sculptural forms. The latter image represents the panoramic view from Aubrey E. Austin Park. From the North Jetty Promenade along the southeast side of the park, this view of Via Marina is framed by the trees within the park, but the angle of view is about the same. Views from the park, being close-up to Via Marina, are more sensitive than those from the promenade.

All the views from the critical viewing positions noted are foreground views that are “focal”; that is, the views are framed by structures and street-side plantings such that attention is channeled in the direction of travel. This would not be true for views from the apartments and homes, the lines of sight being transverse to the alignment of the roads. Focal views are important because potential project impacts, if they occur within such views, unavoidably receive maximum attention.

Figure 5 shows the most critical view from the residences lining the east side of the Grand Canal near the Venice Pumping Plant. These residences are partly shown in the upper image in Figure 4. Only those residences abutting the plant on its southwest side along Hurricane St. would be affected by this alignment alternative, as the receive site and tie-in to the plant would be constructed in the vacant lot shown. The view shown in Figure 5 is dominated by the Venice Pumping Plant and Ballona Lagoon/Grand Canal. While trees line the canal to the northwest, in this vicinity vegetation is sparse and contributes little to the character of the views.

Existing Visual Conditions.

Views from Marquesas Way and Via Marina include no features that would be considered incongruous with the visual character of the area. The overall impression is that of highly manicured boulevards and a moderately high-density residential area. The views in Figures 2, 3, and 6 show no evidence of past actions resulting in features incongruous with the setting. Therefore, the existing conditions are within Visual Modification Class 1 (VMC 1; Table K-2, Attachment A).

Regarding the views from the residences on the east side of the Grand Canal opposite to the Venice Pumping Plant, as well as views from the Grand Canal itself, the Venice Pumping Plant dominates views toward the southwest (Figures 4 and 5). This is the primary orientation for views from the residences. This would also be true for residences along Hurricane St., for views to the east. However, the primary viewing direction from these homes is more to the southeast, somewhat away from the Plant. The Pumping Plant is an industrial facility within the context of a residential neighborhood. The chain-link fence around the vacant lot on the northwest side of Hurricane St. opposite the plant lends an industrial character to that parcel, giving it the appearance of a storage yard serving the plant. In character the Plant and fenced yard are anomalous within their setting, are in the immediate foreground of the affected views, and, particularly because of the Plants large scale, are the “subject” of these views. Given the visual dominance of the Plant, the existing visual conditions are rated VMC 4. This means that for the views from the residences noted and the Canal, visual quality is at its lowest (Table K-2, Attachment A).

Venice Alignment Alternatives

Pacific Avenue Alignment

Character. The critical views relative to the Pacific Avenue Alignment are those from Ballona Lagoon/Grand Canal, Hurricane St and Pacific Ave., the residences lining those streets, the North Jetty Promenade, and those from the Entrance Channel (see Section
2.1). Figure 4 shows Hurricane St. and its adjoining residences. Figure 8 shows Pacific Ave. and Ballona Lagoon, from the pedestrian bridge at Lighthouse St., as well as Pacific Ave. seen from its intersection with Via Marina. The North Jetty Promenade at the corner of Pacific Ave. and Via Marina, and a view along Via Marina from that intersection, are disclosed in Figure 9. Views from the Entrance Channel that include the Pacific Ave./Via Marina intersection are represented by Figure 7. The intersection of Pacific Ave. and Via Marina is especially important because the receive site for one alternative for the under-channel micro-tunneling construction alternative would be proximate to this intersection. Note that the views from residences along this alignment are deemed to be represented by those from the roads serving as the primary access to them (Pacific Ave. and Hurricane St.), with the same caveat as discussed relative to the Marquesas Way/Via Marina Alignment.

The character of most of the critical views potentially affected by the Pacific Ave. Alignment, as is the case for the Marquesas Way/Via Marina Alignment, is that of a “built” environment. Along Hurricane St. and Pacific Ave., the visual character is predominately residential, the dominant features being the multi-story homes and apartments along these streets. Vegetation is sparse and contributes little to the visual character of the area. But, unlike the nearly all of the Marquesas Way/Via Marina Alignment, landforms and water features draw substantial attention. The lagoon and its channel (the only landform within the area) present the most memorable positive features, given the rarity of waterways within residential areas along the southern California coast. Note that the lagoon has been “engineered” to be the linear feature it is today. The straight-lined banks are uncharacteristic of natural waterways, but are characteristic of built environments.

From Hurricane St., the views are framed by the nearby residences and are extremely focal, being directed along the alignment of the street. Those from Pacific Ave. are relatively distant, framed to a much lesser degree, but are also somewhat focal. Note the converging lines of the lagoon banks and Pacific Ave. in the lower image in Figure 8.

At the south end of this alignment alternative, views include the Entrance Channel from points along the North Jetty Promenade. Note in Figures 7 and 9 the observation decks along the promenade, which focus attention to the southeast. The character of views from Via Marina and the promenade differs significantly from that for views from Hurricane St. and Pacifica Ave. While both sets of views are totally engineered (the Channel and Ballona Creek are both structured features), the views from the promenade and Via Marina are panoramic and distant, while those from the other streets are more limited and are focal. Next, the promenade and Via Marina views are dominated by the channel to the southeast and ocean in the distance to the west. Also, the views are dynamic, being influenced by the coming and going of recreational marine traffic that is itself a focus of attention.

Views from the Entrance Channel toward the alignment alternative, as noted in Section 2.1, are not the most critical of the views considered and are not addressed further in this assessment.

Existing Visual Conditions. Views from the residences along Hurricane St. at its northeast end, those lining the east side of the canal in this area, and those from the Grand Canal itself, are dominated by the Venice Pumping Plant. It and the chain-link fenced lot on the opposite side of the street are industrial in character (see the discussion of these features in the section describing the Marquesas Way/Via Marina Alignment). The
anomalous nature of the Plant is incongruous with the residential area around it and dominates views from these residences and from the Grand Canal. Moreover, views from Hurricane St. to the northeast focus on the Plant because the views are framed by residences, limited to the foreground, and are directed toward the Plant by the converging lines of the street. Because the Plant dominates the subject views, the affected views have a visual condition of Visual Modification Class 4 (Table K-2, Attachment A).

Views from Pacific Ave., its intersection with Via Marina, the North Jetty Promenade, and the Entrance Channel include no anomalous features introduced by past actions that would be considered incongruous with the character of the area. Therefore, the existing conditions are within Visual Modification Class 1 (Table K-2, Attachment A).

Dockweiler Beach to Pacific Avenue Alignment

This alternative was considered in the EIR but was deemed not to be viable and is not addressed further in this assessment.

Dockweiler Beach Alignment

This alignment is considered in the EIR not to be a viable alternative and is not addressed further in this assessment.

Westchester/Playa del Rey Alignment Alternatives

Pacific Avenue/Vista del Mar Alignment

Character. The critical views relative to this alternative alignment are those from the bicycle path along the Pacific Ave. “fishing” bridge, the bridge itself, the residential area along Pacific Ave., those from Del Rey Lagoon Park and the nearby beach access route, and the views from Vista del Mar, a designated scenic highway. Figures 10, -11, -13 and -14 show images representing these potentially affected views.

The character of landscape within these views is that of a built environment which is mostly a residential area with adjoining recreation areas, including parking areas serving those sites, a bicycle path, Del Rey Lagoon Park, and Dockweiler Beach. Views from the bridge and bicycle path are panoramic across 360 degrees, taking in Ballona Creek and the Entrance Channel to the northwest, the Pacific Ocean to the southwest, as well as the residential area around the intersection of 62nd St. and Pacific Ave. to the southeast.

Figure 10 shows panoramic views from the northeast to the southwest, seen from the bridge. These views also represent those from the bicycle path on the bridge, and the adjoining public parking areas. The dominant features in the views shown are the multi-story residences at the end of Pacific Ave. in the foreground, and those in the background lining the northeast side of Del Rey Lagoon Park to the northeast. Unlike the views along Via Marina, vegetation plays a minor role in distinguishing the visual character of the area, and the only landmark is the southeast bank of Ballona Creek. However, these views are part of a continuum of the visual experience that includes the views to the northwest and southwest noted above, in which the Entrance Channel, Ballona Creek, and are the dominant features.

The views in Figure 11 show the character of the residential area along Pacific Ave. as well as the proximity of Del Rey Lagoon Park. One of the parking areas serving the park is in the view shown in the lower image. The character of this part of the alignment is
almost entirely residential, with the somewhat natural character of the adjoining park and its lagoon being the focus of attention (Figure 12). At the terminus of this alignment alternative, along Vista del Mar near Waterview St., views are panoramic and include the Pacific Ocean and Dockweiler Beach to the southwest, and the residences lining the northeast side of the street. Figures 13 and -14 are views from points at or near where Vista del Mar intersects with Waterview St. and Napoleon St., respectively. Views from the homes noted cannot be represented directly, so those from the street are treated as representative of those from the residences shown.

Existing Visual Conditions. From the critical public viewing positions noted there are no features or land uses in view that would be considered incongruous with those inherent to character of the area. The overall impression is that of well-maintained urban residential area with adjoining public recreation sites (the park and beach). Therefore, the potentially affected views have a visual condition of Visual Modification Class 1 (Table K-2, Attachment A).

Large Diameter (Mined) Tunneling Alignment Alternatives

Alternative 1: Dockweiler Beach Alignment

This alternative has been deemed in the EIR not to be viable and is not addressed in this assessment.

Alternative 2: LAX – Dockweiler Beach

Character. The critical public views relative to the Starter Shaft site for this alternative are those from Vista del Mar, Napoleon St., the residences along the northeast side of Napoleon St., and a pedestrian access trail which runs along the southwest side of Napoleon St. (Figure 14, upper image). Regarding the Extraction Shaft site, the critical views would be from residences fronting Dockweiler Beach near Hurricane St., as well as those using the beach or playing volleyball at the nearby court (Figure 15, upper image). Critical views relative to cut-and-cover construction would be those from Hurricane St., the residences along that street, the Grand Canal near the Venice Pumping Plant, and from residences lining the east side of the canal (Figure 4 and -14).

Views from Vista del Mar, a designated scenic highway, are panoramic across 360 degrees, taking in the vacant land around the Starter Shaft site (LAX property) and the beach and ocean to the southwest. The LAX property is relatively featureless, being a gently sloping area of grassland and low shrubs. There are several paved roads in the area, but these are barely visible in the view shown in Figure 14. To the southwest, the view takes in Dockweiler Beach, the ocean and distant points along the coast to the northwest (lower image, Figure 14).

Views from the residences in the area could not be directly evaluated, but would be of the same character as those from Vista del Mar. However, the views from Napoleon St. and the nearby residences would be panoramic across 180 degrees; given the orientation of the residences, views face to the southwest toward the Starter Shaft site. From Napoleon St., the views are directed to the northwest and southeast, in the direction of travel. The character of these views is the same as that for views from Vista del Mar, primarily featureless open land and beach, with the Pacific Ocean seen in the distance.
Views including the Extraction Shaft site are panoramic from points on the beach and from the nearby residences. The broad expanse of the beach is nearly featureless, except for the volleyball “court” shown, lifeguard stands in the distance, and the ocean surface.

The character of views from Hurricane St. has been described relative to the Pacific Ave. Alignment Alternative: the views are focal, being framed by the residences along this street, and constrained to the immediate foreground. It is entirely a “built” environment defined by the homes in the area, and landscaping is of minor importance, especially as compared to that which lines Marquesas Way and Via Marina to the northeast.

The cut-and-cover construction activities, where they occur near the pumping plant, would be within view of residences lining the east side of the Grand Canal and from the canal itself. The character of these views was described relative to the Marquesas Way/Via Marina Alignment. The views are dominated by the Venice Pumping Plant and the canal, with vegetation being sparse in this location.

Existing Visual Conditions. Critical views including the Starter Shaft include no features that would be considered incongruous with the visual character of the area. The vicinity is relatively featureless open land serving as a foreground for distant ocean views and views of the nearby beach. There being no incongruous features, the existing conditions are considered to Visual Modification Class 1 (Table K-2, Attachment A). This is also true for the critical views which include the Extraction Shaft area and those including most of the cut-and-cover construction activities along Hurricane St. The exception are those views from this street and the residences on the east bank of the canal which include the Venice Pumping Plant. Here the plant dominates the available views and is a feature that is incongruent with the residential context and the Grand Canal. The existing conditions are considered to be Visual Modification Class 4.

Alternative 3: Direct Mined Tunnel Connection from LAX Property Venice Pumping Plant Via Dockweiler Beach

For this alternative, the Starter Shaft would be located in the same place as that for Alternative 2, on the LAX property described. The character and existing visual condition of the lands within critical public views have been described relative to that alternative. The Extraction Shaft, would be located in the vacant lot opposite to the Venice Pumping Plant. The character and existing visual conditions for views that include this site were described relative to the Marquesas Way/Via Marina Alternative Alignment.

Alternative 4: Direct Mined Tunnel Connection from LAX Property to Venice Pumping Plant

The Starter Shaft and Extraction Shaft sites for this alternative are the same as those for Alternative 3, and the character and existing visual conditions for these sites have been described relative to Alternative 2 and the Marquesas Way/Via Marina Alternative Alignment.
3.0 Regulatory Setting

3.1 City of Los Angeles General Plan

The City of Los Angeles General Plan is an advisory document comprising 11 Citywide Elements: Transportation, Infrastructure Systems, Housing, Noise, Air Quality, Conservation, Open Space, Historic Preservation and Cultural Resources, Safety, and Public Facilities and Services, and the Land Use Element. Of these elements only the Transportation and Land Use Elements are relevant to the Aesthetics/Visual Resources assessment. The Land Use Element is composed of 35 local area plans, known as Community Plans, as well as counterpart plans for the Port of Los Angeles and Los Angeles International Airport. The relevant parts of the Transportation Element and Community Plans are listed discussed below.

3.1.1 Transportation Element

The relevant part of the Transportation Element of the General Plan is the identification of Designated Scenic Highways (Map E) within City limits. One such road is of specific importance to the Proposed Project, the stretch of Vista del Mar between Culver Blvd. and West Imperial Highway. All of the inland Project Alignment Alternatives south of the Marina del Rey Channel and Ballona Creek would be constructed within Vista del Mar up to the terminus near Waterview St. Specific Scenic Highways Guidelines are presented in the Element as interim direction pending the adoption of Scenic Corridor Plans. However, none of the guidelines is pertinent to the Proposed Project, inasmuch as they address roadway design; grading; planting/landscaping; signs/outdoor advertising; and utilities. However, the Vista del Mar’s designation as a Scenic Highway is an indication that views from this road are of the highest sensitivity and importance to the consideration of visual impacts (See Section 2.1, Visual Sensitivity). Moreover, potential interruption of access to this Scenic Highway would be important in the consideration of Visual Impacts.

3.1.2 Venice Community Plan

The Alternative Pacific Avenue and North Dockweiler Beach Alignments for the Proposed Project are within the community of Venice. Specific goals and policies addressing Visual Resources directly or indirectly are found in Chapter 3 (Land Use Policies and Programs).

Historic and Cultural Resources

Coastal Resources Goal 18: Preservation of the Scenic and Visual Qualities of Coastal Areas

The policy supporting this goal is to enhance public access to the coast, but the program for implementation also includes preventing development from interfering with ocean and scenic coastal areas, minimizing the alteration of natural land forms, and assuring that Projects are visually compatible with the character of surrounding areas.
Land Use

Design Principles for New Development

Any development within the Venice Coastal zone is regulated by the Venice Land Use Plan as well as the Venice Coastal Zone Specific Plan. The relevant policy is: (e) Views of distinctive visual resources (e.g., bluffs, wetlands) will not be significantly disturbed.

Coastal Visual Resources

Four policies are articulated relative to Visual Resources:

- Protect existing views of the wetlands from the surrounding public streets and open space areas.
- No billboards or off-premise commercial signs will be permitted.
- Sources of funding shall be sought to allow undergrounding of existing transmission lines inland adjacent to the wetlands.
- Landscaping and plant materials should be used to screen and soften visually obtrusive elements.

3.1.3 Westchester—Playa del Rey Community Plan

The inland Alternative Alignments either follow Pacific Avenue to Vista del Mar and end at Waterview Street or the LAX Starter Shaft site, depending on the construction alternative, or run under South Dockweiler Beach via deep-tunnel construction to end at the LAX site. Specific goals and policies addressing Visual Resources directly or indirectly are found in Chapter 3—Land Use Policies and Program.

Coastal Resources

The communities of Westchester and Playa del Rey have not yet prepared a Local Coastal Program (LCP) to effect the policies of the California Coastal Act (the Act). The Coastal Resources section of the Community Plan has as one objective the provision of a Land Use guide for implementing the policies of the Act (Objective 18-1). This will consist of a Local Coastal Program and Land Use Plan to define local policies and ordinances regarding coastal resources. Specific to Visual Resources in this section is the following goal:

Goal 18.

"Protect Westchester-Playa del Rey’s unique coastal qualities by maintaining the coastal zone in an environmentally sensitive manner and preserving the scenic views of the area, while ensuring access and public use of coastal resources."

The following objective and policy are relevant to the Project:

Objective 18-5, Policy 18-5.1: Specific to Visual Resource protection is this objective: “Preserve coastal visual resources by protecting and enhancing scenic views of the ocean and wetlands from designated Scenic Highways, and public view sites.” Vista del Mar is a designated Scenic Highway from Culver Blvd. to W. Imperial Highway. Aspects of the Project alternatives would fall within views from this roadway, as well as from...
Dockweiler Beach below this road. This beach, by definition, would be a “public view site.” Policy 18-5.1 stipulates that:

- “The scenic and visual qualities of Westchester-Playa del Rey Coastal Zone should be protected and enhanced where feasible by siting and designing development in order to:
  - Protect public views to and along the ocean and scenic coastal areas;
  - Minimize the alteration of natural landforms;
  - Be visually compatible with the character of the surrounding area; and
  - Retain existing views from designated public view areas and Scenic Highways.

- All new development in the Coastal Zone, including public works and recreational facilities, should be subordinate to their setting, and minimized in height and bulk to the extent feasible to accomplish view protection (emphasis added).”

- Under this Policy it is required that any development limit or shield outside lighting.

### 3.2 Coastal Plan Policies

The vicinity of the Project Alternatives is entirely within the coastal zone. As noted above, Westchester and Playa del Rey do not have a Local Coastal Program and Land Use Plan. Those communities, in their Community Plan, have as a policy the preparation of such a program and plan. Coastal Zone issues are addressed, for now, solely in the Community Plan.

#### 3.2.1 Venice Local Coastal Program Land Use Plan

The community of Venice, however, does have a Local Coastal Program. The relevant parts are found in the Land Use Plan for that Program. This Local Coastal Program represents the Venice Community’s response to the California Coastal Act of 1976 requirement that local governments prepare land use plans and implementing actions to effect the policies of the Act. The Coastal Act policies address specific issues which include the protection and preservation of visual and scenic resources. The Act additionally establishes a framework for prioritizing land uses, with the highest priority being accorded to the preservation and protection of natural resources, including prime agricultural lands.

Section 30251. This section of the Venice Local Coastal Program Land Use Plan Policies repeats Section 30251 of the Coastal Act, which requires the consideration of scenic and visual qualities of coastal areas and their protection as a resource of public importance. Specifically:

- Permitted development shall be sited and designed to protect views to and along the ocean and scenic coastal areas,
- To minimize the alteration of natural land forms,
Appendix I: Visual/Aesthetic Resources

- To be visually compatible with the character of surrounding areas, and
- Where feasible, to restore and enhance visual quality in visually degraded areas.
- New development in highly scenic areas...shall be subordinate to the character of its setting.

The Coastal Commission added the following statement regarding this section:

"The primary concern...is the protection of ocean and coastal views from public areas such as highways, roads, beaches, parks, coastal trails and accessways, vista points, coastal streams and waters used for recreational purposes, and other public preserves rather than coastal views from private residences where no public vistas are involved."

3.2.2 Los Angeles County Local Coastal Program: Marina del Rey Land Use Plan

Coastal Act Policies

The aspect of the Los Angeles County Local Coastal Program pertinent to the Proposed Project is the Marina del Rey Land Use Plan, certified by the California Coastal Commission in 1996. Common to all such LCPs are the Policies of the Coastal Act listed in Section 30251 of the Act and the LCPs (see Section 30251 of the Venice LCP). The Marina del Rey Land Use Plan specifically addresses the protection and maintenance of harbor views in conjunction with new development, as well as the visual compatibility of such development with existing natural and manmade environments.

The Scenic Highway Element (Los Angeles County General Plan) identifies Via Marina, from Pacific Avenue to Admiralty Way as a Scenic Highway. Included in the Element's recommendations is the proposal to direct the County departments to give special consideration to aesthetics in the planning, design, and construction of public facilities along scenic highways.

Policy "e-1"

Pertinent to the Proposed Project is the policy to enhance the ability of the public to experience and view the Marina waters and to allow for greater public access to such views. Since the part of Via Marina flanking the Marina del Rey Entrance Channel up to Pacific Avenue is to become part of an officially designated Scenic Drive (Policy e-3), it is assumed that access to—and protection and enhancement of—views of the entrance channel are part of this policy, rather than strictly the protection and enhancement of views of the marina. Moreover, vantage points from lands adjacent to the Main Channel are identified as being among the particularly significant vantage points within the Marina area. The pertinence of the Scenic Drive designation is clear for the Marquessas Way/Via Marina Alignment given that it would be constructed within this street and would have both receive and Push Sites for micro-tunneling along the right-of-way. The Pacific Avenue Alignment Alternative extends to a receive site at Via Marina, as well.
4.0 Environmental Impacts

4.1 Technical Approach

The assessment was conducted in conformance with the California Environmental Quality Act (CEQA) documentation requirements. CEQA defines significant impacts as those having 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” (Article 20, Section 15382).

Appendix G of CEQA (Environmental Checklist) more specifically identifies four areas of concern regarding a project’s potential impact on aesthetics:

- Substantial, adverse effects on a scenic vista.
- Substantial damage to scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within [view from] a state scenic highway.
- Substantial degradation of existing visual character or quality of a site and its surroundings.
- Creation of a new source of substantial light or glare that would adversely affect day or nighttime views in the area.

The methodology for assessing visual impacts is detailed in Attachment A. The focus for this report is to determine whether or not the Project has the potential to cause significant visual impacts. A significant impact is, in accordance with the CEQA definition, a substantial, or potentially substantial, adverse change in the visual resources of the affected environment. An adverse “change,” relative to visual impact assessment occurs when features are changed, introduced, made less visible, or are removed, such that the resultant effect on public views is perceptibly incongruous with their inherent character. Changes that seem uncharacteristic are those that appear out of place, discordant, or distracting. The intensity of a visual impact depends upon how noticeable the adverse change may be. Noticeability is a function of project features and their context and viewing conditions (angle of view, distance, primary viewing directions, lighting, etc.). Four levels of visual impact intensity (noticeability) may occur. These are termed “Visual Modification Classes” (VM Classes) and are defined in Table K-2, Attachment A.

Significant (substantial) changes (significant visual impacts) are further defined as those that would:

- Result in an inconsistency with laws, ordinances, regulations, and standards (LORS) applicable to the protection of visual resources; or
- Cause a perceptible reduction of visual quality. The perception that visual quality has been reduced is partly a function of public sensitivity to adverse visual
impacts. Table K-3 of Attachment A summarizes the relationship of impact intensity, sensitivity, and the perceived reduction in visual quality.

Most usually a third criterion is applied which stipulates that an impact must endure for greater than one year before it may be considered to be significant. However, in this assessment, no particular duration is stipulated because much of the sensitivity for the potentially affected views is due to recreation activities and sites in the vicinity of the Project. The value to the public of a single peak-use season is assumed to be extremely important, and any substantial, adverse visual impacts on the aesthetics of the area during this period are considered to be significant, even if temporary or short-term. Since no information is available regarding when Project construction would commence, it is assumed that construction may occur during the late spring and summer months.

4.2 Thresholds of Significance

4.2.1 CEQA

The threshold for significance, according to CEQA, is that point where an adverse visual impact is deemed to be substantial, i.e., a perceptible reduction in visual quality. CEQA offers no specific criteria for what is deemed “substantial.” Therefore, criteria from other sources have been used to provide a systematic approach to this issue, which is summarized in Table K-3 of Attachment A. The matrix in the table illustrates the relationship of public sensitivity, impact intensity, and what is considered to be a substantial visual impact. The criteria are based upon the principles common to the three primary federal systems for visual resource management and analysis (USDA-FS, 1995; USDA-BLM, 1978; USDOT-FHWA, 1981). This approach has been applied to numerous CEQA-compliant documents over a 15-year period (Headley, 1990-2003).

4.2.2 City of Los Angeles CEQA Thresholds

The City of Los Angeles Draft CEQA Thresholds Guide offers a list of 12 areas of concern to consider in assessing the significance of an impact in accordance with the CEQA Checklist. However, no specific significance criteria accompany this Guideline to use in making that determination. Moreover, the Marquesas Way/Via Marina Alignment Alternative is not within the City of Los Angeles, so the City Guidelines do not apply to this alignment alternative.

In the absence of specific significance criteria in the City of Los Angeles Draft CEQA Thresholds Guide, or for projects within the County of Los Angeles, the methodology in Attachment A, specifically the matrix in Table K-3, has been applied to the determination of significance. Note that all of the City of Los Angeles “Thresholds Guide” issues of concern are considered, as appropriate, in this assessment but are grouped relative to the four CEQA Checklist issues. An exception occurs for the City’s concern over Project-caused shading. The current CEQA Checklist does not require consideration of shading. That notwithstanding, this City issue of concern is listed along with the CEQA-related issues.
AES-1: Would the Proposed Project or its alternatives cause a substantial degradation of existing visual character or quality of a site and its surroundings?

The City of Los Angeles Draft Thresholds Guide directs that; “The determination 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 valued aesthetic image of an area.
- 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 aesthetic value of an area.

AES-2: Would the Proposed Project or its alternatives cause substantial, adverse effects on a scenic vista?

This CEQA issue of concern is interpreted in this assessment as addressing the degree to which Project-related features interfere with a scenic vista, either by obstructing it or interfering with access to it. The City of Los Angeles Draft CEQA Thresholds Guide is relevant to this CEQA issue as follows:

- The extent of obstruction (e.g., total blockage, partial interruption, or minor diminishment) of recognized or valued views (such as natural topography, settings, manmade or natural features of visual interest, and resources such as mountains or the ocean).
- 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.

AES-3: Would the Proposed Project or its alternatives cause substantial damage to scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings, within view from a state scenic highway?

One issue expressed by the City of Los Angeles Draft CEQA Thresholds Guide is relevant to this CEQA issue:

- Whether the project affects views from a designated scenic highway, corridor, or parkway.
AES-4: Would the Proposed Project or alternatives result in a new source of substantial light or glare that would adversely affect day or nighttime views in the area.

Relative to the City of Los Angeles Draft CEQA Thresholds Guide, the factors that are to be considered in determining whether the Project would have a significant impact through nighttime illumination are:

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

AES-5: Would the Proposed Project or alternatives result in substantial negative shadow effects on nearby shadow-sensitive uses?

The City of Los Angeles Draft CEQA Thresholds Guide requires the consideration of the potential impact of shading by project-related structures. The current CEQA Checklist does not require consideration of shading, however it did so at the time the Draft Thresholds Guide was prepared and is, therefore, listed here as an issue to be addressed. However, the analysis does not address this issue because the Project has no potential to create any shading impacts as defined by the City guidelines.

AES-6: Would the Proposed Project or alternatives result in visual impacts that would not be consistent with applicable rules and regulations?

This impact is not expressed in the CEQA Checklist, but is listed in the City of Los Angeles Draft CEQA Thresholds Guide. As stated above, it is interpreted as asking whether the Project and its alternatives would result in any inconsistencies with applicable plans, policies, objectives, standards, ordinances, regulations or statutes.

- Applicable guidelines and regulations.

4.3 Project Description

This section describes those aspects of the Proposed Project and its Alternatives which are pertinent to the assessment of impacts on the visual/aesthetics resources. The potential visual impacts of the Project would be due entirely to its construction; there would be no aspect of its operation which would be visible. Therefore, the critical aspects of the Project have to do with the spatial extent of construction, the equipment and activity associated with it, and the duration of the activities from the start of construction until Project completion. A general description of Project construction activities is presented in Section 3.1.5 of the DEIR (Construction Alternatives). This section of the visual/aesthetic impact assessment summarizes the relevant aspects of construction presented in Section 3.1.5 of the DEIR, while also introducing more detailed information that is not found in the DEIR.
Micro-Tunneling (Boring) and Cut-and-Cover Construction

All the Cut-and-Cover Construction Alignment Alternatives require tunneling under the Marina del Rey Entrance Channel to connect the Playa del Rey alignment with the Venice or the Marina del Rey Alignment Alternatives. Additionally, the Marina del Rey Via Marina Alignment Alternative, would require tunneling under the Grand Canal in order to connect with the Venice Pumping Plant. The tunneling referred to is alternatively termed “Micro-Tunneling” or “Boring.”

The visible aspect of Boring would be the excavation at the starting and ending points of the under-channel and under-canal sections of the alignments. The starting point is variously referred to as the “Launch,” “Jacking,” or “Push” site, while the endpoint is referred to as the “Receive Site.” There is only one viable Push Site for under-channel Boring, and this would be located at the northerly end of the Playa del Rey Alignment Alternative, on the south side of the Entrance Channel, along the northeast side of the Pacific Ave. fishing bridge. There are two options for push sites for under-canal tunneling, as described relative to the Marina del Rey Alignment.

Also, there would be two alternative Receive Sites on the north side of the Entrance Channel. One would be in the parking lot northwest side of the corner where Via Marina turns 90 degrees to the southwest, and the other would be at the southeast end of Pacific Ave.

No graphic examples of the above-ground features of “Boring” construction and the construction of the Push and Receive Sites specific to the Proposed Project were available at the time of the assessment (photo-simulations or photographs of similar construction activities). However, the lower images in Figure 16 shows shaft construction on a scale larger than that proposed for the construction of Push and Receive Sites.

Push Site Equipment

The major visible elements of the Push Sites would be:

- Jacking pit (from which the hydraulic jacks push pipes through the ground behind a remotely operated Tunnel Boring Machine (TBM).
- Remote control cabin for operating the TBM.
- Crane.
- Support facilities (generator, power pack, bentonite lubrication unit).
- Slurry separation equipment and tanks.
- Construction/Laydown area, 10 – 12,000 sq ft in area, for pipe and other equipment storage and staging.
- Truck traffic to and from the pit for transporting tunnel muck, pipe sections and tunneling equipment. There would be eight truck round trips per day for muck removal and material supply.
- Construction crew. There would be 17 construction crew on site and 17 passenger-car round trips daily.
• Nighttime construction and lighting. It may be required to proceed continuously at the end of long drives through sticky soils to prevent the pipe from getting stuck short of the receiving site. In such cases nighttime construction would be required. It is assumed that there would be a need for lighting at the Push site throughout the night, on occasion.

• Acoustic curtain (sound barrier). To minimize the transmission of noise, it is proposed that a 20- to 30-ft tall acoustic curtain be installed around the site. This curtain would shield from view all equipment around the Push Site except for the crane. Typical curtains are shown in three of the images in Figure 16.

**Push Site Construction Duration**

The two Push Sites would require about two months each to complete and must be constructed prior to the start of Boring under the Entrance Channel and the Grand Canal. The under-channel tunnel is 1,800 ft long and boring rates range from 30 – 50 ft per eight-hour shift. A conservative estimate allows for no nighttime work, so it is assumed that there would be one shift per day. Under this assumption, Boring could require from 36 to 60 days (about one to two months). Cumulatively, Push Site construction and Boring would take up to about four months and would be considered to be “temporary” (see Appendix A). Even if tunnel Boring were to be sequential to cut-and-cover construction activities (see below), the cumulative total construction time would be less than one year and would also be considered to be temporary. However, it is assumed that Boring and trench construction would be concurrent.

For under-Channel boring, the rate of advance would be the same as for under-channel boring. The tunnel length would range from about 100 ft to 500 ft, depending on which of two alternative Push Sites is used. Tunneling could therefore require from 10 to 16 days for the longer route, or 3 to 4 days for the shorter route. It is assumed that there would be no nighttime construction.

**Receive Site Equipment**

Construction activity at the Receive Sites would occur during two periods: the initial construction of the Shaft, and then, later, when the TBM is extracted from the tunnel and the pipeline is either connected at the Receive Sites to the alignment along Via Marina or that along Pacific Ave., or, at the north end of the Via Marina alignment, the pipeline is tied in to the Venice Pumping Plant. The major equipment that would be utilized at the Receive Sites would be:

• Crane
• Jacking equipment
• Construction/Laydown site, about 5,000 sq ft in area, for pipe and other equipment storage and staging
• Truck traffic to and from the pit for transporting tunnel muck, pipe sections and tunneling equipment. There would be approximately 15 truck round trips per day for muck removal and material supply.
• Construction crew. There would be 25 construction crew on site and 25 passenger-car round trips daily.
• Acoustic curtain. To minimize the transmission of noise, it is proposed that a 20-
to 30-ft tall acoustic curtain be installed around the site. This curtain would shield
from view all equipment around the Receive Site except for the crane, which will
extend beyond the top of the curtain.

Receive Site Duration

As noted, there would be two alternative Receive Sites along the north side of the
Entrance Channel. Construction of these Receive Sites would require about six weeks
each to complete. Then all activity at the sites would cease until under-channel Tunnel
Boring reaches them. At that point the TBM would be extracted from one or the other of
the Receive Site shafts and the pipeline would be tied in with either the Via Marina or
Pacific Ave. cut-and-cover alignment. It is estimated that the extraction and tie-in
activities would require about one week.

Similarly, the Receive Site in the vacant lot opposite to the Venice Pumping Plant would
require six weeks to complete, then would lie dormant until under-Canal Tunnel Boring
reached the site. One week would be required for TBM extraction and tying the pipeline
in with the Venice Pumping Plant.

Cut-and-Cover Construction Site Equipment

Cut-and-cover construction is a common method of linear pipeline construction that
involves an open trench and sequential activities. The trench would be excavated and
then shored up with sheet piles that would be installed 200 to 300 ft ahead of the pipeline
crew. Construction involves excavation, the pouring of a concrete foundation, backfilling
with a bed of gravel, pipeline installation, backfill and compaction, restoration of curbs
and utilities, and re-paving the affected road. Figure 16 shows one example of a typical
array of equipment used in cut-and-cover construction along a public street.

The major visible elements of the Cut-and-Cover Sites would be:

• Concrete saw
• Pavement Breaker
• Pile driver
• Excavator
• Rubber tire loader
• Cranes (2)
• Backhoe loader/compactor
• Generator/compressor
• Soil compactor
• Asphalt paver
• Sweeper
• Water truck
• Supply truck
- Haul/dump truck
- Minimum of 17 to 28 workers on site daily
- A moving Construction/Laydown area along 1,000-ft stretches of the alignment.
- A Construction/Laydown area next to that serving the Push and Receive Site construction activities.

**Cut-and-Cover Construction Duration**

The proposed cut-and-cover construction method of construction would take 12 weeks to install approximately 1,800 ft of pipeline, completed to the point that the affected road is returned to its pre-construction state (paved). Given that rate of construction, the duration of construction for the alignment alternatives north of the Marina del Rey Entrance Channel would be about seven (7) months, while that for the alignment south of the Entrance Channel (Pacific Ave./Vista del Mar) would also be about seven (7) months. It is assumed that cut-and-cover construction north and south of the Entrance Channel would occur concurrently. Moreover, it is assumed that the construction and operation of the Push and Receive Sites would be concurrent with the cut-and-cover construction. However, these assumptions are not critical to the assessment of visual impacts, as entirely different public views are affected by north- and the south-Channel alternatives. Also, even if the Boring construction activities were sequential to cut-and-cover construction, the cumulative total construction time would be less than one year. Therefore, the visual impacts would be considered to be “temporary” in duration, regardless (see Attachment A).

**Large-Diameter (Mined) Tunneling Construction**

There are four alternative alignments for Mined Tunneling Construction; however, Alternative 1 was considered but found not to be viable. While Alternative 2 primarily would require mined tunneling, it would also use about 1,000 ft of cut-and-cover construction, and Alternatives 2 and 3 would require about 300 ft of cut-and-cover construction. Mined tunneling involves a Starter Shaft and an Extraction Shaft. The Starter Shaft would be located on LAX property about 300 ft northeast of Vista del Mar and as close as 220 ft south of Napoleon St. There are two alternative Extraction Sites, one on Dockweiler Beach at the southwest end of Hurricane St., and the other at the northeast end of Hurricane St. in a vacant lot directly across from the Venice Pumping Plant. The lower images in Figure 16 show a shaft site under construction and enclosed by an acoustic curtain. The scale of the area shown is similar to that which would be required for construction of the Starter Shaft. The Extraction Shaft would require approximately half this area.

Mined tunneling uses manned TBMs along a continuous alignment that may be of any length, so this construction alternative would require just the Starter Shaft and one Extraction Shaft. Additionally, two 3-ft diameter escape shafts would be needed, one north and one south of the Marina del Rey Entrance Channel, but these would be so minimally visible, and their construction would require so little time (a few days), that they are not considered further in this assessment.

**Starter Shaft Equipment**

The major visible elements of the Starter Sites would be:
• 30-ft diameter Starter Shaft.
• One 160-ton crane to lift/set the TBM and hoist muck cars.
• One 35-ton RT crane to handle segments and load segment cars.
• Office facilities, change houses.
• Cut-and-cover equipment (see above) for open trench construction.
• Support facilities (generator for pumps, electrical substation).
• Construction/Laydown area, 12,000 sq ft in area, for storage of tunnel liner and carrier pipe segments throughout the duration of the tunneling.
• Truck traffic to and from the pit for transporting tunnel muck, pipe sections and tunneling equipment. There would be 15 truck round trips per mining shift.
• Construction crew. There would be 20 – 25-man construction crew on site and 20- to 25 passenger-car round trips daily.
• Lighting may be required for security of the construction site and nighttime construction.
• Acoustic curtain. To minimize the transmission of noise, it is proposed that a 20- to 30-ft tall acoustic curtain be installed around the site. This curtain would shield from view all equipment around the Extraction Site except for the crane.

**Starter Shaft Construction Duration**

The Starter Shaft would require approximately seven months to construct (see Table 4.2-7 in the DEIR), and the tunnel portion of construction would last from 27 to 28 months for Alternative 2 and Alternatives 3 and 4, respectively. For Alternative 2, there would be 1000 ft of cut-and-cover construction. About 700 ft of this would occur along Hurricane St., while 300 ft would be needed to tie in the pipeline at the Starter Shaft with the existing C.I.S. in Vista del Mar. For Alternatives 3 and 4, only the tie-in open trench construction from the Starter Shaft to Vista del Mar would be needed. It is assumed that cut-and-cover construction would occur during tunnel construction and would not add to the duration of construction activities.

**Extraction Site Equipment**

The major visible elements of the Extraction Sites would differ depending on the phase involved. The first phase is the construction of the shaft, and the second phase is the removal of the TBM and construction of the tie-in with the pipeline that would be installed along Hurricane St. For construction of the shaft, the following equipment would be needed:

• 20-ft diameter Extraction Shaft.
• Muck cars
• Cranes (2)
• Cut-and-cover equipment (see above) for open trench construction.
• Support facilities (generator for pumps, electrical substation).
• Construction/Laydown area, 5,000 sq ft in area.
• Truck traffic to and from the pit for transporting tunnel muck, pipe sections and tunneling equipment. There would be an estimated 15 truck trips per day for muck removal, and about three truck loads per day for supplies.

• Construction crew. There would be approximately 25 construction crew on site and 25 passenger-car round trips daily.

• Lighting may be required for security of the construction site.

• Acoustic curtain. To minimize the transmission of noise, it is proposed that a 20- to 30-ft tall acoustic curtain be installed around the site. This curtain would shield from view all equipment around the Extraction Site except for the crane.

**Extraction Shaft and Cut-and-Cover Construction Duration**

The Extraction Shaft would require 10 weeks to construct and about one week for TBM removal after tunnel excavation has been completed. The cut-and-cover construction that is part of the Mined Tunnel construction alternative is expected to occur concurrently with tunnel construction.

### 4.4 Visual/Aesthetics Resources Impacts

The visible changes that would be brought about by the Proposed Project and its alternatives, and their potential to create aesthetic impacts, are evaluated in detail in this section relative to each alignment alternative, as well as relative to the several construction alternatives to the Proposed Project (Mined Tunneling Alignment Alternatives). The significance of these visual impacts has been determined by applying criteria summarized in Section 4.3 (and detailed in Attachment A), and the guidelines developed by the City of Los Angeles. Following, in Section 5.0, mitigation measures are recommended for changes that have the potential to create significant impacts; and evaluations are made of whether these measures are likely to reduce the impacts to a level that is less than significant.

#### 4.4.1 Marina del Rey Alternative: Marquesas Way/Via Marina

**Overview**

Critical sensitive public views and existing visual conditions are described in Sections 2.1 and 2.2 of this Technical Appendix. The methodology for the following impact assessment is presented in detail in Attachment A.

The critical sensitive viewing positions along this alignment alternative include those from:

• Via Marina, a scenic highway and scenic drive;
• Aubrey E. Austin Park;
• North Jetty Promenade, east end;
• Marina del Rey Entrance Channel;
• Marquesas Way, Via Dolce, and adjoining residences;
- Residences along the Grand Canal near the Venice Pumping Plant;
- Grand Canal;
- Residences at the northeast end of Hurricane St.

**Via Marina, Aubrey E. Austin Park, North Jetty Promenade, and Entrance Channel.**

Relative to Via Marina and the nearby residences, the Project’s visual impact would be significant and temporary, except for the loss of mature street trees, which would cause a long-term impact. The Project features potentially causing the impact would be the Push Site Option 1 and its related construction/laydown area, the cut-and-cover construction along the roadway, and the Receive Site and its construction/laydown area near the Entrance Channel.

For views from Aubrey E. Austin Park, North Jetty Promenade, and Entrance Channel, the Project’s visual impact would also be significant but temporary. The impact would be due solely to the construction of the Receive Site and the related construction/laydown area nearby. The associated activities would be in the foreground of views from the park and Promenade, the residences noted, and Via Marina. To a lesser extent, they would be visible from the northwest lane of the Entrance Channel.

Existing features within view from these sensitive public roads and areas have not been noticeably and unfavorably modified by past activities (Section 2.2). These views are shown in Figures 2 – 7. The industrial character of Project activities and equipment associated with cut-and-cover pipeline installation and the construction and operation of the Push and Receive Sites along this alignment alternative would be incongruous with the established settings for the several potentially affected views.

To a limited extent, in-street and in-parking-lot construction activity might also be visible from Aubrey E. Austin Park and the east end of the North Jetty Promenade. The activities would not, however, be prominent and distracting due to the viewing distance and intervening parkway plantings, so the impact would not be significant. Such construction activities would not be visible from the Entrance Channel due to intervening structures and vegetation.

**Marquesas Way, Via Dolce, and Adjoining Residences.**

For views from these two streets and the nearby residences, the Project would potentially cause significant but temporary visual impacts. These impacts would be due to activities and equipment needed under Push Site Option 2, its associated construction/laydown area, and cut-and-cover construction activities. The potentially affected views have not be adversely affected by past actions such that the effects are noticeably incongruous with their setting. By contrast, the industrial character of Project features would noticeably and adversely affect public views. The construction/laydown site for this option would be in the foreground of views from Marquesas Way, Via Dolce, and their adjoining residences. Also, a public beach-access path starts near the construction/laydown site and runs along the east side of Ballona Lagoon to the south. From the beginning of this path, the construction/laydown site would be within the foreground.

The Push Site Shaft would be in the vacant lot shown in the upper image of Figure 4. The construction activities here would be in the foreground of residences along the northeast
side of Via Dolce at its intersection with Marquesas Way. The shaft site would be screened by an acoustic curtain from 20 – 30 ft tall on four sides. Cranes would be substantially in view above these curtains, and truck traffic to and from the sites would occur intermittently throughout the construction shifts. As such, these Project features would be incongruous with the established settings for these potentially affected views.

**Grand Canal Residences, Grand Canal, and Hurricane St. Residences.**

The visual impact of the Project on views from these residences and the Grand Canal would be adverse but not significant. Push Site Option 2 and the Receive Site, both shown in Figure 4, would be in the foreground of the residences lining the east side of the canal, the canal itself, and residences at the northeast end of Hurricane St. The Receive Site, like the Push Site, would be screened by an acoustic curtain 20 to 30 ft tall. Cranes would be well in view above these curtains, and truck traffic to and from the sites would occur at different points of the day. The curtained construction area and visible equipment would appear industrial and be incongruous with the generally residential setting.

However, relative to views from residences along the east side of the Grand Canal and the Grand Canal itself, the industrial character of the Venice Pumping Plant dominates attention. This would also be true for views from residences along the northeast end of Hurricane, at least for views to the east. Given the visual dominance of the Plant, the existing visual conditions are such that further visual impacts would not noticeably lessen the quality of the affected views.

**Impact Intensity, Significance and Duration**

The visual impacts for this alignment are summarized and discussed below relative to the thresholds for significance noted in Section 4.3.

**AES-1: The Proposed Project or its alternatives would cause a substantial degradation of existing visual character or quality of a site and its surroundings. The impact would be significant but temporary as well as long term.**

Concerning the six Los Angeles City Thresholds for Significance that are grouped under AES-1, the visual impacts are summarized as follows:

- One or more mature street trees which contribute substantially to the value of the scenic highway/drive status of Via Marina would be removed.
- No natural open space would be graded or developed;
- No structures are proposed for any natural open space;
- There would be a high degree of contrast between proposed features and existing features representing the valued aesthetic image of the area.
- No zone change is proposed
- There would be no positive contribution to the aesthetic value of the area.

Certain critical public views would affected by the Project to the point that the impact would be significant. However, the duration would be temporary. Elsewhere, the Venice Pumping Plant has adversely affected the quality of critical public views to the point that the additional impact of the Project would not significantly affect these views. The
impact would worsen the existing visual quality, but the current visual condition due to the Plant is already at the lowest rating. A more detailed analysis follows.

**Via Marina and Adjoining Residences.** Existing visual conditions for views from this designated scenic highway/drive are VMC 1. From this road the following Project features would be within foreground views, proceeding from its intersection with Marquesas Way to where it turns to the southwest:

- The 10-12,000 sq ft construction/laydown area for Push Site Option 1;
- The Push Site Option 1 shaft construction area within the Via Marina/Marquesas Way intersection;
- Cut-and-cover construction along 0.5 mile of roadway and approximately 1,000 ft of parking lot;
- The Receive Site near the Entrance Channel.

These activities and their associated equipment and work force would dominate views from this road and its flanking residences and would be industrial in character and incongruous with the setting. Note that the Push Site would occupy much of the Via Marina/Marquesas Way intersection and would be surrounded by an acoustic curtain 20–30 ft high. The equipment and activity within the curtains would be screened from view, but a crane would be substantially taller than the curtains. The site would have an apparent mass of a two- to three-story building due to the curtains.

The construction/laydown area, if square in configuration, would occupy an area 110 ft on a side. This storage of industrial equipment in a parking lot currently serving recreation and commercial uses within Marina del Rey would appear discordant and dominate views.

From Via Marina’s intersection with Marquesas Way, for about 0.5 mile to the southeast, cut-and-cover construction would occur in one of the two lanes serving travel to the southeast. At end of the in-street construction, the alignment would angle to the south into a parking lot serving nearby residences and proceed for approximately 1,000 ft to the tie-in with the under-channel pipeline at the Receive Site. For the length of the in-street construction, motorists would be restricted to one lane of travel and pass in close proximity to the cut-and-cover construction activities in the second lane. Where the alignment crosses over into the parking lot, one or more mature trees would be removed due to trenching activities and the movement of equipment. In the parking lot mentioned, cut-and-cover construction would be within the immediate foreground of residences along the southwest side of the lot, as well as in the foreground of views from the scenic highway/drive.

Cut-and-cover construction along a 0.5-mile length of Via Marina would be immediately proximate to residences and motorists using this scenic highway. The associated activity and equipment would displace the current positive aesthetic features along the drive and dominate the views. A separate concern is the transition of the in-street construction to the parking lot, which would require the removal of one or more trees on the southwest side of Via Marina. This would be a noticeable loss of a valued visual resource.

From northwest end of Via Marina to the southeast where it passes by Aubrey E. Austin Park, the visual conditions would change from VMC 1 to VMC 4 (dominant),
representing an Impact Intensity Level 3 (Table K-3, Attachment A). Within a highly sensitive view, such an impact would be significant.

The loss of the street tree(s) would be long term, requiring many years to be mitigated by the maturation of new plantings. The duration of the other impacts is uncertain, as it is not known to what degree certain activities would occur concurrently. The cut-and-cover construction would last for about three months, and it is likely that most of the Push and Receive Site construction would be completed concurrently. If not, the cumulative construction could last for about five months. In either case, the time frame would be considered to be temporary. Conclusion: the impact would be significant and primarily temporary, except for the loss of mature street trees, which would be a long-term impact.

Aubrey E. Austin Park, North Jetty Promenade, east end, and Marina del Rey Entrance Channel. The existing visual condition for views from this these critical public viewing areas is VMC 1. The most critical of these views is that from the park, followed by those from the Promenade and the Channel. The only Project feature that would affect views from the Park and Promenade would be the 5,000 sq ft construction/laydown area for Receive Site for the under-channel tunnel boring and the shaft site itself. The cut-and-cover construction would be largely obscured by the intervening street trees and hedges (see Figure 6).

The Receive Site would be surrounded by a 20- to 30-ft-tall acoustic curtain and would be peripheral to the primary views from the park. Given the park’s proximity to the Entrance Channel, it is assumed that views most usually would be directed away from the Receive Site and toward the boating activity in the Channel and the ocean to the southwest. This would also be true for views from the North Jetty Promenade, which is proximate to the Channel. Also, views from the Promenade toward the Receive Site are screened by mature trees within the Park. Regarding views from the Entrance Channel, they would tend to be focused along the Channel either to the northeast or southwest, in the directions of travel.

The most critical of these views are those from the park. Although most viewing might be away from the Receive Site, the park is oriented for viewing to the northwest as well (toward the Receive Site). A conservative approach would be to assume that substantial attention is directed toward Via Marina and the Receive Site. Accordingly, the Site would attract considerable attention at the point of competing with other features in view, if not dominating attention. The two- to three-story curtained area would appear out of place and discordant, not appearing to be an inherent feature of the largely residential area. The resulting visual condition would be VMC 3 (co-dominant). The change in visual conditions would be Intensity Level 2. Within a highly sensitive view, such an impact intensity would be considered to be significant, although the cumulative duration of construction activities at the Receive Site would be seven weeks and, therefore, temporary.

Due to the primary direction of views from the Promenade and the Entrance Channel, coupled with screening by vegetation and attenuation by distance (for the Channel views), the affect of constructing the Receive Site at Via Marina is not expected to be substantial (not significant).

Marquesas Way, Via Dolce, and Adjoining residences. The existing visual conditions for potentially affected views from these roads and residences is currently VMC 1. From
these roads and residences, the following Project features would be within foreground views:

- The 10- to 12,000 sq ft construction/laydown area for Push Site Option 2;
- The Push Site Option 2 shaft construction area;
- Cut-and-cover construction along Marquesas Way/Via Dolce that would connect with the Push Site Option 2 Shaft site.

Activities associated with Push Site Option 1 primarily would not be visible from these roads and residences, as there would be no construction along Marquesas Way or within the “island” at the intersection with Via Dolce. Here, micro-tunneling would occur from this Push site, located northeast of the Via Marina/Marquesas Way intersection, to the Receive site in the vacant lot across from the Venice Pumping Plant. A small part of the cut-and-cover construction at Via Marina would be briefly in view but would be at a distance and not within primary views from most of the residences or along much of the street. An exception would occur for motorists driving on Marquesas Way when approaching the stop light at Via Marina. Here in-road construction would be seen for a relatively short part of the alignment where it would tie in.

On the other hand, the activities, equipment and work force associated with Push Site Option 2, the nearby construction/laydown area, and cut-and-cover construction would dominate views from the roads and residences noted. They would be industrial in character and incongruous with the setting. The construction/laydown area, if it were square in configuration, would occupy an area up to 110 ft long on each side, or an equilateral triangle up to 155 ft on a side (the available space is triangular). It would appear that there is insufficient area in the designated “island” location at the intersection of these two streets, as there is less than 6,000 sq ft of space there. Use of this space for a construction/laydown area is further complicated by the alignment of the cut-and-cover construction needed to bring the pipeline to Push Site Option 2. The alignment seemingly would need to traverse the laydown area in order to directly reach the Push Site, thereby diminishing the area available for laydown. Additional laydown space may be available in the vacant lot next to the Push Site construction area, but that space is limited as well. Consequently, some additional part of Via Dolce or Marquesas Way may have to serve as a construction/laydown area.

Using the island for a construction/laydown area would likely cause the damage and removal of the large, mature tree, as well as all of the landscape materials in the island. This island (see Figure 2) is an entry statement for residential area and the visual focus of traffic along both streets. The loss of the tree and other plantings would cause an irretrievable loss of visual quality.

Regarding the Option 2 Push Site, the construction/laydown site for this option would be in the foreground of views from Marquesas Way, Via Dolce, and their adjoining residences. Also, a public beach access path starts near the construction/laydown site and runs along the east side of Ballona Lagoon to the south. From the beginning of this path, the construction/laydown site would be within the foreground.

The Push Site Shaft would be in the vacant lot shown in the upper image of Figure 4. The construction activities here would be in the foreground of residences along the northeast side of Via Dolce at its intersection with Marquesas Way. The 20- to 30-ft-tall acoustic
Appendix 1: Visual/Aesthetic Resources

curtain around the Push Site would largely fill the vacant lot. This two- to three-story curtain wall would be on all four sides of the site, and would look like a featureless block structure incongruous with the setting. The crane inside the site would protrude well above the curtain walls, and the necessary truck traffic would be visible intermittently throughout the day.

The effect of cut-and-cover construction would be the same as described for the Via Marina views. Views from the roads would be dominated by the proximate construction. Additionally, since open trench construction would need to proceed more or less straight to the Push Site in the vacant lot, the planted island area described above would be traversed by the alignment. The trench construction would unavoidably destroy plantings and cut the roots of the mature tree in the island. Using the area as a laydown site most likely would damage the tree, and trench construction would cause further damage. Together, the activities could cause the tree to be removed.

The visual impacts associated with the construction of the Option 2 Push Site, its operation, the use of the intersection island for a laydown site, and cut-and-cover construction would severally and together dominate views with features incongruous with the setting. The existing visual conditions would change from VMC 1 to VMC 4, representing and impact intensity of Level 3. Given the sensitivity of the views affected, the impact would be significant.

The duration of the construction activities note is as follows. The Option 2 Push Site shaft would be constructed within about two months, and the approximately 500 ft of cut-and-cover construction along Marquesas Way that would be required for this Push Site would take about three to four weeks. It is assumed that shaft construction and cut-and-cover activities would be concurrent, but at worst, if they were not, the duration would extend to three months instead of two. The impacts, while significant, would, therefore, be temporary in duration.

Grand Canal Residences, Grand Canal, and Hurricane St. Residences. The existing visual conditions for potentially affected views from these roads and residences is currently VMC 4 due to the presence of the Venice Pumping Plant. From the residences and the canal, the following Project features would be within foreground views:

- The Option 2 Push Site; and
- The Receive Site in the vacant lot opposite the Venice Pumping Plant;

These activities and equipment, activity, and work force associated with the Push Site and Receive Site would be co-dominant with the Venice Pumping Plant. The appearance of the acoustic curtain-enclosed sites, the protruding crane, and truck traffic have been described relative to AES-1. These features would be industrial in character and incongruous with the generally residential setting. However, because the existing visual conditions are VMC 4, the conditions could not substantially worsen and the impact, while adverse, would not be significant. This adverse impact would endure for six weeks of construction for the receive site, but this would be concurrent with the construction of the Push Site, which would last for about two months. The adverse impact would, therefore, be temporary.
AES-2: The Proposed Project or its alternatives would cause substantial, adverse effects on scenic vistas. The impact would be significant, primarily temporary but to a limited extent long-term.

The impacts of the Project, relative to the two Los Angeles City Thresholds for Significance that are grouped under AES-2, are summarized as follow:

- There would be a significant impact due to partial obstruction of recognized and valued views due to roadside cut-and-cover construction, construction/laydown areas, and optional Push Sites.
- The impact would significantly affect the recognized views currently available from lengths of public roadways (Via Marina, Marquesas Way, and Via Dolce).

Via Marina is a designated scenic highway/drive, and the views from this road represent a continuous series of scenic vistas culminating in view of the Entrance Channel. Also, there are scenic vistas from Aubrey E. Austin Park and the North Jetty Promenade which extend out across the Entrance Channel, but in the case of the park also extend along Via Marina. Furthermore, the views from the residences lining the east bank of the Grand Canal near the Venice Pumping Plant are highly scenic vistas which include the canal and the Ballona Lagoon to the southeast. The adverse impact on the views noted has been assessed in detail relative to AES-1. That on views from Via Marina and Aubrey E. Austin Park would be significant and primarily temporary, excepting the loss of street trees, which would be a long-term impact. The impact on views from the Grand Canal residences, the Grand Canal, and Hurricane St. residences would be adverse but not significant due to the existing effect of the Venice Pumping Plant.

AES-3: The Proposed Project or its alternatives would cause substantial damage to scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings, within view from a state scenic highway. The impact would be significant and long-term.

Regarding the one Los Angeles City Threshold factor for Significance that under AES-3:

- The Project would significantly impact views from a designated scenic highway. This has been discussed.

The Project would result in the loss of mature street trees along Via Marina, a designated scenic highway (designated by the County of Los Angeles) and one mature tree at the intersection of Via Dolce and Marquesas Way. The impact of the loss of these trees has been described relative to AES-1, and would be significant and long-term.

AES-4: The Proposed Project or alternatives would not result in a new source of substantial light or glare that would adversely affect day or nighttime views in the area.

No nighttime construction would be required for construction activities along the subject alignment alternative. However, if there were, the acoustic curtains would shield such lighting from view. The Los Angeles City Threshold factors for AES-4 do not, therefore, apply.

AES-5: The Proposed Project or alternatives would not result in substantial negative shadow effects on nearby shadow-sensitive uses.
There are no shadow-sensitive land uses in the vicinity of the Proposed Project or its alternatives.

AES-6: The Proposed Project or alternatives would result in visual impacts that would not be consistent with applicable rules and regulations. The impact would, therefore, be significant, but it would be temporary.

The applicable regulatory setting is the Los Angeles County Local Coastal Program for Marina del Rey, embodied in the Marina del Rey Land Use Plan and discussed in Section 3.2. Policy "e-3" of the Plan established Via Marina as a scenic drive, and the Scenic Highway Element of the County General Plan identifies Via Marina as a scenic highway. It is assumed that unfettered access to Via Marina and its continuous enjoyment by the public is implicitly a policy of the Plan, as would be the protection from adverse impacts the views from this road. The adverse impacts from Via Marina have been described and are deemed in this assessment not to be consistent with the Plan. Therefore, these visual impacts would be significant; however, they would be temporary.

4.4.2 Venice Alignment Alternatives: Pacific Avenue Alignment

The critical sensitive viewing positions along this alignment alternative include those from:

- Hurricane St. and adjoining residences;
- Pacific Ave. and adjoining residences;
- Bikeway along Pacific Ave.;
- Ballona Lagoon/Grand Canal;
- Public beach access path along easterly side of Ballona Lagoon;
- The North Jetty Promenade

Overview

Hurricane St., Grand Canal at Hurricane St., and Adjoining Residences

The Project does not have the potential to significantly and adversely impact views from this street, the canal or the nearby residences. Cut-and-cover construction would occur in one of the two lanes of Hurricane St. and would be in the immediate foreground of motorists and residents along the street. Construction activities would also be noticeable from the residences lining the east side of the Grand Canal just northeast of the end of the street, as demonstrated in Figures 4 and 5. However, the existing visual condition for views from these sensitive viewing positions has been adversely affected by the Venice Pumping Plant to the degree that a noticeable lessening of visual quality is not possible. The views are dominated by the industrial character of the Plant.

Pacific Ave., and Residences, Southwest End of Via Marina, Bikeway, Ballona Lagoon, Beach Access Path and North Jetty Promenade

The Project has the potential to cause significant, but temporary, visual impacts relative to views from the sensitive viewing positions listed. In these views, no features anomalous with the character of the area are currently noticeable. The Project, however,
would introduce an industrial character to the affected area. Cut-and-Cover construction
would be within the foreground of views from Pacific Ave., the bikeway and Ballona
Lagoon. For the residences along Pacific Ave., those driving along the street, and those
using the bikeway, construction activity would unavoidably dominate the views. The
industrial nature of the activity would sharply contrast with the residential character of
the neighborhood and the semi-natural character of the lagoon.

In addition, this alternative would require that a Receive Site be constructed along the
North Jetty Promenade at the intersection of Via Marina and Pacific Ave. To construct
the Receive Site and the open trench pipeline, one lane of Via Marina along the Entrance
Channel and the adjoining public parking would be used for a construction/laydown area.
In essence, Via Marina in this area would be closed to public use, amounting to
eliminating public access to a scenic route and the associated views. Also, the three-
story-tall Receive Site would interfere with views toward the Entrance Channel from
sensitive public viewing positions in the vicinity.

Impact Intensity, Significance and Duration

The visual impacts for this alignment are discussed and summarized below relative to the
thresholds for significance noted in Section 4.3.

AES-1: The Proposed Project or its alternatives would cause a substantial
degradation of existing visual character or quality of a site and its surroundings.
The impact would be significant but temporary.

Relative to the six Los Angeles City Thresholds for Significance that are grouped under
AES-1, the impacts are summarized as follows:

- No features contributing to valued visual character or neighborhood image would
  be removed, altered, or demolished.
- No natural open space would be graded or developed;
- No structures are proposed for any natural open space;
- There would be a high degree of contrast between proposed features and existing
  features representing the valued aesthetic image of the area.
- No zone change is proposed
- There would be no positive contribution to the aesthetic value of the area.

Most of the critical public views would be affected by the Project such that the impact
would be significant. However, the duration would be temporary. For views from
Hurricane St. and residences at its northeast end, as well as the Grand Canal and
residences close to this end of the street, the Venice Pumping Plant has adversely affected
the quality of critical public views to the point that the additional impact of the Project
would not significantly affect these views. The impact would worsen the existing visual
quality, but the current visual condition due to the Plant is already at the lowest rating. A
more detailed analysis follows.

Hurricane St., Residences, Grand Canal and its Residences. As noted, the existing visual
condition for views from the points listed is VMC 4. The cut-and-cover construction
would be in the immediate foreground of residences along the street, while from the
“Grand Canal” residences and the canal itself, the construction activity and equipment would be seen at a distance of about 150 ft.

These construction activities and their associated equipment and work force would attract substantial attention first because they would occur in the immediate foreground of some views, and second because they would represent a sudden change. Although the Venice Pumping Plant is industrial and currently dominates these views, the construction of the pipeline would command more attention from the closest viewing positions (Hurricane St. and its residences). Nonetheless, visual quality here is currently at the lowest rating, and the construction activities could not substantially impact the views further. While the impact would be adverse, it would not be significant in this case.

The length of Hurricane St. affected by construction (from the Pumping Plant to Pacific Ave.) is about 400 ft. Given the rate of advance expected, the cut-and-cover construction would last for about three weeks. The time frame would be considered to be temporary. Conclusion: the impact would not be significant and would be temporary.

Pacific Ave. and Residences, Southwest End of Via Marina, Bikeway, Ballona Lagoon, Beach Access Path and North Jetty Promenade. As noted, the existing visual condition for views from these critical public viewing areas is VMC 1. Relative to views from most of Pacific Ave., the bikeway, Ballona Lagoon, and the Beach Access Path, the cut-and-cover construction along about 3,800 ft of Pacific Ave. would be within view. Given that the beach access path would be about 270 ft from the construction activity, it is expected that the quality of views from the path would not be appreciably affected. Were a person to be boating on the lagoon, they could be close to the moving construction site. For the residences along Pacific Ave., those driving along the street, and those using the bikeway, construction activity would unavoidably dominate the views. The industrial nature of the activity would sharply contrast with the residential character of the neighborhood and the semi-natural character of the lagoon. The visual conditions would change to VMC 4, representing an impact intensity of Level 3. Within a highly sensitive view, this change would signal a substantial reduction in visual quality.

From the southeast end of Pacific Ave. where it intersects with Via Marina, the major concern over visual impacts would be the effect of constructing the Receive Site. First, Via Marina is a scenic highway/drive, and the North Jetty Promenade is a popular recreation facility. To construct the Receive Site, a 10- to 12,000 sq ft construction/laydown area would be required. To accommodate this laydown area, one lane of Via Marina and most of the public parking along this road would have to be closed. This would bring the industrial nature of what amounts to an equipment yard into the immediate foreground of views from the Promenade and the road, as well as the residences along Via Marina across from the public parking.

The impact of closing the road to public use and eliminating public parking is addressed relative to AES-2, -3, and -6. The Receive Site would be enclosed by an acoustic curtain 20 to 30 ft high, as noted earlier in the analysis. This box-like structure, apart from the tall crane protruding above it, would be featureless and impose upon views toward the Entrance Channel from the residences in the vicinity, the southeast end of Pacific Ave., what remains of Via Marina during construction, and the North Jetty Promenade. It would be as much as three stories tall, or approximately as high as the neighboring residences. Moreover, intermittent truck traffic would occur during the work shifts.
Figure 9 shows a close-up view of the site from the intersection of Pacific Ave. and Via Marina, while Figure 7 is a view from the Entrance Channel. The latter view discloses the array of residences that would be close to the Receive Site. The curtained site, alone, would dominate views that are highly sensitive. But the construction/laydown area would also dominate views. Together the laydown area and the Receive site would substantially lessen the visual quality of the area, resulting in visual conditions of VMC 4. The reduction from VMC 1 would be an impact of intensity Level 3. For highly sensitive views, this impact would be especially significant.

Concerning the duration of construction, the cut-and-cover operation along the 4,000-ft length of the Pacific Ave. would last nearly seven months. During this period, the construction/laydown area along Via Marina would be remain. The Receive Site construction would require six weeks to construct, then the acoustic curtains would be removed and the shaft would be covered by a metal plate. When the under-channel tunnel boring is complete, the TBM would be extracted and the pipeline tied to that installed along Pacific Ave. This latter activity would last one week. It is assumed that the Receive Site Construction and operation would be concurrent with the cut-and-cover construction and that construction would be complete and all evidence removed at the end of seven months. The duration of the impact would, therefore, be temporary. Conclusion: the impact would be significant but temporary in duration.

AES-2: The Proposed Project or its alternatives would cause substantial, adverse effects on scenic vistas. The impact would be significant but temporary.

Relative to the two Los Angeles City Thresholds for Significance that are grouped under AES-2, the impacts may be summarized as follows:

- There would be a significant impact due to partial obstruction of, and elimination of public access to, recognized and valued views because of roadside cut-and-cover construction, construction/laydown areas, and a Receive Site.
- The impact would significantly affect the recognized views currently available from lengths of public roadways (Via Marina and Pacific Avenue) and the bike path along Pacific Ave.

Concerning the first of these two City of L.A. Thresholds, Via Marina is a designated scenic highway/drive, and the views from this road are, therefore, "recognized." Also, there are “recognized” scenic vistas from the North Jetty Promenade which extend out across the Entrance Channel. The closing of Via Marina to public use and eliminating public parking would make inaccessible to the public scenic vistas from that road and the Promenade that are currently enjoyed by the public. The impact would, functionally, be the same as totally obstructing the views; therefore, impact would be significant.

Conclusion: The adverse effect on the recognized views from Via Marina, the Promenade, Pacific Ave., its Class II bikeway, and Ballona Lagoon, while significant, would be temporary, as discussed in detail relative to AES-1.

AES-3: The Proposed Project or its alternatives would not cause substantial damage to scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings, within view from a state scenic highway.

One Los Angeles City Threshold factor for Significance is relevant to this CEQA issue and is summarized as follows:
• The Project would significantly impact views from a designated scenic highway (see AES-1), but would not impact any specific scenic resources.

The Project would not directly damage features contributing to the visual aesthetics of the potentially affected views. Rather, the Project would introduce features into these views which are incongruous with the established setting and would block specific views (for instance, the Receive Site would interfere with views of the Entrance Channel from various viewing positions). These impacts have been addressed under AES-1 and AES-2.

Views from a designated scenic highway (Via Marina) would be adversely affected, but aesthetic features in view would not, as noted, be adversely impacted. A separate impact not specifically addressed by the City of Los Angeles Thresholds is that access to a designated scenic highway would be eliminated, temporarily (traffic would be restricted to local residents and controlled along one lane), as would access to the Promenade and the Entrance Channel views through the temporary elimination of public parking in the area. In essence, eliminating access to views represents an irretrievable loss of the resource (the scenic highway and public parking at least partly serving as access to scenic views) for the period of construction. This impact is addressed under AES-6 and would be temporary.

AES-4: The Proposed Project or alternatives would not result in a new source of substantial light or glare that would adversely affect day or nighttime views in the area.

No nighttime construction would be required for construction activities along the subject alignment alternative. However, if there were, the acoustic curtains would shield such lighting from view. The Los Angeles City Threshold factors for AES-4 do not, therefore, apply.

AES-5: The Proposed Project or alternatives would not result in substantial negative shadow effects on nearby shadow-sensitive uses.

There are no shadow-sensitive land uses in the vicinity of the Proposed Project or its alternatives.

AES-6: The Proposed Project or alternatives would result in visual impacts that would not be consistent with applicable rules and regulations. The impact would, therefore, be significant, but it would be temporary.

The applicable regulatory documents are the Venice Community Plan and the Venice Local Coastal Program land Use Plan, as this alignment alternative lies entirely within the boundaries of Venice. Section 3.0 details the applicable plans and policies. Coastal Resources Goal 18 of the Venice Community Plan calls for the preservation of the scenic and visual qualities of coastal areas. The policy is to assure that projects are visually compatible with the character of surrounding areas. Moreover, design principles set forth in the Venice Land Use Plan requires that views of distinctive visual resources not be significantly disturbed. As discussed relative to AES-1, the Project would introduce features into view which are visually incompatible with the character of the affected area. Also, views of the Entrance Channel would be directly impacted, and the Channel arguably presents a distinctive visual resource. Conclusion: Because the Project would not be consistent with the regulatory setting, the visual impacts described would be considered to be significant. They would, however, be short term, lasting for about seven months.
4.4.3 Westchester/Playa del Rey Alignment Alternatives: Pacific Avenue/Vista del Mar Alignment.

The critical sensitive viewing positions along this alignment alternative include those from:

- Pacific Ave. Fishing Bridge;
- Bikeway along Pacific Ave. Bridge;
- Pacific Ave. and 62nd St., including adjacent residences;
- Del Rey Lagoon and adjacent parking area;
- Dockweiler Beach Access from Pacific Ave.
- Vista del Mar (scenic highway) and adjacent residences.

Overview

Pacific Ave. Fishing Bridge, Bikeway, Boat Launch, Pacific Ave. and 62nd St., Residences along 62nd St.

The Project has the potential to significantly, but temporarily, impact views from the public viewing positions listed. Today, within views from positions along the bridge and bikeway, in the vicinity of the boat launch, at the northwest end of Pacific Ave., and along 62nd St., there are no noticeably incongruous features in sight. The existing views are shown in Figure 10. In this vicinity, the activities and equipment associated with cut-and-cover construction, as well as the construction and operation of the Push Site, would be within the immediate foreground. Such equipment and activities would have a decidedly industrial appearance that would be incongruous with the recreation and residential land uses and character there. The appearance of these project features would command attention.

Pacific Ave. and Adjoining Residential Area, Del Rey Lagoon Park, Beach Access Path

In the vicinity of Del Rey Lagoon Park, views from the park, Pacific Ave., the nearby residential area and the beach access path would be significantly, but temporarily impacted by the Project. From these sensitive viewing positions, the potentially affected views include no anomalous features incongruous with the character of the area. Figures 11 and 12 show the residential area along Pacific Ave., the adjacent Del Rey Lagoon Park, and one of its parking lots. Cut-and-cover construction would occur in one of the two lanes of Pacific Ave. and would be in the immediate foreground for park users, local residents, and those using the beach access path leading from the parking area along Pacific Ave. that also serves the park. Such construction would contrast unfavorably with the character of the setting and dominate attention.

Vista del Mar and Adjacent Residences

As is the case for the other views from this alignment alternative, the Project would significantly, but temporarily affect sensitive public views that currently have not been adversely affected by past actions. Figures 13 and 14 show the terminus of the alignment where the new pipeline would tie in with the existing C.I.S., as well as the character of the residential area and the quality of the ocean views available from this road. Cut-and-
Cover construction would be within one lane of Vista del Mar and, therefore, be in the immediate foreground of views from the street and residences noted. The appearance of this activity would be incongruous with the residential setting and inconsistent with scenic highway status of Vista del Mar.

**Impact Intensity, Significance and Duration**

The visual impacts for this alignment are discussed and summarized below relative to the thresholds for significance noted in Section 4.3.

AES-1: The **Proposed Project or its alternatives would cause a substantial degradation of existing visual character or quality of a site and its surroundings. The impact would be significant but temporary.**

Relative to the six Los Angeles City Thresholds for Significance that are grouped under AES-1, the impacts are summarized as follows:

- No features contributing to valued visual character or neighborhood image would be removed, altered, or demolished.
- No natural open space would be graded or developed;
- No structures are proposed for any natural open space;
- There would be a high degree of contrast between proposed features and existing features representing the valued aesthetic image of the area.
- No zone change is proposed
- There would be no positive contribution to the aesthetic value of the area.

The critical public views noted would be affected by the Project such that the impact would be significant. The affected views are highly sensitive and Project construction activities would be within the immediate foreground of these views. Of particular importance is that Vista del Mar is a scenic highway, and therefore views from this road are especially important. However, the duration of the impacts noted would be temporary.

A detailed impact assessment follows:

**Pacific Ave. Fishing Bridge, Bikeway, Boat Launch, Pacific Ave. and 62nd St., Residences along 62nd St.** From these critical viewing positions, the following Project features would be within the foreground:

- The 10- to 12,000 sq ft construction/laydown area for the Push Site;
- The Push Site;
- Cut-and-cover construction at the northwest end of Pacific Ave. south of the Entrance Channel;

The activities, equipment, and work force associated with these Project features would dominate these views and be incongruous with the setting, as noted. The Push Site would be located in the parking lot abutting the bridge on its northeast side. It would also have to accommodate some space for construction/laydown, as the primary location for this,
the parking lot abutting the southwest side of the bridge, would be too small. Therefore, it is assumed that the Push Site would occupy the entire area between the boat launch and the bridge, including the northeast end of 62nd St. As well, the associated construction/laydown site would occupy the entire parking lot flanking the southwest side of the bridge.

As has been noted before, the Push Site (like the Receive Sites) would be surrounded by an acoustic screen that would be 20 to 30 ft high. A crane would be substantially higher than the curtain, so not all of the equipment would be shielded from view. Also, truck traffic required for the delivery of materials and supplies and muck hauling would be periodically within the subject views.

A limited stretch of cut-and-cover construction would affect the views noted, as this aspect of the Project terminates at the Push Site. Here the trenched pipeline would be tied in with the under-channel pipeline. Cut-and-cover construction would require a moveable construction/laydown area alongside of the open-trench construction, as well as a portion of the parking lots noted.

The existing visual conditions would change from VMC 1 to VMC 4 (dominant, incongruous features), representing an impact intensity of Level 3 (Table K-3, Attachment A). Conclusion: Within a highly sensitive view, such an impact would be significant.

Regarding the duration of the impact on the subject views, the Push Site must be completed prior to Tunnel Boring and would require two months to construct. Tunnel Boring would require from one to two months (Section 4.4, Project Description). Cumulatively, Push Site construction and Boring would therefore be completed over a four-month period. It is assumed that the short stretch of cut-and-cover construction within the subject views would occur within this time frame. Consequently, the visual impact of construction would be temporary.

Pacific Ave. and Adjoining Residential Area, Del Rey Lagoon Park, Beach Access Path. Relative to these critical viewing positions, primarily it would be cut-and-cover construction that would adversely impact the visual quality of the area. However, truck traffic required for the construction and operation of the Push Site, and that needed for delivery of materials for open-trench construction, would also be within view and pose an adverse impact.

The activities, equipment, and work force associated with pipeline installation, and the truck traffic noted, would occur within a few feet of the edge of Del Rey Lagoon Park, the nearby residences, parking for the residences and Lagoon, and the beach access path. The scale, proximity, contrast, and movement of the equipment and work force would unavoidably draw focused attention and dominate the scene. The existing visual conditions would change from VMC 1 to VMC 4 (dominant, incongruous features), representing an impact intensity of Level 3. Within the highly sensitive views noted, such an impact would be significant.

There would be about 2,000 ft of cut-and-cover construction along Pacific Ave. up to where it intersects with Vista del Mar. At the rates of advance described in the summary Project Description in Section 4.4, construction along this road would be complete within about 3.5 months. Consequently, the visual impact of construction, while significant, would be temporary.
Vista del Mar and Adjacent Residences. As would be the case for the Pacific Ave. stretch of the alignment, along Vista del Mar, the primary aspect of the Project that would be within view would be cut-and-cover construction within one lane of the roadway. The impact of this construction would be as described earlier relative to other foreground views. There would be an impact of Level 3 intensity, and it would therefore be significant. The length of Vista del Mar that would be affected would be about 1,600 ft long. At the rate of advance projected, it would take about 3 months to complete this part of the alignment. Therefore, the impact, while significant, would be temporary.

AES-2: The Proposed Project or its alternatives would cause substantial, adverse effects on scenic vistas. The impact would be significant but temporary.

Relative to the two Los Angeles City Thresholds for Significance that are grouped under AES 2, the impacts may be summarized as follows:

- There would be a significant impact due to partial obstruction of recognized and valued views due to the construction and operation of a Push Site.

- The impact would substantially affect recognized views currently available from a length of a public roadway and a portion of a bikeway.

Vista del Mar is a designated scenic highway, and the views from this road represent a continuous series of scenic vistas of the Pacific Ocean and Dockweiler Beach. Also, there are scenic vistas from the bikeway along the South Jetty, the Pacific Ave. Fishing Bridge, and 62nd St. which extend out across the Entrance Channel. The potential adverse impact on the views noted has been assessed in detail relative to AES-1 and has been considered to be significant but temporary.

AES-3: The Proposed Project or its alternatives would not cause substantial damage to scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings, within view from a state scenic highway.

One Los Angeles City Threshold factor for Significance is relevant to this CEQA issue and the impact is summarized as follows:

- The Project would significantly impact views from a designated scenic highway (see AES-1 and -2), but would not impact any specific scenic resources within view of a scenic highway.

The Project would not directly damage features contributing to the visual aesthetics of the potentially affected views, particularly views from a scenic highway. Rather, the Project would introduce features into these views which are incongruous with the established setting. These impacts have been addressed under AES-1 and AES-2.

AES-4: The Proposed Project or alternatives would not result in a new source of substantial light or glare that would adversely affect day or nighttime views in the area.

No nighttime construction would be required for construction activities along the subject alignment alternative. However, if there were, the acoustic curtains would shield such lighting from view. The Los Angeles City Threshold factors for AES-4 do not, therefore, apply.
AES-5: The Proposed Project or alternatives would not result in substantial negative shadow effects on nearby shadow-sensitive uses.

There are no shadow-sensitive land uses in the vicinity of the Proposed Project or its alternatives.

AES-6: The Proposed Project or alternatives would result in visual impacts that would not be consistent with applicable rules and regulations. The impact would, therefore, be significant, but it would be temporary.

Section 3.0 details the applicable plans and policies. The applicable regulatory document is the Coastal Resources chapter of the Westchester-Playa del Rey Community Plan. Objective 18-5 is relevant: “Preserve coastal visual resources by protecting and enhancing scenic views of the ocean and wetlands from designated Scenic Highways, and public view sites.” Vista del Mar is a designated scenic highway.

Policy 18-5.1 for this objective calls for the following relevant stipulations for siting and designing development in order to:

- Protect public views to and along the ocean and scenic coastal areas;
- Be visually compatible with the character of the surrounding area; and
- Retain existing views from designated public view areas and Scenic Highways.

Under this policy, “all new development in the Coastal Zone, including public works and recreational facilities, should be subordinate to its setting, and minimized in height and bulk to the extent feasible to accomplish view protection (emphasis added).”

Siting the pipeline construction within a designated scenic highway is inconsistent with this policy. Doing so does not protect views to and long the ocean; the activities, equipment and workforce needed will be visually incompatible with the character of the surrounding area; and closing off one lane of this highway will substantially limit public enjoyment of this scenic highway.

Consequently, the impact of the Project is significant due to its inconsistency with Policy 18-5.1. The duration of the impact would be about two months, so, while significant, the impact would be temporary.
4.4.4 Mined Tunnel Construction Alternatives

The Mined Tunnel Construction Alternatives comprise three viable alternative alignments. All require a Starter Shaft on LAX land southeast of the Napoleon St./Vista del Mar intersection. Alternative 2 requires an Extraction Shaft on Dockweiler Beach at the end of Hurricane St. and cut-and-cover construction to tie the pipeline to the Venice Pumping Plant. Alternatives 3 and 4 entail direct, continuous tunneling from the LAX Starter Shaft to an Extraction Shaft in a vacant lot at the northeast end of Hurricane St. across from the Pumping Plant. Alternatives 3 and 4, relative to above-ground features, would be identical. Rather than by alternative, the impacts have been assessed relative to:

- The Starter Shaft;
- The Extraction Shaft at Dockweiler Beach;
- The Extraction Shaft at the Venice Pumping Plant.

To summarize, Alternatives 3 and 4 would have the potential for significant, but short-term visual impacts due to the Starter Shaft, but would affect primarily private, residential views. Alternative 2 would have the same “Starter Shaft” impacts—significant, but short term—but would also have the potential for significant—albeit temporary—“Extraction Shaft” impacts that would affect not only private residential views, but also public views from Dockweiler Beach. Additionally, Alternative 2 would have the potential for significant, temporary visual impacts due to cut-and-cover construction of the Hurricane St. part of the alignment.

There will be no detailed discussion of the Hurricane St. cut-and-cover construction, as the impact on residential views along this street has been discussed relative to the Pacific Ave. Alternative Alignment within Venice. For Alternative 2, cut-and-cover construction would extend from the southwest end of Hurricane St. about 785 ft to the Venice Pumping Plant, whereas for the Pacific Ave. alignment, it would extend about 450 ft from Pacific Ave. to the Plant. The nature and intensity of the impact would be the same. The existing visual conditions are VMC 1 until reaching the Plant, where they are VMC 4. The construction activities, equipment, and workforce would dominate views (VMC 4), representing a substantial reduction in visual quality for views from most of Hurricane St. (impact intensity Level 3). The impact would, therefore, be significant. The 785-ft alignment would be completed in less than 6 weeks, so it will be temporary in duration.

Impact Intensity, Significance and Duration

AES-1: The Proposed Project or its alternatives would cause a substantial degradation of existing visual character or quality of a site and its surroundings. The impact would be significant but short term.

Relative to the six Los Angeles City Thresholds for Significance that are grouped under AES-1, the impacts are summarized as follows:

- No features contributing to valued visual character or neighborhood image would be removed, altered, or demolished.
- Natural open space would be graded or developed;
- A Structures is proposed for a natural open space;
• There would be a high degree of contrast between proposed features and existing features representing the valued aesthetic image of the area.

• No zone change is proposed

• There would be no positive contribution to the aesthetic value of the area.

The critical public views noted would be affected by the Project such that the impact would be significant. The affected views are highly sensitive and Project construction activities would be within the foreground of these views. Of particular importance are views from nearby residences and Vista del Mar, a scenic highway. However, the duration of the impacts noted would be short term, lasting for about two years.

A detailed impact assessment follows.

**Starter Shaft**

The critical sensitive viewing positions potentially affected by the construction and operation of the Starter Shaft are those from:

• The residences lining the northeast side of Napoleon St. and facing the Site;
• The beach access path along Napoleon St.; and
• Vista del Mar, a scenic highway.

The existing visual conditions are VMC 1 for these potentially affected views. The Starter Shaft Site would require about 12,000 sq ft of space, including space for a construction/laydown site, and would be enclosed by a 20- to 30-ft-tall acoustic curtain just as would the Push and Receive Sites relative to the Bored Tunneling construction alternatives. There will be two cranes on site that will be taller than the curtains, so these would be visible. The remainder of the facilities within this site would be screened from view. However, the 15 daily truck round trips would be noticeable, and there would as much as 300 ft of cut-and-cover construction to tie the pipeline to the existing C.I.S. within Vista del Mar.

**Residences and beach access path.** The beach access path runs along the fence skirting the northerly side of the LAX property along Napoleon St. Views from there are closely similar to those from the residence on the other side of Napoleon, except that the residences are multi-story and views from the upper stories would be more elevated. Figure 14 shows the vacant LAX land in which the Starter Shaft would be sited, seen from VP 16 (see Figure 1). This land appears substantially natural; there are no structures, but there are several unobtrusive roads within this area. The location of the site is approximate in this photograph. If it were to be sited as shown in Figure 1, it would be over 700 ft away from the viewing position from which the photograph was taken. By way of contrast, the nearest residence on Napoleon St. would be about 224 ft from the center point of this site, as shown in Figure 1. If the configuration of the Starter Shaft Site were to be square, the site would be about 110 ft on a side (12,000 sq ft). This means that the edge closest to the residences would be at least 55 ft closer than the center of the site, or just 164 ft. Seen at that distance, which is about half the length of a football field, a 20- to 30-ft-tall “box” 110 ft on a side would attract considerable attention, particularly since the open land around the site is featureless and some of the residences are oriented directly toward the site. Stated differently, the Shaft Site would be as tall as the
residences from which it would be viewed, but it would occupy substantially more square footage.

Given that the land around the Starter Shaft Site is vacant and featureless, the Starter Shaft Site would command attention to the point of at least competing with the ocean views to the southwest. The acoustic curtained “box” would not be a feature that would be mistaken for a building. The presence of the cranes extending above the curtains and the truck traffic would, together with the screening, lend an industrial character to the site. Moreover, it is not clear that all equipment would be within the enclosure. For instance, with a construction crew of 20 to 25 persons, 20 to 25 vehicles may need to be parked on site in order to allow the public to park along Vista del Mar. Were the site to compete for attention, the visual conditions would be rated VMC 3, a reduction by two ratings from the current VMC 1. The impact intensity would be Level 2. Given the sensitivity of residential views, the impact would be significant.

The length of time needed to construct the Starter Shaft would be seven months. However, it would be in operation for up to about 28 months during the Mined Tunneling. Therefore, from the start of construction to completion, the Shaft would be within view for nearly 3 years. Conclusion: The visual impact would be significant but short term.

Vista del Mar. Views from Vista del Mar (scenic highway) would tend to be directed toward the scenic Pacific Ocean and the Beach below the road. The site would be oblique to the directions of travel and peripheral to the main views to the southwest. For most of the public, the Starter Shaft might have to be pointed out to be noticed, given the primary direction of viewing, either along the road (to safely operate the vehicle) or toward the ocean, away from the site. Conclusion: In views from this road, visual quality would likely not be substantially lessened.

**Extraction Shaft—Dockweiler Beach**

The critical sensitive viewing positions potentially affected by the construction and operation of the Starter Shaft are those from:

- The residences lining the Dockweiler Beach;
- Dockweiler Beach

The existing visual conditions are VMC 1 for these potentially affected views. The Extraction Shaft Site would require about 5,000 sq ft of space, including the construction/laydown area, and would be enclosed by a 20- to 30-ft-tall acoustic curtain, just as would the Starter Shaft, and the Push and Receive Sites (Bored Tunneling). There would be a crane on site that would be taller than the curtains, so it would be visible. The remainder of the facilities within this site would be screened from view. However, the daily truck round trips would be noticeable.

Apart from the multi-story residences, there is “Ocean Front Walk,” a pedestrian beach access running along the beach side of the residences. A few feet away from the Extraction Shaft Site is a beach volleyball court, and passive beach uses may occur anywhere in the vicinity of the site. The Extraction Shaft Site would be much smaller than the Starter Shaft Site, being only 5,000 sq ft in size. This would be a square 70 ft on a side. However, the site may be within 50 ft or less of the residences and pedestrian
beach access path. It would inevitably dominate views from the residences with its industrial appearance, as it could be as tall as the residences (VMC 4). Moreover, the associated truck traffic would also be a distraction. The impact would be intensity Level 3, as the existing conditions are VMC 1. Conclusion: Relative to the highly sensitive views affected, the impact would be significant.

The period of its initial construction would be 10 weeks. After it is constructed, all equipment would be removed from the site and a steel plate would be placed over the shaft. It can be expected not to be especially noticeable at that point, as wind-driven sand would naturally tend to cover the plate over time. The Shaft would become operational at the point that the TBM needs to be extracted from the Mined Tunnel, which would be about 28 months later. The TBM would be extracted, and the pipeline tied into the pipeline installed with cut-and-cover construction, over a one-week period. The cumulative seven-week period in which the Shaft would be constructed and operated would be temporary.

**Extraction Shaft—Venice Pumping Plant**

The critical sensitive viewing positions potentially affected by the construction and operation of the Starter Shaft are those from:

- The residences lining the east side of the Grand Canal near the Venice Pumping Plant;
- The Grand Canal;
- Residences along Hurricane St. at its northeast end.

The existing visual conditions are VMC 4 for these potentially affected views. The Extraction Shaft Site has been described relative to the Dockweiler Beach Extraction Shaft Site. It would appear industrial and be as large as the nearby multi-story residences. The visible part of the crane and truck traffic, coupled with the acoustic screened site, would attract considerable attention and compete for it with the existing Venice Pumping Plant. However, the existing conditions are VMC 4, and while there would be an adverse visual impact, no substantial reduction in visual quality would occur. Moreover, the duration of the impact would be temporary, lasting cumulatively just seven weeks.

**AES-2: The Proposed Project or its alternatives would not cause substantial, adverse effects on scenic vistas**

Relative to the two Los Angeles City Thresholds for Significance that are grouped under AES 2, the impacts may be summarized as follows:

- There would be no significant impact due to partial obstruction of recognized and valued views.
- The impact would not substantially affect recognized views currently available from a length of a public roadway and a portion of a bikeway.

Alternatives 2, 3 and 4 would not have the potential to obstruct any recognized or valued views, nor would they substantially affect recognized views from a public roadway or bikeway.
AES-3: The Proposed Project or its alternatives would not cause substantial damage to scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings, within view from a state scenic highway.

One Los Angeles City Threshold factor for Significance is relevant to this CEQA issue and the impact is summarized as follows:

- The Project would neither significantly impact views from a designated scenic highway (see AES-1 and -2) nor significantly impact any specific scenic resources within view of a scenic highway.

Alternatives 2, 3 and 4 would not significantly impact views from Vista del Mar, the only scenic highway in the vicinity of these alternatives. Moreover, the construction of the Starter and Extraction Shafts would not adversely affect any landscape features contributing to scenic quality.

AES-4: The Proposed Project or alternatives would not result in a new source of substantial light or glare that would adversely affect day or nighttime views in the area.

No nighttime construction would be required for construction activities along the subject alignment alternative. However, if there were such construction required for the Starter and Extraction Shafts, the acoustic curtains would shield such lighting from view. The Los Angeles City Threshold factors for AES-4 do not, therefore, apply.

AES-5: The Proposed Project or alternatives would not result in substantial negative shadow effects on nearby shadow-sensitive uses.

There are no shadow-sensitive land uses in the vicinity of the Proposed Project or its alternatives.

AES-6: The Proposed Project or alternatives would result in visual impacts that would not be consistent with applicable rules and regulations. The impacts would, therefore, be significant, but they would be temporary and short term.

Section 3.0 details the applicable plans and policies. The applicable regulatory document is the Coastal Resources chapter of the Westchester-Playa del Rey Community Plan, relative to the Starter Shaft Site. Concerning the two alternate Extraction Shaft Sites, both are in Venice; the relevant regulatory documents are the Venice Community Plan and the Venice Local Coastal Program Land Use Plan.

Regarding the Westchester-Playa del Rey Community Plan, Objective 18-5 is relevant: “Preserve coastal visual resources by protecting and enhancing scenic views of the ocean and wetlands from designated Scenic Highways, and public view sites.” Vista del Mar is a designated scenic highway. However, views from this scenic highway would not be significantly impacted.

Policy 18-5.1 for this objective calls for the following relevant stipulations for siting and designing development in order to:

- Protect public views to and along the ocean and scenic coastal areas;
- Be visually compatible with the character of the surrounding area; and
• Retain existing views from designated public view areas and Scenic Highways.

Under this policy, “all new development in the Coastal Zone, including public works and recreational facilities, should be subordinate to its setting, and minimized in height and bulk to the extent feasible to accomplish view protection (emphasis added).”

The Starter Shaft would not interfere with public views to and along the ocean. There are no public view areas in the vicinity, and the Shaft Site would not interfere with scenic highway-based views. However, the Shaft Site would not be visually compatible with the natural open space character of the LAX property. Consequently, the impact of the Project would not be entirely consistent with Policy 18-5.1 of the subject Plan. The impact, though, would be short term.

Concerning the Venice Community Plan and the Venice Local Coastal Program land Use Plan, Coastal Resources Goal 18 of the Venice Community Plan calls for the preservation of the scenic and visual qualities of coastal areas. The policy is to assure that projects are visually compatible with the character of surrounding areas. Moreover, design principles set forth in the Venice Land Use Plan require that views of distinctive visual resources not be significantly disturbed. As discussed relative to AES-1, the Starter and Extraction Shafts would be visually incompatible with the character of the affected area. Because the Project would not be consistent with certain policies and goals of the Venice regulatory setting, the visual impacts described would be considered to be significant. They would, however, be temporary and short term in duration, lasting for seven weeks in the case of the Extraction Shaft Sites, and less than three years in the case of the Extraction Shaft.

5.0 Mitigation Measures

5.1 Direct Mitigation Measures

As noted in Section 4.4.2, cut-and-cover, micro-tunneling, and mined tunneling alternative construction activities, and their associated equipment and work force, would all have the potential to cause significant visual impacts, to varying degrees, that would primarily be temporary in duration. With one exception, the Project or its alternatives would cause no damage to scenic resources (features contributing to the positive visual quality of potentially affected views), no new source of light and glare, and no negative shadow effects. Instead, depending on the alternative, the impacts would variably be due to:

• The introduction to views of features not congruent with the existing visual character of the area;
• Partial obstruction of views, or the limiting of access to the views;
• Adverse effects on views from scenic highways or the temporary elimination of access to these highways;
• And inconsistency with one or more regulatory goals, objectives or policies.

Mitigation measures either entail redesigning a project so as to site it in an area not within sensitive public views, screening the Project features from view with landscaping, or redesigning the Project features to mimic those that are characteristic of the area. In the case of the Project, the visual impacts are due to construction activities, equipment and
the presence and movement of the workforce, and not because of its appearance once it is complete. Because the visual impacts of construction are all temporary or short term, they end with the completion of the Project. No feasible measures can mitigate the impacts of construction to a level that is less than significant, for it is assumed that, by definition, such measures must occur within the context of undertaking the Project. That is, construction activities must occur. Regarding re-siting the alignment of the Project, the alignments are constrained by the starting and ending points. The area in between is characterized by dense, residential development, the presence of scenic highways, and the attraction of recreation opportunities. It would not be possible to avoid sensitive views.

Where specific positive landscape features are damaged, obscured, or removed, direct mitigation may take the form of adjusting the siting of an aspect of the project to avoid the impact, or replacing the feature if it is damaged or removed. In the case of the Marquesas Way/Via Marina Alignment Alternative, several mature street trees will be removed by cut-and-cover construction and/or the use of an area as a construction/laydown site. Based on available information, otherwise logical options are not viable. These include a choice to re-align the pipeline to avoid crossing from Via Marina into the parking lot serving the Receive Site, and re-locating the Option 2 Push Site construction/laydown area at the Via Dolce/Marquesas Way intersection. The only feasible mitigation measure is:

- **Mitigation Measure AES-1**: Replace street trees destroyed by construction activities with very large-diameter, mature trees. Depending on the species, this may or may not be possible.

### 5.2 Offsetting Mitigations

Where impacts may not be directly mitigated, they may be offset by actions taken elsewhere to compensate for the loss of visual quality. It would be speculative to definitively list specific offsetting actions at this time. However, such actions generally would include:

- Landscaping public areas within affected neighborhoods where open space is currently degraded and unsightly;
- Screening from public view existing features which are incongruous with the character of their surroundings (such as the Venice Pumping Plant);
- Creating public access to currently unavailable scenic vistas (new beach access routes, paths, bikeways, public parking).

During public scoping meetings, some suggested that the existing Venice Pumping Plant could be made to be more aesthetically pleasing. Currently, this industrial facility has reduced visual conditions in its vicinity to VMC 4. One measure would be to paint the facility a color matching nearby residences and removing the art deco-like treatment of the wall facing the Grand Canal. Plantings which soften the Plant’s profile or cover its walls with vines might be investigated, if there is the physical space available to landscape the perimeter. A walkway abutting the blue wall fronting the Grand Canal (Figure 5, upper image) might be converted into a planter, or several large, decorative planters with tall shrubs or small trees might be installed along that part of the walk (since the walk ends here, the loss of this stretch of sidewalk would not be important to pedestrians). A small strip of fill at the northeast end of Hurricane could provide room for
large trees that would block some views of the Plant. In the upper image of Figure 4, large trees are growing along the edge of the sidewalk. In the lower image in Figure 5, it is apparent that such plantings could be installed between the chain-link fence along the vacant lot and the sidewalk next to it. These trees, in time, would screen the lot and provide a more aesthetic edge to the Grand Canal. The residual impact of offsetting mitigations would be inversely proportional to the degree of public acceptance of the measures.

Regarding the improvement of the visual quality in public spaces, Figure 10 discloses, in the upper image, the opportunity to improve the appearance of the parking lot along the bridge in the vicinity of where the Push Site for under-channel tunneling would occur. The bank in the foreground might be planted to shield from view the parking lot and conceal or replace the jumbled chunks of concrete rip-rap. Similar plantings on the other side of the bridge along the parking area there (the site for the construction/laydown area) would aesthetically frame the bikeway’s entrance into Playa del Rey.

6.0 Unavoidable Adverse Impacts

All of the significant, temporary and short term impacts described in Section 4.4.2 are unavoidable. These impacts will end, however, with the completion of construction. These impacts may be offset by actions taken elsewhere within the affected communities to improve the aesthetics of existing views. The acceptability of any measures contemplated is best addressed through public involvement.

The long-term impact of the destruction of mature street plantings along Via Marina and Marquesas Way might be improved to the point that the duration would be short term (less than five years in duration) if trees of a large size are planted. Several years of growth would be required for the replacement trees to approach in height that of those trees that would be removed.

7.0 Cumulative and Secondary Impacts

Of the projects listed as related to the Proposed Project in the Introduction to the DEIR, Section G, Table G-1, only two would be relevant. In neither case would there be significant cumulative impacts.

- **Marina del Rey Tide Gates Project.** This project entails the removal, rehabilitation and improvement of portions of the existing outlet structure for the Grand Canal. The outlet is at the southeast end of the Grand Canal where it passes under Via Marina, so the "Gates" project would occur where aspects of the Proposed Project would also occur. The one aspect of construction that would be relevant to cumulative impacts is that the "Gates" project may require the closure of one lane of Via Marina St. during construction, with traffic controlled by a flagman. The Proposed Project also calls for such closure and traffic control. At the time of this assessment, no specific time frames for construction of either project had been identified. It can only be said that if the projects do not occur simultaneously, sequential construction would result in a prolonged period during which views from a designated scenic highway/drive (Via Marina) are unavailable to the public; e.g., it would seem likely that traffic along Via Marina would be restricted to local residential access because there would be no public...
parking along the road and, therefore, no place to stop and enjoy the view. The impact of closing one lane due to the Proposed Project would, by itself, represent a significant, albeit, temporary visual impact. Lane closure due to the “Gates” project would also be a temporary but significant visual impact. If the two projects were to occur sequentially, the combined effect would solely be to lengthen the duration of the impact to the point of being short-term (one to five years’ duration).

To mitigate the impact, if it is feasible both projects should be completed within the same time frame, thereby limiting the time during which the one lane of Via Marina would have to be closed.

- **Venice Pumping Plant Sluice Gate Replacement Project.** This project involves the temporary diversion of sewer flows in order to bypass the Venice Pumping Plant while the sluice gate within the Plant is rehabilitated. The bypass would be via a pipeline placed above ground along the Grand Canal from Driftwood St. to Hurricane St. along the Esplanade. The pumping mechanisms and pipeline would be in place for about one month. This project is relevant to the Proposed Project in consideration of cumulative impacts because activities associated with the Project would occur in the same area as the southeast end of the “Sluice Gate” project (near the Pumping Plant).

The initial study for the Sluice Gate project found that there would be no significant visual impacts, based partly on their short duration. CEQA does not recognize specific time limits as thresholds of significance, nor does the City of L.A. Thresholds Guide. However, as noted in Section 2.2, the existing visual condition for views potentially affected by the Sluice Gate project is VMC 4 due to the presence of the Pumping Plant. This industrial facility dominates the views from points in its vicinity. For that reason, not due to the duration of the impact, the Sluice Gate project would not be a significant impact, as the condition of the affected views cannot worsen. Likewise, together with the Proposed Project, the Sluice Gate project would not cumulatively cause a significant impact, due to the existing condition of the area.
8.0 References


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_____. 1999a. Appendix E, Inventory of Designated Scenic Highways, Transportation Element, General Plan of the City of Los Angeles.

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Attachment A

Technical Approach

Environmental Setting

Definition of the Resource.

The visual resources of an area comprise the features of its landforms, vegetation, water surfaces and cultural modifications (physical changes caused by human activities) that give the landscape its visually aesthetic qualities. Landscape features, natural appearing or otherwise, form the overall impression of an area. This impression is referred to as "visual character." Visual character is studied as a point of reference to assess whether a given project would appear compatible with the established features of the setting or would contrast noticeably and unfavorably with them. Existing landforms, water surfaces, vegetation, and cultural modifications are treated as an established part of the setting if they reflect how the landscape was formed (i.e., ecological processes versus human activities), how it functions (i.e., as part of an urban versus agricultural context), and how it is structured ("patterns" of development, such as irrigated croplands versus natural mosaic of grasslands and woodlands).

Visual resources have a social setting, which includes public values, goals, awareness and concern regarding visual quality. This social setting is addressed as "visual sensitivity," the relative degree of public interest in visual resources and concern over adverse changes in the quality of that resource (U.S. Department of Interior, Bureau of Land Management [BLM], 1978; U.S. Department of Agriculture, Forest Service [U.S. Forest Service], 1977). As applied to visual impact analyses, sensitivity refers to public attitudes about specific views, or interrelated views, and is key in assessing how important a visual impact may be and whether or not it represents a significant impact.

Visual Sensitivity.

The assessment of visual sensitivity establishes the most important (critical) viewing positions early in the analytical process. The other attribute, visual character, is assessed only in relation to the important, potentially affected views. Visual impacts subsequently are evaluated in the context of the character of these views.

To assess visual sensitivity, indicators of public concern were identified and sensitivity rated accordingly. The indicators are listed in Table K-1 and reflect the concepts and methods of several federal agencies which treat sensitivity as a function of viewer activity, awareness, values, and goals (U.S. Forest Service, 1979a; U.S. Department of Agriculture - Soil Conservation Service [SCS], 1978; BLM, 1986; U.S. Department of Transportation, Federal Highway Administration [FHWA], 1980). Certain activities tend to heighten viewer awareness of scenic resources, while others tend to be distracting. People who are camping, picnicking, or driving for pleasure are more apt to notice the surrounding scenery than those commuting in heavy traffic or working at a construction site. Viewer awareness may also be heightened where areas are formally classified or otherwise designated as being of special interest, such as national historic monuments, national and state parks and forests, scenic routes and overlooks, visitor information centers, and wildlife refuges.
High visual sensitivity is assumed to exist where landscapes, particular views, or the visual characteristics of certain features are protected through policies, goals, objectives, and design controls in public planning documents. Visual significance is not always a function of aesthetic appeal. The public may confer visual significance on landscape components and areas that would otherwise appear unexceptional (FHWA, 1980). For example, unexceptional landscapes along tertiary roads may be particularly important to local residents (Kaplan, 1979) as undesignated open spaces. Other areas may have regional or national cultural significance, but not be especially scenic. Nonetheless, their visual character may be considered important to their cultural value (FHWA, 1980). The three levels of sensitivity are high, moderate, and low:

- **High Sensitivity.** High sensitivity suggests that at least some part of the public is likely to react strongly to a threat to visual quality. Concern is expected to be great because the affected views are rare, unique, or in other ways are special to the region or locale. A highly concerned public is assumed to be more aware of any given level of adverse change and less tolerant than a public that has little concern. A small modification of the existing landscape may be visually distracting to a highly sensitive public and represent a substantial reduction in visual quality.

- **Moderate Sensitivity.** Moderate sensitivity suggests that the public would probably voice some concern over visual impacts of moderate to high intensity. Often the affected views are secondary in importance or are similar to others commonly available to the public. Noticeably adverse changes would probably be tolerated if the essential character of the views remains dominant.

- **Low Sensitivity.** Low sensitivity is considered to prevail where the public is expected to have little concern about changes in the landscape. Only a visual impact of the greatest intensity would be perceived as substantial (significant).

- **No Sensitivity.** There is no sensitivity where the potentially affected views are not “public” (not accessible to the general public) or because there are no indications that the affected views are valued by the public.

**Identification of Critical Viewing Positions.**

Critical views are partly defined as those that are moderately to highly sensitive. The public is considered to have a substantial concern over adverse changes in the quality of such views. Criteria used to identify moderate to high sensitivity have been presented in Table K-1.

Critical views also are defined as being those public views that would be most affected by the subject action (e.g., the greatest intensity of impact due to viewer proximity to the project and project visibility, duration of the affected view, etc.). The approach to identifying critical viewing positions starts with an inventory of moderately to highly sensitive viewing positions in the project vicinity, using the referenced criteria. A review of literature and maps, and an inspection of the project site and the potentially affected environs, serves to identify those features and public use areas of cultural, historic, recreational, and aesthetic significance.

The range of sensitive views is then considered and several representative views in which the proposed facilities would be most noticeable are selected for detailed analysis. This decision is based primarily on proximity and degree of project exposure. Consideration is
also given to having the views be representative of the public experience; i.e., that they be from viewing positions frequently used by the public and readily located, based on the description and photographs presented in this report.

**Visual Character.**

As has been noted, visual character is assessed only relative to those moderately to highly sensitive views that may be affected by a proposed action. The visual character of the potentially affected landscape typically is described in terms of its landforms, vegetation, water features, and the "built" features of the environment. There are three objectives in assessing visual character:

- **Visual Resources.** The first is to identify the types of features considered both to be “visual resources,” (i.e., features contributing to the positive visual quality of the potentially affected lands) and to be inherent to the area. It is usually obvious which features are visual resources and which are not. Rarely, features may be considered to be visual resources by the public yet have no demonstrable aesthetic appeal, as has been noted (Kaplan, 1979). For instance, local laws and regulations protecting certain views may indicate high sensitivity, even though the aggregate of features may possess no obvious positive visual qualities. Features are treated as inherent if they are expressive of the prevailing land uses, for instance, in an urban or rural area, or if they are among the physical features associated with the physiographic provinces in which a natural appearing landscape is located. The more defined the landscape is (i.e., totally natural appearing, purely residential, consistently rural), the more opportunity there is for introduced features not part of the prevailing character to noticeably contrast with those defining the landscape.

- **Patterns.** The second objective in assessing visual character is to identify patterns or the distribution of features that are characteristic of the affected setting. For instance, ecotones might define the distribution of vegetation in a natural setting. Architectural styles or density of housing might be defining attributes of a residential area.

- **Existing Visual Condition.** If the analysis of character identifies visual resources (an aggregate of features with visually aesthetic qualities), after identifying the characteristic patterns or distribution of the visual resource features, the analysis turns to the third objective for assessing visual character. This objective is to assess the one parameter of visual quality that may be adversely affected by a proposed action, its existing visual condition. The existing visual condition of the landscape is a measure of the degree to which past actions have noticeably changed the landscape in ways that appear inconsistent with the visual resources of the affected lands. Existing visual conditions serve as the baseline for evaluating the magnitude and intensity of potentially adverse changes in the landscape. They vary inversely with how noticeable incongruous features may be within current public views and are defined in terms of four Visual Modification Classes (VMC), defined in Table K-2. Landscapes where all features appear compatible with the inherent visual resources of the area are of the highest quality, while those where incompatible features dominate the scene are of the lowest quality. In some cases, the character of the potentially affected lands comprise features with no obvious aesthetic qualities (i.e., there are no “visual resources”). Here, although all features within view may appear compatible with one another, visual quality is low. A purely
industrial landscape is an example; there are no visual resources, visual quality is low, yet all features are compatible with the setting. For such lands, there is no potential for adverse visual impacts and an assessment of existing visual conditions is not informative.

Visual Impact Assessment

CEQA considers an effect to be a change in any of the physical conditions within the area affected by the project (State of California, 1970) but does not delineate specific criteria or thresholds for the significance of impacts. CEQA limits the guidance concerning the determination of significance to whether or not the effect is both adverse and substantial: a significant effect would be “...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.” (Section 15382, Article 20). Four specific issues of concern over substantial/significant visual impacts are listed in Appendix G of CEQA (Environmental Checklist) as follows:

- Substantial, adverse effects on a scenic vista.
- Substantial damage to scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway (sic).
- Substantial degradation of existing visual character or quality of a site and its surroundings.
- Creation of a new source of substantial light or glare that would adversely affect day or nighttime views in the area.

No further guidance is provided. Apparently it is at the discretion of the investigator, or the agency responsible for the EIR, to determine criteria for what constitutes a “substantial” effect, damage, degradation, or new source of light or glare.

Definition of Visual Impacts.

This section presents definitions useful in understanding the methodology for identifying adverse visual impacts, their intensity, and their significance:

- **Visual Impact.** An “adverse change” in aesthetics/visual resources occurs when, relative to a public view:
  - An action will perceptibly change features of the physical environment so that they no longer appear to be characteristic of those inherent to the region and/or locale;
  - An action will introduce features to the physical environment that are perceptibly uncharacteristic of the region and/or locale; and/or
  - Visual access to the landscape, or the visibility of one or more valued features of the landscape, will be adversely affected (e.g., partially or totally blocked from view);

(Features that are, or have become, uncharacteristic are those that appear out of place, discordant, or distracting.)

Visual impacts are further defined as follows:
• **Visual Impact Intensity.** The terms “intensity” and “magnitude” are used interchangeably. The magnitude—or intensity—of a visual impact is the degree to which existing visual conditions (the baseline for the analyses) would change as a result of project construction and operation. Visual Conditions are described in terms of Visual Modification Classes (Table K-2).

Three levels of visual impact intensity may occur. Level 1 is a reduction in Visual Conditions by one Visual Modification Class (VMC) rating; Level 2 is a reduction by two VMC ratings; and Level 3 is a reduction by three VMC ratings.

• **Temporary Visual Impacts:** Those lasting for one year or less.

• **Short-Term Impacts:** Those lasting for more than one year but fewer than five years.

• **Long-Term Impacts:** Those lasting for five years or more.

• **Significant Visual Impact**

The following definition augments the CEQA Guidelines for determining visual impacts to be significant. As noted, CEQA considers a significant effect to be “…a substantial, or potentially substantial, adverse change….” Accordingly, significant (substantial) changes (significant visual impacts) are defined as those occurring for more than one year and which result in:

- An inconsistency with public laws, ordinances, regulations, plans, policies or objectives, or other directives concerning visual resources; and/or

- A perceptible reduction of visual condition (quality). The perception that visual quality has been reduced is partly a function of the observable intensity of the impact. However, the context of social conditions, including public values, goals, awareness and concern regarding visual quality, influences the degree to which the public perceives a change in visual conditions as significant and reacts adversely to it. That context is referred to as Visual Sensitivity, as noted above. The influence of Visual Sensitivity on the perception that a change in visual conditions (Intensity) is substantial (significant) is described as follows:

  - **No Sensitivity.** Where there is demonstrably no public sensitivity, particularly where there are no public views of a project under consideration, it is assumed that there would be no adverse public response to visual impacts of even the greatest intensity.

  - **Low Sensitivity.** Where there is low sensitivity, it is assumed that at least a minority of the viewing public may have some concern over visual quality. This public would notice only the greatest change in visual conditions as a substantial (significant) reduction in visual quality (Intensity Level 3: a reduction by three Visual Modification Classes).

  - **Moderate Sensitivity.** Where there is moderate public sensitivity, a change of two or more Visual Modification Classes (to VMC 3, or 4) would be considered to be an adverse visual impact of substantial (significant) importance, and the public would be likely to react negatively to the change.
High Sensitivity. Within a highly sensitive view, any change in visual conditions (a change of one or more Visual Modification Classes to VMC 2, 3, or 4) would be considered to be an adverse visual impact of substantial (significant) importance.

Table K-3 summarizes the relationship of impact intensity, sensitivity, and the perception that a reduction in visual conditions is substantial (significant).

Magnitude (Intensity) of Visual Impacts.

Instrumental in determining the magnitude of visual impact is the use of Visual Simulations. These are realistic computer-generated three-dimensional images of a proposed project that simulate project features in their context as they would be seen in critical views and under specific viewing conditions matching baseline photographs of the same views. These conditions include angle of view, distance, time of day, and ambient lighting and atmospheric perspective (the attenuation of details due to particulates or moisture). The computer imaging is generally restricted to features of the project, with the context being represented by a photograph. The image and photograph are then blended to realistically portray the project in its context.

Details about the camera used for the base photograph are recorded and later emulated by the computer program used for the simulation. Key information about the camera includes its location, tilt, bearing, lens focal length, time of the photograph, and exposure information. A Global Positioning System is used to identify the location and elevation of the camera lens in order to correlate the computer image with the photograph.

The camera data collected in the field is input into a computer program (3d Studio Max, an Autodesk product widely used for architectural visualization) that digitally replicates the three dimensional world at full scale. The computer simulation can vary in detail from a highly detailed architectural model of the project to a simple massing study lacking detail but representing the volume and dimensions of the project. Projects seen at a moderate distance, for instance, can be successfully simulated using a massing study because details cannot be discerned beyond a certain distance. A closer view would justify a more detailed simulation.

Confirmation of scale and position of the computer rendering is often accomplished by installing marker poles on site at points correlating with the project plan to provide registration points. The preliminary computer image will simulate the project and poles, and the image will be positioned and scaled until the simulated poles overlay exactly those appearing in the underlying base photograph. Aerial photographs and USGS maps are typically used to confirm locations and angles of view.

The impression of the project can be represented under specific lighting and atmospheric conditions. For instance, the computer can simulate the effect of haze and backlighting (where the sun is behind the project) on color. The amount of haze is estimated by sampling shadow tones in the foreground and background, comparing the two, and arriving at a color and density for the atmospheric haze. Shadows and sun angle are derived from the latitude and time of day so they match what appears in the photograph. Using visual simulations, the magnitude of the impact may be estimated. The magnitude (noticeability) of the potential visual impacts is described in terms of the estimated future Visual Modification Class of the affected view. Several factors affecting the context of views are considered: viewer activity; primary viewing direction(s); viewing distance;
project exposure; duration of viewing; relationship of the subject view to the sequence available; the presence of existing features of competing visual interest; and established features tending to draw attention toward the project facilities (focal point sensitivity).

**Significance of Visual Impacts**

See the definition of significance at the start of this Section. The magnitude of the impact (Visual Modification Class) is compared to the sensitivity of the affected view to determine whether a perceptible reduction in visual quality is likely to occur. Table K-3 presents the relationship of magnitude and sensitivity to a perceptible reduction in visual quality. As noted, the perception of lowered visual quality is one of three criteria for significance; the other two are duration of the impact and its consistency with laws, ordinances, regulations, and standards applicable to the protection of visual resources. Note that a perceptible reduction in visual quality is not treated in this methodology as significant unless it is estimated to persist for more than one year. Also, an adverse visual impact may be significant if it is inconsistent with laws, ordinances, regulations, and standards (LORS), whether or not it meets the criteria in Table K-3; the impact, however, must be estimated to last more than one year.
TABLE K-1

INDICATORS OF VISUAL SENSITIVITY

HIGH SENSITIVITY

- Views of and from areas the aesthetic values of which are protected in laws, public regulations and policies, and public planning documents.
- Views of and from designated areas of aesthetic, recreational, cultural, or scientific interest, including national, state, county, and community parks, reserves, memorials, scenic roads and trails, interpretive sites of scientific value, scenic overlooks, recreation areas, designated open space, and historic structures, sites, and districts.
- Views of and from areas or sites of cultural/religious importance to Native Americans.
- Views from national or state-designated scenic highways or roads, or designated scenic highways or roads of regional importance.
- Views from resort areas.
- Views from urban residential subdivisions and segments of roads near them that serve as their primary access route.
- Views from segments of travel routes, such as roads, rail lines, pedestrian and equestrian trails, and bicycle paths, that are near designated areas of aesthetic, recreational, cultural, or scientific interest and which lead directly to them. Views seen while approaching an area of interest may be closely related to the appreciation of the aesthetic, cultural, scientific, or recreational significance of that destination.

MODERATE SENSITIVITY

- Views from segments of travel routes near highly sensitive use areas of interest serving as a secondary access route to those areas.
- Views from highways or roads locally designated as scenic routes and of importance only to the local population, or informally designated as such in literature, road maps and road atlases.
- Views from rural residential areas (groups of four or more homes) and segments of roads near them that serve as their primary access route.
- Views of, and from, undesignated but protected or popularly used or appreciated areas of aesthetic, recreational, cultural, or scientific significance at the local, county, or state level.
- Views from segments of travel routes, such as roads, trails, bicycle paths, and equestrian trails, that are near protected or popularly used undesignated areas important for their aesthetic, recreational, cultural, or scientific interest, and which lead directly to them.
- Views of and from religious facilities and cemeteries.

LOW SENSITIVITY

- Views from farmsteads, or groupings of fewer than four residences.
- Views from industrial (i.e., research, development, and manufacturing), commercial, and agricultural land areas.
- Views from travel routes serving as secondary access to moderately sensitive areas, or serving primarily commercial, industrial, or agricultural traffic.
TABLE K-2
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 the 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 the 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 chances often cause a lasting impression of the affected landscape.
### TABLE K-3

**RELATIONSHIP OF IMPACT INTENSITY AND VISUAL SENSITIVITY TO PUBLIC PERCEPTION OF AN EFFECT'S BEING A SUBSTANTIAL (SIGNIFICANT) ADVERSE IMPACT ON VISUAL QUALITY**

<table>
<thead>
<tr>
<th>Visual Sensitivity&lt;sup&gt;1&lt;/sup&gt;</th>
<th>High</th>
<th>Moderate</th>
<th>Low</th>
<th>None</th>
</tr>
</thead>
<tbody>
<tr>
<td>**Intensity of Impact&lt;/sup&gt;&lt;sup&gt;2&lt;/sup&gt;</td>
<td><strong>Level 1</strong></td>
<td>S&lt;sup&gt;3&lt;/sup&gt;</td>
<td>N</td>
<td>N</td>
</tr>
<tr>
<td></td>
<td><strong>Level 2</strong></td>
<td>S</td>
<td>S</td>
<td>N</td>
</tr>
<tr>
<td></td>
<td><strong>Level 3</strong></td>
<td>S</td>
<td>S</td>
<td>S</td>
</tr>
</tbody>
</table>

1) **High Sensitivity (H):** The potential for public concern over adverse change in scenic/visual quality is great. Affected views are rare, unique, or in other ways are special and highly valued in the region or locale. Any perceptible change in visual conditions would be considered to be a significant lessening of visual quality.

**Moderate Sensitivity (M):** The potential for public concern over adverse change in scenic/visual quality is substantial. Affected views are secondary in importance or similar to views commonly found in the region or locale. A moderately to highly intense visual impact would be perceived as a significant lessening of visual quality.

**Low Sensitivity (L):** There is little evidence of public concern over, or interest in, scenic/visual resource impacts on the affected area. Only the highest intensity of adverse change in the condition of aesthetics/visual resources would be noticed as a substantial (significant) impact on visual quality.

**No Sensitivity (None):** The views are not public, or there are no indications of public concern over, or interest in, scenic/visual resource impacts on the affected area.

2) **Intensity of Impact:**

   - **(Level 1)** A reduction in Visual Condition by one Visual Modification Class rating (Table K-2)
   - **(Level 2)** A reduction in Visual Condition by two Visual Modification Class ratings
   - **(Level 3)** A reduction in Visual Condition by three Visual Modification Class ratings

3) **S:** Substantial (Significant) Reduction in Visual Quality

   **N:** Less than Substantial (No Significant) Reduction in Visual Quality.