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December 17, 2014

The Honorable Michael N. Feuer
City Attorney
200 North Main Street, 8th Floor
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**Attention: Michael J. Bostrom
Deputy City Attorney**

**RE: DRAFT OF LOS ANGELES INTERNATIONAL AIRPORT (LAX) SIGN DISTRICT
ORDINANCE**

Council File No: 13-0285-S2

CPC File No: 2011-1964-SN, ENV-2011-1965-EIR

At its meeting on August 22, 2013, the City Planning Commission (CPC) approved a draft ordinance establishing the Los Angeles International Airport (LAX) Sign District for a portion of LAX, located at One World Way, as shown on the attached map. The CPC-approved version of the draft ordinance included a change by the Commission to increase the funding associated with the proposed Visual Blight Reduction Program for aesthetic improvements in the surrounding area.

Subsequent to City Planning Commission, at a meeting on September 9, 2014, the Planning and Land Use Management (PLUM) Committee recommended adoption of the draft ordinance with changes identified to ensure that the ordinance conforms to a letter received from the Federal Aviation Administration (FAA) dated July 18, 2014. These changes include a reduction in the amount of funding for the Visual Blight Reduction Program from an ongoing percentage of net revenue to a one-time, fixed payment.

The PLUM Committee directed Planning staff to work with the City Attorney to incorporate the recommended revisions and review the draft Ordinance as to form and legality. The Sign District Ordinance was subsequently reviewed by the City Attorney, and thereafter transmitted to the City Planning Department for review under delegated authority by the CPC. The revised draft Ordinance contains changes to the Visual Blight Reduction Program that are not consistent with what was approved by the CPC on August 22, 2013.

Therefore, pursuant to Sections 558 and 559 of the City Charter, I have reviewed the findings of the CPC's action taken and disapprove this Ordinance establishing the LAX Sign District, insofar as it does not conform to the latest action of the City Planning Commission on this matter.

Very truly yours,

MICHAEL J. LOGRANDE
Director of Planning

A handwritten signature in blue ink, appearing to be 'PDM' followed by a long horizontal line.

Patricia Diefenderfer
Senior City Planner

Attachments:
Transmittal
Findings

FINDINGS

General Plan/Charter Findings

1. In accordance with **Charter Section 556**, the proposed LAX Sign District ordinance (Exhibit B) is in substantial conformance with the purposes, intent, and provisions of the General Plan. The proposal is consistent with and implements policies contained in portions of the General Plan, including the General Plan Framework and the LAX Plan. Specifically, the General Plan Framework states the following:

Economic Development Chapter, Introduction.

"...the City must take advantage of the critical role of the Port of Los Angeles and the Los Angeles International Airport in supporting the local economy."

Economic Development Policy 7.2.13.

Facilitate environmentally sound operations and expansion of the Port of Los Angeles and the Los Angeles International Airport as major drivers of the local and regional economy.

Economic Development Policy 7.3.4.

Recognize the crucial role that the Port of Los Angeles and the Los Angeles International Airport play in future employment growth by supporting planned Port and Airport expansion and modernization that mitigates its negative impacts.

These policies recognize the crucial role that LAX plays as a major driver of the local and regional economy. Signage is a common feature at airports that plays a role in defining the image of the airport, and the proposed LAX Sign District is a part of the overall modernization effort to provide an improved image at LAX with state-of-the-art facilities for travelers. The proposed ordinance ensures that signage will be well-designed and integrated into the architecture in a way that enhances the visual environment. In addition, the Sign District is intended to allow for the promotion of the unique character of Los Angeles through positive imagery, illustrations, and sponsorships of familiar local attractions, industries, and landmarks.

Further, the LAX Plan states:

Goal 3: Optimize LAX's critical role in supporting the economy as a major generator of economic activity.

Policy 3.5, Program P2.

Modernize, upgrade, and improve LAX in order to sustain the airport's economic benefits.

Consistent with the economic policies cited from the Framework Element, the LAX Plan also calls for airport improvements that will have beneficial economic impacts beyond the airport itself. As mentioned above, the proposed Sign District will improve the image of the airport, facilitate modernization projects, and allow for the promotion of key components of the Los Angeles economy to visitors. In addition, the sign removal and aesthetic enhancement components of the proposed ordinance will remove visual blight in the surrounding communities and support beautification efforts that support increased economic activity.

Policy 3.9, Program P4 and Policy P4, Program 3.9.

Develop and incorporate signage guidelines that provide guidance and establish controls for signage that are appropriate to an airport.

The LAX Plan calls for the development of sign guidelines and controls that are consistent with the property's use as a major international airport and primary point of entry to the City of Los Angeles. The proposed Sign District ordinance is consistent with and implements this program of the LAX Plan by specifying controls on the number of signs, sign type, sign dimensions, sign placement, sign illumination, and the use of digital technology. In addition, the proposed ordinance includes a design review process to ensure that new off-site signs are consistent with a uniform standard of quality, similar to the existing LAX Airport Tenant Signage Standards for on-site signs. The signage review procedures and process contained in the proposed ordinance does not alter these existing standards, but will be in harmony and comparable with those standards.

Goal 5: Acknowledge neighborhood context and promote compatibility between LAX and the surrounding neighborhoods.

Policy P1, Program 3.2.2.

Ensure that the scale and activity level of airport facilities appropriately relates to any abutting neighborhood edges.

Policy P6, Program 3.2.2.

Locate airport uses and activities with the potential to adversely affect nearby land uses through noise, light spill-over, odor, vibration, and other consequences of airport operations and development as far from, or oriented away from adjacent residential neighborhoods as feasible.

Policy P1, Program 3.9.

Appropriately relate those airport facilities that are adjacent to community land uses to the scale and level of activity of those uses.

Consistent with the above-referenced policies and programs, the proposed ordinance includes Project Design Features that limit the visibility of off-site signs from surrounding communities consistent with LAX Master Plan Commitment LU-4 which pertains to ensuring that the airport is as compatible as possible with surrounding properties and neighborhoods. Consistent with LAX Master Plan Commitment DA-1, the new off-site signage would be located internally within LAX and not within the north and south buffer areas. The signage is designed to be viewed by visitors to LAX and travelers as opposed to viewed from off-airport locations, and would not affect the use of landscaping or other screening methods to obscure views of the airport from surrounding communities. As specified in the Project Design Features, no new off-site signage would be placed along the boundary of LAX, and no electronic or light-enhanced off-site signage would be visible from the adjacent residential areas.

Policy P2, Program 3.9.

Relate Airport Landside facilities to the existing airport infrastructure in a clear, well-organized, functional, and compatible manner.

The proposed Sign District is a part of the overall modernization effort underway at LAX to improve the visual environment by unifying disparate components in the Central Terminal Area through artful integration of lighting, graphics, and architecture. Signage

is required to be well-designed and integrated into the architecture in a way that draws upon and is complementary to key existing airport elements such as the light pylons and Theme Building.

2. In accordance with **Charter Section 558**, the proposed LAX Sign District ordinance (Exhibit B) will have no adverse effect upon the General Plan, specific plans, or any other plans being created by the Department of City Planning. The proposed ordinance is consistent with the General Plan and carries out the General Plan's goals, policies, and objectives as discussed above. In addition, the ordinance is in conformity with the public necessity, convenience, general welfare, and good zoning practice. The proposed LAX Sign District would create unique signage regulations for the Central Terminal Area of LAX and connecting passenger boarding bridges. The provision of specially tailored dynamic signage regulations will advance the LAX Plan's goals for revitalization of the area by creating an engaging visual environment for travelers and reducing visual blight in surrounding communities. The LAX Sign District would enhance the means of promoting business, cultural, entertainment, and visitor-serving activities and events in the City of Los Angeles. The LAX Sign District would create a uniform aesthetic appearance in the messaging, theming, and branding occurring throughout LAX, and help contribute to Los Angeles' image as a world-class entertainment and tourist destination. As such, the LAX Sign District conforms to the public necessity, convenience, and general welfare of the city.

The signage regulations reflect good zoning practice in that they include controls on the type, size, height, hours of operation, illumination level, and other physical characteristics of new, off-site signs at the airport. Appropriate and balanced sign regulations are necessary to maintain compatibility and sensitivity to surrounding uses. The LAX Sign District would establish regulations that minimize potential traffic hazards and protect public safety, including minimizing any potential traffic hazards to the surrounding roadways. Such standards include a reduction of existing off-site signs in surrounding communities, no increase in off-site signage along surrounding public streets, including Sepulveda Boulevard, regulation of refresh rates on digital display signs, and regulations regarding the total amount of allowable commercial signage to be activated within the Sign District area at one time to avoid potential conflicts with airport wayfinding.

The proposed LAX Sign District also conforms to good zoning practice in that it clarifies and establishes certain signage design criteria, standards, location, and types of permitted and prohibited signs. The LAX Sign District would not create visual impacts on the surrounding communities, and no signs would be placed on significant architectural features or buildings within LAX.

The LAX Specific Plan allows for the erection, installation, or construction of new off-site, supergraphic, and mural signs or the alteration, redesign, or replacement of existing off-site, supergraphic and mural signs within the Airport Airside and Airport Landside Sub-Areas, pursuant to the establishment of a sign district as set forth in LAMC Section 13.11. While the LAX Specific Plan supersedes the sign regulations contained in the LAMC, the process of permitting off-site, supergraphic, and mural signs through the supplemental use district application process is specifically provided for by the LAX Specific Plan, and represents good zoning practices consistent with the Department of City Planning's standardized process for review of off-site sign requests.

Further, the proposed ordinance is in support of the General Plan Framework and LAX Plan as discussed above.

Entitlement Findings

The enabling language for the establishment of Sign Districts contained in Section 13.11 B of the Municipal Code requires that the following findings be made:

1. *Each "SN" District shall include only properties in the C or M Zones, except that R5 Zone properties may be included in a "SN" Sign District provided that the R5 zoned lot is located within an area designated on an adopted community plan as "Regional Center," "Regional Commercial," or "High Intensity Commercial," or within any redevelopment project area.*

The proposed LAX Sign District is located entirely within the LAX Specific Plan, and all property within the proposed Sign District is designated in the LAX Zone. Notwithstanding the provision in LAMC Section 13.11 B that a Sign District shall only include properties in the C or M Zones, and certain R5 zoned properties, Section 3.B of the LAX Specific Plan provides that the Specific Plan shall prevail and supersede the applicable provisions of the LAMC wherever it contains provisions that establish regulations, including for signage, which are different from, more restrictive or more permissive than would be allowed under the LAMC. Furthermore, the LAX Zone permits M uses and was created to tailor those uses to the needs of a large public airport. Section 14.D of the LAX Specific Plan specifically provides for the alteration, redesign, or replacement of existing off-site signs, or erection, construction, or installation of new off-site signs, supergraphic signs, and mural signs, pursuant to the establishment of a Sign District in accordance with LAMC Section 13.11.

2. *No "SN" District shall contain less than one block or three acres in area, whichever is the smaller.*

The proposed LAX Sign District contains an area of approximately 502 acres, bounded by Sepulveda Boulevard on the east, 96th Street and to the north of Terminals 1, 2, and 3 on the north, to the west of the Tom Bradley International Terminal on the west, and to the south of Terminals 4, 5, 6, 7, and 8 and Sepulveda Boulevard on the south, as depicted on the Plot Plan.

3. *The total acreage in the district shall include contiguous parcels of land which may only be separated by public streets, ways or alleys, or other physical features, or as set forth in the rules approved by the Director of Planning.*

The proposed LAX Sign District includes contiguous property which is separated only by public streets, as required by Section 13.11 B.

California Environmental Quality Act (CEQA) Findings

Having received, reviewed and considered the following information as well as all other information in the administrative record of all proceeding on this matter, the City Planning Commission hereby finds and recommends that the City Council of the City of Los Angeles finds, determines and declares the following:

1. Certification Of The Final EIR

The City Council of the City of Los Angeles (the "City") hereby finds that the Final Environmental Impact Report State Clearinghouse No. 2012031055, dated June 2013 (the "Final EIR") for the

proposed Project described below has been completed in compliance with the California Environmental Quality Act (CEQA), Public Resources Code Section 21000 et seq. This Final EIR is being certified in connection with all approvals required to implement the Project.

The City determined an EIR was necessary to analyze the potential environmental effects of the proposed Project. The Notice of Preparation (NOP) for a Draft EIR (the "Draft EIR") was circulated for a 30-day review period starting on March 16, 2012, and ending on April 16, 2012. A scoping meeting was held on March 31, 2012. Based on public comments in response to the NOP and a review of environmental issues by the City, the Draft EIR analyzed the following environmental impact areas:

Land Use and Planning; Visual Resources; Artificial Light and Glare; Transportation Safety

On October 11, 2012, the City released the Draft EIR for public comment. The public comment period was 45 days and ended on November 26, 2012. The lead agency received six written comments on the Draft EIR from persons, organizations and public agencies. Responses to all comments received during the comment period are included in the Final EIR.

2. CEQA Findings

Section 21081 of the California Public Resources Code and Section 15091 of the State CEQA Guidelines (the "Guidelines") require a public agency, prior to approving a project, to identify significant impacts of the project and make one or more of three possible findings for each of the significant impacts.

- Changes or alteration have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effect as identified in the Final EIR. (Guidelines Section 15091(a)(1));
- Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency. (Guidelines Section 15091(a)(2)); or
- Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible, the mitigation measures or project alternatives identified in the Final EIR. (Guidelines Section 15091(a)(3)).

For those significant effects that cannot be mitigated to a level below significance, the City is required to find that specific overriding economic, legal, social, technological, or other benefits of the project outweigh the significant effects on the environment.

Section 21081.6 of CEQA requires public agencies to adopt a monitoring and reporting program for the changes to the project that have been adopted to mitigate or avoid significant effects on the environment. Based on the analysis contained in Chapter IV (Environmental Impact Analysis) of the Draft EIR, implementation of the proposed Project, which includes implementation of 18 Project Design Features and four applicable LAX Master Plan (Los Angeles World Airports [LAWA]-adopted) commitments, would avoid or reduce any significant environmental impacts. As such, no mitigation measures are required. Although no mitigation measures are required for the proposed Project, the Project Design Features and LAWA-adopted commitments as discussed herewith and as set forth in the Project's Project Design Features and LAX Master Plan (LAWA-adopted) Commitments Monitoring and Reporting

Program, have been incorporated by reference into these Findings. In addition, any revisions to the Project that have occurred during the administrative process are incorporated by reference into these Findings. In accordance with the provisions of CEQA (California Public Resources Code §§ 2100, et seq.) and the CEQA Guidelines (California Code of Regulations Title 14, Chapter 3, §§ 15000 et seq.), these findings are hereby adopted as part of the certification of the Final EIR. As no significant unavoidable potential impacts were found in association with the proposed Project, there is no Statement of Overriding Consideration for the Project.

3. Environmental Impacts Found To Be No Impact or Less Than Significant Without Mitigation

The Final EIR found that the following environmental impacts of the proposed Project will be no impact or less-than-significant without mitigation measures:

Aesthetics

Description of Effects: The Project site is not located adjacent to or within the viewshed of a designated scenic highway or vista and no signage would be placed on or at historic buildings. Proposed signage would be similar to existing signage at the airport. Therefore, implementation of the proposed Project would not damage scenic resources, including historical resources or other locally recognized desirable aesthetic natural features within a City-designated scenic highway or from other non-designated locales.

Agricultural and Forest Resources

Description of Effects: The proposed Project site is located within a developed airport and is surrounded by airport uses, urbanized areas, and the Los Angeles/El Segundo Dunes and is not currently zoned for or used for agricultural purposes or forest land. Implementation of the proposed Project would not result in the loss of or conversation of farmland or forest land. No Williamson Act contracts are applicable within the proposed Project area. Therefore, no impacts to agricultural and forest resources would occur with implementation of the proposed Project.

Air Quality

Description of Effects: Implementation of the proposed Project would involve limited amounts of new air emissions; however, the Project is consistent with development assumptions for the City of Los Angeles, the Air Quality Element of the General Plan, and would not obstruct or conflict with the objectives or implementation of the Air Quality Management Plan.

Implementation of the proposed Project would be limited to the installation of the signage structures/devises and the changing and replacement of the signage as necessary. Air emissions would be very minor and would not exceed the South Coast Air Quality Management District's (SCAQMD's) thresholds of significance for construction or operational emissions. Therefore the proposed Project would not violate an air quality standard or contribute substantially to an existing or projected air quality violation and would not expose sensitive receptors to substantial pollutant concentrations. In addition, due to the distance to sensitive receptors, there would be no odor impact.

Since any potential emissions associated with the proposed Project would be substantially less than the significance criteria, the proposed Project would not result in a cumulatively considerable net increase in any criteria pollutant.

Biological Resources

Description of Effects: The proposed Project is within the boundary of LAX. Wildlife use of the airport is generally limited to common species. The vegetation within the Project site is ruderal (i.e., weeds) and ornamental vegetation (i.e., palm trees, Giant Bird of Paradise, various shrubs and groundcover) planted to denote perimeters or as a buffer. Implementation of the proposed Project would not place signage in a manner that would adversely impact the landscaping. There is no riparian habitat or other sensitive natural community at or near the vicinity of the proposed Project and no adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan that includes the Project site or immediate vicinity. Therefore, implementation of the proposed Project would not impact sensitive or special status species or habitats, or any riparian or other sensitive natural community, nor would there be impacts to adopted conservation plans.

Cultural Resources

Description of Effects: The Project site is a highly disturbed area that has long been, and is currently being, used for airport and airport-related uses. Any resources that may have existed on the site at one time are likely to have been displaced or damaged and, as a result, the overall sensitivity of the site with respect to buried resources is low. Additionally, no excavation into soils is expected to occur, which would further limit the potential for archaeological and paleontological resources, unique geologic features, and human remains resources to be encountered or impacted with implementation of the proposed Project.

Implementation of the proposed Project includes placement of signage on terminal facades, parking structures, sky bridges, columns, and hanging signs throughout the Central Terminal Area (CTA) and passenger boarding bridge signs. No signage would be placed on or at the Theme Building (City Historic Cultural Monument #570) and placement of the signage would not extend above the height of the terminal buildings or parking structures. As a result, the proposed Project would not interfere with scale, proportion, or massing of the Theme Building and its Setting, or adversely reduce or change the setting and primary views of the Theme Building, and therefore, there would be no direct impacts and no adverse indirect impacts on historical resources.

Geology and Soils

Description of Effects: The Project site is not located within an Alquist-Priolo Special Study Zone. The Charnock Fault, a potentially active fault, may be located near or through the eastern portion of the Project site. However, evaluations have indicated that the Charnock Fault is considered to have low potential for surface rupture independently or in conjunction with movement on the Newport-Inglewood Fault Zone, which is located approximately three miles east of the Project site. The proposed Project would involve the establishment of new signage within the Project site mounted on structures (i.e., facades, sky and passenger boarding bridges, columns, and poles). Construction of framework and mounting of the signs would comply with current building codes; therefore, no impact on the exposure of people or structures to risk associated with rupture of a known earthquake fault, strong seismic ground shaking, seismic-related ground failure and liquefaction, and risk of landslides during a seismic event would occur.

The Project site is developed with buildings and covered with impervious surfaces and the proposed Project (which is the placement of signage on existing structures and equipment in compliance with current building code requirements) would not involve any excavation, grading or foundations. Therefore, no impacts related to soil erosion or any risk associated with

unstable geologic units or soils, no increased exposure of people or structures to risk associated with expansive soils, nor any impacts to the ability of on-site soils to support septic tanks or alternative wastewater systems would occur with implementation of the proposed Project.

Greenhouse Gas Emissions

Description of Effects: The proposed Project could generate greenhouse gas (GHG) emissions from vehicle exhaust (i.e., trucks, cherry picker/lift[s], and construction worker commuting) associated with installation of new signage and periodic replacement of the advertising material. Additionally, purchased electricity necessary to operate the signs (digital display signs and lighting of other types of signage) would cause indirect GHG emissions. The operation of the proposed digital display signs (Controlled Refresh [CR] I and CR III combined, which was assumed to be 38,649 square feet [sq ft]), assuming that the digital signage would be operated at full power 24 hours per day, would consume approximately 2,383,499 kilowatt-hours per year (kWh/year). Using global warming potential factors from the Intergovernmental Panel on Climate Change's Second Assessment Report, total carbon dioxide equivalent (CO₂e) emissions were estimated to be approximately 1,331 metric tons per year for all digital displays (i.e., 38,649 sq ft) operating continuously at full power.

Subsequent to distribution of the Final EIR, and in response to questions and concerns raised by the Coalition to Ban Billboard Blight, LAWA provided additional information on the potential energy usage related to the proposed digital signage. Based on new data from Daktronics, which is an industry leader in designing and manufacturing electronic scoreboards, programmable display systems, large screen video displays, and digital billboards, the operation of the proposed digital display signs (maximum of 38,649 sq ft), assuming that it operated at full power 24 hours per day, would consume approximately 1,454,226 kWh/year and the total CO₂e emissions were estimated to be approximately 812 metric tons per year for all digital displays operating continuously at full power. Therefore, the assumptions in the Final EIR were conservative and over estimated projected energy consumption of the proposed digital signage by about 39 percent. This information does not change our conclusions that the energy use from the new signs would be less than significant. Further, we anticipate that advances in sustainable energy use will continue in the future with improved energy usage.

Based on the SCAQMD-established draft GHG emissions significance threshold of 10,000 metric tons CO₂e per year for industrial facilities, total emissions (operational plus amortized construction) would be less than the threshold and less than significant. In addition, as the GHG associated with the proposed Project are less than significant, GHG emissions from the proposed Project would not conflict with Assembly Bill 32, the purpose of which is to reduce statewide GHG emissions to 1990 levels by 2020, or S-3-05.

Hazards and Hazardous Materials

Description of Effects: The proposed Project involves establishment and implementation of a Sign District, and would not involve the use, handling, or storage of any potentially hazardous materials, nor would it involve excavation that could potentially disturb contaminated soils or groundwater. In addition, there are no schools located or proposed within one-quarter mile of the Project site, nor is the Project site within a Wildfire Hazard Area. The Project site is not located within the vicinity of a private airstrip but rather within a public airport. Road closures if needed would be temporarily and areas would remain clear and unobstructed at all times such as not to significantly impair implementation or physically interfere with an adopted emergency response plan or emergency evacuation plan. Therefore, implementation of the proposed Project would not result in the exposure of people or structures to hazards or hazardous materials.

Hydrology and Water Quality

Description of Effects: The proposed Project involves placement of signs on structures and equipment and as such would not cause any violations associated with water quality standards or water discharge requirements. The proposed Project would not change the amount of impervious surfaces at the Project site or otherwise alter existing drainage patterns or surface water runoff quantities on the Project site. As such, implementation of the proposed Project would not result in impacts on surface water quality. Implementation of the proposed Project would not involve dewatering, nor would it change the amount of permeable surface areas, drainage patterns, or affect stormwater drainage systems. Implementation of the proposed Project would not substantially deplete groundwater supplies or interfere with groundwater recharge, and, as such, no impacts would occur. The proposed Project is not located in a 100-year floodplain area and does not involve the construction of housing. In addition, the Project site is not within a boundary of an inundation area from a flood control basin. Further, the Project site is not located within the downstream influence of any levee or dam, nor is the site delineated as a potential inundation or tsunami impacted area or affected by mudflows. Therefore, no impacts due to the exposure of people or structures to a risk of loss, injury, or death involving flooding as a result of the failure of a levee or dam and no impacts resulting from inundation by seiche, tsunami, or mudflow would occur with implementation of the proposed Project.

Land Use and Planning

Description of Effects: The Project site is located entirely within the boundaries of a developed airport in an urbanized area and placement of signs on structures and equipment would not disrupt or divide the physical arrangement of an established community. Thus, the proposed Project would not divide an established community. In addition, there is no adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plan or other natural community conservation plan that includes the Project site and no impact is anticipated.

Mineral Resources

Description of Effects: The Project site is within the boundaries of the LAX airport and surrounded by airport-related uses. There are no actively-mined mineral or timber resources on the Project site, nor is the site available for mineral resource extraction given the existing airport use. Therefore, the proposed Project would not affect access to or the availability of valued mineral resources. In addition, the Project site is not within an area delineated on the City of Los Angeles Oil Field & Oil Drilling Areas. Therefore, the proposed Project would not affect the availability of a locally-important mineral resource recovery site.

Noise

Description of Effects: The proposed Project would entail installation of signs on existing structures. Implementation of the proposed Project would not result in a substantial temporary or permanent increase in ambient noise levels, nor would it expose persons to generation of noise levels in excess of standards or excessive groundborne vibration or noise. Additionally, the proposed Project would not result in an increase in noise generating activities such as traffic, an increase in the number of daily flights arriving and departing from LAX, or the ambient growth in aviation activity at LAX that is projected to occur in the future. Further, no changes would be made to runway locations or configurations as part of the proposed Project. Therefore, noise impacts are considered to be less than significant.

Population and Housing

Description of Effects: The proposed improvements would not increase existing long-term employment, passenger capacity or aircraft parking capacity at LAX. With no increase in long-term employment or passenger capacity, and no new homes proposed, the proposed Project would not induce substantial population growth. There are no existing residential properties on the Project site; therefore, implementation of the proposed Project would not displace housing. Furthermore, the Project site is located within a developed airport, and no new roads or extensions of existing roads or other growth-accommodating infrastructure are proposed. Therefore, implementation of the proposed Project would not directly or indirectly induce substantial population growth or affect housing and no impacts would occur.

Public Services

Description of Effects: Construction of the proposed Project and periodic replacement of the advertising material could result in temporary periodic closures or partial closures within the CTA roadway. However, access to the Project site would be kept clear and unobstructed at all times in accordance with FAA, State Fire Marshal, and Los Angeles Fire Code regulations, and thereby would not create a significant impact to fire and police protection or response times. In addition, implementation of the proposed Project would not increase existing passenger capacity and would not increase long-term employment that would indirectly result in enrollment increases that would adversely impact schools; it would not create the need for new parks, or governmental services, including roads, and no impact would occur.

Recreation

Description of Effects: The proposed Project does not include development of recreational facilities nor does it include residential development that would increase demand for recreational facilities. The proposed Project would not increase existing passenger capacity at LAX or increase long-term employment such that increased demand for neighborhood and regional parks or other recreational facilities would occur. Therefore, the proposed Project would not result in substantial physical deterioration of existing area recreational facilities or require the construction or expansion of recreational facilities.

Transportation/Circulation

Description of Effects: The proposed Project would not change air traffic patterns or increase airport operations. Therefore, the proposed Project would have no impact on air traffic patterns. Although implementation of the proposed Project may require periodic temporary closures of the segments of lanes within the CTA during construction and periodic installation and removal of advertising material, these related lane closures would be of short duration and occur only at limited locations at any one time so as not to impact intersection flow and emergency access routes within the Project site. In accordance with FAA, State Fire Marshal, and Los Angeles Fire Code regulations, emergency access would be maintained at all times. The proposed Project involves the placement of signage on structures and equipment, which would not conflict with, nor hinder performance of policies, plans, or programs regarding alternative forms of transportation. Therefore, the proposed Project would not result in a significant impact.

Utilities

Description of Effects: The proposed Project would not increase existing employment or passenger capacity at LAX or otherwise affect water use or wastewater generation. As such, implementation of the proposed Project would not require or result in the construction of new

water or wastewater treatment facilities, expansion of existing facilities, nor new or expanded water supply entitlements; therefore, no impact to wastewater or water facilities or water supply would occur. Implementation of the proposed Project would result in the generation of solid waste from the periodic disposal of signage when advertisements are updated/replaced and periodic replacement of the LED lights on the digital display signs. The solid waste generated from replacing signage and lighting would be negligible and would not exceed the current capacity available at the Sunshine Landfill.

4. Environmental Impacts Found To Be Less Than Significant With Project Design Features And LAX Master Plan (LAWA-Adopted) Commitments

The Final EIR found that the following environmental impacts of the proposed Project will be less-than-significant with Project Design Features and LAWA-adopted commitments:

Land Use and Planning

Description of Effects: The development of the proposed Project would be subject to numerous City land use plans, regulations in the Los Angeles Municipal Code (LAMC), and the future LAX sign ordinance (which would supersede the sign regulations set forth in the LAMC). In addition, the proposed Project is intended to support the LAX Specific Plan, which contemplated the establishment of a Sign District at LAX (Section 14[D]). With approval of the LAX sign ordinance, the proposed Project would be consistent with the policies and goals of applicable land use plans and policy documents from the state, regional, and local levels, including Southern California Association of Governments' Regional Comprehensive Plan, Southern California Compass Blueprint Growth Vision, Regional Transportation Plan/Sustainable Communities Strategy, the Airport Land Use Plan, 2011 California Airport Land Use Planning Handbook, the City of Los Angeles General Plan Framework Element, the LAX Plan, the LAX Specific Plan, and the LAMC. In addition, although the proposed Project is under the existing sign ordinance/regulations, consistency with the proposed citywide sign ordinance was addressed. The analysis determined that the proposed Project would be less than significant as related to impacts to land use and planning.

Finding: The proposed Project includes implementation of 18 Project Design Features and four LAWA-adopted commitments to either avoid or reduce potential impacts to a less-than significant level; therefore, there are no significant unavoidable impacts. As such, no mitigation measures are required. As set forth in the Final EIR, although no mitigation measures were required for the proposed Project, Project Design Features and LAWA-adopted commitments will be implemented in accordance with a Monitoring and Reporting Program and will be monitored through the sign ordinance throughout the life of the Project as approved.

Aesthetics (Visual Resources)

Description of Effects: New off-site signage has the potential to negatively impact visual quality. The proposed Project includes a Project Design Feature that restricts the placement of new off-site signage from being located on notable buildings (i.e., the Theme Building, Airport Traffic Control Tower, and future Bradley West Terminal). In addition, signage would not be placed where it would obstruct or degrade views of the notable buildings. Within the Landside Sub-Area, various types of on-site signs are already allowed. Proposed signage would be similar to existing on-site signage and primarily located on existing structures that are largely functional in nature (terminal buildings, sky bridges, parking structures, and columns) without extensive architectural features, and thus, they do not contribute meaningfully to the aesthetic quality of the CTA. The introduction of new well-designed signage would add new and variable visual elements to these functional structures, contributing to the overall aesthetic of LAX. This

signage would be located on existing facilities, separated from the viewer by intervening development or features. The signage would not be visually prominent, and would not change or detract from the existing urban character of the site. As such, the proposed Project would not adversely alter the visual identity of the Landside Sub-Area.

The only signage that would be on the Landside Sub-Area that is not interior to the CTA was the proposed digital display/supergraphic sign on the eastern elevation of Terminal 1. As detailed in the Final EIR, the proposed location of the sign on the eastern facade of the terminal would not substantially alter or degrade the existing visual character along the eastern boundary of the Project site. Subsequent to the distribution of the Final EIR and in response to questions and concerns raised by the Coalition to Ban Billboard Blight, LAWA will eliminate its request for a 800-foot sign on Terminal 1 East Elevation, so that no off-site signage would be visible from anywhere beyond the LAX property lines, including sidewalks, streets, buildings across Sepulveda or the Century Corridor. The elimination of this 800-foot sign would reduce the overall proposed signage within the Landside Sub-Area from 81,522 sq ft to 80,722 sq ft.

Within the Airside Sub-Area, there is existing on-site signage on the passenger boarding bridges. The new off-site signage would be similar to the existing signage and would not change the utilitarian and active character of the site. As such, the proposed Project would not adversely alter the visual identity of the Airside Sub-Area. There are sensitive viewers (residential uses) on the northern and southern boundaries of LAX. Airside Sub-Area signage would be in some fields of view from these locations. However, it would be a limited long distance view of the Airside Sub-Area facilities, and signage in those areas would not be illuminated. Signage would blend into this distant background and not change the visual character or aesthetics of the Project site.

Therefore the proposed Project would not substantially alter, degrade, or eliminate the existing visual character of an area, including valued existing features or resources and would not substantially contrast with the visual character of the surrounding area and its aesthetic image; therefore impacts on visual resources were found to be less than significant and no mitigation is required.

Finding: The proposed Project includes implementation of 18 Project Design Features and four LAWA-adopted commitments to either avoid or reduce potential impacts to a less-than significant level; therefore, there are no significant unavoidable impacts. As such, no mitigation measures are required. As set forth in the Final EIR, although no mitigation measures were required for the proposed Project, Project Design Features and LAWA-adopted commitments will be implemented in accordance with a Monitoring and Reporting Program and will be monitored through the sign ordinance throughout the life of the Project as approved.

Aesthetics (Artificial Light and Glare)

Description of Effects: The Project site is located within a heavily lighted urban area. There are many existing sources of light in the Project area, including building lighting, street lighting, traffic, and airfield lights (runway and taxiway lighting). New lighted signs, including new digital display signs, would add to the existing sources of light in the Project area. Project Design Features have been included to restrict and control the digital display lighting intensity. Although the CTA does not contain traditional light-sensitive receptors, operators of vehicles could perceive additional artificial light associated with the Project signs. However, the Project area is already characterized by high ambient light levels. In addition, the diodes associated with the digital displays would be pointed down and towards the airport roadways, and lighting associated with proposed signage would not add to the ambient glow of the CTA that would represent a substantial change in brightness levels. Furthermore, digital signage would be

subject to limits on brightness levels (i.e., 4,500 cd/m² during the daytime and 300 cd/m² during the nighttime) and equipped with sensors that modify the brightness of the sign in response to ambient lighting conditions. With the elimination of the 800-foot sign at the Terminal 1 East Elevation, none of the new off-site signage within the Landside Sub-Area would be visible from the Project boundary and none of the signage in the Landside Sub-Area would be visible from sensitive receptors. Therefore, a change in brightness and light trespass would not occur.

There are sensitive viewers (residential uses) on the northern and southern boundaries of LAX. Airside Sub-Area signage would be in some fields of view from these locations. However, it would be a limited long distance view of the Airside Sub-Area facilities, and signage in those areas would not be illuminated. Signage would blend into this distant background and not change the existing artificial light conditions; therefore, no change in the existing artificial light conditions would occur.

By design, signage does not include large areas of reflective elements, because they would detract from the visibility of the signage. Therefore, signage would not be a substantial source of glare within, or surrounding, the Project site.

Finding: The proposed Project includes implementation of 18 Project Design Features and four LAWA-adopted commitments to either avoid or reduce potential impacts to a less-than significant level; therefore, there are no significant unavoidable impacts. As such, no mitigation measures are required. As set forth in the Final EIR, although no mitigation measures were required for the proposed Project, Project Design Features and LAWA-adopted commitments will be implemented in accordance with a Monitoring and Reporting Program and will be monitored through the sign ordinance throughout the life of the Project as approved.

Transportation Safety

Description of Effects: The Project site is located within a public airport. Due to the amount of traffic signals, pedestrian crossings, and vehicular activity, the speed of traffic on the CTA roadways is generally lower than the posted speed limit (25 miles per hour) and much lower than on typical public streets. In addition, numerous safeguards at LAX are required to minimize the potential for impacts on airport safety. FAA's Airport Design Standards establish, among other things, land use related guidelines to protect people and property on the ground, including establishment of safety zones that keep areas near runways free of objects that could interfere with aviation activities. The proposed Project involves placing signs on structures and equipment. The proposed Project includes Project Design Features to minimize the potential for traffic hazards and would comply with regulations that are consistent with factors identified as reducing safety concerns. Such Project Design Features include regulating placement of the signs to minimize visibility from off-airport roadways, restricting allowable placement of signs, shielding of lights, and limiting illumination levels (through sensors that modify the brightness of a digital sign in response to ambient lighting conditions) and the control refresh rates of digital signs to lessen the potential for driver distraction to occur. In areas within the Landside Sub-Area (i.e., CTA) where traffic is moving, CR III digital display signs are proposed because they would change or refresh simultaneously every 12 hours. In areas within the CTA not directly in the line-of-sight of moving traffic (such as on the surfaces of parking structures parallel to the roadway) CR I digital display signs are proposed, which have a controlled refresh of no more than one refresh event every eight seconds. The exception is the proposed location of the CR I digital display sign on the east elevation of Parking Structure P1. Because the Parking Structure P1 digital is at an intersection that has a notable amount of oncoming traffic, the CR I at this location would be timed such that the controlled refresh event would occur every 14 seconds.

The Citywide Sign Ordinance establishes controls on the size, height, and spacing of signs to protect the visual environment and regulates the design, construction, and maintenance of outdoor advertising signs to ensure that signs do not interfere with transportation safety or otherwise endanger public safety. The LAX Sign District ordinance includes requirements such as restricting where signs could be located and limiting total square footage that would prevent visual clutter and help to ensure that roadway visibility would not be obstructed and that wayfinding signs would be visible to help pedestrians and motorists navigate within the CTA. Any signs that are determined by the Department of Building and Safety to have the potential of creating a safety risk are sent to the Los Angeles Department of Transportation (LADOT) for review. If LADOT determines that the signs would be a safety hazard, a permit will not be issued.

Lighting at LAX is not allowed to interfere with the nighttime visibility of ATC operators and incoming pilots, or interfere with lighting used to guide aircraft such as approach lighting, runway/taxiway guidance lighting, runway end identifier lights, and ground lighting/markings. Signs within the Airside Sub-Area would be installed on existing facilities subject to the LAX sign ordinance and would not be lit. Therefore, no distractions to pilots or ATC personnel within the Airside Sub-Area would occur.

Finding: The proposed Project includes implementation of 18 Project Design Features and four LAWA-adopted commitments to either avoid or reduce potential impacts to a less-than significant level; therefore, there are no significant unavoidable impacts. As such, no mitigation measures are required. As set forth in the Final EIR, although no mitigation measures were required for the proposed Project, Project Design Features and LAWA-adopted commitments will be implemented in accordance with a Monitoring and Reporting Program and will be monitored through the sign ordinance throughout the life of the Project as approved.

5. Environmental Impacts Found To Be Significant And Unavoidable

The Final EIR includes Project Design Features and LAWA-adopted commitments as elements of the proposed Project to avoid or reduce potentially significant impacts; therefore, there are no environmental impacts found to be significant and unavoidable.

6. Alternatives To The Proposed Project

As identified in the Final EIR, the LAX Sign District Project objectives are:

- 1) Promote and enhance LAX as an international gateway to the Pacific Rim, an important public amenity, and maintain an image as one of the nation's premier airports by encouraging creative, well-designed signs that contribute in a positive way to LAX's visual environment.
- 2) Recognize the uniqueness of LAX as a regional economic engine.
- 3) Ensure that new off-site signs are responsive to and integrated with the aesthetic character of the structures on which they are located, and are positioned in a manner that is compatible both architecturally and relative to the other signage at the airport, thereby minimizing potential safety issues.
- 4) Protect adjacent communities from potential adverse impacts of new off-site signs by avoiding visual clutter, including visual impacts of excessive number of signs, excessive sign size, sign illumination, and sign motion/animation.

- 5) Support and enhance limited new off-site signage to the interior of LAX and the urban design, land use, economic development, and modernization objectives of the LAX Master Plan and LAX Specific Plan.

GENERAL FINDINGS.

Based on these findings, the Final EIR, and the whole of the administrative record, the City finds that the Final EIR analyzes a reasonable range of alternatives that would feasibly attain most of the basic objectives of the proposed Project, but would not fully realize project objectives. Project alternatives would not allow the flexibility to fully support and enhance limited new off-site signage to the interior of LAX and the urban design, land use, economic development, and modernization objectives of the LAX Master Plan and LAX Specific Plan to the extent allowed for by the proposed Project. Understanding that there are no unavoidable significant impacts associated with the proposed Project, the City finds that the impacts of the alternatives would be similar to the less than significant impacts under the proposed Project or somewhat less when compared with the proposed Project, and the Final EIR adequately evaluates the comparative merits of each alternative. Specifically, the Final EIR considered the following three (3) alternatives:

- 1) No Project Alternative
- 2) Reduced Signage Alternative (80 percent Project)
- 3) No Digital Signage Alternative

[Note: Additionally, Section 15126.6(e)(2) of the CEQA Guidelines requires that an environmentally superior alternative be identified among the analyzed alternatives. See below in Section 7.]

Having weighed and balanced the pros and cons of each of the alternatives analyzed in the Final EIR, and based on the Final EIR's analyses which determined that the proposed Project and the Project alternatives would result in a less than significant impact on the environment, the Project objectives, these CEQA findings, and economic, legal, environmental, social, technological and other considerations, each of the alternatives is hereby found to be infeasible and rejected. These considerations include the provision of development of the proposed Project with the unique LAX campus and conditions of the CTA, lack of significant impacts, as well as the importance to the City, all as supported by the evidence contained in the whole of the administrative record and the evidence and testimony presented in this matter. Following is a matrix displaying the comparison of environmental impacts of the alternatives to those of the proposed Project.

Impact Category	Proposed Project	Alternative 1 No Project	Alternative 2 Reduced Signage	Alternative 3 No Digital Signage
Land Use and Planning	LTS	LTS (0)	LTS (0)	LTS (0)
Visual Resources	LTS	LTS (-)	LTS (-)	LTS (0)
Artificial Light and Glare	LTS	LTS (-)	LTS (0)	LTS (-)
Transportation Safety	LTS	LTS (-)	LTS (0)	LTS (0)

Notes:

LTS: Less Than Significant

LTS (-): Impact considered to be somewhat less when compared with the proposed Project.

LTS (0): Impact considered to be similar or equal to the proposed Project.

LTS (+): Impact considered to be somewhat greater when compared with the proposed Project.

ALTERNATIVE NO. 1

No Project Alternative

This alternative is required by CEQA. Under the No Project Alternative, no new off-site signage would be placed in the Project site. On-site, wayfinding, and tenant signage would continue, as well as the existing off-site signage at the Park One Property (subject to their current leases), and no billboard take downs or compliance with other applicable requirements from the Department of City Planning associated with the proposed Project would occur. In summary, Alternative 1 would not preclude future improvements or signage already permitted within the Project site.

Impact Summary: Similar to the proposed Project, all the potential environmental impacts were found to be less than significant.

Finding: With this Alternative, potential impacts to visual resources, artificial light and glare and transportation safety would be considered to be somewhat less when compared with the proposed Project. The No Project Alternative (Alternative 1) would be the environmentally superior alternative primarily because no new off-site signage, including supergraphics or digital signage, would be placed in the Project site. Under this Alternative, on-site, wayfinding and tenant signage would still be allowed within the Project site. The No Project Alternative does not fully meet the Project's objectives. It is found pursuant to Public Resources Code Section 21081(a)(3), that specific economic, legal, environmental, social, and technological or other considerations of importance to the City, including the provision of employment opportunities, make infeasible the No Project Alternative described in the Final EIR.

Rationale for Finding: This Alternative would be similar to the proposed Project in that it would be consistent with land use and planning requirements. Alternative 1 would introduce fewer new sources of artificial light and glare, fewer elements that have the potential to create traffic distractions associated with new off-site signage than the proposed Project. Alternative 1 would meet the objective of the proposed Project of protecting adjacent communities from visual clutter. Maintaining the signage currently allowed at LAX would partially meet the objectives of providing well-designed signs that support economic development; however, there would be substantially less flexibility to provide modern creative signage to enhance the visual environmental and less opportunity to support economic development and the uniqueness of LAX. The No Project Alternative would not provide a revenue stream that would be used to support infrastructure projects at LAX.

ALTERNATIVE NO. 2

Reduced Project Alternative (80 Percent Project)

The Reduced Project Alternative (Alternative 2) would establish a new sign district that would allow 20 percent less signage throughout the Project site than under the proposed Project. Alternative 2 includes a maximum of approximately 65,218 square feet of proposed new off-site signage within the Landside Sub-Area and a maximum of approximately 231,680 square feet of proposed new off-site signage within the Airside Sub-Area. Alternative 2 would also create a sign ordinance that would govern the type and size of allowable off-site signs and their

placement throughout the Project site. The proposed signage types and allowable locations under this alternative would be the same as under the proposed Project and would include supergraphics, wall signs, digital display signs, and other signs such as signs on passenger boarding bridges, hanging signs, and column wraps. As with the proposed Project, Alternative 2 is designed to limit visibility from off-airport locations (i.e., surrounding communities) and to not visually or negatively affect airport operations or affect or alter historical buildings within LAX. No digital displays or externally lit signs would be allowed in the Airside Sub-Area. As with the proposed Project, Alternative 2 would also include a plan to remove a number of billboards in LAWA's control and compliance with other applicable requirements from the Department of City Planning.

Impact Summary: Similar to the proposed Project, all the potential environmental impacts were found to be less than significant.

Finding: With this Alternative, only the potential impact to visual resources would be considered to be somewhat less when compared with the proposed Project. After the No Project Alternative, Alternative 2 would tie with Alternative 3 as the environmentally superior alternative because either alternative would result in fewer environmental impacts compared to the proposed Project. Alternative 2 would not fully meet the project objectives. It is found pursuant to Public Resources Code Section 21081(a)(3), that specific economic, legal, environmental, social, and technological or other considerations of importance to the City, including the provision of employment opportunities, make infeasible the Reduced Project Alternative described in the Final EIR.

Rationale for Finding: This Alternative would be similar to the proposed Project in that it would be consistent with land use and planning requirements and would introduce similar new sources of artificial light and glare, and elements that have the potential to create traffic distractions associated with new off-site signage. Alternative 2 would support the objectives of the proposed Project, however to a lesser degree, as the decreased amount of signage would provide less flexibility to enhance the visual environment through modern creative signs, and would provide a decreased opportunity to support LAX as a regional engine. In addition, compared to the proposed Project, the decreased amount of signage under Alternative 2 would provide a decreased revenue stream that would be used to support infrastructure projects at LAX.

ALTERNATIVE NO. 3

No Digital Signage Alternative

Under this alternative, no digital off-site signage would be allowed within the Project site. As with the proposed Project, Alternative 3 would establish a new sign district that would allow a maximum of approximately 81,522 square feet of proposed off-site signage within the Landside Sub-Area and a maximum of approximately 289,600 square feet of proposed off-site signage within the Airside Sub-Area. The proposed location of digital displays within the Landside Sub-Area would be replaced with supergraphics.

Proposed new off-site signage within the Airside Sub-Area would remain the same as under the proposed Project. Alternative 3 would also create a sign ordinance which would govern the type and size of allowable off-site signs and their placement throughout the Project site. The proposed signage under this alternative would include supergraphics, wall signs, and other signs such as signs on passenger boarding bridges, hanging signs, and column wraps. Alternative 3 is also designed to limit visibility from off-airport locations (i.e., surrounding communities) and to not visually or negatively affect airport operations or affect or alter historical buildings within LAX. No lighted signs would be allowed in the Airside Sub-Area. Under

Alternative 3, there would be no digital display signs available as use for emergency communication as necessary. As with the proposed Project, Alternative 3 would include a plan to remove a number of billboards in LAWA's control and compliance with other applicable requirements from the Department of City Planning.

Impact Summary: Similar to the proposed Project, all the potential environmental impacts were found to be less than significant.

Finding: With this Alternative, only the potential impacts to artificial light and glare would be considered to be somewhat less when compared with the proposed Project. After the No Project Alternative, Alternative 3 would tie with Alternative 2 as the environmentally superior alternative because either alternative would result in fewer environmental impacts compared to the proposed Project. Alternative 3 would not fully meet the project objectives. It is found pursuant to Public Resources Code Section 21081(a)(3), that specific economic, legal, environmental, social, and technological or other considerations of importance to the City, including the provision of employment opportunities, make infeasible the No Digital Signage Alternative described in the Final EIR.

Rationale for Finding: Alternative 3 would support the objectives of the proposed Project; however, to a lesser degree, as without digital displays, the Sign District would have less flexibility to enhance the visual environment through modern creative signs. In addition, compared to the proposed Project, the likely decreased amount of advertising that could be sold with the elimination of digital displays under Alternative 3 would provide a decreased revenue stream that would be used to support infrastructure projects at LAX.

7. Environmentally Superior Alternative

As stated above, Section 15126.6(e)(2) of the CEQA Guidelines requires that an environmentally superior alternative be identified among the analyzed alternatives. From a strictly environmental standpoint, excluding social or economic issues, the No Project Alternative would be the environmentally superior alternative because it would result in less development and therefore fewer impacts. The No Project Alternative, in and of itself, would not fully meet the Project's objectives. Therefore, the Reduced Project and the No Digital Signage Alternatives would both represent the environmentally superior alternative because either alternative would result in fewer environmental impacts compared to the proposed Project. Neither alternative would fully meet the project objectives.

As indicated above, implementation of the proposed Project would not result in any impacts that are significant or could not be mitigated to a level that is less than significant; hence, the need to identify and evaluate alternatives that can avoid or substantially lessen any significant impacts of the proposed Project is diminished.

8. Findings Regarding General CEQA Impact Categories

Short Term versus Long Term Impacts

The proposed Project involves placement of signs on existing structures and equipment at LAX. The proposed Project as approved by the City Council is intended to provide support and enhance limited new off-site signage to the interior of LAX that would support the urban design, land use, economic development, and modernization objectives of the LAX Master Plan and LAX Specific Plan. In addition, the proposed Project as approved is intended to support the LAX Specific Plan, which contemplated the establishment of a Sign District at LAX (Section 14[D]). Short term impacts related to traffic adjacent to placement of new off-site signage near

the CTA roadway would occur, but are limited to the immediate signage area and are of short duration. There are no long term impacts associated with the proposed Project.

Growth Inducing Impacts

CEQA Guidelines Section 15126.2(d) requires that an EIR discuss growth inducing impacts of a proposed project. Growth-inducing impacts are ways in which the project could "...foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment." This includes projects that would remove obstacles to growth. However, as stated in the Guidelines, "it must not be assumed that growth in any areas is necessarily beneficial, detrimental, or of little significance to the environment."

Implementation of the proposed Project involves placement of signs on structures and equipment and does not include residential development. The proposed Project would not directly foster significant population growth or the construction of new housing in the Project's region of influence (Los Angeles County, Orange County, Riverside County, San Bernardino County, and Ventura County), remove obstacles to population growth, or necessitate the construction of new community facilities that would lead to additional growth in the surrounding area.

The direct effects of the proposed Project on regional growth stems from economic growth resulting from labor needs and expenditures. The proposed Project would not result in the generation of a significant amount of jobs at the Project site, as the Project would not result in a change in use of the site. In addition, the proposed signage would not increase passenger capacity at LAX. With no increase in long-term employment or passenger capacity, and no new homes proposed, the proposed Project would not induce substantial population growth. Furthermore, the Project site is located within a developed airport, and no new roads or extensions of existing roads or other growth-accommodating infrastructure are proposed. Therefore, the proposed Project would not directly or indirectly induce substantial population growth through extension of roads or other infrastructure, and no impacts would occur.

An objective of the proposed Project is to support and enhance limited new off-site signage to the interior of LAX and the urban design, land use, economic development, and modernization objectives of the LAX Master Plan and LAX Specific Plan. Development of the proposed Project could generate demand for goods, services, or facilities not directly associated with the proposed Project. Although the proposed Project has the potential to indirectly increase jobs through advertising associated with the proposed Project that could indirectly foster economic development and growth through the potential increase in patronage of businesses and services in the Los Angeles area and as a source of funding for LAX improvements, the growth would not be significant as the Project would serve an existing population. In addition, the proposed Project is smaller in scale as compared to other development projects within the Los Angeles area. Any potential indirect Project-related increase in patronage of businesses and services is expected to have little impact on the regional economy as a whole. Therefore, it is not anticipated that the proposed Project would encourage or facilitate other activities that could significantly affect the environment, either individually or cumulatively.

Significant Irreversible Impacts

CEQA Guidelines Section 15126.2(c) requires that an EIR analyze significant irreversible environmental changes that would be caused by the proposed project. This includes the use of nonrenewable resources during construction and operation of a project to such a degree that the use of the resources thereafter is unlikely. It also includes significant and irreversible environmental changes that could result from environmental accidents associated with the

project. Implementation of the proposed Project would consume limited slowly renewable and non-renewable resources. These resources would include: 1) building materials; and 2) fossil fuel, electrical energy, and operational materials/resources. Use of these energy resources would be irretrievable and irreversible.

Construction of the proposed Project would require consumption of various construction materials (mostly metals) associated with the signage framework, hooks or rail system devices, and appurtenant equipment such as lights and electrical boxes. Fossil fuels, such as gasoline and oil, would also be consumed in the use of construction vehicles and equipment.

Operation of the proposed Project would involve ongoing consumption of resources that are not replenishable or resources that may renew so slowly as to be considered non-renewable. These resources include petrochemical synthetics (i.e., plastics and adhesives) associated with supergraphics, wall signs, column wraps, hanging signs, and passenger boarding bridge signs, and electricity and lighting equipment (such as LED light bulbs) associated specifically with digital display signage, as well as lighting for supergraphics and wall signs. In addition, the resources that are needed to produce the signage or lighting consume directly or indirectly electricity, fossil fuels, and natural gas. In addition, fossil fuels, such as gasoline and oil, would also be consumed in the use of vehicles and equipment used to install and maintain the signage. To the extent that fossil fuels remain a principal source of energy within the nation, the proposed Project represents a long-term commitment of these resources.

The commitment of resources associated with the construction and operation of the proposed Project would limit the availability of these resources for future generations. However, consumption of these resources would be consistent with anticipated change and growth and relatively small in scale when compared to the resource consumption for the City of Los Angeles, the County of Los Angeles, and the southern California region. As such, although the materials and energy associated with the proposed Project would be unavailable for other uses, the use of such resources would be justified by the economic growth that could be indirectly increased as a result of the proposed Project.

9. Other CEQA Considerations

Recirculation of Final EIR

CEQA Guidelines Section 15088.5 does not require recirculation of the Final EIR based on the following:

- No significant new information has been added that would deprive the public of a meaningful opportunity to comment on a substantial adverse environmental effect of the Project, a feasible way to mitigate or avoid such an impact that the Applicant has declined to implement, or a feasible Project alternative;
- The new information, including certain factual corrections and minor changes, provides clarification to points and information already included in the Draft EIR;
- There are no significant new environmental impacts resulting from the Project or from a new mitigation measure proposed to be implemented; There is no substantial increase in the severity of an environmental impact that has not been mitigated to a level of insignificance;

- The Applicant has not declined to adopt any feasible project alternatives or mitigation measures, considerably different from others previously analyzed, that clearly would lessen the environmental impacts of the Project; and
- The Final EIR is not so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment are precluded. The City Council finds that, after considering the Final EIR, there is substantial evidence to conclude that none of the conditions requiring recirculation of the Final EIR are present and therefore recirculation of the Final EIR is not required.

Project Description

CEQA requires that the description of the project include “the whole of an action” and must contain specific information about the proposed Project to allow the public and reviewing agencies to evaluate and review its environmental impacts, and that this description must include all integral components of the proposed Project. A proper project description is important to ensure that “environmental considerations do not become submerged by chopping a large project into many little ones – each with minimal impact on the environment – which cumulatively may have disastrous consequences.” (Bozung v. Local Agency Formation Commission [1975] 13 Cal.3d 263, 283-284.) The Final EIR contains a project description that describes the whole of the proposed action consistent with CEQA requirements.

Substantial Evidence

The City Council finds and declares that substantial evidence for each and every finding made herein is contained in the Draft EIR and Final EIR and other related materials, each of which are incorporated herein by this reference. Moreover, the City Council finds that where more than one reason exists for any finding, the City Council finds that each reason independently supports such finding, and that any reason in support of a given finding individually constitutes a sufficient basis for that finding.

Relationship of Findings to EIR

These Findings are based on the most current information available. Accordingly, to the extent there are any apparent conflicts or inconsistencies between the Draft EIR and the Final EIR, on the one hand, and these Findings, on the other, these Findings shall control and the Draft EIR and Final EIR or both, as the case may be, are hereby amended as set forth in these Findings.

Custodian of Documents

The custodian of the documents or other material which constitutes the record of proceedings upon which the City Planning Commission and City Council’s decision is based is the City of Los Angeles, Department of City Planning, located at 200 North Spring Street, Los Angeles, California 90012.

Miscellaneous

- a. The concept of “feasibility” encompasses the question of whether a particular alternative promotes the underlying goals and objectives of a Project. “Feasibility” under CEQA encompasses “desirability” to the extent that desirability is based on a reasonable balancing of the relevant economic, environmental, social, and technological factors.

- b. CEQA requires that the lead agency exercise its independent judgment in reviewing the adequacy of a Final EIR and that the decision of a lead agency in certifying a Final EIR and approving a Project not be predetermined. The City has conducted its own review and considered the Final EIR, and is exercising its independent judgment when acting as herein provided.
- c. The responses to the comments on the Draft EIR, which are contained in the Final EIR, clarify and amplify the analysis in the Draft EIR.
- d. CEQA requires the Lead Agency approving a Project to adopt a Mitigation Monitoring Program for the changes to the Project which it has adopted or made a condition of Project approval in order to ensure compliance with the mitigation measures during Project implementation. As the proposed Project does not require mitigation but includes several Project Design Features and LAWA-adopted commitments that have been added to the Project (as detailed in the Final EIR) to would avoid or reduce significant impacts, a Monitoring and Reporting Program (MRP) associated with these Project elements has been developed. The Project Design Features and LAWA-adopted commitments included in the Final EIR as certified by the City Council and included in the MRP as adopted by the City Council serves that function. The MRP includes all of the Project Design Features and LAWA-adopted commitments that are part of the proposed Project to avoid or reduce potential impacts as detailed in the Final EIR and adopted by the City Council in connection with the approval of the Project and has been designed to ensure compliance with such features and commitments during implementation of the Project. In accordance with CEQA, the MRP provides the means to ensure that the Project Design Features and LAWA-adopted commitments are fully enforceable. The final measures are described in the MRP. Each of the features and commitments identified in the MRP, and contained in the Final EIR, is incorporated into the Project. In accordance with the requirements of Public Resources Code § 21081.6, the City Council hereby adopts the MRP and incorporated by reference into these findings.

The City Council finds that the impacts of the Project do not require mitigation and that the Project Design Features and LAWA-adopted commitments identified in the MRP, and contained in the Final EIR, fully avoid or reduce potential impacts to less-than-significant levels.

- e. In accordance with the requirements of Public Resources Code § 21081.6, the City Council hereby adopts each of the Project Design Features and LAWA-adopted commitments expressly set forth herein as conditions of approval for the Project.
- f. The City Council finds and declares that substantial evidence for each and every finding made herein is contained in the Final EIR, which is incorporated herein by this reference, or is in the record of proceedings in the matter.
- g. The City, acting through the Department of City Planning, is the "Lead Agency" for the Project evaluated in the Final EIR. The City Council finds that the Final EIR was prepared in compliance with CEQA and the CEQA Guidelines. The City Council finds that it has independently reviewed and analyzed the Final EIR for the Project, that the Draft EIR that was circulated for public review reflected its independent judgment and that the Final EIR reflects the independent judgment of the City Council.
- h. The City Council finds that the Final EIR provides objective information to assist the decision-makers and the public at large in their consideration of the environmental

consequences of the Project. The public review period provided all interested jurisdictions, agencies, private organizations, and individuals the opportunity to submit comments regarding the Draft EIR. The Final EIR was prepared after the review period and responds to comments made during the public review period.

- i. The Planning Department evaluated comments on the environmental issues received from persons who reviewed the Draft EIR. In accordance with CEQA, the Planning Department prepared written responses describing the disposition of significant environmental issues raised. The Final EIR provides adequate, good faith and reasoned responses to the comments. The Planning Department reviewed the comments received and the responses thereto and has determined that neither the comments received nor the responses to such comments add significant new information regarding environmental impacts to the Draft EIR. The Lead Agency has based its actions on a full evaluation of all viewpoints, including all comments received up to the date of adoption of these findings, concerning the environmental impacts identified and analyzed in the Final EIR.
- j. The significant environmental impacts of the Project and the alternatives were identified and evaluated in the Draft and Final EIR.
- k. The City Council is approving and adopting findings for the entirety of the actions described in these Findings and in the Final EIR as comprising the Project. It is contemplated that there may be a variety of actions undertaken by other State and local agencies (who might be referred to as "responsible agencies" under CEQA). Because the City is the Lead Agency for the Project, the Final EIR is intended to be the basis for compliance with CEQA for each of the possible discretionary actions by other State and local agencies to carry out the Project.

10. Monitoring And Reporting Program

The MRP has been prepared in accordance with Public Resources Code Section 21081.6, which requires a Lead or Responsible Agency that approves or carries out a plan where a Final EIR has identified significant environmental effects to adopt a "reporting or monitoring program for the changes to project which it has adopted or made a condition of project approval in order to mitigate or avoid significant effects on the environment." The City is the Lead Agency for the MRP.

Based on the analysis contained in the Final EIR, implementation of the proposed Project includes implementation of several Project Design Features and LAWA-adopted commitments. As a result no significant unavoidable impacts would result and no mitigation measures are required. Although no mitigation measures were required for the proposed Project, the Project Design Features and applicable LAWA-adopted commitments would be implemented in accordance with this MRP and will be monitored through the sign ordinance throughout the life of the Project as approved. All responsible parties listed in the MRP are within the City unless otherwise noted. The entity responsible for the implementation of all Project Design Features and LAWA-adopted commitments shall be the City unless otherwise noted.

11. Statement Of Overriding Considerations

Based on the analysis contained in the Final EIR, implementation of the proposed Project includes implementation of several Project Design Features and LAWA-adopted commitments. As a result no significant unavoidable impacts would result. Therefore, the proposed Project does not require the City to prepare or adopt a Statement of Overriding Considerations

concerning the unavoidable significant impacts or to explain why the benefits of the LAX Sign District Project outweigh and override its unavoidable impacts, as none were found.