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CPC-2018-5152-SN-SP	ENV-2015-2497-EIR (4th Addendum)	9—Price, 1—Cedillo

PROJECT ADDRESS:
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NOTES / INSTRUCTION(S):
Attached are the updated findings that reference the revised 4th Addendum to the project's Final EIR.

TRANSMITTED BY:	TRANSMITTAL DATE:
Jenna Monterrosa	4/8/19

FINDINGS

General Plan Consistency

The proposed Amendments to the Coliseum District Specific Plan and Coliseum and Soccer Stadium Sign District are in conformance with the purposes, intent, and provisions of the City of Los Angeles General Plan.

- Framework Element—Land Use
- *Objective 3.1 - Accommodate a diversity of uses that support the needs of the City's existing and future residents, businesses, and visitors."*

The two new Stadium Freeway Signs would support the new MLS stadium and its ancillary uses within Exposition Park and thereby enhance the available resources to support the City's and neighborhood's existing and future residents, businesses, and visitors. The stadium has and will continue to enhance the economic vitality of the South Los Angeles area and the region by providing both temporary job opportunities associated with the construction of the stadium and permanent jobs opportunities associated with on-going operation of the stadium. The Stadium Freeway Signs would support the comprehensive signage program for the stadium that includes naming and sponsorship rights, consistent with a state-of-the-art MLS stadium and entertainment venue, and were acknowledged in the City's approval for the stadium as a component of the expected overall signage program.

With respect to freeway signage, the Sign District, expressly recognizes that additional locations for freeway signs could be added to the Sign District at a future date, which was necessary because locations for freeway signs had not yet been identified or secured at the time the City Council approved the Sign District in 2016. The Sign District specifically provides that "up to three Stadium Freeway Signs may be located in the future on up to three other non-contiguous parcels in an expanded Freeway Zone." (Sign District Section 8 E.5.) This is in addition to a fourth non-contiguous parcel at 3843 Grand Avenue already housing the Existing Major Site Sign for the Coliseum. The Sign District further provides that "[a]n amendment of this Ordinance shall be required to add the locations of additional Stadium Freeway Signs to the District." (Sign District Section 9 X.1.a.) Accordingly, to permit the proposed freeway signs, LAFC proposes to amend the Sign District to include the Grand Avenue Site and the 12th Place Site in the Sign District and to provide regulations for the Freeway Signs.

In addition, consistent with the provisions in the Sign District the Specific Plan provides that a Sign District "may be established... and may include up to four non-contiguous parcels located in any zone, including the parcel located easterly of the 110 (Harbor) Freeway containing the Existing Major Site Sign, and additional non-contiguous parcels that may contain new Stadium Freeway Signs as may be allowed by the Outdoor Advertising Act, codified in California Business & Professions Code Section 5272, et seq." (Specific Plan Section 3.C.) The Specific Plan further provides that "[s]igns within the Specific Plan area shall be regulated by a Sign District with boundaries that encompass the Specific Plan area. The Sign District may also include the Existing Major Site Sign and Stadium Freeway Signs, as permitted by the Outdoor Advertising Act, as codified at California Business & Professions Code Section 5272, et seq., which may be located on separate parcels that are non-contiguous with the Specific Plan area." (Specific Plan Section 11.)

Thus, for the four total non-contiguous freeway-adjacent parcels anticipated in the Sign District and Specific Plan, one is already in use for the Existing Major Site Sign for the Coliseum, two are being proposed with this Project for the identical LAFC Soccer Stadium Freeway Signs, and one would remain unused upon approval of this Project, but held in reserve for possible future use by a second Coliseum sign, although no such fourth sign is currently proposed. A fourth such sign, if proposed in the future, would have to be approved through a process similar to the two LAFC Soccer Stadium Freeway Signs proposed in this Project.

The Stadium Freeway Signs would not increase the square footage of signage that has already been approved for LAFC's stadium and entertainment venue. Instead, the Freeway Signs' square footage is proposed to be allocated from signage that is already contained in the Sign District for LAFC's stadium. Accordingly, as part of the amendment to the Sign District, the amount of signage allowed on the stadium site (in the Soccer Stadium Zone and South Parking Lot Zone) would be reduced and allocated to the Grand Avenue Site and the 12th Place Site in the amended Freeway Zone where the new proposed Freeway Signs would be located.

- The stadium and its ancillary uses hosts MLS games, concerts, conferences, and a variety of special events. The Stadium Freeway Signs would serve as monuments to the stadium, by advertising its events and sponsors, and draw attention to these events within Exposition Park. The Stadium Freeway Signs' designs evoke the LAFC brand and contain Art Deco details. The Stadium Freeway Signs are critical elements of the stadium's overall signage program, and are designed to draw attention to the stadium, its sponsors, and its events, which will in turn draw visitors to Exposition Park and generate additional revenue to support the on-going operation of the stadium and its ancillary facilities, as well as the museums and other businesses in and around Exposition Park.

- In addition, the Stadium Freeway Signs would provide needed financial support to the stadium by advertising products and services provided by the sponsors, pursuant to requirements of the Outdoor Advertising Act. The Stadium Freeway Signs are an important component of the larger stadium project that adds a diverse array of entertainment, restaurant, business and other public uses to the already diverse existing set of uses within and around Exposition Park.

Framework Element- Land Use

Policy 3.4.1 - Conserve existing stable residential neighborhoods and lower-intensity commercial districts and encourage the majority of new commercial and mixed-use (integrated commercial and residential) development to be located (a) in a network of neighborhood districts, community, regional, and downtown centers, (b) in proximity to rail and bus transit stations and corridors, and (c) along the City's major boulevards, referred to as districts, centers, and mixed-use boulevards, in accordance with the Framework Long-Range.

The proposed Stadium Freeway Signs would be sited along a major thoroughfare, the 110 Freeway, and the digital faces would be visible in either the northerly or southerly direction of travel along the freeway. The Stadium Freeway Signs are proposed to be located on freeway-adjacent properties that currently contain storage and commercial uses. The Stadium Freeway Signs have been designed to minimize impacts to nearby residential uses by directing digital elements and lighting toward the freeway and away from surrounding development. Each sign

includes an aluminum backing that will screen mechanical equipment from the view of neighborhoods. The Stadium Freeway Signs' structural support extends their iconic design all the way to the ground evoking the LAFC wing motif as well as Art Deco architectural lines. This ensures that visual interest and quality materials will also be provided at the pedestrian level, to the extent there are limited areas of visibility at the sign bases.

The Stadium Freeway Signs would support the MLS stadium and ancillary uses by driving attendance to events and advertising sponsors, which creates additional revenue to support the stadium's ongoing operation. The stadium and its ancillary uses are located among a diverse array of neighborhood commercial, residential, and open space uses within and surrounding Exposition Park. The ancillary uses associated with the stadium are open to the public on non-event days to serve as a catalyst for the revitalization of Exposition Park and to complement and enhance the existing venues and destinations within the park. Together with existing commercial, retail, and restaurant uses across Figueroa Street from the stadium site, these uses improve the commercial character of the neighborhood for residents and visitors alike who demand a diversity of commercial options. The Stadium Freeway Signs would highlight these important uses for the area and direct visitors to the various entertainment and commercial options available within Exposition Park. In addition, the revenue from the Freeway Signs would fund the long-term operation of the stadium and ancillary uses, ensuring that these amenities continue to provide jobs and economic value to the local community and City as a whole.

- Framework Element—Urban Form and Neighborhood Design

Objective 5.2 Encourage future development in centers and in nodes along corridors that are served by transit and are already functioning as centers for the surrounding neighborhoods, the community or the region.

Policy 5.2.2 Encourage the development of centers, districts, and selected corridor/boulevard nodes such that the land uses, scale, and built form allowed and/or encouraged within these areas allow them to function as centers and support transit use, both in daytime and nighttime (see Chapter 3: Land Use). Additionally, develop these areas so that they are compatible with surrounding neighborhoods, as defined generally by the following building characteristics.

The Stadium Freeway Signs would be located near existing commercial and entertainment centers along the 110 Freeway, and have been designed to be compatible with surrounding neighborhoods. The Stadium Freeway Signs would direct attention to the new MLS stadium and its sponsors, by advertising events, on-site uses, as well as sponsor products and services. The 110 Freeway is a high-traffic corridor that guides drivers into and out of downtown Los Angeles and its surrounding neighborhoods. The Stadium Freeway Signs placement along the 110 Freeway is consistent with freeway-facing signage advertising for other large sporting event venues in the Los Angeles region, such as the Coliseum, Staples Center, and StubHub Center. The Stadium Freeway Signs are designed to ensure visibility of messaging both during the daytime and at night. The digital faces of the Stadium Freeway Signs are in a unique portrait orientation, which will provide for an iconic design. The Stadium Freeway Signs' static elements incorporate the LA monogram and LAFC wing motif into the design.

The Stadium Freeway Signs are an important element of the stadium and will both support the advertising and naming sponsorship rights for the stadium (which in turn generates revenue streams necessary for stadium funding and operations), and draw visitors to Exposition Park. The stadium and ancillary uses are located in Exposition Park, which is home to a number of cultural, entertainment, and sporting facilities and has long served as a community and regional center.

Exposition Park is served by a robust public transit system. Transit lines and stops in the vicinity include the Expo Park/USC Station, Jefferson/USC Station, and Expo/Vermont Station stops of the Expo Light Rail Line, as well as seven nearby Metro and LADOT bus lines within a quarter mile of the stadium site. These transit lines allow access to the stadium from a wide latitude of areas. For example, the Metro Expo Line serving the stadium via by the Expo Park/USC (.35 miles) and the Expo/Vermont (.7 miles) Metro Expo Line Stations, provide light rail connections running from Downtown to Santa Monica. Furthermore, the stadium includes convenient pedestrian access to this substantial existing infrastructure.

The Stadium Freeway Signs support the stadium and other uses by providing Exposition Park with additional visibility. The stadium is another landmark feature adding to the already expansive list of public entertainment within the park and the Freeway Signs will serve as a monument to the stadium and its sponsors, driving attendance to the stadium and other attractions located in Exposition Park.

Framework Element – Urban Form and Neighborhood Design

Policy 5.8.4 - Encourage that signage be designed to be integrated with the architectural character of the buildings and convey a visually attractive character.

The Amendments to the Sign District and Specific Plan do not specify a specific design for the Stadium Freeway Signs. However, the Applicant has submitted applications for two Stadium Freeway Signs whose construction would be subject to the Director of Planning's approval of their consistency with the proposed Amendments. These proposed signs' designs are consistent with this policy.

The Stadium Freeway Signs would be constructed with designs that are identical to each other and evoke the LAFC brand and contain Art Deco details. The designs would be highlighted by orienting the signs' digital boards in a portrait orientation instead of the typical landscape orientation utilized in most signs. In addition, the signs would be designed consistent with the LAFC color scheme, which is black and gold, and would also include gray and white elements. These colors are reflected in the LAFC stadium. The signs would be designed with the LAFC wing motif at the top of the sign. The signs' structural support, which would extend the design all the way to the ground, would evoke the LAFC wing motif as well as Art Deco architectural lines, which are used throughout the LAFC branding. The letters "LA" also feature prominently at the base of the signs, reflecting both their association with the LAFC professional soccer team and their location in the City of Los Angeles.

The environmental analysis in the Fourth Addendum to the Environmental Impact Report (EIR) concluded that the Proposed Project did not introduce any new significant and unavoidable environmental impacts, nor did it exacerbate any previously identified significant and unavoidable environmental impacts. This was accomplished by keeping the brightness of the signs within a safe range that would not impair driver safety nor cause any light and glare impacts on the signs' ground-level neighbors. Light and Glare impacts are measured against several thresholds, such as a light intensity exceeding 3.0 foot-candles (fc) at the property line of any residence or other sensitive receptor, a light intensity 0.6 fc above ambient illuminance, or a nighttime brightness exceeding 600 candelas per square meter (cd/m^2) and California Vehicle Code (CVC) requirements. The Project as analyzed in the Addendum stayed within these thresholds of significance, and the regulations in the Sign District Amendment as proposed restrict the brightness of the freeway signage even further, for example, maintaining an illuminance no more than 0.3 fc above ambient illuminance and a nighttime brightness below 300 cd/m^2. In addition,

the Project would limit the brightness during twilight and when ambient sun light falls to less than 100 footcandles to 1,500 cd/m^2. These project design features are included in the Mitigation Monitoring Program (MMP) as Project Design Features PDF A-7 and PDF A-8.

Community Plan Consistency

- 12th ***Place Sign, Westlake Community Plan***

The 12th Place Site is located within the Westlake Community Plan area. The Westlake Community Plan was adopted on September 16, 1997. The Westlake Community Plan area is located south of the Hollywood Freeway (US-101), north of the Santa Monica Freeway (Interstate 10) and west of the 110 Freeway. The 12th Place Site is currently designated for Commercial Manufacturing uses in the Westlake Community Plan and is located across from the Staples Center.

Commercial

> *Objective 1: To conserve and strengthen viable commercial development in the community and to provide additional opportunities for new commercial development and services.*
>
> > *Policy 1: The commercial facilities be located on existing traffic arteries and commercial corridors.*
> >
> > *Policy 6: The development of new high intensity uses activities be designed to emphasize service or employment of local residents.*

The proposed 12th Place Sign would be located along the existing traffic artery and commercial corridor of the 110-Freeway, immediately to the west of Downtown Los Angeles and directly across from an established sports and entertainment center where other freeway-facing signs are located. The 12th Place Site is a rectangular shaped parcel developed with a one-story commercial building with a surface parking lot. No change to the building is proposed as part of the addition of the 12th Place Sign. The sign is part of a comprehensive signage program supporting LAFC's approved MLS stadium that is integral to its long-term financial viability. The stadium presents a major economic opportunity to create jobs and stimulate investment in the City. The stadium has enhanced the economic vitality of the region by providing both temporary job opportunities associated with the construction of the stadium and permanent jobs opportunities associated with on-going operation of the stadium. LAFC has a local hire program that ensures that many of the permanent jobs that the stadium generates are filled by local residents. The signage program, including the 12th Place Sign, is an important element of a major league sports stadium as it is necessary to support the advertising and naming sponsorship rights for the stadium and will generate revenue streams necessary for stadium funding and operations. The 12th Place Sign is an integral part of the stadium's economic success by providing advertising revenue needed to support on-going operations and drive attendance at games and special events.

As with all professional sports stadiums, advertising revenue and sponsorships are needed to fund this continued operation. The 12th Place Sign will help to ensure the long-term sustainability of the stadium and its ancillary uses, and retain the jobs it has created. The stadium and it ancillary uses have created a new hub for entertainment within Exposition Park, and the 12th Place

Sign will help maintain and increase the economic base in the City that the stadium has assisted in developing.

Recreation and Parks Facilities/Open Space

Objective 2: To conserve, maintain, and better utilize existing recreation and park facilities which promote the recreational experience.

Policy: Preserve and improve the existing recreation and park facilities and park space.

LAFC has committed to expanding recreational opportunities for youth in the community and has invested in various programs that encourage children to play soccer. The cornerstone of LAFC's community initiatives is the LAFC Youth Leadership Program, which trains at-risk high school students to serve as coaches of youth soccer program in South and Central Los Angeles. These high school students then organize and lead soccer programs, after-school classes, and workshops to get kids interested in soccer. The LAFC Youth Leadership Program helps connect kids with recreational opportunities in their community while developing skills and competencies in high school students. The 12th Place Sign will provide LAFC with revenue needed to support on-going community programs, including those focused on encouraging recreational experiences.

LAFC's recently developed MLS stadium project is part of an on-going revitalization of Exposition Park. The stadium and its ancillary uses will continue to draw visitors and support maintenance and improvement activities. The stadium's ancillary uses, which operate on non- game days, provide visitors to Exposition Park with various dining options, allowing them to extend their stay at the park. The 12th Place Sign will highlight the stadium and its ancillary uses, and draw attendees to games, special events, nearby museums and Exposition Park generally. By helping to draw additional visitors to Exposition Park, the proposed 12th Place Sign will help preserve and promote Exposition Park's facilities and park space.

Grand Avenue Sign, Southeast Los Angeles Community Plan

- The proposed Grand Avenue Sign is located within the Southeast Los Angeles Community Plan area. The Southeast Los Angeles Community Plan recently completed a community plan update, with a published draft Community Plan Implementation Ordinance (CPIO) that was adopted by the City Council on December 12, 2018, and took effect December 29, 2018. The Community Plan outlines objectives and policies to guide land use and development within the 14.8-square-mile area bounded by the Santa Monica Freeway on the north, Figueroa Street and Broadway on the east, the 105 Freeway and 120th Street on the south, and the Alameda corridor to the west. The Grand Avenue Site is now designated for Hybrid Industrial uses in the Southeast Los Angeles Community Plan.

Industrial Land Use

- Goal LU14: Sufficient land is conserved for a variety of industrial uses with maximum employment opportunities.

- *Policy LU14.1: Retain Industrial Designations for Industrial Uses. Retain industrial plan designations, such as for the Alameda Corridor and the Goodyear Tract, to*

provide for existing and future industrial uses which contribute quality job opportunities for residents and which minimize environmental and visual impacts to the community.

- *Policy LU14.2: Protect Established Industrial Districts from Encroachment. Protect viable, established industrial districts from encroachment by non- industrial uses, including retail, residential, live-work, and schools.*

The Grand Avenue Sign would be located within land designated Hybrid Industrial just to the east to the 110 Freeway on a vacant property currently used for storage located near the stadium, which is located to the west of the freeway. The Grand Avenue Sign would direct the sign faces toward the freeway, which is consistent with other nearby signage used to advertise venues and sponsors, including the Coliseum freeway sign. The Grand Avenue Sign is an integral part of the stadium's economic success by providing advertising revenue needed to support on-going operations and drive attendance at games and special events. The Freeway Signs would draw attendees to Exposition Park and its surrounding neighborhoods, stimulating existing commercial development in the area. The design of the Freeway Signs incorporate the classic elements of Art Deco Design. The unusual portrait orientation of the digital displays and black, gold, and gray sign structures convey a distinctive character unlike other signage. The Freeway Signs were designed with attention to detail to ensure that every element, from the LAFC wing at the top of the sign to the cohesive sign structure that reaches grade, contributes to the aesthetic theme. Additionally, the proposed Project was analyzed in an Addendum to the Environmental Impact Report, finding that the Grand Avenue Sign created no new significant environmental impacts, and did not substantially increase the intensity of any existing environmental impacts.

Accordingly, the Grand Avenue Sign conserves an industrial use within an industrially- designated area, supporting a stadium that provides job opportunities for residents, minimizing environmental and visual impacts to the community. The Grand Avenue Sign also does not involve any encroachment on industrial districts by non-industrial uses.

- *Goal LU16: Industrial uses that are compatible with adjacent residential and commercial land uses.*

- *Policy LU16.1: Buffering and Transitions. When separated by a shared property line, industrial properties should be designed in a manner sensitive to adjacent residential, public facility, and other similar uses by providing buffering and appropriate transitions.*

- *Policy LU16.2: Context-Sensitive Design. Promote context-sensitive design that provides quality design and aesthetically pleasing façades visible from public view.*

- *Policy LU16.4: Minimize Incompatibilities. Minimize residential-industrial land use incompatibilities and prohibit noxious industrial uses adjacent to residential.*

The Grand Avenue Sign would be constructed with a design that evokes the LAFC brand and contains Art Deco details. The design would be highlighted by orienting the sign's digital boards in a portrait orientation instead of the typical landscape orientation. With a portrait orientation, the digital portion of the Grand Avenue Sign and the 12th Place Sign would be unlike other freeway signs in the City of Los Angeles. In addition, the Grand Avenue Sign would be designed

consistent with the LAFC color scheme, which is black and gold, and would also include gray and white elements. These colors would preserve the character and provide consistency with signage at the MLS stadium. Further, the Grand Avenue Sign would be designed with the LAFC wing at the top of the sign, which provides architectural diversity compared to other freeway signs in the City. The Grand Avenue Sign's structural support, which would extend the design all the way to the ground, would evoke the LAFC wing as well as Art Deco architectural lines, which are used throughout the LAFC branding.

The Grand Avenue Sign also was designed to minimize any pedestrian-level impacts. The Grand Avenue Sign's digital displays are directed toward the freeway and away from adjacent properties. Accordingly, while the sign would attract visitors to the Exposition Park commercial area and enhance the commercial district, it would not detract from neighboring properties. Specifically, the Grand Avenue Sign will have an aluminum backing to screen mechanical equipment from the street level and adjacent properties. The sign also will be fenced to further minimize any pedestrian-level impacts, and its structural support extends the design all the way to the ground evoking the LAFC wing as well as Art Deco architectural lines.

The environmental analysis in the Fourth Addendum to the Environmental Impact Report (EIR) concluded that the Proposed Project did not introduce any new significant and unavoidable environmental impacts, nor did it exacerbate any previously identified significant and unavoidable environmental impacts. This was accomplished by keeping the brightness of the signs within a safe range that would not impair driver safety nor cause any light and glare impacts on the signs' ground-level neighbors. Light and Glare impacts are measured against several thresholds, such as a light intensity exceeding 3.0 foot-candles (fc) at the property line of any residence or other sensitive receptor, a light intensity 0.6 fc above ambient illuminance, or a nighttime brightness exceeding 600 candelas per square meter (cd/m^2), and California Vehicle Code (CVC) requirements. The Project as analyzed in the Addendum stayed within these thresholds of significance, and the regulations in the Sign District Amendment as proposed restrict the brightness of the freeway signage even further, for example, maintaining an illuminance no more than 0.3 fc above ambient illuminance and a nighttime brightness below 300 cd/m^2. In addition, the Project would limit the brightness during twilight and when ambient sun light falls to less than 100 footcandles to 1,500 cd/m^2. These project design features are included in the Mitigation Monitoring Program (MMP) as Project Design Features PDF A-7 and PDF A-8.

Therefore, the proposed Grand Avenue Sign is compatible with adjacent residential or commercial land uses.

- *Goal LU17: Hybrid Industrial corridors that facilitate transitions from traditional industrial districts to neighborhoods and commercial areas, and accommodate job generating uses with limited residential in selected areas.*
    - *Policy LU17.1: Preserve Hybrid Industrial Zones. Improve jobs-housing balance by preserving the job generating potential of Hybrid Industrial zones.*
    - *Policy LU17.2: Minimize Impacts. Minimize impacts to sensitive uses and surrounding neighborhoods through transitions and buffering.*

The proposed Grand Avenue Sign is part of a comprehensive signage program supporting the stadium that is integral to its long-term financial viability. The stadium presents a major economic opportunity to create jobs and stimulate investment in the City, particularly in the South Los

Angeles community, which suffers from higher unemployment and poverty rates than other parts of the Greater Los Angeles region. The stadium has enhanced the economic vitality of the region by providing both temporary job opportunities associated with the construction of the stadium and permanent jobs opportunities associated with on-going operation of the stadium. The signage program, including the Grand Avenue Sign, is an important element of a major league sports stadium as it is necessary to support the advertising and naming sponsorship rights for the stadium and will generate revenue streams necessary for stadium funding and operations. The Grand Avenue Sign is an integral part of the stadium's economic success by providing advertising revenue needed to support on-going operations and drive attendance at games and special events. The Grand Avenue Sign would draw attendees to Exposition Park and its surrounding neighborhoods, which will expand market opportunities by stimulating existing commercial uses and supporting the establishment of new businesses.

As with all professional sports stadiums, advertising revenue and sponsorships are utilized to supplement this continued operation. The Grand Avenue Sign will help to ensure the long-term sustainability of the stadium and its ancillary uses, and retain the jobs it has created. The stadium and it ancillary uses have created a new hub for entertainment within Exposition Park, and the Grand Avenue Sign will help maintain and increase the job generating potential of the nearby Soccer Stadium.

The Grand Avenue Sign also was designed to minimize any impacts to sensitive uses and surrounding neighborhoods. The Grand Avenue Sign's digital displays are directed toward the freeway and away from adjacent properties. Accordingly, while the sign would attract visitors to the Exposition Park commercial area and enhance the commercial district, it would not detract from neighboring properties. Specifically, the Grand Avenue Sign will have an aluminum backing to screen mechanical equipment from the street level and adjacent properties. The sign also will be fenced to further minimize any pedestrian-level impacts, and its structural support extends the design all the way to the ground evoking the LAFC wing as well as Art Deco architectural lines.

The environmental analysis in the Fourth Addendum to the Environmental Impact Report (EIR) concluded that the Proposed Project did not introduce any new significant and unavoidable environmental impacts, nor did it exacerbate any previously identified significant and unavoidable environmental impacts. This was accomplished by keeping the brightness of the signs within a safe range that would not impair driver safety nor cause any light and glare impacts on the signs' ground-level neighbors. Light and Glare impacts are measured against several thresholds, such as a light intensity exceeding 3.0 foot-candles (fc) at the property line of any residence or other sensitive receptor, a light intensity 0.6 fc above ambient illuminance, a nighttime brightness exceeding 600 candelas per square meter (cd/m^2), and California Vehicle Code (CVC) requirements. The Project as analyzed in the Addendum stayed within these thresholds of significance, and the regulations in the Sign District Amendment as proposed restrict the brightness of the freeway signage even further, for example, maintaining an illuminance no more than 0.3 fc above ambient illuminance and a nighttime brightness below 300 cd/m^2. In addition, the Project would limit the brightness during twilight and when ambient sun light falls to less than 100 footcandles to 1,500 cd/m^2. These project design features are included in the Mitigation Monitoring Program (MMP) as Project Design Features PDF A-7 and PDF A-8.

- **Outdoor Advertising Act Consistency**

The proposed Stadium Freeway Signs are consistent with the Outdoor Advertising Act (Cal. Business & Professions Code Section 5200, et seq.) ("OAA"). The OAA regulates signage that is visible from freeways and provides allowances for signage that is associated with major

professional sports stadiums. Pursuant to OAA Section 5272, up to two freeway signs for a major professional sports stadium are exempt from certain OAA requirements provided they meet the following requirements:

- The freeway signs advertise products, goods, or services marketed or promoted on the premises of an arena pursuant to a sponsorship marketing plan;
- The arena is capable of providing a venue for professional sports on a permanent basis;
- The arena has a capacity of 15,000 or more seats;
- The freeway signs are authorized as of January 1, 2019, by, or in accordance with, a local ordinance, including, but not limited to, a specific plan or sign district adopted in connection with the approval of the arena by the city, county, or city and county;
- The freeway signs bear the name or logo of the arena; and
- The freeway signs are visible when approaching off-ramps from the interstate, primary, or state highways used to access the premises of the arena.

The proposed Stadium Freeway Signs would meet all of these requirements. Advertising on the Freeway Signs would be subject to a sponsorship marketing plan. The LAFC stadium has a capacity of 22,000 seats and provides a venue for a MLS team on a permanent basis. The Stadium Freeway Signs would be authorized by the Specific Plan and Sign District ordinances adopted in connection with the stadium. The Stadium Freeway Signs would bear the name of the arena. Finally, both of the Stadium Freeway Signs would be visible when approaching off- ramps from the 110 Freeway used to access the stadium. Accordingly, the Stadium Freeway Signs would satisfy all the necessary requirements provided in OAA Section 5272 and the Stadium Freeway Signs would be consistent with the OAA.

Sign District Amendment and Specific Plan Amendment Findings

The project is in conformity with public necessity, convenience, general welfare, and good zoning practice.

The proposed Stadium Freeway Signs are part of a comprehensive signage program supporting the stadium that is integral to its long-term financial viability. The stadium has enhanced the economic vitality of the region by providing both temporary job opportunities associated with the construction of the stadium and permanent jobs opportunities associated with on-going operation of the stadium. The signage program, including the Stadium Freeway Signs, is an important element of a major league sports stadium as it will support the advertising and naming sponsorship rights for the stadium and will generate revenue streams necessary for stadium funding and operations.

Signage for the stadium site and adjacent areas within Exposition Park, including the neighboring Los Angeles Memorial Coliseum property, is regulated by the Sign District. The Sign District provides comprehensive signage regulations to ensure that stadium signage is cohesive with existing signage and appropriate for a major league sports stadium.

The Stadium Freeway Signs are consistent with the Sign District, which currently authorizes up to three freeway signs on sites that are not contiguous with Exposition Park, in addition to the

Existing Major Site Sign for the Coliseum at 3843 Grand Avenue. The Sign District is consistent with the Outdoor Advertising Act, which regulates signage associated with major professional sports stadiums that is visible from freeways. The Stadium Freeway Signs would be sited to allow advertising to both northbound and southbound traffic on the 110 Freeway. Consistent with the Sign District requirements, the Stadium Freeway Signs would each include digital panels that will advertise the stadium and its sponsors. The Stadium Freeway Signs have been designed to orient visibility toward the freeway and away from neighborhoods.

The Stadium Freeway Signs would be constructed with designs that complement each other and evoke the LAFC brand and contain Art Deco details. The iconic designs would be highlighted by orienting the signs' digital boards in a portrait orientation instead of the more typical landscape orientation. In addition, the signs would be designed consistent with the LAFC color scheme, which is black and gold, and would also include gray and white elements. The signs would be designed with the LAFC wing motif at the top of the sign. The signs' structural support, which would extend the design all the way to the ground, would evoke the LAFC wing as well as Art Deco architectural lines, which are used throughout the LAFC branding.

The two proposed Stadium Freeway Signs would not increase the square footage of signage that has already been approved by the City Council for LAFC's stadium and entertainment venue. Instead, the Freeway Signs' digital square footage is proposed to be allocated from digital signage that is already contained in the Sign District for LAFC's stadium. Accordingly, as part of the amendment to the Sign District, the amount of signage allowed on the stadium site would be reduced and allocated to the Grand Avenue Site and the 12th Place Site in the amended Freeway Zone, where the new proposed Freeway Signs would be located.

The Stadium Freeway Signs would support the stadium and ancillary uses, ensuring that these uses continue to provide entertainment, dining, and employment opportunities to Exposition Park and South Los Angeles. The stadium's location within Exposition Park continues to help drive the revitalization of the area by drawing additional visitors to this hub of entertainment and culture. The stadium is easily accessible by various public transportation routes, providing easy access from all parts of the region. In addition, the ancillary uses will serve the visitors to Exposition Park both when the stadium hosts events and on non-event days. The stadium and ancillary uses have created long-term jobs and economic benefits to the surrounding communities.

The Sign District includes comprehensive signage regulations to ensure that signs are developed in a cohesive fashion and reflect the parameters that the City Council have established for the LAFC stadium and the Los Angeles Memorial Coliseum. The Sign District regulates signage operating hours, illumination of permitted signs, refresh rates for digital displays, and the design and placement of signs. These regulations, and those related to signage contained in the Specific Plan, contemplated the future development of freeway signs to support LAFC's MLS stadium. The City Council adopted the Sign District to ensure that the development of signage, including freeway signs, would conform to minimum design standards and be developed in a thoughtful manner.

With respect to freeway signage, the Sign District expressly recognizes that additional locations for freeway signs could be added to the Sign District at a future date, which was necessary because locations for freeway signs had not yet been identified or secured at the time the City Council approved the Sign District. The Sign District specifically provides that "up to three Stadium Freeway Signs may be located in the future on up to three other non-contiguous parcels in an expanded Freeway Zone." (Sign District Section 8 E.5.) This is in addition to the Existing Major Site Sign for the Coliseum at 3843 Grand Avenue. The Sign District further provides that

"[a]n amendment of this Ordinance shall be required to add the locations of additional Stadium Freeway Signs to the District." (Sign District Section 9 X.1.a.) Accordingly, to permit the proposed freeway signs, LAFC proposes to amend the Sign District to include the Grand Avenue Site and the 12th Place Site in the Sign District and to provide regulations for the Freeway Signs.

The proposed Sign District and Specific Plan amendments would allow the development of Freeway Signs needed to support the long-term sustainability of the previously approved MLS stadium and ancillary uses. The City Council contemplated the addition of new sites to accommodate the freeway signs authorized under the Specific Plan and Sign District. The Freeway Signs are fully consistent with the Sign District's requirements for freeway signs, which are themselves consistent with the OAA. The Stadium Freeway Signs are critical to funding the stadium and its long-term operation. For these reasons, the Stadium Freeway Signs are in conformance public necessity, convenience, and general welfare. The Stadium Freeway Signs support and conform to good zoning practice by developing previously-authorized signage in a manner that is consistent with both state and local law.

CEQA Findings

While the City of Los Angeles is the Lead Agency for this Project amending the Sign District and Specific Plan to incorporate two sites for freeway signage for the LAFC Soccer Stadium, environmental impacts for this Project are analyzed in the Fourth Addendum to an Environmental Impact Report (EIR) originally prepared for a project for which the Los Angeles Memorial Coliseum Commission (Coliseum Commission) was the Lead Agency.

Serving as Lead Agency, the Coliseum Commission determined that an Environmental Impact Report should be prepared for the Los Angeles Memorial Sports Arena Redevelopment Project in accordance with the requirements of the California Environmental Quality Act ("CEQA") (Pub Resources Code §21000 et seq.; 14 Cal. Code Regs. §15000 et seq.). In compliance with CEQA Section 21080.4 and Section 15082 of the State CEQA Guidelines, the Coliseum Commission circulated a Notice of Preparation (NOP) to state, regional, and local agencies, and member of the general public for a 30-day review period starting on April 19, 2010 and ending on May 19, 2010. The NOP was subsequently re-circulated for a period running from May 27, 2010 to June 30, 2010, to announce a public scoping meeting would be held to solicit comments from the general public and responsible agencies with regard to the scope of the EIR. The public scoping meeting was held on June 16, 2010 at the Coliseum Commission's Board Room at 3939 S. Figueroa Street, in Los Angeles, California. Appendix A to the EIR contains copies of each NOP, the scoping meeting attendance sign-in sheet, and all written comments submitted to the Coliseum Commission in response to the NOPs.

The EIR analyzed the demolition of the Los Angeles Memorial Sports Arena and the development of two potential options on the Sports Arena's site in Exposition Park: (1) a multiple-use space that would serve as a public venue for civic gatherings, celebratory and entertainment events, (e.g. festivals, carnivals, rallies, concerts) and other similar uses (Multi- Use Project); or (2) a Major League Soccer (MLS) Stadium with a permanent seating capacity of approximately 22,000 seats and associated amenities such as restrooms, concessions, press facilities, spectator viewing areas, luxury suites and club seating, and locker and dressing facilities (Original Stadium Project). As required by CEQA, the Draft EIR was prepared and circulated during a 45-day public review period that began on November 15, 2010 and ended on December 30, 2010. Pursuant to Section 15088 of the CEQA Guidelines, the Coliseum Commission, as Lead Agency, reviewed all comments received during the review period for the Draft EIR and responded to each comment in Section III of the Final EIR.

The Coliseum Commission published the Final EIR on January 21, 2011. The Final EIR is intended to serve as an information document for public agency decision-makers and the general public regarding the objectives and components of the proposed project. The Final EIR addresses the environmental effects associated with implementation of each project option, identifies feasible mitigation measures and alternatives that may be adopted to reduce or eliminate these impacts, and includes written responses to all comments received on the Draft EIR during the public review period. Copies of the Draft EIR, Final EIR, and EIR Appendices were made available for public review on the Coliseum Commission's website and at its administrative offices during normal business hours at the Sports Arena ticket office. On February 2, 2011, the Los Angeles Memorial Coliseum Commission, acting as lead agency, certified the Final EIR (Certified EIR) prepared for the Los Angeles Memorial Sports Arena Redevelopment Project (State Clearinghouse No. 2010041059).

After the Certified EIR was certified by the Coliseum Commission, the Coliseum Commission leased the Sports Arena and the Project Site to the University of Southern California (USC) with permitted uses including those approved under the Certified EIR. USC has now leased the Sports Arena site to the Los Angeles Football Club (LAFC or Applicant), which sought approval of certain modifications to the Original Stadium Project in order to develop the LAFC Stadium on the Project site (Modified Project). The Modified Project consists of the Original Stadium Project (reconfigured on the Project site) together with the addition of up to approximately 105,900 square feet of ancillary facility floor area (up to approximately 119,000 gross square feet), including the following uses and floor areas: up to approximately 30,250 square feet of office and conference facility space, including no more than 21,250 square feet of office space; an approximately 36,000-square-foot "World Football" museum; up to approximately 27,750 square feet of team store or other retail space; and up to approximately 11,900 square feet of restaurant uses. The Modified Project also includes signage and lighting programs to support stadium operations.

In accordance CEQA Guidelines Section 15164, an addendum was released on September 4, 2015 (Modified Project Addendum) to analyze the Modified Project's proposed modifications to the Original Stadium Project and to determine whether implementation of the Modified Project would result in any new significant environmental impacts that were not identified in the Certified EIR, or whether the previously identified significant impacts would be substantially more severe under the Modified Project.

On September 17, 2015, the Coliseum Commission, acting as lead agency under CEQA, considered the Modified Project, the Certified EIR and the Modified Project Addendum at a public meeting. The Coliseum Commission found that the minor changes resulting from the Modified Project do not meet the standards for a Subsequent or Supplemental EIR pursuant to Public Resources Code Section 21166 and CEQA Guidelines Section 15162. In addition, the Coliseum Commission approved the Modified Project and adopted: (1) the Modified Project Addendum; (2) CEQA findings pursuant to Public Resources Code Section 21081 and CEQA Guidelines Section 15091; (3) a Statement of Overriding Considerations pursuant to CEQA Guidelines Section 15093; and (4) a Mitigation Monitoring Program. On June 21, 2016, the City of Los Angeles (City) approved the Modified Project and the Modified Project Addendum as a responsible agency pursuant to CEQA Guidelines Section 15096.

The Modified Project and Modified Project Addendum authorized the development of future freeway signs associated with the stadium, but did not specify their locations as the locations had not yet been secured. Two additional addenda analyzed impacts associated with extended construction hours and the replacement of existing street trees adjacent to the LAFC Stadium, and did not include analysis of impacts associated with signage. Subsequently, sites for two

freeway signs have been identified and the design of the freeway signs has been developed. The freeway signs would include both static and digital components and would be located adjacent to the 110 Freeway with one freeway sign located at 3912 S. Grand Avenue (APNs 5122-046-028, 5122-046-029, 5122-046-030) (the Grand Avenue Sign on the Grand Avenue Site) and a second freeway sign located at 1320 W. 12th Place (portion of APN 5137-031-029) (the 12th Place Sign on the 12th Place Site) (collectively the Grand Avenue Sign and the 12th Place Sign are referred to as the Freeway Sign Project). Because the Freeway Sign Project is not within the jurisdiction of the Coliseum Commission and is within the jurisdiction of the City of Los Angeles, the City is the lead agency for purposes of CEQA in considering the potential effects of the proposed Freeway Sign Project. In accordance with CEQA Guidelines Section 15164, the City released an addendum on October 4, 2018, which was updated on April 5, 2019 (Freeway Sign Addendum) to analyze the development and operation of the freeway signs and determine whether implementation of the freeway signs would result in any new significant environmental impacts that were not identified in the Certified EIR or previous Addenda, or whether the previously identified significant impacts would be substantially more severe with the development of the freeway signs.

The Freeway Sign Addendum demonstrates that the Freeway Sign Project would not result in any new significant impacts compared to those evaluated and disclosed in the Certified EIR, nor would it substantially increase the severity of previously identified significant impacts. In addition, the Freeway Sign Addendum demonstrates that there are no substantial changes to the circumstances under which the Original Stadium Project analyzed in the Certified EIR would have been undertaken, and no new information of substantial importance which was not known and could not have been known when the Certified EIR was certified has been identified. Therefore, the City finds that the minor changes resulting from the Freeway Project do not meet the standards for a Subsequent or Supplemental EIR pursuant to Public Resources Code Section 21166 and CEQA Guidelines Section 15162.

The analyses provided below address the environmental issues evaluated in the Certified EIR and Addenda and focus on any potential changes in environmental impacts that could result from the installation and operation of the proposed Freeway Sign Project. Specifically, potential impacts are compared with the analyses and findings within the Certified EIR and Addenda for those impact areas that could be implicated by the installation and operation of the proposed Freeway Sign Project to determine if such impacts are within the envelope of impacts previously documented, including whether new significant impacts would result or whether previously identified significant impacts would be substantially more severe. Furthermore, the analyses only address those environmental issues that could be affected by implementation of the two proposed freeway signs; impacts that are influenced by population or habitable building square footage, for example, are not addressed. Also, several of the analyses focus strictly on construction-related impacts, as operational impacts would be negligible for most issues.

The City therefore makes the following findings required by CEQA Guidelines Section 15096 for responsible agencies.

I. FINDINGS REQUIRED TO BE MADE BY LEAD AGENCY UNDER CEQA

California Public Resources Code (PRC) Section 21166 states that unless one or more of the following events occur, no Subsequent or Supplemental EIR is required by the lead agency or by any responsible agency:

1. Substantial changes are proposed in the project which will require major revisions of the previous EIR;

2. Substantial changes occur with respect to the circumstances under which the project is being undertaken that will require major revision in the environmental impact report; or,

3. Previously unknown new information at the time of the certification of the EIR as complete becomes available.

The findings reported in the following pages incorporate the facts and discussions of the environmental impacts that are found to be significant in the Certified EIR, including any modifications to the Certified EIR's analysis disclosed in the Freeway Sign Addendum, for the project as fully set forth in those documents. The following discussion includes a description of the Freeway Sign Project's impacts, comparison to the impacts analyzed in the Certified EIR and previous Addenda, and any required mitigation measures.

The Freeway Sign Addendum evaluated the following potential project and cumulative environmental impacts that could be implicated by the Freeway Sign Project: Aesthetics; Air Quality (Construction); Biological Resources; Cultural Resources; Geology and Soils; Greenhouse Gas Emissions; Hazards and Hazardous Materials (Construction); Hydrology and Water Quality (Construction); Land Use and Planning; Noise (Construction); Traffic and Transportation; and Utilities and Service Systems – Energy.

The Freeway Sign Addendum did not evaluate the following areas, because the Freeway Sign Project would result in no change in the potential impacts identified in the Certified EIR and prior Addenda in these areas: Agriculture and Forestry Resources; Air Quality (Operation); Hazards and Hazardous Materials (Operation); Hydrology and Water Quality (Operation); Mineral Resources; Noise (Operation); Population, Housing, and Employment; and Public Services.

II. IMPACTS FOUND TO BE LESS THAN SIGNIFICANT AND NOT SUBSTANTIALLY MORE SEVERE THAN THE IMPACTS PREVIOUSLY IDENTIFIED IN THE CERTIFIED EIR OR ADDENDA

A. *Aesthetics/Visual Resources*

1. Visual Character and Views (Construction and Operation)

As set forth in the L.A. CEQA Thresholds Guide and within the Certified EIR, visual character and views impacts are based on a number of factors that are used to determine whether a project would substantially alter, degrade, or eliminate the existing visual character of an area. As set forth on pages IV.A-21–IV.A-22 of the Certified EIR, these factors include the existing valued aesthetic features that would be removed; open space to be developed; integration of new structures with open spaces; contrast of project features with the area's aesthetic image; the potential for new structures to detract from the existing image of the area; the project's contribution to the area's aesthetic value; and consistency of the project with applicable design guidelines and/or regulations.

Construction-related visual character and views impacts were not assessed in detail in the Certified EIR. However, the Addenda concluded that impacts with respect to visual character and views during construction would be less than significant. As set forth in the L.A. CEQA Thresholds

Guide and within the Certified EIR, visual character and views impacts are based on a number of factors that are used to determine whether a project would substantially alter, degrade, or eliminate the existing visual character of an area.

Construction activities associated with installation of the two proposed freeway signs would be limited in scope and duration, as described above. Aside from involving new locations within which sign installation would occur, the general nature of construction activities would be similar to those previously evaluated. Both the 12th Place Site and the Grand Avenue Site are within commercial/industrial properties and site activities are largely shielded from public view at ground level due to existing fencing (the signs would become visible once erected). As such, views of construction activities from off-site areas would be screened by the existing fencing surrounding each sign site. Given the temporary nature of construction activities (approximately one to two months), the limited amount of construction equipment needed on-site, and the presence of existing fencing that would limit views of construction activities, short-term construction activities would not substantially or adversely alter or degrade the visual character of the sign locations. As such, installation of the freeway signs would not affect the construction-phase analysis of visual character and views provided in the Certified EIR and Addenda. Therefore, impacts would remain less than significant, and no mitigation measures are required.

The Certified EIR concluded that impacts with respect to visual character and views during operation would be less than significant. Similarly, the Addenda determined operational impacts relative to visual character and views, including impacts related to the addition of signage to the Expo Park Site, would be less than significant. In particular, the Modified Project Addendum evaluated the Sign District, recognizing that the signage program would represent an important component of the Modified Project and a strong visual element that would influence the aesthetics of the Expo Park Site. The types and extent of permitted signage, including freeway signs and other dynamic signage, were found to emphasize the Modified Project's event- and entertainment-oriented aspects and help establish a unique visual identity for the Expo Park Site, while being consistent with the well-lit, active pedestrian environment in the surrounding area.

With the addition of the two proposed freeway signs, the Freeway Sign Project's overall physical development envelope would not vary substantially from that previously evaluated. In particular, the approved Sign District permits freeway signs and includes one designated Freeway Zone site located east of the 110 Freeway, directly east of the Expo Park Site. In addition, the Sign District allows for up to three additional freeway signs located on up to three other non- contiguous parcels in an expanded Freeway Zone. Accordingly, consistent with the existing allowances in the Sign District, the Sign District would be amended to include the Grand Avenue Site and the 12th Place Site in the Sign District area and set forth regulations for the two proposed freeway signs. As part of the proposed Sign District Amendment, LAFC would remove exterior digital and static signage previously approved for the Expo Park Site such that with the addition of the Freeway Sign Project there would be no increase to the approximately 44,500 square feet of total signage, including the maximum of approximately 18,300 square feet of exterior digital signage, that is already permitted within the Expo Park Site under the Sign District.

As it relates to views, visual resources in the general Project area, including within and around the MLS stadium, the Grand Avenue Site, and the 12th Place Site, include the Coliseum and landscaped open space areas within Exposition Park, the Coliseum sign located on the east side of the 110 Freeway, the downtown skyline to the north and east, and the distant San Gabriel Mountains to the north. In addition, although the Project area does not include any City- or State-designated scenic highways or view corridors, the segments of the 110 Freeway located adjacent to the Grand Avenue and 12th Place Sites are designated by the City in the applicable Community

Plans as a scenic freeway, due to the availability of northbound views of the downtown skyline and the San Gabriel Mountains in the distance. The Grand Avenue Sign would minimally affect northerly views of the Coliseum sign, downtown skyline, and distant mountain ridges from specific points along the 110 Freeway, but any obstruction would be limited, intermittent, and transitory in nature. The 12th Place Sign could partially obstruct some views of downtown or the distant mountains from certain limited vantages, but these resources would continue to be visible from numerous locations throughout the surrounding area, including from other vantage points on the 110 Freeway. As such, consistent with the conclusions in the Certified EIR and the Addenda, potential impacts associated with views would be less than significant.

Based on the analysis above, the Freeway Sign Project would not result in any new significant impacts with respect visual character and views, including impacts related to signage, and it would not substantially increase the severity of any significant impacts previously identified in the Certified EIR.

2. Light and Glare

Potential impacts associated with construction-related lighting and glare were not assessed in detail in the Certified EIR. The previous Addenda concluded that light and glare impacts associated with construction would be less than significant with mitigation. As set forth on page IV.A-22 of the Certified EIR, impacts with respect to light and glare would be significant if a project would result in a new substantial source of light or glare, which would adversely affect day or nighttime views in the area.

Installation of the two freeway signs would be subject to Code Required (CR) Measure G-2, detailed in the adopted MMP, which restricts exterior construction and demolition activities to the hours of 7:00 a.m. to 6:00 p.m. Monday through Friday, and 8:00 a.m. to 6:00 p.m. on Saturday, except as may otherwise be permitted by the Los Angeles Board of Police Commissioners. Thus, construction lighting would be limited to short durations during the winter season—if sign installation occurs during the winter months—and would be temporary. Further, construction-related illumination would be used for safety and security purposes only, in compliance with LAMC light intensity requirements. Additionally, the perimeter of the Project Site would continue to be screened by existing fencing, which would limit views of construction activities and associated lighting. Therefore, uses surrounding the Grand Avenue and 12th Place Sites would not be substantially affected by construction light or daytime glare. Thus, with adherence to existing LAMC regulations, light and glare impacts associated with sign installation would be less than significant. As such, the Freeway Sign Project would not result in any new significant impacts with respect to construction-related lighting. No additional mitigation measures are required.

The Certified EIR concluded that impacts with respect to light and glare during operation would be less than significant with mitigation. The Modified Project Addendum determined the Modified Project's operational lighting impacts to be less than significant, although the adopted mitigation measures would still be implemented. The Modified Project Addendum specifically addressed signage lighting associated with proposed signage in the Sign District and concluded that illumination impacts associated with signage would be less than significant, and no mitigation measures were required. Daytime glare impacts under the Modified Project were found to be less than significant with incorporation of the adopted mitigation, while nighttime glare impacts, including the signage program, were found to be less than significant.

As set forth in the Certified EIR, impacts with respect to light and glare would be significant if a project would result in a new substantial source of light or glare, which would adversely affect day

or nighttime views in the area. A detailed analysis of the potential light and glare impacts associated with the Freeway Sign Project's two freeway signs is provided in the Lighting Technical Report (2018 Lighting Report) prepared by Francis Krahe & Associates on August 6, 2018 and the Supplemental Lighting Technical Report (2019 Lighting Report) prepared by Francis Krahe & Associates on March 21, 2019. As discussed in detail in the 2018 Lighting Report, a computer model was used to evaluate the freeway signs' potential light and glare impacts in accordance with recommended practices established by the Illuminating Engineering Society of North America (IESNA). To analyze potential lighting impacts, both illuminance and glare from the freeway signs were evaluated. As a supplement to the 2018 Lighting Report, the 2019 Lighting Report was prepared to evaluate potential glare impacts to drivers resulting from the freeway signs.

A. Grand Avenue Sign

Light-sensitive land uses in proximity to the Grand Avenue Site were selected for analysis based on their potential to experience an increase in light intensity associated with the proposed sign, proximity to the Grand Avenue Site, and view of the Grand Avenue Site. Specifically, the closest residences to the Grand Avenue Site were identified to the north, west and east, and these locations were used in the analysis as sensitive receptors.

Existing light levels (illuminance) were measured at the receptor locations to determine existing lighting conditions in the vicinity of the Grand Avenue Site. The measured illuminance is consistent with urban lighting conditions, with relatively high illuminance at the street and sidewalk within the public right-of-way as well as near I-110, and medium to high illuminance within commercial and industrial properties due to safety and security lighting. The Grand Avenue Site includes commercial uses with exterior security lighting, which contribute to a bright nighttime environment. The 2018 Lighting Report also evaluates existing visual contrast conditions at each of the receptor sites, which describe how bright a visible object appears in comparison to the surrounding objects within any given field of view. Contrast ratios are classified as high (greater than 30:1, which are generally uncomfortable to the human eye); medium (between 10:1 and 30:1, which will not introduce a new sources of glare; and low (under 10:1, which also will not introduce a new sources of glare). Contrast ratios less than 3:1 are not visible and are considered to be of uniform brightness. Within views of the Grand Avenue Site from the receptor sites, the measured light output (luminance) includes prominent, high brightness light sources and illuminated surfaces, such as street lights, illuminated signs, and flood lighted buildings, as well as lower brightness surfaces such as sidewalks, parking lots, and unilluminated walls or landscape areas. The 2018 Lighting Report determined that contrast ratios from the receptor locations for the Grand Avenue Sign would be in the low classification, and some would not be visible. As a result, the Grand Avenue Sign would have a less than significant glare impact.

The potential brightness of the Grand Avenue Sign at full power in an all-white setting would be 7,500 cd/m2. The Grand Avenue Sign would be limited to 6,750 cd/m2 during the daytime. In accordance with proposed Project Design Feature (PDF) A-7, at night, the sign would be limited to a maximum of 300 cd/m2, consistent with Sign District requirements. The sign also would comply with applicable California Energy Code (Title 24, Part 6) standards, such as Section 130.3, which requires a minimum 65 percent dimming at night for sign lighting. The 2018 Lighting Report determined that the Grand Avenue Sign's illuminance would fall below the LAMC significance threshold at the analyzed receptor locations. In addition, more distant properties would experience substantially less light from the freeway sign due to the increased distance and intervening development, trees, and landscaping. Therefore, light trespass impacts relative to LAMC requirements would be less than significant.

B. 12th Place Sign

Light-sensitive land uses in proximity to the 12th Place Site were similarly selected for analysis based on their potential to experience an increase in light intensity associated with the proposed sign, proximity to the 12th Place Site, and view of the 12th Place Site. Four sites surrounding the 12th Place Site were selected in the analysis as sensitive receptors.

Similar to area surrounding the Grand Avenue Site, the measured illuminance around the 12th Place Site is consistent with urban lighting conditions, with higher illuminance near I-110 and the adjacent industrial buildings and the lowest levels near residential properties to the west and southwest. The 12th Place Site is surrounded by City street lights, exterior security lighting, and parking lot light fixtures, which contribute to a bright night environment. Existing visual contrast conditions in the vicinity of the 12th Place Site were calculated based on the measured average and maximum luminance levels at each receptor site. The 2018 Lighting Report determined that contrast ratios from the receptor locations for the 12th Place Sign would be in the low classification, and some would not be visible. As a result, the 12th Place Sign would have a less than significant glare impact.

As with the Grand Avenue Sign, potential brightness of the 12th Place Sign at full power in an all-white setting would be 7,500 cd/m2. The 12th Place Sign would be limited to 6,750 cd/m2 during the daytime. In accordance with proposed PDF A-7, at night, the sign's faces would be limited to 300 cd/m2, consistent with Sign District requirements. The sign also would comply with applicable California Energy Code (Title 24, Part 6) standards, such as Section 130.3, which requires a minimum 65 percent dimming at night for sign lighting. The 2018 Lighting Report determined that the 12th Place Sign's illuminance would fall below the LAMC significance threshold of 3.0 fc for signs at all analyzed receptor locations. In addition, more distant properties would experience substantially less light from the freeway sign due to the increased distance and intervening development, trees, and landscaping. Therefore, light trespass impacts relative to LAMC requirements would be less than significant.

C. Glare Affecting Drivers

An analysis of the potential for glare from the freeway signs to affect drivers on the surrounding roadways is provided in the 2019 Lighting Report. The analysis evaluates the freeway signs' impact to drivers during the nighttime, twilight, and daytime periods and was conducted based on California Vehicle Code (CVC) requirements.

The 2019 Lighting Report evaluates the luminance of the freeway signs (300 cd/m2) during the nighttime, when ambient light and the measured brightness in a driver's field of view are at their lowest, and to which the most stringent CVC requirements apply. Using the most conservative assumptions, during nighttime the CVC provides a maximum allowable luminance of 500 fL. (1,579 cd/m2). Given that all sign faces on both freeway signs would be limited to 300 cd/m2 (equivalent to 95.4 fL) during nighttime hours, as provided in PDF A-7, the freeway signs would not exceed the strictest CVC limitation of 500 fL. Therefore, the freeway signs would not exceed the maximum allowable nighttime luminance, would not introduce a source of distracting glare to drivers, and would not impair the vision of drivers at night. Impacts would be less than significant.

The 2019 Lighting Report also evaluates the signs' glare effects during twilight. The freeway signs would be operated with an electronic control system that would slowly dim the signs from the daytime luminance to 1,500 cd/m2 (477.5 fL) 20 minutes prior to sunset and further dim the

signs to 300 cd/m2 by sunset. In a similar manner, during the 20 minutes after sunrise the electronic control system would raise the brightness of the freeway signs such that they would not exceed 1,500 cd/m2 during the initial 20 minutes after sunrise. PDF A-8 provides that the freeway signs shall not exceed a maximum brightness of 1,500 cd/m2 for the 20 minutes before sunset and the 20 minutes after sunrise. Therefore, using the most conservative CVC luminance threshold of 500 fL (1,579 cd/m2), the signs would not exceed the threshold and thus would not impair the vision of drivers during twilight.

The evaluation of glare during daytime under full sun conditions and light overcast sky conditions is based on a maximum allowable brightness of 10,000 fL per the CVC. Although operation of the freeway signs would be limited to 6,750 cd/m2 during daytime hours, the signs' maximum brightness of 7,500 cd/m2 was evaluated to provide a conservative analysis of daytime impacts. This maximum luminance of 7,500 cd/m2 (2,381 fL) would not exceed the daytime CVC threshold of 10,000 fL and thus would not impair the vision of drivers during the day under either clear sky or light overcast conditions. In addition, based on the 2019 Lighting Report, the freeway signs' maximum sign luminance would be reduced from 7,500 cd/m2 (2,381 fL) to 1,500 cd/m2 (477.5 fL) when ambient sunlight falls to less than 100 footcandles, such as during storms, cloud cover, or other low ambient sunlight conditions, consistent with PDF A-8. With this control system, the sign brightness would always remain less than the maximum luminance stipulated by the CVC.

Therefore, the freeway signs would not introduce a source of distracting glare to drivers, and would not impair the vision of drivers during nighttime, twilight, or daytime conditions, including during storms and overcast conditions. Impacts would be less than significant.

3. Shading

Potential impacts associated with shading were not assessed in detail in the Certified EIR. However, the Addenda concluded that impacts with respect to shading would be less than significant. As set forth in the L.A. CEQA Thresholds Guide, a project would have a significant shading impact if off-site shadow-sensitive uses would be shaded by project-related development for more than three hours between the hours of 9:00 a.m. and 3:00 p.m. Pacific Standard Time (between early November and early March), or more than four hours between the hours of 9:00 a.m. and 5:00 p.m. Pacific Daylight Time (between early March and early November).

A. Grand Avenue Sign

Shadow-sensitive uses in proximity to the Grand Avenue Site include multi-family residential uses to the immediate north, multi-family residential uses further north across 39th Avenue, and single- and multi-family residential uses to the east across an alley, as well as further to the east. The 110 Freeway essentially forms the western boundary of the Grand Avenue Site and serves as a buffer for land uses to the west.

Shadow drawings showing representative shadows cast by the Grand Avenue Sign during the Summer Solstice, Winter Solstice, and Spring/Fall Equinoxes are presented in Figure 10 through Figure 12, on pages 42 through 44 of the Freeway Sign Addendum. Given the slender profile of the sign, shadows would transition quickly across neighboring properties throughout the course of the day. Accordingly, the Grand Avenue Sign is not anticipated to shade off-site shadow-sensitive uses in excess of the thresholds during any time of the year. As such, potential shading impacts would be less than significant, and no mitigation measures are required.

B. 12th Place Sign

The 12th Place Site is nearly entirely surrounded by commercial and light industrial uses. Nearby shadow-sensitive uses include a small residential community one block to the northwest, and a series of small residential buildings within a commercial manufacturing (CM) zone to the immediate north across 12th Place. The 110 Freeway essentially forms the eastern boundary of the 12th Place Site and serves as a buffer for land uses to the east.

Shadow drawings showing representative shadows cast by the 12th Place Sign during the Summer Solstice, Winter Solstice, and Spring/Fall Equinoxes are presented in Figure 13 through Figure 15, on pages 46 through 48 of the Freeway Sign Addendum. Given the slender profile of the sign, shadows would transition quickly across neighboring properties throughout the course of the day. Accordingly, the 12th Place Sign is not anticipated to shade off-site shadow-sensitive uses in excess of the thresholds during any time of the year. As such, potential shading impacts would be less than significant, and no mitigation measures are required.

Based on the analysis above, the Grand Avenue Sign would not result in additional or more severe impacts associated with scenic views and vistas, light and glare, or shading. Similarly, the 12th Place Sign would not result in additional or more severe impacts associated with scenic views and vistas, light and glare, or shading. Thus, the Freeway Sign Project would not result in any new significant impacts with respect to aesthetics and would not substantially increase the severity of any significant impacts previously identified in the Certified EIR or the Addenda.

B. *Air Quality*

1. Localized Emissions (Construction)

The Certified EIR and Addenda concluded that air quality impacts associated with construction would be significant and unavoidable for regional emissions of nitrogen oxides (NOX) and reactive organic compounds (ROG)/volatile organic compounds (VOC) but less than significant for localized emissions of all pollutants. Of note, the Modified Project Addendum determined that regional construction emissions under the Modified Project would be less than those of the Original Project for most pollutants, although the significance of air quality impacts would remain unchanged.

Installation of the proposed freeway signs would involve minimal construction activity over the course of one to two months, as the signs would be fabricated off-site and installed in large structural pieces. Excavation would be limited to approximately 950 cubic yards for the Grand Avenue Sign and 350 cubic yards for the 12th Place Sign, with the excavated materials likely sent to Olinda Landfill in the City of Brea. An auger would be used to drill the holes, which would be reinforced with concrete and rebar. Installation would require only a few construction workers on-site, thus limiting the number of construction worker trips to and from the sites. Similarly, delivery truck trips would be minimal since sign fabrication would occur off-site. Based on the anticipated excavation quantities, a combined total of fewer than 100 haul truck trips would be necessary from the two sites. Such limited construction activity dispersed over two distinct sites would have a negligible effect on the broader emissions previously evaluated.

A total of 15,804 square feet of signage previously approved for the Expo Park Site would be reallocated to the Grand Avenue and 12th Place Sites in the amended Freeway Zone. In essence, the Freeway Sign Project proposes the relocation of some of the signage that was previously

proposed, evaluated and approved, but that has not yet been constructed. The construction impacts associated with this signage relating to air quality have been previously considered in connection with evaluation of the Modified Project as a whole. To this end, the air quality analyses provided in the Certified EIR and the Addenda were based on conservative assumptions (e.g., all equipment operating simultaneously) to account for minor changes such as the current proposal. In addition, construction activities associated with the currently proposed freeway signs would occur outside of the peak construction periods that were analyzed in the Certified EIR and the Addenda and against which air quality impacts were previously assessed.

Further, given that construction impacts are based on peak daily emissions associated with the peak level of construction activity, it is acknowledged that the peak construction activity related to installation of the proposed freeway signs would be substantially less than the peak activity level associated with construction of the MLS stadium. Additionally, these construction activities and in particular the related trips would occur in 2019, well after completion of the MLS stadium (which has been in operation since April 2018), and thus would not combine with other stadium construction impacts to produce peak construction emissions beyond those previously evaluated. Moreover, the Freeway Sign Project would still implement the same project design features and mitigation measures set forth in the adopted MMP (as applicable), thus controlling exhaust emissions from on-site heavy-duty construction equipment, encouraging contractors to apply for Southern California Air Quality Management District (SCAQMD) Surplus Off-Road Opt-In for NOX (SOON) funds, and complying with SCAQMD Rule 403 regarding fugitive dust control.

As such, construction impacts associated with the proposed freeway signs are anticipated to be less than those previously evaluated and would be less than significant. Therefore, the proposed Freeway Sign Project would not result in any new significant construction-related impacts with respect to air quality, nor would it substantially increase the severity of any significant impacts previously identified in the Certified EIR and the Addenda.

C. *Biological Resources*

Significant impacts to biological resources could occur if a project were to conflict with a habitat conservation plan or local ordinance protecting biological resources, or result in adverse effects on endangered and/or threatened species, riparian habitat, wetlands, other sensitive natural communities, or wildlife movement.

The Certified EIR and previous Addenda concluded that no impacts to biological resources would occur.

Both the Grand Avenue Site and the 12th Place Site are located within developed properties located within highly urbanized areas that do not provide native or natural habitats and do not support any candidate, sensitive, or special status species. In addition, there are no locally designated natural communities, federally protected wetlands, riparian habitats, wildlife corridors, or native wildlife nursery sites in the vicinity. Furthermore, the 12th Place Site is completely devoid of vegetation, while landscaping within the Grand Avenue Site is limited to a few isolated trees, including three Washingtonia palms, and shrubs. Although unlikely, the Grand Avenue Site Washingtonia palms could potentially provide nesting sites for migratory birds. In the event any of the palms require removal or would otherwise be affected by installation of the Grand Avenue Sign, construction activities would be required to comply with the Migratory Bird Treaty Act and the California Department of Fish and Game Code. Through compliance with this regulatory requirement, potential impacts to nesting birds would be less than significant.

Thus, installation and operation of the proposed freeway signs would not affect these types of resources or conflict with any adopted habitat conservation plans. As such, consistent with the conclusions in the Certified EIR and Addenda, no impact with respect to sensitive species, sensitive habitats, wildlife movement corridors, or habitat conservation plans would occur, and no mitigation measures are required. Similarly, impacts related to potential conflicts with local policies or ordinances protecting biological resources, including the City of Los Angeles Protected Tree Ordinance and City of Los Angeles Street Tree Division requirements, would be less than significant, and no mitigation measures are required.

Based on the analysis above, the Freeway Sign Project would not result in any new significant impacts with respect to biological resources and would not substantially increase the severity of any significant impacts previously identified in the Certified EIR or the Addenda.

D. *Cultural Resources*

1. Archaeological and Paleontological Resources

Potential impacts to archaeological and paleontological resources were not assessed in detail in the Certified EIR. However, the Modified Project Addendum found the Modified Project's impacts with respect to archaeological and paleontological resources to be less than significant.

Both the Grand Avenue Site and the 12th Place Site are located within developed properties that have been subject to disturbance and excavation in the past. Any archaeological and/or paleontological resources that may have existed near the surface of the sites are likely to have been disturbed and/or previously removed. However, the footing for the Grand Avenue Sign would extend to a depth of approximately 16 feet, while the 12th Place Sign footing would extend to a depth of approximately 46 feet. As such, excavation into native Alluvium soils would occur. Accordingly, although unlikely, the potential exists for previously undiscovered archeological and/or paleontological resources to be encountered during installation of the proposed freeway signs. If any potential archaeological resource is discovered during sign installation, work in the area would cease and deposits would be treated in accordance with applicable federal, State, and local guidelines, including those set forth in California Public Resources Code (PRC) Section 21083.2. Any discovery of human remains would be treated in accordance with PRC Section 5097.98 and Health and Safety Code Section 7050.5. Therefore, through regulatory compliance, impacts with respect to archaeological resources would be less than significant, and no mitigation measures are required.

Based on the analysis above, construction of the Freeway Sign Project would not result in any new significant impacts with respect to archaeological and paleontological resources and would not substantially increase the severity of any significant impacts previously identified in the Certified EIR or the Addenda.

2. Historic Resources

The Certified EIR and the previous Addenda concluded that impacts with respect to historic resources would be significant and unavoidable even with implementation of mitigation. Such impacts were related to the demolition of the Los Angeles Memorial Sports Arena, which was found eligible for the California Register of Historical Resources under Criteria 1 (PRC Section 5024.1; Title 14 CCR, Section 44852) for its association with events that have made a significant contribution to Los Angeles history. In addition, the Modified Project Addendum

evaluated the potential for the Modified Project to affect the integrity of several nearby historic resources within Exposition Park and found such impacts to be less than significant.

The following analysis is based on the Historic Resources Investigation: Los Angeles Football Stadium Freeway Sign (Historic Memo) prepared by Historic Resources Group on August 2, 2018. The analysis of impacts to historic resources primarily focuses on direct impacts, which are effects that would result in a "substantial adverse change" to a historic resource. CEQA Guidelines Section 15064.5(b) defines a substantial adverse change as the "physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired." The significance of a historic resource is materially impaired when a project demolishes or materially alters in an adverse manner those physical characteristics that convey its historical significance and that justify its inclusion in, or eligibility for, historic listing.

In addition, the analysis of historic resources also reviews indirect impacts to historic resources, which address the alteration of the setting of a historic resource, the interruption or alteration of historic spatial relationships, or the obstruction of important views. However, an alteration of existing conditions (whether the physical setting, spatial relationships, or views) does not necessarily constitute a significant indirect impact. To be significant, the alteration would need to materially impair the significance of that resource as defined by CEQA. To do so, the setting, spatial relationship(s), or view affected would need to be intrinsic to the significance of the historic resource.

A. Grand Avenue Sign

As previously indicated, the Grand Avenue Site is located within a developed property that includes storage uses. According to the Historic Memo, no listed or designated historic resources are located on the site or in the immediate vicinity. However, SurveyLA conducted historic resource surveys in 2012 and 2015 throughout the Southeast Los Angeles Community Plan area, within which the Grand Avenue Site is located. SurveyLA identified a collection of ornamental streetlights dating from the early-20th century located on South Grand Avenue between 39th Street (just north of the Grand Avenue Site) and Jefferson Boulevard. The streetlights were identified as historically significant as an "excellent collection of early ornamental streetlights in Southeast Los Angeles." Field observation of the streetlights on South Grand Avenue between 39th Street and Jefferson Boulevard confirms that they are the double-lantern model streetlights installed during the 1920s. They are treated as historic resources in the Freeway Sign Addendum for the purposes of CEQA.

SurveyLA also identified the Coliseum sign located at 3843 South Grand Avenue as eligible for local listing. The Coliseum sign was found significant for its association with the 1984 Olympic Games. However, the SurveyLA finding indicates the Coliseum sign "appears to be eligible for local designation only and may not meet significance thresholds for National Register and California Register eligibility." As discussed further in the Historic Memo, the National Register Criteria for Evaluation exclude properties that have achieved significance within the past 50 years unless they are of exceptional importance. The Coliseum sign was constructed in 1984 and thus is 34 years old. In addition, the Coliseum sign was altered for maintenance and upgrades in 2015. SurveyLA uncovered no evidence to suggest the sign is of exceptional importance sufficient to satisfy the National Register criteria. Therefore, the Coliseum sign was not found eligible for the National Register. Although criteria for the California Register are somewhat less exacting in terms of age thresholds, it is likely the sign was not found eligible for the California Register for similar reasons.

The sign is one of a handful of extant structures specifically designed and constructed for the 1984 Olympic Games, which represent an important event of national, state, and local history. Despite some alterations, the Coliseum sign retains its original form and structure from 1984, and replacement display components have maintained the original display area dimensions. Therefore, while the Coliseum sign is not eligible for listing under the National Register and California Register, because the sign may be eligible for local designation, the Freeway Sign Addendum conservatively treats the sign as a historic resource for the purposes of CEQA.

With respect to direct impacts, as the Grand Avenue Site does not include any historic resource(s), installation of the Grand Avenue Sign would not result in any material impairment of a historic resource. For the eligible historic resources in the surrounding vicinity (i.e., the South Grand Avenue streetlights and the Coliseum sign), the physical characteristics that convey historic significance and justify eligibility for historic listing would remain intact and unchanged following development of the Grand Avenue Sign. Therefore, introduction of the Grand Avenue Sign would not result in a significant direct impact to historic resources as defined by CEQA.

Relative to indirect impacts, the South Grand Avenue streetlights would be located more than 400 feet from the Grand Avenue Sign. New construction located south of the streetlights, including the approximately 135-foot-tall Grand Avenue Sign, would not alter the setting or spatial relationships of the streetlights in a manner that would impair or reduce their historic significance.

Based on view studies provided in Appendix D of the Historic Memo, the Grand Avenue Sign would not block the Coliseum sign at a point approximately 1,000 feet south of the Coliseum sign travelling northbound in the far right lane of I-110. The far right lane is considered the most conservative viewing angle, and the other lanes are less likely to have view obstruction given their angle of view. No view blockage would occur from any lane at any distances closer than 1,000 feet from the Coliseum sign. It is the physical form and design of the Coliseum sign, as well as the readability of its text displays, that together convey the sign's historic significance. However, any interruption in views of the Coliseum sign would occur at distances at which the sign is not readable. Intermittent interruption of current views of the Coliseum sign from some limited locations at distances beyond 1,000 feet would not be sufficient to reduce the sign's ability to convey its historic significance.

Accordingly, construction of a freeway sign at the Grand Avenue Site would not alter the setting or spatial relationships, nor obscure important views of a historic resource and, therefore, construction of a freeway sign at the Grand Avenue Site would not result in a significant impact to historical resources as defined by CEQA.

B. 12th Place Sign

As previously indicated, the 12th Place Site is located within a developed property that includes commercial uses. The parcel contains a one-story, brick-clad commercial office building constructed in 1958. The building is rectangular in plan with a flat roof. According to the Historic Memo, the building is not an important example of style or type, and no important associations were uncovered. As such, no listed or designated historic resources are located on the site or in the surrounding vicinity. In addition, SurveyLA conducted a historic resource survey in 2014 within the Westlake Community Plan area, within which the 12th Place Site is located, and did not identify any resources eligible for historic listing either on-site or in the surrounding vicinity.

Given that there are no listed, designated, or eligible historic resources located on or near the 12th Place Site, introduction of the 12th Place Sign would not have any effect, either directly or

indirectly, on historic resources. More specifically, no material impairment of a historic resource, alteration of the setting or spatial relationship of a historic resource, or obstruction of views of a historic resource would occur. As such, the 12th Place Sign would not result in a significant impact to historic resources as defined by CEQA.

Based on the analysis above, the Freeway Sign Project would not result in any new significant impacts with respect to historic resources and would not substantially increase the severity of any significant impacts previously identified in the Certified EIR or the Addenda.

E. *Geology and Soils*

Potential impacts related to geology and soils were not assessed in detail in the Certified EIR. However, the Modified Project Addendum determined the Modified Project would not: cause or accelerate geologic hazards which would result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury; constitute a geologic hazard to other properties by causing or accelerating instability from erosion, or accelerate natural processes of wind and water erosion and sedimentation, resulting in sediment runoff or deposition which would not be contained or controlled on-site; or destroy, permanently cover, or materially and adversely modify any distinct or prominent geologic or topographic features. As such, impacts related to geology and soils were concluded to be less than significant.

As previously described, installation of the Grand Avenue Sign and 12th Place Sign would require footings to a depth of 16 feet and 46 feet, respectively. An auger would be used to drill the holes, which would be reinforced with concrete and rebar. Soil export of up to approximately 1,300 cubic yards would be required. The following analysis is based on the Geotechnical Engineering Report—Los Angeles Football Club Stadium Freeway Signs, Los Angeles Football Club Stadium Project (Geotech Report) prepared by Langan Engineering and Environmental Services, Inc. (Langan) on June 27, 2017. The Geotech Report provides geotechnical, seismic, and construction-related recommendations for the proposed freeway signs, which were prepared in accordance with the 2016 California Building Code (CBC) and associated 2017 City of Los Angeles amendments to the Los Angeles Building Code (LABC).

Field investigations involved borings within the two signage sites to a depth of 101.5 feet below the ground surface (bgs). The subsurface conditions at each site generally consist of artificial fill underlain by Alluvium deposits, as described further below. Groundwater was not encountered at either site within the maximum explored depth.

Within the Grand Avenue Site, fill soils comprised of medium dense, brown to brown-white, dry to moist, silty fine to coarse sand with fine to coarse gravel were encountered to approximately seven feet bgs. Below this, Alluvium was encountered to the maximum explored depth of 101.5 feet. The Alluvium consists of dense to very dense, tan-brown to gray-tan, dry to moist, fine to coarse sand, with variable amounts of silt and gravel and very stiff, light brown to brown-gray, moist, silt and clay with varying amounts of fine to medium sand. The historical high groundwater level at the site is reported to be 45 to 50 feet bgs; however, a 2016 Langan study for the LAFC stadium reported groundwater at 162 feet bgs at a monitoring well approximately one mile northwest of the stadium site.

Within the 12th Place Site, fill soils comprised of loose, brown, moist, silty fine to coarse sand with fine to coarse gravel were encountered to depths ranging from five to seven feet bgs. Below this, Alluvium was encountered to the maximum explored depth of 101.5 feet. The Alluvium consists of dense to very dense, tan to orange-brown, dry to moist, fine to coarse sand, with variable

amounts of silt and fine to coarse gravel and very stiff to hard, brown, moist, silt and clay with varying amounts of fine sand. The historical high groundwater level at the site is reported to be 90 to 100 feet bgs.

According to the Geotech Report, the alluvial soils at each site are suitable to support the proposed freeway signs using deep foundations, such as cast-in-drilled-hole (CIDH) piles. The Geotech Report details the appropriate design criteria, including seismic design criteria, pile capacity parameters, lateral capacities, pile installation and corrosion considerations, as well as considerations for excavation and utilities. Groundwater is not anticipated to be encountered; however, temporary casing may be needed to maintain an open and stable borehole during drilling and prior to pouring concrete due to the presence of cohesionless soil layers (gravelly sand layers) at various depths. It is recommended that a Geotechnical Engineer review the final design plans to confirm technical specifications and observe the installations in order to perform testing of geotechnical-related work, as needed, and ensure quality assurance. In addition, the proposed freeway signs would be designed and constructed in accordance with applicable Los Angeles Building Code and California Building Code regulations. Other site conditions at the Grand Avenue Site and the 12th Place Site, such as proximity to active faults, potential for fault rupture and ground shaking, and liquefaction or landslide potential, would not result in impacts different from those described in the Modified Project Addendum.

Based on the information provided in the Freeway Sign Addendum and in the Geotech Report, the Freeway Sign Project would not result in any new significant impacts with respect to geology and soils and would not substantially increase the severity of any significant impacts previously identified in the Certified EIR or the Addenda.

F. *Greenhouse Gas Emissions*

The Certified EIR and the previous Addenda concluded that impacts with respect to greenhouse gas (GHG) emissions would be less than significant. As discussed in the First Addendum, numerous regulatory changes occurred following certification of the Certified EIR in 2011 which are pertinent to the study of GHG impacts under CEQA, and the regulatory environment has continued to evolve.

The Grand Avenue and 12th Place Signs would be fabricated off-site and installed in large structural pieces. On-site installation work for each sign is anticipated to take approximately one to two months to complete and would require a combined total of approximately 1,300 cubic yards of soil export. Given the limited scope of construction work and associated construction trips involved, particularly as compared to construction of the MLS stadium, construction-related GHG emissions associated with the signs would be minimal.

A total of 15,804 square feet of signage previously approved for the Expo Park Site would be reallocated to the Grand Avenue and 12th Place Sites in the amended Freeway Zone. In essence, the Freeway Sign Project proposes the relocation of some of the signage that was previously proposed, evaluated and approved, but that has not yet been constructed. Accordingly, although site-specific conditions and sign specifications may vary, the construction of 15,804 square feet of signage previously approved, which was included as part of the Modified Project and addressed in the Modified Project Addendum, would instead occur on the Grand Avenue and 12th Place Sites. In other words, the construction impacts associated with this signage have been previously considered. To this end, the GHG analyses provided in the Certified EIR and the Addenda were based on conservative assumptions to account for minor changes such as the current proposal.

Similarly, operation of the signs would require virtually no vehicular trips other than for occasional maintenance activities and relatively limited energy usage to illuminate the signs, thus generating a limited amount of GHGs. Electricity necessary for the operation of the previously approved sign square footage under the Sign District would have generated substantially the same amount of indirect GHG emissions, so the Freeway Sign Project would not result in any net gain in GHG emissions. Furthermore, the proposed freeway signs would be subject to 2016 Title 24 energy requirements, which have resulted in energy efficiency improvements compared to the 2013 Title 24 standards that were in effect at the time the Modified Project was approved in 2015. Accordingly, GHG emissions associated with operation of the proposed freeway signs are anticipated to be nominal and the same or less than those generated by an equivalent amount of previously approved signage, had it been constructed within the Expo Park Site. Therefore, consistent with the conclusions in the Certified EIR and the previous Addenda, impacts with respect to GHG emissions would be less than significant and not cumulatively considerable, and no mitigation measures are required.

Based on the analysis above, the Freeway Sign Project would not result in any new significant impacts with respect to GHG emissions and would not substantially increase the severity of any significant impacts previously identified in the Certified EIR or the Addenda.

G. *Hazards and Hazardous Materials*

The Certified EIR concluded that impacts with respect to hazards and hazardous materials would be less than significant through compliance with applicable regulatory requirements, while the Modified Project Addendum concluded such impacts would be less than significant with mitigation. The following analysis is based in part on regulatory database reviews for each of the two sign sites conducted by Converse Consultants in August 2018.

Existing conditions at the Grand Avenue Site include a storage yard use, with a temporary trailer and a canopy as the only structures on-site. According to the database search, the property was identified on the HAZNET database for manifesting approximately 0.2424 ton of asbestos waste in 1993. As the waste was disposed of under a manifest, this listing is not considered an environmental concern. There are no leaking underground storage tanks (LUSTs) or other contamination cleanup programs within the Grand Avenue Site. Similarly, there are no permitted underground storage tanks (USTs), waste discharge requirements, oil/gas sites, or hazardous waste locations on-site. Additionally, the site is not located within a Methane Zone or Methane Buffer Zone identified by the City. Two properties within a 300-foot radius of the Grand Avenue Site are listed on the Environmental Data Resources (EDR) Historical Cleaner database and the EDR Historical Auto Stations database, respectively, but based on a lack of documented releases, these listings are not expected to represent an environmental concern. The remainder of listings are located more than 300 feet from the Grand Avenue Site and/or have received a regulatory case closed status; accordingly, these sites are not expected to represent an environmental concern to the Grand Avenue Site.

The 12th Place Site is developed with a one-story commercial building and a surface parking lot. According to the database search, there are no LUSTs or other contamination cleanup programs within the 12th Place Site, and no currently permitted USTs, waste discharge requirements, oil/gas sites, or hazardous waste locations on-site. The property was identified on the EDR Historical Auto Stations database as a former automobile repair facility in 1933; the California Statewide Environmental Evaluation and Planning System (SWEEPS) UST and California Facility Inventory Database (CA FID) UST databases as an inactive tank site; and the HAZNET database for manifesting approximately 0.01 ton of aqueous solution containing reactive anion wastes in 2000.

With respect to the UST listing, a July 27, 1991 permit was issued to abandon (i.e., close) atmospheric tanks per specifications submitted to the City of Los Angeles Fire Department (LAFD) Fire Prevention Bureau and subject to a field inspector's approval. Based on this information, the former UST is not considered an environmental concern. Regarding the HAZNET listing, based on a lack of documented releases and proper handling, this listing also is not considered an environmental concern. Surrounding the 12th Place Site, several properties are listed on the following databases: the EDR Historical Auto Stations database in 1924; the Resource Conservation and Recovery Act Small Quantity Generator (RCRA–SQG), Facility Registry Service/Facility Index (FINDS), Enforcement and Compliance History Online (ECHO), and CA Emissions (EMI) databases; the EDR Historical Auto Station database from 1933 to 1994; the EDR Historical Cleaner database from 1939 to 1937; and the CA Envirostor, CA Historical UST, and EDR Historical Cleaner databases. Based on the current regulatory status, lack of violations and/or non-contiguous locations of these properties, these sites are not expected to represent an environmental concern to the 12th Place Site. In addition, the 12th Place Site is located within a Methane Zone identified by the City. Such areas have a risk of methane intrusion emanating from geologic formations, and the City has development regulations in place to address ventilation and methane gas detection systems depending on the design category. While excavation within the Methane Buffer Zone could pose a potential for methane build-up, resulting in a possible hazardous condition, adherence to the City of Los Angeles' Methane Mitigation Ordinance, applicable construction safety measures, as well as compliance with California Occupational Safety and Health Act (OSHA) safety requirements would serve to avoid substantial risk in the event elevated methane levels are encountered. Based on such safety provisions and appropriate monitoring, construction activities associated with the 12th Place Sign within the Methane Buffer Zone are not expected to substantially expose construction workers to elevated levels of methane. Thus, compliance with regulatory standards would reduce the chance of exposure of people to a substantial risk resulting from the release or explosion of methane gas or from exposure to a health hazard. Related impacts would be less than significant.

At both the Grand Avenue Site and the 12th Place Site, no demolition (aside from pavement removal) would be necessary, so there would be no potential for contact with or release of asbestos containing materials, lead-based paint, or polychlorinated biphenyls. As previously indicated, the sign footings are not anticipated to reach groundwater. However, given that excavation for the sign footings would extend to depths of at least 16 feet and 46 feet, respectively, it is possible that contact with a previously unknown or unidentified UST or subsurface contamination could occur if such conditions exist on-site. Although the regulatory database reviews revealed no evidence of recognized environmental conditions in connection with the Grand Avenue Site or the 12th Place Site, mitigation is proposed to address the potential for any hazards associated with previously unknown or unidentified conditions. Mitigation Measure H-3 calls for a geophysical survey at each signage site and tank removal in accordance with applicable regulations if any UST is found. This measure has been incorporated into the Freeway Sign Project's MMP. With the implementation of this measure, potential impacts with respect to hazards and hazardous materials would be less than significant.

Based on the above, with regulatory compliance and implementation of Mitigation Measure H-3, the Freeway Sign Project would not result in any new significant impacts with respect to hazards and hazardous materials and would not substantially increase the severity of any significant impacts previously identified in the Certified EIR or the Addenda.

H. *Hydrology and Water Quality*

The Certified EIR and the previous Addenda concluded that construction-related impacts with respect to hydrology, water quality, and groundwater would be less than significant through compliance with applicable regulatory requirements, as ensured through mitigation measures requiring regulatory compliance. In particular, the Applicant was required to prepare and implement a Stormwater Pollution Prevention Plan (SWPPP) in compliance with the National Pollutant Discharge Elimination System (NPDES) Construction General Permit administered by the State Water Resources Control Board (SWRCB), as well as comply with other applicable NPDES permit requirements and General Waste Discharge Requirements (WDRs) related to construction dewatering. Coverage under an NPDES permit is required for the discharge of pollutants to "waters of the United States," while SWPPPs require the implementation of temporary controls, or best management practices (BMPs), to address the discharge of pollutants, including soil and sediment, in stormwater discharges. The WDRs include provisions mandating notification, sampling and analysis, and reporting of dewatering and testing-related discharges.

The combined area of the Grand Avenue Site and the 12th Place Site is approximately 0.31 acre, which falls below the one-acre threshold for a "small construction activity" subject to NPDES requirements and preparation of a SWPPP. As such, installation of the proposed freeway signs would not be subject to any NPDES permit, WDRs, or SWPPP requirements. Nonetheless, construction activities would be required to comply with the City's grading permit regulations (set forth in LAMC Chapter IX, Article 1, Division 70), including the preparation of an erosion control plan to reduce the effects of sedimentation and erosion, as applicable. Additionally, construction would comply with the City's stormwater and urban runoff control requirements (set forth in LAMC Chapter VI, Article 4.4), including Municipal Separate Storm Sewer System (MS4) permit requirements, as applicable. With respect to groundwater, recent borings did not encounter groundwater at either site within the maximum depth explored depth of approximately 101.5 feet. The historical high groundwater level at the Grand Avenue Site is reported to be 45 to 50 feet bgs; however, a 2016 Langan study for the MLS Stadium reported groundwater at 162 feet bgs at a monitoring well approximately one mile northwest of the stadium site. The historical high groundwater level at the 12th Place Site is reported to be 90 to 100 feet bgs. As the sign footings are not anticipated to reach groundwater, construction dewatering would not be expected to occur, and thus dewatering BMPs would not be necessary. Following sign installation, the ground surface surrounding each sign footing would be graded and returned to existing conditions such that existing stormwater flows and drainage patterns would be maintained.

Therefore, consistent with the conclusions in the Certified EIR and the previous Addenda, construction-related impacts with respect to hydrology, water quality, and groundwater would be less than significant through regulatory compliance. Based on the analysis above, the Freeway Sign Project would not result in any new significant impacts with respect to hydrology, water quality, or groundwater, nor would they substantially increase the severity of any significant impacts previously identified in the Certified EIR or the Addenda.

I. *Land Use and Planning*

The Certified EIR and Addenda concluded that impacts related to consistency with applicable land use plans and policies would be less than significant. Although impacts would be less than significant, the Certified EIR included mitigation to reinforce requirements for permits and discretionary approvals to ensure land use consistency. The Certified EIR and Addenda specifically evaluated consistency with the land use and zoning designations for the Expo Park Site, the South Los Angeles Community Plan, the Exposition/University Park Redevelopment Plan, the California Museum of Science and Industry (CMSI)/Exposition Park Master Plan, and applicable regional plans and regulations.

Given the locations and nature of the proposed freeway signs, of most relevance to the Freeway Sign Addendum's analysis of regulatory consistency are the Coliseum District Specific Plan, the Coliseum and Soccer Stadium Sign District (Ordinance No. 184290), the land use and zoning designations for each signage site, the Southeast Los Angeles Community Plan (with respect to the Grand Avenue Sign) and the Westlake Community Plan (with respect to the 12th Place Sign), the Redevelopment Plan for the Council District Nine Corridors South of the Santa Monica Freeway Recovery Redevelopment Project (CD9 Corridors Redevelopment Plan) (with respect to the Grand Avenue Sign; applicable signage regulations set forth in the LAMC, and the Outdoor Advertising Act (California Business & Professional Code Section 5200, et seq.).

The Freeway Sign Project's consistency with the applicable land use plans and policies noted above are addressed below.

1. Coliseum District Specific Plan

The Specific Plan established a Freeway Zone, which currently consists of a single site located immediately east of the 110 Freeway and north of 39th Street, in the location of the existing Los Angeles Memorial Coliseum freeway sign. The Specific Plan also allows the future expansion of the Freeway Zone, explaining that it may include up to three additional non-contiguous parcels for freeway signs permitted by the Outdoor Advertising Act. As such, a Specific Plan Amendment is requested to extend the Specific Plan's Freeway Zone to include the Grand Avenue Site and the 12th Place Site. Subsequently, a Director's Review would occur pursuant to Specific Plan Section 6.A to verify compliance of the freeway signs with applicable Specific Plan requirements. However, with the exception of several signage definitions and clarifying the applicability of certain LAMC provisions, the Specific Plan refers to the Sign District for the regulation of signage. Therefore, with the proposed amendment to the Specific Plan, the Freeway Sign Project would be consistent with the Specific Plan. Impacts would be less than significant, and no mitigation measures are required.

2. Coliseum and Soccer Stadium Sign District

The Sign District regulates signage within the Specific Plan area, including the Los Angeles Memorial Coliseum and the Expo Park Site where the stadium is located, adjacent parking and open space areas, and the Freeway Zone (i.e., the existing Los Angeles Memorial Coliseum freeway sign site). With respect to freeway signage, the Sign District provides that an additional three Stadium Freeway Signs may be located in the future on up to three other non-contiguous parcels. Accordingly, a Sign District amendment is requested to include the Grand Avenue Site and the 12th Place Site in the Sign District area and set forth regulations for the proposed freeway signs.

The Sign District permits approximately 44,500 square feet of signage for the MLS stadium (specifically, 37,500 square feet within the Soccer Stadium Zone and 7,000 square feet in the South Parking Lot Zone), including up to approximately 18,300 square feet of exterior digital signage (based on the total area of approved individual digital signs), and excluding aerial view signs, information signs, temporary signs, and interior signs. LAFC proposes to reallocate approved signage from the Soccer Stadium Zone and the South Parking Lot Zone, including approved exterior digital signs, such that with the addition of the freeway signs (totaling approximately 9,284 square feet of digital signage and approximately 6,520 square feet of static signage) there would be no increase to the 44,500 square feet of signage permitted for the MLS stadium and no increase to the approximately 18,300 square feet of approved exterior digital signage.

While the Sign District sets forth limits to the size of individual signs for various sign types, no size restrictions are established for freeway signs. As such, the sign area of 7,902 square feet per freeway sign, comprised of 4,642 square feet of digital display area and 3,260 square feet of static sign area, is permitted under the Sign District. In addition, the Sign District limits freeway signs to two sign faces. The Grand Avenue Sign and 12th Place Sign advertising would primarily occur on the north and south facing sign faces, however, the digital board would wrap around the side of the sign facing the freeway. This would create a cohesive digital package connecting all three sign faces and provide an opportunity for the City to program this area during special events to promote messages or symbols of local interest. The Sign District Amendment would clarify that the digital wrap on the side of the sign is permitted. The Sign District also requires a minimum separation from another stadium freeway sign of 500 feet, which the proposed Grand Avenue Sign and 12th Place Sign would meet (the Grand Avenue Sign would be located approximately 554 feet from the Coliseum sign). The Sign District also regulates the operating hours, illumination, and refresh rates for digital signs in the Soccer Stadium Zone and South Parking Lot Zone. However, as such requirements are not established for the Freeway Zone, the proposed Sign District Amendment would provide regulations addressing the operating hours, illumination, and refresh rates for the freeway signs that would comply with the Outdoor Advertising Act, as applicable.

It is noted that the Sign District includes procedures to ensure compliance with Sign District requirements. Specifically, per Sign District Section 6 C and D, the Director's Sign-Off or Project Permit Compliance process requires the Director's determination that a sign is in compliance, with conditions imposed to achieve compliance if necessary. The consistency of the freeway signs with the Sign District would be evaluated based on the Sign District Amendment initiated by the City Council regarding the proposed Grand Avenue Sign and 12th Place Sign. Therefore, with the proposed amendment to the Sign District, the Freeway Sign Project would be consistent with the Sign District. Impacts would be less than significant, and no mitigation measures are required.

3. Community Plans/Land Use and Zoning Designations

A. Grand Avenue Sign

The Southeast Los Angeles Community Plan functions as part of the Land Use Element of the City's General Plan that is applicable to the Grand Avenue Site. The Southeast Los Angeles Community Plan provides a land use designation of Hybrid Industrial for the Grand Avenue Site. This land use designation did not preclude signage; however, signage is addressed more broadly in the Community Plan's Design Guidelines. While several of the signage guidelines pertain specifically to retail and residential signage, relevant guidelines call for signage to be conceived as an integral part of a project and recommend that the location, size, and appearance of signs should complement the building and should be in character with the district in which they are located. In addition, sign elements that reflect the history and/or culture of the community are encouraged. The proposed Grand Avenue Sign would meet these guidelines through its modern and prominent design intended to draw attention to events at and sponsors of the MLS stadium located within Exposition Park across the 110 Freeway. In particular, as envisioned by the Sign District (discussed above), the new freeway sign would help establish a unique visual identity for the MLS stadium while emphasizing its event- and entertainment-oriented aspect. Therefore, the Grand Avenue Sign is consistent with the Southeast Los Angeles Community Plan. Impacts would be less than significant, and no mitigation measures are required.

With respect to zoning, the Grand Avenue Site is zoned CM-1-CPIO. In the CM zone within Height District 1, there is no applicable height limit for the sign, as the height limit is based on

building floor area. The Grand Avenue Site is located within the Community Plan Implementation Overlay District (CPIO) within Subarea I Hybrid Limited. Within the CPIO Subarea I Hybrid Limited, certain signage is prohibited including digital displays, unless they are included in a specific plan. Accordingly, with the proposed amendment to the Specific Plan to include the Grand Avenue Site, the Grand Avenue Sign would be consistent with the applicable land use regulations. Impacts would be less than significant, and no mitigation measures are required.

B. 12th Place Sign

The Westlake Community Plan functions as part of the Land Use Element of the City's General Plan that is applicable to the 12th Place Site. The 12th Place Site is located in the Westlake Community Plan area and has a land use designation of Industrial: Commercial Manufacturing. The Westlake Community Plan does not have any guidelines, restrictions, or requirements regarding signage. In addition, the 12th Place Site is zoned CM-1-O. In the CM zone within Height District 1 there is no applicable height limit for the sign, as the height limit is based on building floor area. Accordingly, the proposed 12th Place Sign would be consistent with the applicable land use and zoning designations, as well as the Westlake Community Plan. Further, as with the Grand Avenue Site, the Specific Plan and Sign District Amendments would apply those planning documents to the 12th Place Site and set forth the land use and signage regulations applicable to the 12th Place Site. Impacts therefore would be less than significant, and no mitigation measures are required.

4. Redevelopment Plan for the Council District Nine Corridors South of the Santa Monica Freeway Recovery Redevelopment Project

The Grand Avenue Site is located in the CD9 Corridors Redevelopment Plan area, which covers commercial and industrial corridors located south of the I-10 freeway to 84th Street and on both sides but mainly east of I-110. Accordingly, all permit applications require review and approval by CRA/LA prior to permit issuance. Adopted in 1995, the CD9 Corridors Redevelopment Plan contains development standards regarding land use, density, and design. Regarding signage, the Redevelopment Plan states requires that all signs comply with the Design for Development specific to billboards and pole signs. Accordingly, the proposed Grand Avenue Sign is proposed to be reviewed and approved by CRA/LA. Because the Grand Avenue Sign would be consistent with the Specific Plan and Sign District, the Grand Avenue Sign would be consistent with Section 512 of the Redevelopment Plan.

The Design for Development broadly defines pole signs and provides sign regulations, including regulations regarding proximity to other signs, proximity to residential uses, proximity to scenic highways, and maximum sign areas. The Grand Avenue Sign is not designed as a pole sign or billboard and is instead designed as a three-dimensional digital board with a unique portrait orientation to emphasize the event- and entertainment-oriented aspect of the MLS stadium. The CRA will review the Freeway Sign Project to determine compliance with the Design for Development or whether a minor modification or amendment to the Design for Development is required to clarify that the restrictions on billboard and pole signs under the Design for Development do not apply to the Grand Avenue Sign.

Therefore, the Grand Avenue Sign complies with the Redevelopment Plan. Impacts would be less than significant, and no mitigation measures are required.

5. Los Angeles Municipal Code

Signage regulations are primarily set forth in LAMC Chapter 1, Article 3, Section 13.11 ("SN" Sign District); Chapter 1, Article 4.4 (Sign Regulations); Chapter II, Article 8 (Advertising); Chapter VI, Article 7 (Outdoor Advertising Structures, Accessory Signs, Post Signs and Advertising Statuary); and Chapter IX, Article 1 (Building Code), Division 62 (Signs). However, the Sign District ordinance (discussed above) is intended to permit certain signs not otherwise permitted by the LAMC in order to create a vibrant and animated area that includes dynamic and creative signage. Accordingly, in certain cases, the Sign District provisions supersede LAMC requirements, including specifically LAMC Sections 14.4.4 C, D, and F; Sections 14.4.10 D and E; Sections 14.4.17 A through G; Sections 28.10, 28.11, and 28.15; and Sections 67.02(a) and 67.29. In addition, the Sign District provisions preempt the regulations in LAMC Sections 14.4.1, et seq., and 91.6201, et seq., relating to height, digital displays, sign area, and location; Section 14.4.5 regarding LADOT hazard review; and Sections 14.4.6, 91.6201.6.6, and 80.08.4 regarding freeway exposure. Other applicable LAMC signage provisions apply unless otherwise indicated in the Sign District ordinance. Furthermore, building permits must be obtained from the Los Angeles Department of Building and Safety (LADBS), as required, in accordance with applicable LAMC provisions for any signs, sign structures, and/or sign alterations other than changes to or replacement of copy.

Of the remaining LAMC signage requirements that are applicable to the proposed freeway signs, the most relevant to the analysis in the Freeway Sign Addendum are LAMC Sections 14.4.4 E and 93.0117, which address lighting restrictions based on the resulting light levels at nearby residential property lines or residential uses. Please refer to the lighting analysis above in Section V.A(b)(ii) for a discussion of compliance with these requirements. It is also noted that permits would be obtained for the proposed freeway signs, as required by LADBS, in accordance with applicable LAMC requirements.

Therefore, the freeway signs would comply with applicable LAMC requirements. Impacts would be less than significant, and no mitigation measures are required.

6. Outdoor Advertising Act

Signs that are visible from and located within 660 feet from the edge of a freeway right-of-way are subject to the State's Outdoor Advertising Act (California Business & Professions Code Section 5200, et seq.), most recently updated in 2016. However, the Outdoor Advertising Act exempts from certain requirements up to two freeway signs that are associated with but located off of the premises of a professional sports arena with 15,000 or more seats, such as the MLS stadium, and that meet certain criteria. These criteria include signs that are used to advertise products, goods, or services either sold, marketed, or promoted at the arena; and, for signs located off the arena premises (such as the proposed freeway signs), the signs must be authorized by an ordinance adopted by the City prior to January 1, 2021 (such as the Sign District), bear the name or logo of the arena, and be visible when approaching freeway off- ramps used to access the arena. Accordingly, these types of off-premises signs are instead governed by the stadium freeway sign provisions set forth in the Sign District ordinance.

The proposed freeway signs would meet all of these requirements. The content of the freeway signs would be defined pursuant to a sponsorship marketing plan(s). The MLS stadium has a capacity of approximately 22,000 seats and provides a venue for a MLS team on a permanent basis. The freeway signs would be authorized by the Specific Plan and Sign District for the stadium, based on the proposed Specific Plan and Sign District Amendments. The freeway signs would bear the name of the arena, and both signs would be visible when approaching the I-110 off-ramps used to access the stadium.

Accordingly, the Freeway Sign Project would satisfy all the necessary requirements provided in Outdoor Advertising Act Section 5272, and the freeway signs would be consistent with the Outdoor Advertising Act. Impacts would be less than significant, and no mitigation measures are required.

7. Land Use Compatibility

The Certified EIR and the Addenda concluded that impacts related to land use compatibility during construction would be significant and unavoidable, while land use compatibility during operation would be less than significant. The significant and unavoidable conclusion was based on temporary and intermittent impacts to adjacent land uses due to temporary increases in air emissions (including fugitive dust), noise, and traffic congestion as a result of construction activities. These potential effects were discussed in their respective sections of the Certified EIR and the Addenda, and mitigation measures were recommended to further reduce construction-related impacts to adjacent land uses. Nonetheless, the Certified EIR and the Addenda concluded that from a land use compatibility standpoint, construction impacts would be significant and unavoidable, although the extent of impacts would be temporary and sporadic and would only persist through the construction period.

As previously described, installation of the proposed freeway signs would involve minimal construction activity over the course of one to two months, as the signs would be fabricated off-site and installed in large structural pieces. As evaluated herein, any construction-related impacts associated with the signs would be similar to or substantially reduced in comparison to construction of the MLS stadium. Furthermore, the proposed freeway signs represent a reallocation of signage previously approved but not constructed on the Expo Park Site, which was included as part of the Modified Project and addressed in the Modified Project Addendum; in other words, the construction impacts associated with this signage have been previously considered. In addition, construction activities associated with the currently proposed freeway signs would occur outside of the peak construction periods that were analyzed in the Certified EIR and the Addenda and against which land use compatibility impacts were previously assessed. Accordingly, land use compatibility impacts during sign installation would be reduced relative to those previously analyzed for the MLS stadium on the Expo Park Site.

The primary type of land use compatibility impact associated with operation of the proposed freeway signs relates to aesthetics and lighting. As discussed above, aesthetic and lighting impacts would be less than significant. Therefore, land use compatibility impacts during operation are anticipated to be less than significant, consistent with the conclusions presented in the Certified EIR and the Addenda.

Based on the analysis above and with approval of the requested entitlements, the Grand Avenue Sign and the 12th Place Sign would comply with applicable land use regulations and requirements. Therefore, consistent with the conclusions in the Certified EIR and the Addenda, impacts with respect to consistency with applicable land use plans and regulations would be less than significant. Accordingly, the Freeway Sign Project would not result in any new significant impacts with respect to land use consistency and land use compatibility and would not substantially increase the severity of any significant impacts previously identified in the Certified EIR or the Addenda.

J. *Noise*

The Certified EIR and Addenda concluded that impacts with respect to construction noise would be significant and unavoidable even with implementation of mitigation.

Installation of the proposed freeway signs would involve minimal construction activity over the course of one to two months, as the signs would be fabricated off-site and installed on the two signage sites in large structural pieces. An auger would be used to drill the holes, and no pile driving would occur. At each signage site, temporary sound barriers and mufflers on equipment would be used with the augur to reduce noise by at least 10 dBA, and for each doubling of distance from the equipment, noise levels would be reduced by another 6 dBA. Installation would require only a few construction workers on-site, thus limiting the number of construction worker trips to and from the sites. Similarly, delivery truck trips would be minimal since sign fabrication would occur off-site. Based on the anticipated excavation quantities, a combined total of fewer than 100 haul truck trips would be necessary. Such limited construction trips dispersed over two distinct sites would have a negligible effect on the broader construction- related traffic noise previously evaluated. Additionally, these construction activities and in particular the related trips would occur in 2019, which is well after the completion of the MLS stadium's construction (which began operation in April 2018), and thus would not combine with stadium impacts to produce noise levels beyond those previously evaluated.

Nonetheless, a quantitative analysis of construction noise was performed to determine potential impacts to nearby sensitive receptors. Relative to the Grand Avenue Site, sensitive receptors are located approximately 80 feet east of the proposed construction site (i.e., the specific sign location). At the 12th Place Site, sensitive receptors are located approximately 160 feet north of the proposed construction site. It was assumed that an auger/drill rig, crane, backhoe, and haul trucks would be required for sign installation at each location. In accordance with PDF L-2 set, a temporary noise barrier would be installed at the Grand Avenue Site to block the line-of-sight from construction activities to the nearby sensitive receptors. Sensitive receptors near the 12th Place Site would not have a direct line-of-sight to construction activities.

Construction noise levels were calculated for the closest residential use to each sign location. Relative to the Grand Avenue Site, sensitive receptors are located approximately 80 feet east of the proposed construction site. At the 12th Place Site, sensitive receptors are located approximately 160 feet north of the proposed construction site. Furthermore, it is noted that both the Grand Avenue and 12th Place Sites are located adjacent to I-110 and thus characterized by high ambient noise levels due to constant freeway noise. Moreover, the Freeway Sign Project would still implement the same Code-required measures and mitigation measures set forth in the adopted MMP (as applicable), thus minimizing construction noise to the extent feasible. Based on the assessment of the ambient noise conditions and implementation of PDF L-2, the Freeway Sign Addendum concluded that the noise impacts associated with the Freeway Sign Project would be less than previously evaluated and less than significant.

Therefore, construction of the proposed freeway signs would not result in any new significant construction-related impacts with respect to noise, nor would they substantially increase the severity of any significant impacts previously identified in the Certified EIR or the Addenda.

K. *Traffic/Transportation*

Potential impacts from construction-related traffic were not assessed in detail in the Certified EIR. Construction traffic impacts were determined to be less than significant in the Addenda. Installation of the proposed freeway signs would require only a few construction workers on-site, thus limiting the number of construction worker trips to and from the sites. Similarly, delivery truck

trips would be minimal since sign fabrication would occur off-site. Based on the anticipated excavation quantities, a combined total of fewer than 100 haul truck trips would be necessary. Such limited construction trips dispersed over two distinct sites would have a negligible effect on the broader construction-related traffic impacts previously evaluated. Additionally, these construction trips would occur in 2019, well after completion of construction of the MLS stadium (which began operation in April 2018), and thus would not combine with trips for construction of the stadium to produce traffic levels beyond those previously evaluated. Furthermore, as previously discussed, the proposed freeway signs represent a reallocation of signage previously approved for the Expo Park Site, which was included as part of the Modified Project and addressed in the Modified Project Addendum; accordingly, the construction trips associated with this signage have been previously considered. Moreover, the Freeway Sign Project would still implement the same project design features and mitigation measures set forth in the adopted MMP (as applicable), thus minimizing construction traffic to the extent feasible.

As such, traffic impacts associated with installation of the proposed freeway signs are anticipated to be less than significant. Therefore, the Freeway Sign Project would not result in any new significant construction-related impacts with respect to traffic/transportation, nor would they substantially increase the severity of any significant impacts previously identified in the Certified EIR or the Addenda.

An analysis of the potential for traffic safety hazards to occur as a result of the Freeway Sign Project is provided in the Safety Impact Analysis Evaluation for Proposed LAFC Freeway Signs (Traffic Hazard Memo) prepared by Fehr & Peers on March 19, 2019. As discussed therein, the two freeway signs would comply with a number of design and operational restrictions that are expected to minimize the potential for traffic safety hazards caused by driver distraction. Specifically, the Sign District includes regulations pertinent to driver safety that apply to illuminated signage related to: refresh rate; illuminance and brightness; brightness transition; photocell technology; dimmer/timer; screening; and horizontal beam spread that will minimize the potential for driver distraction and potential traffic safety hazards. In addition, PDF O-7 prohibits animated or sequenced content. The Sign District's regulations and PDF O-7 would ensure that the design and operational characteristics of the freeway signs minimize driver distraction and the potential for traffic safety hazards. These characteristics would avoid distracting animation, movement, message sequencing, and transitions, and would ensure appropriate signage placement within the geometric context of the Project Site area. Based on these characteristics, the Freeway Sign Project would minimize the potential for traffic safety hazards associated with driver distraction. Therefore, the Freeway Sign Project would not result in any new significant impacts with respect to traffic, nor would it substantially increase the severity of any significant impacts previously identified in the Certified EIR or the Addenda.

L. *Utilities and Service Systems – Energy*

The Certified EIR and the previous Addenda concluded that impacts with respect to energy conservation would be less than significant. Specifically, energy demands during construction were determined to be typical of construction projects for similarly sized projects and would not necessitate additional energy facilities or distribution of infrastructure. Regarding energy during operations, the Modified Project Addendum concluded that while the Modified Project would represent an increase in annual energy consumption over existing conditions with the Sports Arena due to the proposed additional number of annual events at the MLS stadium and the addition of the Ancillary Uses, the Modified Project would be more energy efficient than the Sports Arena, as well as than the Original Project analyzed in the Certified EIR. Therefore, the Certified EIR and Addenda both concluded that the existing electricity and natural gas infrastructure and

supplies would be able to accommodate projected energy demand, and impacts related to energy conservation would be less than significant.

Construction and installation of the proposed freeway signs would be typical of construction activities associated with similar types of signs, which were contemplated as part of the Modified Project, and would not necessitate additional energy facilities or distribution of infrastructure. Moreover, as previously discussed, the Freeway Sign Project proposes the reallocation of some of the signage that was previously proposed, evaluated and approved for the Expo Park Site, but that has not yet been constructed. Accordingly, although site-specific conditions and sign specifications may vary, the construction of 15,804 square feet of signage previously approved for the Expo Park Site, which was included as part of the Modified Project and addressed in the Modified Project Addendum, would instead occur on the Grand Avenue and 12th Place Sites. In other words, the construction impacts associated with this signage have been previously considered. To this end, the energy analyses provided in the Certified EIR and the Addenda were based on conservative assumptions to account for minor changes such as the current proposal.

Likewise with respect to operation, the energy demand associated with sign operation would be nominal. As previously discussed, the Freeway Sign Project represents the reallocation of 15,804 square feet of signage that was previously proposed for the Expo Park Site, evaluated in the Modified Project Addendum, and approved, but that is not yet constructed or operational. In other words, the operational impacts associated with this signage have been previously considered. To this end, the energy analyses provided in the Certified EIR and the Addenda were based on conservative assumptions to account for minor changes such as the current proposal. Furthermore, the proposed freeway signs would incorporate state-of-the-art technology to avoid the wasteful, inefficient, and/or unnecessary consumption of energy, as required by CEQA Guidelines Appendix F. In addition, the proposed freeway signs would be subject to 2016 Title 24 energy requirements, which have resulted in energy efficiency improvements compared to the 2013 Title 24 standards that were in effect at the time the Modified Project was approved in 2015. As such, existing electricity and natural gas infrastructure and supplies would be able to accommodate the Freeway Sign Project's energy demand, and impacts related to energy conservation would be less than significant.

Based on the analysis above and provided in the Freeway Sign Addendum, energy impacts associated with the proposed freeway signs are anticipated to be less than significant. Therefore, the Freeway Sign Project would not result in any new significant impacts with regard to energy or substantially increase the severity of any significant impacts previously identified in the Certified EIR or the Addenda.

M. *Cumulative Impacts*

While the specific geographic context for the cumulative impact analysis of each of the issues addressed above may vary, many types of impacts, particularly those related to construction, are typically localized and thus largely limited to the immediate vicinity. In each of the analyses provided above, impacts associated with the Freeway Sign Project would be within the envelope of impacts evaluated in the Certified EIR and the Addenda, and as such, the Freeway Sign Project's contribution to potential cumulative impacts would remain unchanged from that previously evaluated. Furthermore, as previously discussed, the Freeway Sign Project represents the relocation of 15,804 square feet of signage that was previously proposed for the Expo Park Site, evaluated in the Freeway Sign Project Addendum, and approved, but that has not yet been constructed or become operational. In other words, the impacts associated with this signage have been previously considered. Therefore, the cumulative impact conclusions set forth in the

Certified EIR and the Addenda would not change as a result of the Freeway Sign Project. As such, the Freeway Sign Project would not result in any new significant cumulative impacts, nor would it substantially increase the severity of any significant cumulative impacts previously identified in the Certified EIR or the Addenda.

III. GENERAL FINDINGS

As demonstrated in by the Freeway Sign Addendum, all environmental impacts from the freeway signs would be substantially similar to or less than those addressed in the Certified EIR and previous Addenda. The City has determined that:

1. The City, acting through the Department of City Planning, is the "Lead Agency" for the Freeway Sign Project that is evaluated in the Freeway Sign Addendum. The City finds that the Freeway Sign Addendum was prepared in compliance with CEQA and the CEQA Guidelines. The City finds that it has independently reviewed and analyzed the Freeway Sign Addendum and that the Freeway Sign Addendum reflects the independent judgment of the City.

2. The Freeway Sign Project does not involve substantial changes in the project scope requiring major revisions in the previous EIR due to new significant environmental effects, or an increase in the severity of a previously identified significant effect.

3. The circumstances under which the project is undertaken do not require revisions of the previous EIR due to new significant environmental effects or an increase in the severity of previously identified significant effects.

4. There is no new information of substantial importance showing new significant environmental effects not discussed in the previous EIR, or an increase in the severity of previously examined significant effects.

5. The City finds that the Freeway Sign Addendum provides objective information to assist the decision- makers and the public at large in their consideration of the environmental consequences of the Project.

6. The mitigation measures identified for the Freeway Sign Project are included in the Freeway Sign Addendum, which include those applicable measures from the Certified EIR and previous Addenda.. The final mitigation measures for the Freeway Sign Project are described in the Mitigation Monitoring Program (MMP). Each of the applicable mitigation measures identified in the MMP is incorporated into the Freeway Sign Project. The City finds that the impacts of the Freeway Sign Project have been mitigated to less than significance by the feasible mitigation measures identified in the MMP.

7. CEQA requires the Lead Agency approving a project to adopt an MMP or the changes to the project which it has adopted or made a condition of project approval to ensure compliance with the mitigation measures during project implementation. The mitigation measures included in the MMP serve that function. The MMP includes all the mitigation measures and project design features adopted by the City in connection with the approval of the Freeway Sign Project and has been designed to ensure compliance with such measures during implementation of the Project. In accordance with CEQA, the MMP provides the means to ensure that the mitigation measures are fully enforceable.

8. In accordance with the requirements of Public Resources Section 21081.6, the City hereby adopts each of the mitigation measures expressly set forth herein as conditions of approval for the Freeway Sign Project.

9. The custodian of the documents or other material which constitute the record of proceedings upon which the City's decision is based is the City Department of City Planning, Environmental Review Section, 221 North Figueroa Street, Room 1350, Los Angeles, California 90012.

10. The City finds and declares that substantial evidence for each and every finding made herein is contained in the Freeway Sign Addendum, which is incorporated herein by this reference, or is in the record of proceedings in the matter.

11. The City is certifying/approving the Freeway Sign Addendum for, and is approving and adopting findings for, the entirety of the actions described in these Findings and in the Freeway Sign Addendum as comprising the Freeway Sign Project.

12. The Freeway Sign Addendum is a Project Addendum for purposes of environmental analysis of the Project. A Project Addendum examines the environmental effects of a specific project. The Freeway Sign Addendum serves as the primary environmental compliance document for entitlement decisions regarding the Freeway Sign Project by the City and other regulatory jurisdictions.