

# **FOURTH ADDENDUM**

## **TO THE ENVIRONMENTAL IMPACT REPORT FOR THE LOS ANGELES MEMORIAL SPORTS ARENA REDEVELOPMENT PROJECT RE: AMENDMENT TO THE APPROVED SPECIFIC PLAN AND SIGN DISTRICT FOR FREEWAY SIGNS**

State Clearinghouse No. 2010041059

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### **PREPARED FOR:**

The City of Los Angeles Department of City Planning

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**March 2019**

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# **FOURTH ADDENDUM TO THE ENVIRONMENTAL IMPACT REPORT FOR THE LOS ANGELES MEMORIAL SPORTS ARENA REDEVELOPMENT PROJECT RE: AMENDMENT TO THE APPROVED SPECIFIC PLAN AND SIGN DISTRICT FOR FREEWAY SIGNS**

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## **I. Introduction**

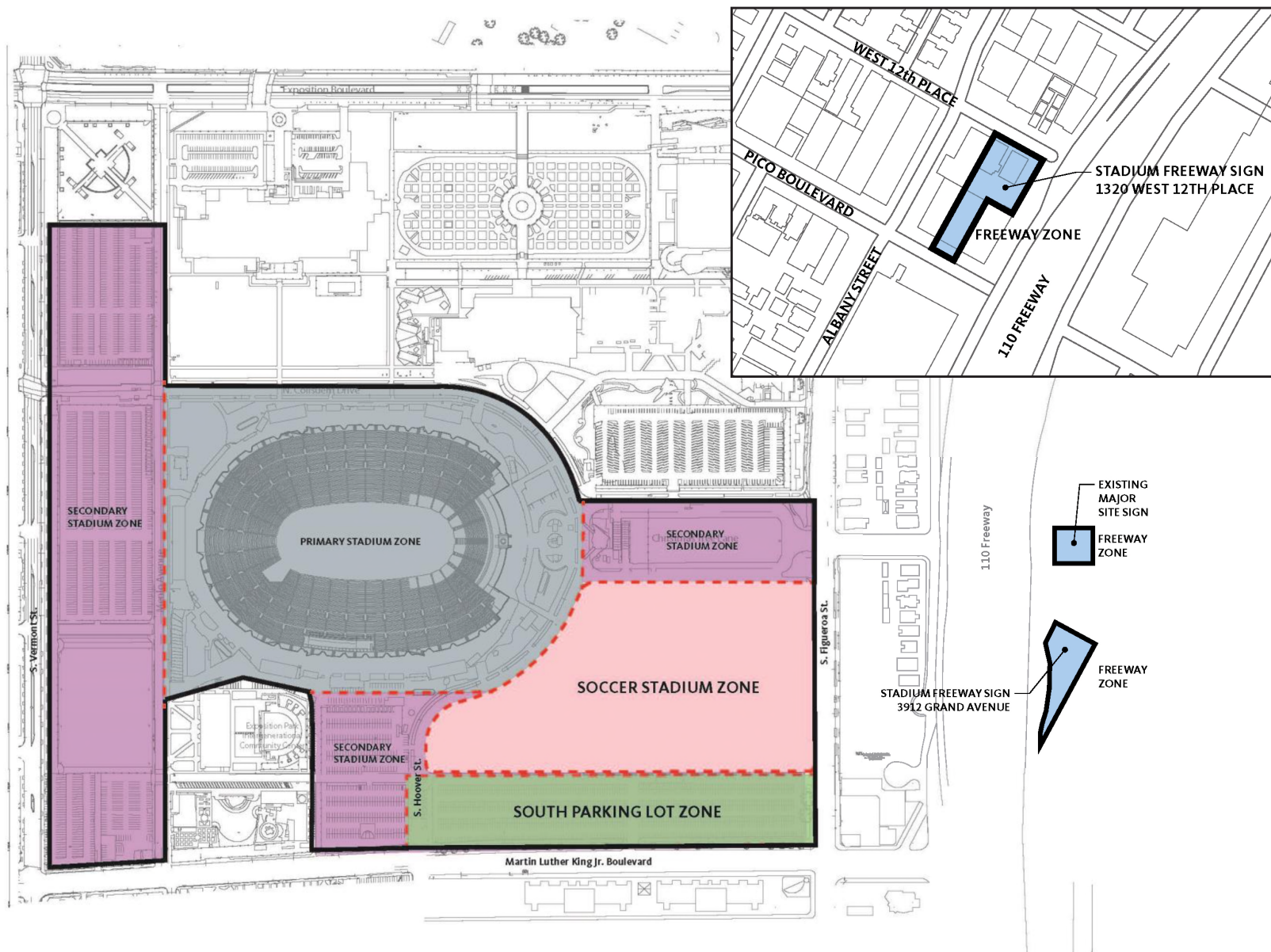
This document is the Fourth Addendum to the Los Angeles Memorial Sports Arena Redevelopment Project Environmental Impact Report (State Clearinghouse No. 2010041059; Certified EIR), which was certified and adopted by the Los Angeles Memorial Coliseum Commission (Coliseum Commission) on February 2, 2011. This Fourth Addendum addresses proposed amendments to the associated Coliseum District Specific Plan (Ordinance No. 184289; Specific Plan) and Coliseum and Soccer Stadium Sign District (Ordinance No. 184290; Sign District), both of which became effective on June 21, 2016. Specifically, the proposed amendments that are analyzed in this Fourth Addendum (“Revised Project”) involve the approval and construction of two new digital Los Angeles Football Club (LAFC) freeway signs for its Major League Soccer (MLS) stadium and entertainment venue recently developed in the cultural and event center of Exposition Park in the City of Los Angeles (City). The freeway signs would be located adjacent to the 110 Harbor Freeway (I-110) on two parcels that are non-contiguous with the Coliseum District Specific Plan area; these proposed sites are referred to herein as the Grand Avenue Site and the 12th Place Site.

Under California state law, codified at California Environmental Quality Act (CEQA) Guidelines Section 15162 and Public Resources Code Section 21166, no subsequent or supplemental environmental impact report shall be required by the lead agency for a subsequent discretionary approval unless: (i) there are substantial changes to the project that will require a major revision to the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; (ii) there are substantial changes with respect to the circumstances under which the project is undertaken, which will require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or (iii) there is new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified.

The previously approved and adopted Specific Plan and Sign District expressly allowed for the addition of up to three freeway signs on up to three non-contiguous parcels located in an expanded Freeway Zone at a future date. (Coliseum and Soccer Stadium Sign District, Section 8.E.5.) Thus, the “project,” as revised for purposes of this Fourth Addendum, was previously assessed in the Certified EIR and the first Addendum to the Certified EIR (First Addendum), as discussed further below. Consistent with those provisions, amendments to the Specific Plan and Sign District, along with other associated discretionary approvals, are now proposed to permit the two LAFC freeway signs. This Fourth Addendum seeks to effectuate the addition of these freeway signs by identifying and analyzing the potential for any new or more severe impacts associated with the specific locations proposed for the signage. Moreover, a total of 15,804 square feet of signage previously approved for the MLS stadium would be reallocated to the Grand Avenue and 12th Place Sites, which would be added to the amended Freeway Zone, illustrated in Figure 1 on page 3. As a result, the two proposed freeway signs would not result in additional signage square footage beyond what was previously approved for the MLS stadium as part of the Sign District. The Los Angeles Memorial Sports Arena Redevelopment Project, as most recently approved, together with the two proposed freeway signs are referred to herein as the “Revised Project.”

This Fourth Addendum analyzes whether the Revised Project will have significant effects not previously discussed or analyzed or whether the significant effects previously examined will be substantially more severe than shown in the Certified EIR or subsequent Addenda(. Based on the analysis set forth herein, the implementation of the Revised Project would not result in any new significant impacts and would not substantially increase the severity of any significant impacts previously identified in the Certified EIR or subsequent Addenda. None of the conditions described in CEQA Guidelines Section 15162 calling for preparation of a subsequent EIR have occurred.

- PRIMARY STADIUM ZONE
  - SECONDARY STADIUM ZONE
  - SOCCER STADIUM ZONE
  - SOUTH PARKING LOT ZONE
  - FREEWAY ZONE
- BOUNDARY LINES**
- Coliseum District Specific Area
  - Internal Zones



**Figure 1**  
District Sign Zones Map

## II. Overview of the Revised Project

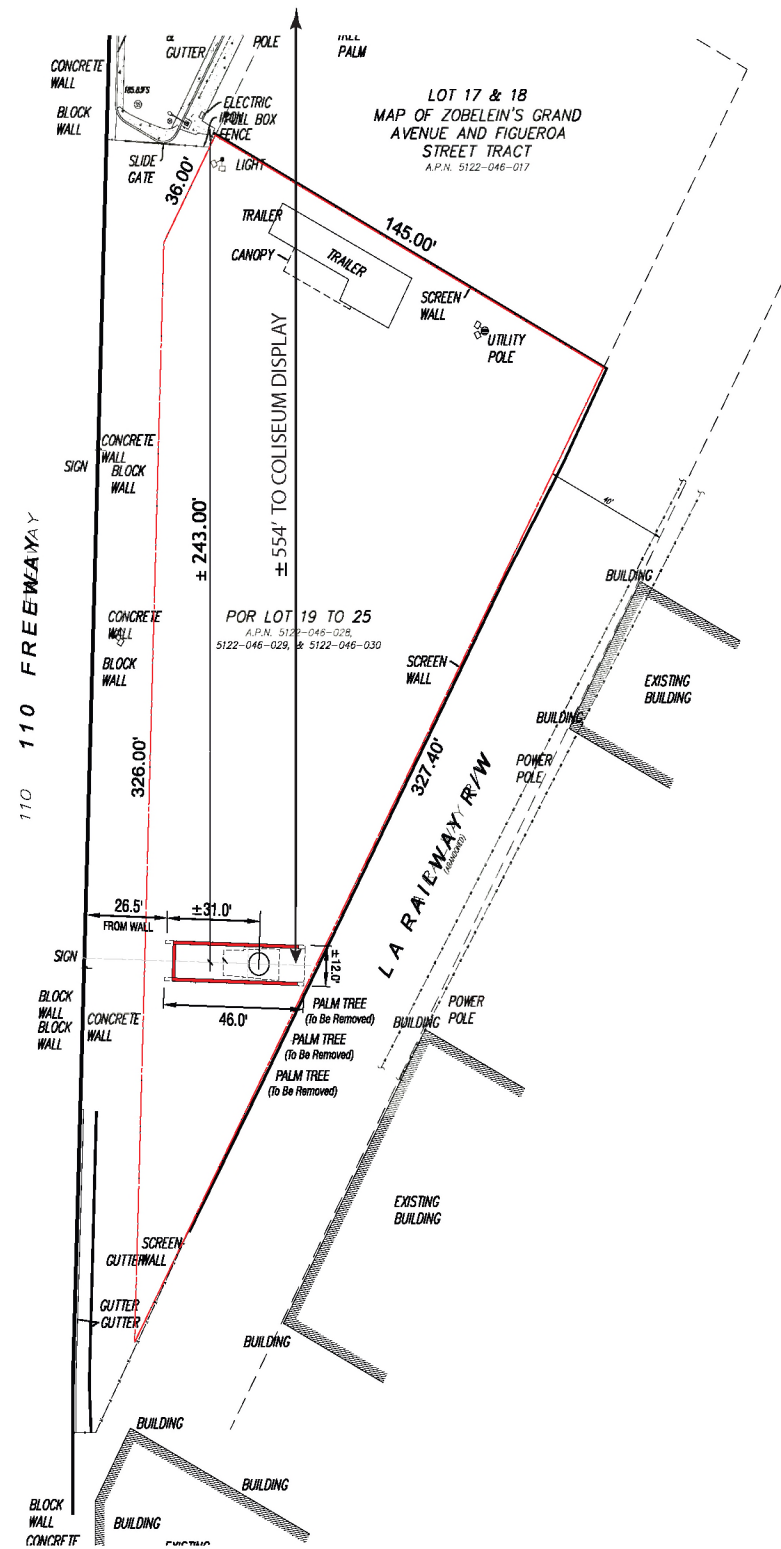
In their current form, the Specific Plan and Sign District expressly recognize that at a future date locations for freeway signs on non-contiguous parcels may be added to the Specific Plan and Sign District. Consistent with the approved Specific Plan and Sign District, LAFC proposes two freeway signs for its MLS stadium and entertainment venue, which is located within Exposition Park. The two freeway signs would be visible from freeway off-ramps used to access the stadium, consistent with existing allowances under California's Outdoor Advertising Act. (California Business & Professions Code Section 5200, et seq.)

The two freeway signs would include both static and digital components. Site plans for the two signage sites are provided in Figure 2 on page 5. The freeway signs, described further below, are a component of the comprehensive signage program for the MLS stadium identified in the approved Specific Plan and Sign District that includes naming and sponsorship rights, consistent with a state-of-the-art stadium and entertainment venue.

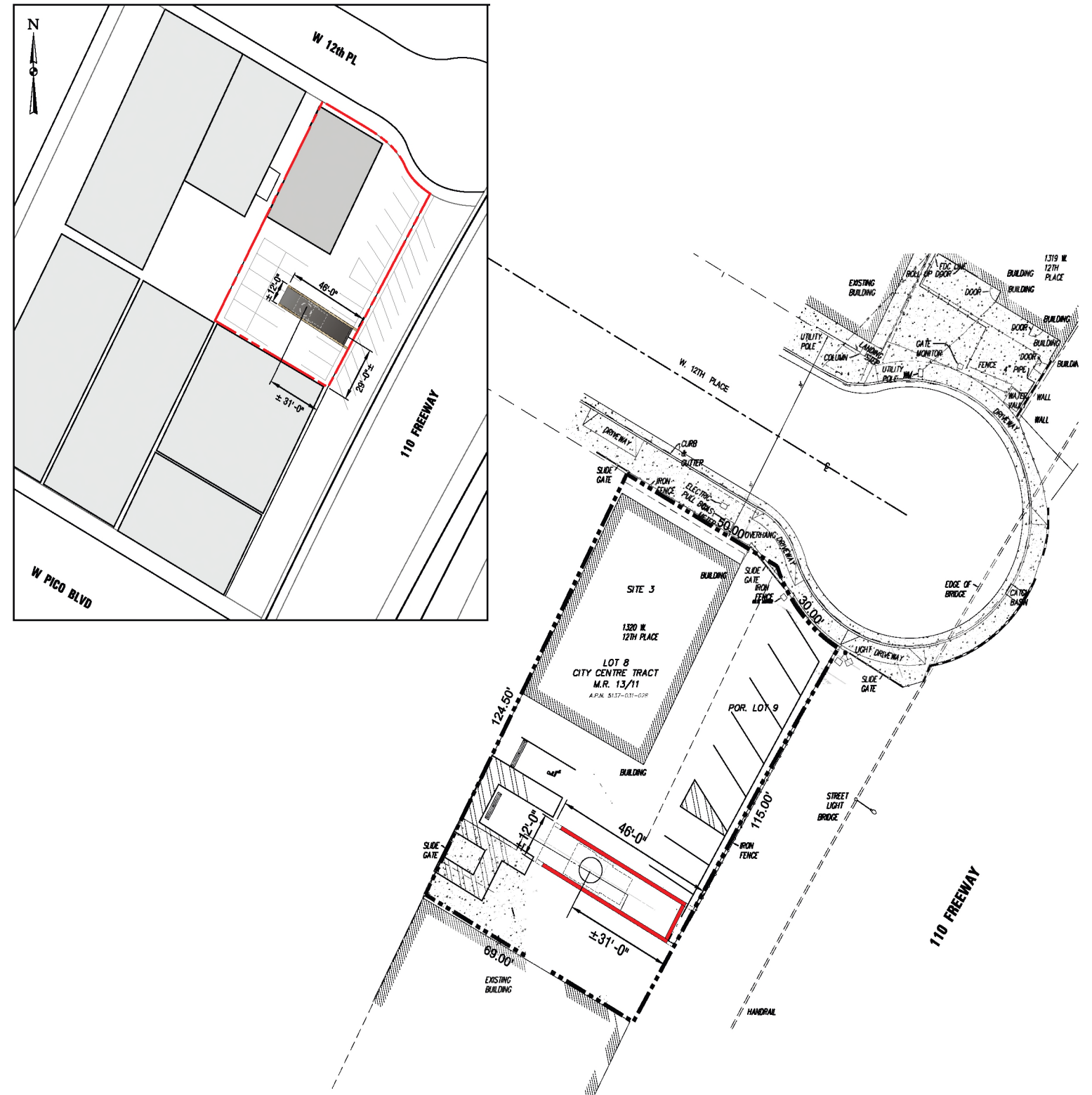
- (1) Grand Avenue Sign, located at 3912 South Grand Avenue (APNs 5122-046-028, 5122-046-029, 5122-046-030; referred to herein as the Grand Avenue Site) to the east of the I-110 Freeway and south of 39th Street. This sign would reach a maximum height of approximately 135 feet, a maximum width of 46 feet, and have a depth of 12 feet, with the main sign faces directed toward traffic traveling north and south on the I-110 Freeway. No change to the existing storage yard use on the Grand Avenue Site is proposed in conjunction with the Grand Avenue Sign.
- (2) 12th Place Sign, located at 1320 West 12th Place (portion of APN 5137-031-029; referred to herein as the 12th Place Site) to the west of the I-110 Freeway, with 12th Place to the north, Albany Street to the west, and Pico Boulevard to the south. The 12th Place Sign would have a design identical to the Grand Avenue Sign. No change to the existing one-story commercial building and surface parking lot on the 12th Place Site or to the site's land use is proposed in conjunction with the 12th Place Sign.

The two freeway signs are identical in design (described in further detail below) and would each contain 4,642 square feet of digital display area and 3,260 square feet of static elements, resulting in 7,902 square feet of sign area per freeway sign and a combined total of 15,804 square feet of sign area for both freeway signs. The two proposed freeway signs would not increase the square footage of signage that has already been approved for the MLS stadium and entertainment venue. Instead, the freeway signs' square footage is proposed to be allocated from approved signage identified in the Sign District for the stadium. Specifically, for the MLS stadium, the Sign District permits a total of





Grand Avenue Sign Site Plan



12th Place Sign Site Plan

Figure 2  
Site Plans for Grand Avenue Sign and 12th Place Sign



approximately 44,500 square feet of signage within the Soccer Stadium Zone (i.e., the MLS stadium site) and the South Parking Lot Zone (i.e., the parking lot south of the MLS stadium site), which collectively are referred to herein as the Expo Park Site, including up to approximately 18,300 square feet of exterior digital signage.<sup>1</sup> As part of the proposed Sign District Amendment, the amount of signage allowed on the Expo Park Site would be reduced by approximately 9,284 square feet of digital signage and approximately 6,520 square feet of static signage, which would be reallocated to the Grand Avenue Site and the 12th Place Site in the amended Freeway Zone, where the new proposed freeway signs would be located. Collectively, the Expo Park Site in conjunction with the Grand Avenue Site and the 12th Place Site are referred to herein as the “Project Site.”

### **III. Project Background and Prior Environmental Analyses**

The Certified EIR consists of the Draft EIR (November 2010) and Final EIR (January 2011), which analyzed impacts associated with what is now referred to as the Original Project. Additional CEQA analysis subsequently was conducted to evaluate modifications to the Original Project, including a First Addendum to the Certified EIR that analyzed a Modified Project (further defined below), which included signage approved through a Sign District (September 2015), Errata 1 to the First Addendum (March 2016), a Second Addendum (May 2017), and a Third Addendum (June 2017). (Collectively, the First Addendum, Errata 1 to the First Addendum, Second Addendum, and Third Addendum may be referred to below as “the Addenda” where appropriate when referencing all of the documents.) A brief summary of these documents and associated project changes is provided below.

The Draft and Final EIR analyzed the demolition of the then-existing Los Angeles Memorial Sports Arena (Sports Arena) on an approximately 15-acre site in the southeastern portion of Exposition Park (MLS stadium site) in the City and the development of two potential options therein: (1) a multiple-use space that would serve as a public venue for civic gatherings, celebratory and entertainment events (e.g., festivals, carnivals, rallies, and concerts), and other similar uses (Multi-Use Project); or (2) an 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 Project).

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<sup>1</sup> *These numbers exclude aerial view signs, information signs, temporary signs, and interior signs.*

After certification of the EIR on February 2, 2011, the Coliseum Commission leased both the Los Angeles Memorial Coliseum (Coliseum) and Sports Arena sites to the University of Southern California (USC), allowing development of the uses approved under the EIR. USC subsequently agreed with the Los Angeles Football Club (LAFC), which acquired an MLS expansion franchise, to cooperate with LAFC's efforts to seek approval of certain modifications to the Original Project in order to develop a MLS stadium on the MLS stadium site (Modified Project).

The Modified Project was the subject of the First Addendum and consisted of the Original Project (reconfigured on the MLS stadium site) together with the addition of up to approximately 105,900 square feet (sf) of ancillary facility floor area (up to approximately 119,000 gross sf), including office and conference facility space, a "World Football" museum, a team store or other retail space; and restaurant uses.<sup>2</sup> The Modified Project also included signage and lighting programs to support stadium operations. The First Addendum together with a Project Agreement were approved by the Coliseum Commission on September 17, 2015. The Coliseum Commission specifically determined that the Modified Project is consistent with the Certified EIR based on evidence in the First Addendum and the record and that none of the events requiring preparation of a subsequent or supplemental EIR under Public Resources Code Section 21166 or CEQA Guidelines Section 15162 had occurred. Errata 1 to the First Addendum was issued in March 2016 to address a typographical error in one project design feature. No changes to the Modified Project were proposed, and none of the conditions in Public Resources Code Section 21166 or CEQA Guidelines Section 15162 occurred.

On May 6, 2016, the Los Angeles City Council approved the Modified Project and approved an Amendment of the Specific Plan, the creation of the Sign District, and adopted the Project findings, the project design features and mitigation measures set forth in a Mitigation Monitoring Program, and a Statement of Overriding Considerations. The approved Specific Plan and Sign District expressly recognize that non-contiguous parcels may be added to the Specific Plan and Sign District at a future date for freeway signs. Components of the Modified Project as allowed by the Specific Plan were approved by a City of Los Angeles Director's Administrative Clearance dated June 21, 2016.

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<sup>2</sup> *Except where otherwise noted, square footage is calculated pursuant to the LAMC definition of floor area for the purpose of calculating FAR. In accordance with LAMC Section 12.03, floor area is defined as: "[t]he area in square feet confined within the exterior walls of a building, but not including the area of the following: exterior walls, stairways, shafts, rooms housing building-operating equipment or machinery, parking areas with associated driveways and ramps, space for the landing and storage of helicopters, and basement storage areas."*

In May 2017, a Second Addendum was prepared to analyze a temporary extension of construction hours to enable construction during the evening/nighttime hours for a limited duration of approximately four months. The Second Addendum was approved by the Coliseum Commission on May 11, 2017. The Coliseum Commission specifically determined that the temporary extension of construction hours was consistent with the Certified EIR based on evidence in the Second Addendum and the record and that none of the events requiring preparation of a subsequent or supplemental EIR under Public Resources Code Section 21166 or CEQA Guidelines Section 15162 had occurred.

In June 2017, a Third Addendum was prepared to analyze the proposed removal of 10 street trees along the MLS stadium site's South Figueroa Street frontage and an associated request for a street tree removal permit by the City of Los Angeles Department of Public Works' Bureau of Street Services, Urban Forestry Division. That document provided necessary analysis regarding the physical environmental effects associated with the proposed discretionary permit approval for the removal of street trees and demonstrated that none of the events requiring preparation of a subsequent or supplemental EIR under Public Resources Code Section 21166 or CEQA Guidelines Section 15162 would occur. As such, the City of Los Angeles Board of Public Works approved the Third Addendum and approved the request for a street tree removal permit on March 12, 2018.

The Project Applicant, LAFC, now seeks approval of amendments to the Specific Plan and Sign District, along with other associated entitlements described below, in order to permit two new freeway signs for the MLS stadium and entertainment venue. This Fourth Addendum provides necessary information regarding the proposed freeway signs and the requested discretionary approvals, as well as associated analysis demonstrating that no new significant impacts or any increased severity of significant impacts previously evaluated and disclosed in the Certified EIR or the Addenda would occur. No other changes to the Modified Project are proposed.

## **IV. CEQA Authority for an Addendum**

CEQA establishes the type of environmental documentation required when changes to a project occur after an EIR is certified. Specifically, CEQA Guidelines Section 15164(a) states that:

*The lead agency or responsible agency shall prepare an addendum to a previously Certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred.*

CEQA Guidelines Section 15162 states that no subsequent or supplemental environmental impact report shall be required by the lead agency or by any responsible agency unless a further discretionary approval on the project is required and one or more of the following circumstances exist:

- (1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
- (2) Substantial changes occur with respect to the circumstances under which the project is undertaken, which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
- (3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the negative declaration was adopted, shows any of the following:
  - (a) The project will have one or more significant effects not discussed in the previous EIR or negative declaration;
  - (b) Significant effects previously examined will be substantially more severe than shown in the previous EIR;
  - (c) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
  - (d) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

Likewise, Public Resources Code Section 21166 states that no subsequent or supplemental environmental impact report shall be required by the lead agency or by any responsible agency, unless one or more of the following events occur:

- (a) Substantial changes are proposed in the project which will require major revisions of the environmental impact report;

- (b) Substantial changes occur with respect to the circumstances under which the project is being undertaken which will require major revisions in the environmental impact report; or
- (c) New information, which was not known and could not have been known at the time the environmental impact report was certified as complete, becomes available.

As demonstrated by the analysis herein, the freeway signs now proposed under the Revised Project would not result in any new significant impacts, nor would they substantially increase the severity of previously identified significant impacts. In addition, there are no substantial changes to the circumstances under which the Original Project as analyzed in the Certified EIR or the Modified Project as analyzed in the Addenda would have been undertaken. Furthermore, no new information of substantial importance has been identified which was not known and could not have been known when the Certified EIR or the Addenda were certified. Therefore the minor changes associated with the proposed freeway signs do not meet the standards for a subsequent or supplemental EIR pursuant to CEQA Guidelines Section 15162 or Public Resources Code Section 21166. Further, since only minor changes and additions to the Certified EIR are necessary and none of the conditions described in CEQA Guidelines Section 15162 or Public Resources Code Section 21166 have occurred, an Addendum is the appropriate CEQA document to analyze the proposed freeway signs.<sup>3</sup>

## **A. The First Addendum Contemplated the Addition of New Signage Consistent with the Revised Project**

Signage for the MLS stadium and entertainment venue and adjacent areas within Exposition Park, including the neighboring Los Angeles Memorial Coliseum property, is regulated by the Sign District. The signage program set forth by the Sign District is an important element of a major league sports stadium as it supports the advertising and naming sponsorship rights for the stadium and generates revenue streams necessary for stadium funding and operations. (First Addendum at pp. 21-22.) For purposes of the Revised Project, the First Addendum analyzed the Modified Project, which included the Sign District that permits 37,500 square feet of signage within the Soccer Stadium Zone (i.e., the MLS stadium site) and 7,000 square feet of signage in the South Parking Lot Zone (i.e., the parking lot south of the MLS stadium site).<sup>4</sup> Thus, together approximately 44,500 square feet of signage, including up to approximately 18,300 square feet of exterior digital

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<sup>3</sup> See CEQA Guidelines Section 15164(a).

<sup>4</sup> See specifically Coliseum and Soccer Stadium Appendix A which details the approved signs within each Sign District zone.

signage, is currently permitted in the Expo Park Site for the MLS stadium and entertainment venue; much of this signage has not yet been constructed.<sup>5</sup> Separate from the approved signage within the Expo Park Site and other signage permitted in other zones within the Sign District, a Freeway Zone was identified east of the I-110 Freeway where an existing freeway sign for the Los Angeles Memorial Coliseum (referred to herein as the Coliseum sign) is located. Furthermore, as previously indicated, Sign District Section 8.E.5 allows for the addition of up to three additional freeway signs on up to three other non-contiguous parcels located in an expanded Freeway Zone. Sign District Section 8.E.5 also indicates that the signage area of the new freeway signs shall not count towards the total sign area limitation set forth in Sign District Section 8.F.1.

Although not required, in order to accommodate the sign area associated with the proposed freeway signs, the amount of signage allowed on the Expo Park Site would be reduced by approximately 9,284 square feet of digital signage and approximately 6,520 square feet of static signage. This combined 15,804 square feet of previously approved signage would be reallocated to the Grand Avenue Site and the 12th Place Site, which would be added to the Freeway Zone, thus creating an expanded Freeway Zone. In essence, the Revised Project proposes to relocate 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 for the Expo Park Site, which was included as part of the Modified Project and addressed in the First Addendum, would instead occur on the Grand Avenue and 12th Place Sites.

Except in the Freeway Zone, the Sign District permits signs that vary in size from approximately 40 to 3,800 square feet, depending on the sign type and location. The types and extent of permitted signage emphasize the event and entertainment-oriented aspect of the MLS stadium. Specifically, signage types include identification signs, temporary event signs, electronic digital displays, changeable message light-emitting diode (LED) boards, static signs, identification signs, and retail/tenant identification signs, with both on-site and off-site signage allowed. In addition, the Sign District includes limitations on the operating hours and illumination of permitted signs.

The First Addendum considered the impacts of “lighting emissions resulting from the illuminated signage...[including] front-lit signs, electronic digital displays, and changeable message LED boards.” (First Addendum at p. 25.) As part of the underlying environmental analysis, the First Addendum included a Lighting Study (Appendix B, hereinafter referred as to the “2015 Lighting Study”) that “define[d] the existing lighting conditions within and

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<sup>5</sup> *These numbers exclude aerial view signs, information signs, temporary signs, and interior signs.*

surrounding the [Expo Park] Site, review[ed] the applicable lighting metrics, and model[ed] the lighting of the proposed project to evaluate the potential Project lighting impacts on surrounding properties.” (2015 Lighting Study at p. 1.) The 2015 Lighting Study also analyzed a series of receptor sites in the Exposition Park area, including locations to the east and south of the Expo Park Site. (First Addendum at p. 44.) The First Addendum to the Certified EIR concluded that light and glare impacts from the Modified Project’s signage would be less than significant, consistent with the conclusions in the Certified EIR. (First Addendum at pp. 43-45.) As discussed further below, a new 2018 Lighting Study and 2019 Lighting Report have been prepared as part of this Fourth Addendum to analyze specifically the Grand Avenue and 12th Place Sign locations and are attached hereto as Appendix B and Appendix B1.

In relation to the currently requested discretionary approvals for amendments to the Sign District and Specific Plan, the Sign District expressly indicated additional locations for freeway signs could be added to the Sign District at a future date 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 further provides that “[a]n amendment of this Ordinance shall be required to add the locations of additional Stadium Freeway Signs to the District.”<sup>6</sup> LAFC proposes to amend the Sign District to include the Grand Avenue Site and the 12th Place Site in the Sign District area and set forth 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...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.”<sup>7</sup> 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.”<sup>8</sup> Consistent with the Sign District approval summarized above, the Specific Plan language was necessary because specific locations for freeway signs had not yet been identified or secured at the time the City Council approved the Specific Plan in 2016. Therefore, LAFC now also proposes to amend the Specific Plan to include the

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<sup>6</sup> *Coliseum and Soccer Stadium Sign District, Section 9 X.1.a.*

<sup>7</sup> *Coliseum District Specific Plan, Section 3.C.*

<sup>8</sup> *Coliseum District Specific Plan, Section 11.*

Grand Avenue Site and the 12th Place Site within the Specific Plan's Freeway Zone. As indicated earlier, the Freeway Zone already contains the existing Coliseum sign on a site referred to in the Specific Plan as the Existing Major Site Sign, which is not contiguous with the rest of the Specific Plan area.

## **B. Freeway Sign Design and Related Characteristics**

The proposed freeway signs would be constructed with iconic designs that complement each other and evoke the LAFC brand and contain Art Deco details that are representative of the City of Los Angeles. The designs would be highlighted by orienting the digital boards of the signs with a unique portrait orientation instead of the typical freeway sign landscape orientation. In addition, the sign designs would be consistent with LAFC's black and gold color scheme, also featuring gray and white elements. The signs would be designed with the LAFC wing at the top of the sign, which refers to the "City of Angels." 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 in light of Downtown Los Angeles' rich collection of Art Deco buildings. The proposed identical sign designs are illustrated in renderings provided in Figure 3 and Figure 4 on pages 14 and 15, respectively, and described further below.

### **1. Grand Avenue Sign**

As shown in Figure 3, the Grand Avenue Sign would be located on the Grand Avenue Site, a triangular shaped parcel located east of the 110 Freeway and south of 39th Street. The approximately 0.61-acre (26,424-square-foot) Grand Avenue Site is currently rented as a storage yard for construction equipment and materials, and aside from installation of the sign within a portion of the yard, no change to that use is proposed by LAFC. The Grand Avenue Sign would be located approximately 750 feet east of the MLS stadium (across the 110 Freeway) and over 550 feet south of the Los Angeles Memorial Coliseum freeway sign (also located on the east side of the 110 Freeway). Traveling northbound on the 110 Freeway, the Grand Avenue Sign would be visible when approaching the Exposition Boulevard off-ramp, which can be used to access to the MLS stadium. Traveling southbound on the 110 Freeway, the Grand Avenue Sign would be visible when approaching the Martin Luther King, Jr. Boulevard off-ramp, which can be used to access the stadium. Security provisions for the Grand Avenue Site would include a security gate at the driveway and perimeter fencing around the property, which are currently in place, as well as 8-foot-high fencing around the sign base and potentially bollards as well.

The Grand Avenue Sign would have a rectangular structure (as viewed from above) placed atop the sign's structural support or base, as shown in Figure 3. The sign would



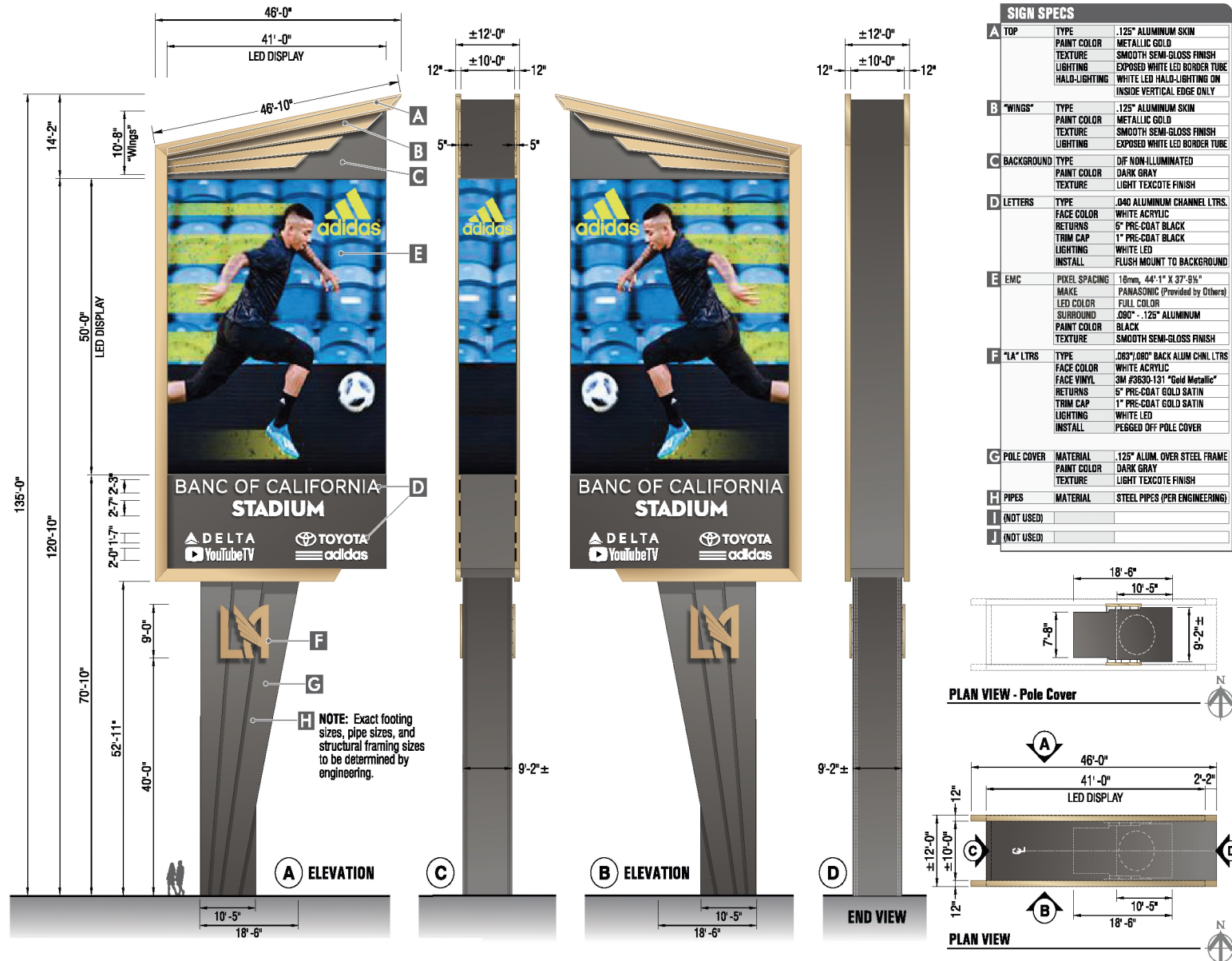


Figure 3  
Rendering of Grand Avenue Sign

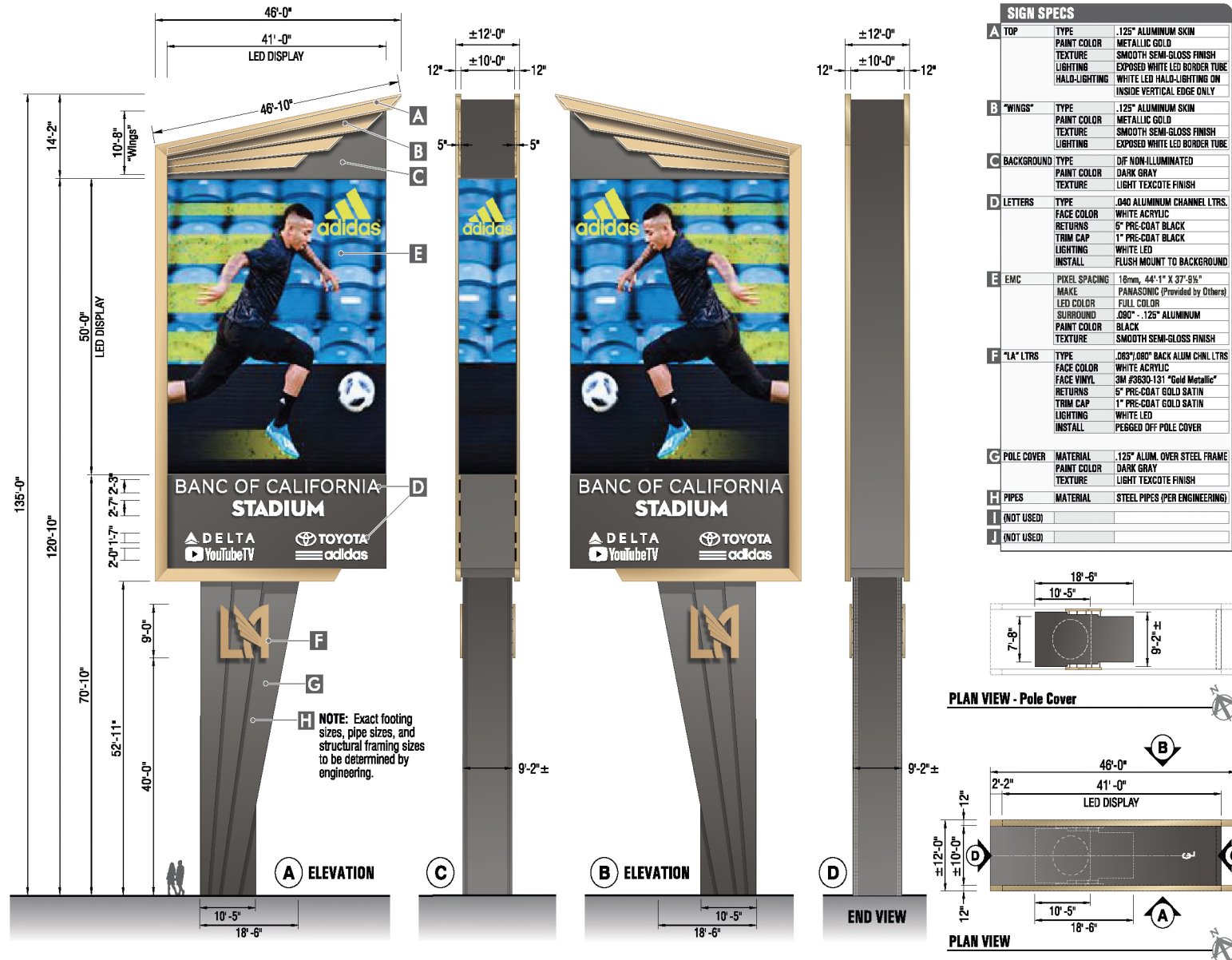


Figure 4  
Rendering of 12th Place Sign

reach a maximum height of approximately 135 feet, measuring a maximum width of 46 feet (from west to east) and a depth of 12 feet (from north to south), with the main sign faces directed toward traffic traveling north and south on I-110. The north- and south-facing sides of the sign would be trapezoidal in shape with the LAFC wing on the top and would each include a portrait-oriented digital display measuring approximately 50 feet tall and 41 feet wide, resulting in a digital display area of approximately 2,050 square feet per sign face.<sup>9</sup> The digital display would wrap around the west face of the sign (directly facing the freeway edge), which would be approximately 50 feet tall and 10 feet 10 inches wide, resulting in an additional digital display area of approximately 542 square feet. This would create a cohesive digital package connecting all three sign faces and provide an opportunity for the City to program the west face during special events to promote messages or symbols of local interest. For example, the west sign face could be used to display images of the American flag or stripes of red, white, and blue to commemorate July 4th, or to display the Olympic rings when Los Angeles hosts the Olympic Games in 2028. Together, the three digital faces (north, south, and west) would provide a total of approximately 4,642 square feet of digital display area. The Grand Avenue Sign also would include static display elements for stadium and team identification and fixed sponsorship signage. Static display elements would be located on the north and south faces and would include 1,630 square feet of static sign area on each sign face, for a combined total of 3,260 square feet of static sign area. Together, the three sides of the Grand Avenue Sign containing signage would provide approximately 7,902 square feet of sign area (4,642 square feet of digital elements and 3,260 square feet of static elements). The east side of the sign would have an aluminum backing with no signage. The footprint of the sign base would measure approximately 170 square feet.

The Grand Avenue Site is located in Council District 9 in the Southeast Los Angeles Community Plan area and the Council District Nine Corridors South of the Santa Monica Freeway Recovery Redevelopment Project Area. The Southeast Los Angeles Community Plan provides a land use designation of Hybrid Industrial for the Grand Avenue Site. 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.<sup>10</sup>

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<sup>9</sup> *Sign District Section 4 defines "Sign Area" as the area circumscribed by the smallest geometric shape created with a maximum of eight straight lines that will enclose all words, letters, figures, symbols, designs and pictures, together with all framing, background material, colored or illuminated areas and attention-attracting devices. Sign support structures are excluded from the sign area calculation if neutral in color. To calculate the sign area of the Grand Avenue and 12th Place Signs, each sign face was calculated as provided for in the Sign District, excluding the portion of the sign support structure that includes no signage.*

<sup>10</sup> *See LAMC Section 12.21.1.A: "The total Floor Area contained in all the main Buildings on a Lot in a commercial or industrial zone in Height District No. 1 shall not exceed one-and-one-half times the Buildable Area of the Lot."*

As discussed further below, LAFC is seeking amendments to the Specific Plan and Sign District to permit the Grand Avenue Sign.

## 2. 12th Place Sign

The 12th Place Sign would be located on the 12th Place Site, a rectangular shaped parcel located on a block bounded by 12th Place to the north, Albany Street to the west, Pico Boulevard to the south, and the 110 Freeway to the east. The approximately 0.20-acre (8,874-square-foot) 12th Place Site is currently developed with a one-story commercial building with a surface parking lot. No change to the building or associated land use is proposed in conjunction with the 12th Place Sign. The 12th Place Sign would be located approximately 2.3 miles north of the MLS stadium. Traveling southbound on the 110 Freeway from north of Interstate 10, the 12th Place Sign would be visible when approaching the Adams Boulevard off-ramp, which could be used to access the MLS stadium. Security provisions for the 12th Place Site would include a security gate at the driveway and perimeter fencing around the property, which are currently in place, as well as 8-foot-high fencing around the sign base and potentially bollards as well.

The 12th Place Sign would have a design identical to the Grand Avenue Sign, with a rectangular structure (as viewed from above) placed atop the sign's structural support or base, as shown in Figure 4 on page 15. The sign would reach a maximum height of approximately 135 feet, measuring a maximum width of 46 feet (from west to east) and a depth of 12 feet (from north to south), with the main sign faces directed toward traffic traveling north and south on I-110. The north- and south-facing sides of the sign would be trapezoidal in shape with the LAFC wing on the top and would each include a portrait-oriented digital display measuring approximately 50 feet tall and 41 feet wide, resulting in a digital display area of approximately 2,050 square feet per sign face.<sup>11</sup> The digital display would wrap around the west face of the sign (directly facing the freeway edge), which would be approximately 50 feet tall and 10 feet 10 inches wide, resulting in an additional digital display area of approximately 542 square feet. This would create a cohesive digital package connecting all three sign faces and provide an opportunity for the City to program the east face during special events to promote messages or symbols of local interest. For example, the east sign face could be used to display images of the American flag or stripes of red, white, and blue to commemorate July 4th, or to display the Olympic rings when Los

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<sup>11</sup> *Sign District Section 4 defines "Sign Area" as the area circumscribed by the smallest geometric shape created with a maximum of eight straight lines that will enclose all words, letters, figures, symbols, designs and pictures, together with all framing, background material, colored or illuminated areas and attention-attracting devices. Sign support structures are excluded from the sign area calculation if neutral in color. To calculate the sign area of the Grand Avenue and 12th Place Signs, each sign face was calculated as provided for in the Sign District, excluding the portion of the sign support structure that includes no signage.*

Angeles hosts the Olympic Games in 2028. Together, the three digital faces (north, south, and east) would provide a total of approximately 4,642 square feet of digital display area. The 12th Place Sign also would include static display elements for stadium and team identification and fixed sponsorship signage. Static display elements would be located on the north and south faces and would include 1,630 square feet of static sign area on each sign face, for a combined total of 3,260 square feet of static sign area. Together, the three sides of the 12th Place Sign containing signage would provide approximately 7,902 square feet of sign area (4,642 square feet of digital elements and 3,260 square feet of static elements). The west side of the sign would have an aluminum backing with no signage. The footprint of the sign base would measure approximately 170 square feet.

The 12th Place Site is located in Council District 1 in the Westlake Community Plan area and has a land use designation of Industrial: Commercial Manufacturing. 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.<sup>12</sup> As discussed further below, LAFC seeks amendments to the Specific Plan and Sign District to permit the 12th Place Sign.

### 3. Construction

Both the Grand Avenue Sign and the 12th Place Sign would be fabricated off-site and installed in large structural pieces. The Grand Avenue Sign would include a spread footing approximately 40 feet by 40 feet in size and approximately 16 feet deep. The footing for the 12th Place Sign would be directly buried and would measure approximately 16 feet in diameter and approximately 46 feet deep. (These differences in installation and footing specifications relate to the site constraints, such as soil conditions and proximity to nearby structures, at each individual signage site.) Soil export of up to approximately 1,300 cubic yards would be required, 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. Although the sign footings are not anticipated to reach groundwater, should contact with perched groundwater occur, steel casings or a slurry would be used. As discussed in the analysis below, the Geotechnical Report details the appropriate design criteria for installation of the proposed freeway signs; site-specific soil reports would be prepared to determine final footing engineering, and it is recommended that a Geotechnical Engineer review the final design plans to confirm technical specifications. On-site installation work for each sign is anticipated to take approximately one to two months to complete and is currently planned for 2019.

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<sup>12</sup> See LAMC Section 12.21.1.A: “The total Floor Area contained in all the main Buildings on a Lot in a commercial or industrial zone in Height District No. 1 shall not exceed one-and-one-half times the Buildable Area of the Lot.”

As previously discussed, in order to accommodate the sign area associated with the proposed freeway signs, the amount of signage allowed on the Expo Park Site would be reduced by approximately 9,284 square feet of digital signage and approximately 6,520 square feet of static signage. This combined 15,804 square feet of previously approved signage would be reallocated to the Grand Avenue Site and the 12th Place Site in the amended Freeway Zone, where the proposed freeway signs would be located. In essence, the Revised Project proposes to relocate 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 for the Expo Park Site, which was included as part of the Modified Project and addressed in the First Addendum, would instead occur on the Grand Avenue and 12th Place Sites.

## **C. Discretionary Actions**

Approvals by the City of Los Angeles that are required for development of the proposed freeway signs would include, but may not be limited to, the following:

- Amendment of the Specific Plan to provide the land use regulations applicable to the Grand Avenue Site and 12th Place Site to allow development of the proposed freeway signs;
- Director's Review (pursuant to the Specific Plan);
- Amendment of the Sign District to provide the signage regulations applicable to the Grand Avenue Site and 12th Place Site;
- Director's Sign-Off (pursuant to the Sign District)
- Other discretionary and ministerial permits and approvals that may be deemed necessary, including but not limited to sign permits and excavation permits.

In addition to the discretionary actions that will be requested from the City of Los Angeles acting as lead agency, other discretionary approvals for the freeway signs may include:

- CRA/LA approval of an amendment to the Design for Development established for the Council for the District Nine Corridors South of the Santa Monica Freeway Recovery Redevelopment Project Area, and other approvals as may be required, including without limitation potential consideration and approval of Site Plan Review.

## **V. Comparative Analysis of Proposed Freeway Signs**

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 two proposed freeway signs. 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 two proposed freeway signs 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 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. As demonstrated in the analyses below, the installation and operation of the two proposed freeway signs would not result in any new significant environmental impacts or a substantial increase in the severity of a significant impact already identified in the Certified EIR or the Addenda. In addition, a revised Mitigation Monitoring Program (MMP) containing all project design features and mitigation measures applicable to the Revised Project, including applicable mitigation measures from the Certified EIR and Addenda analyses, is included as Appendix A to this Fourth Addendum.

### **A. Aesthetics**

#### **1. Visual Character and Views**

##### *(a) Construction*

Construction-related visual character and views impacts were not assessed in detail in the Certified EIR. However, the Addenda, specifically the First Addendum, 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. As set forth on pages IV.A-21 and IV.A-22 of the Certified EIR, these factors include the existing 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 activities associated with installation of the two 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 sign locations 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 Addenda. Therefore, impacts would remain less than significant, and no mitigation measures are required.

*(b) Operation*

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 First 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 aspect 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 Revised 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.<sup>13</sup> Accordingly, as discussed above and 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

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<sup>13</sup> *Coliseum and Soccer Stadium Sign District, Section 8.E.5.*

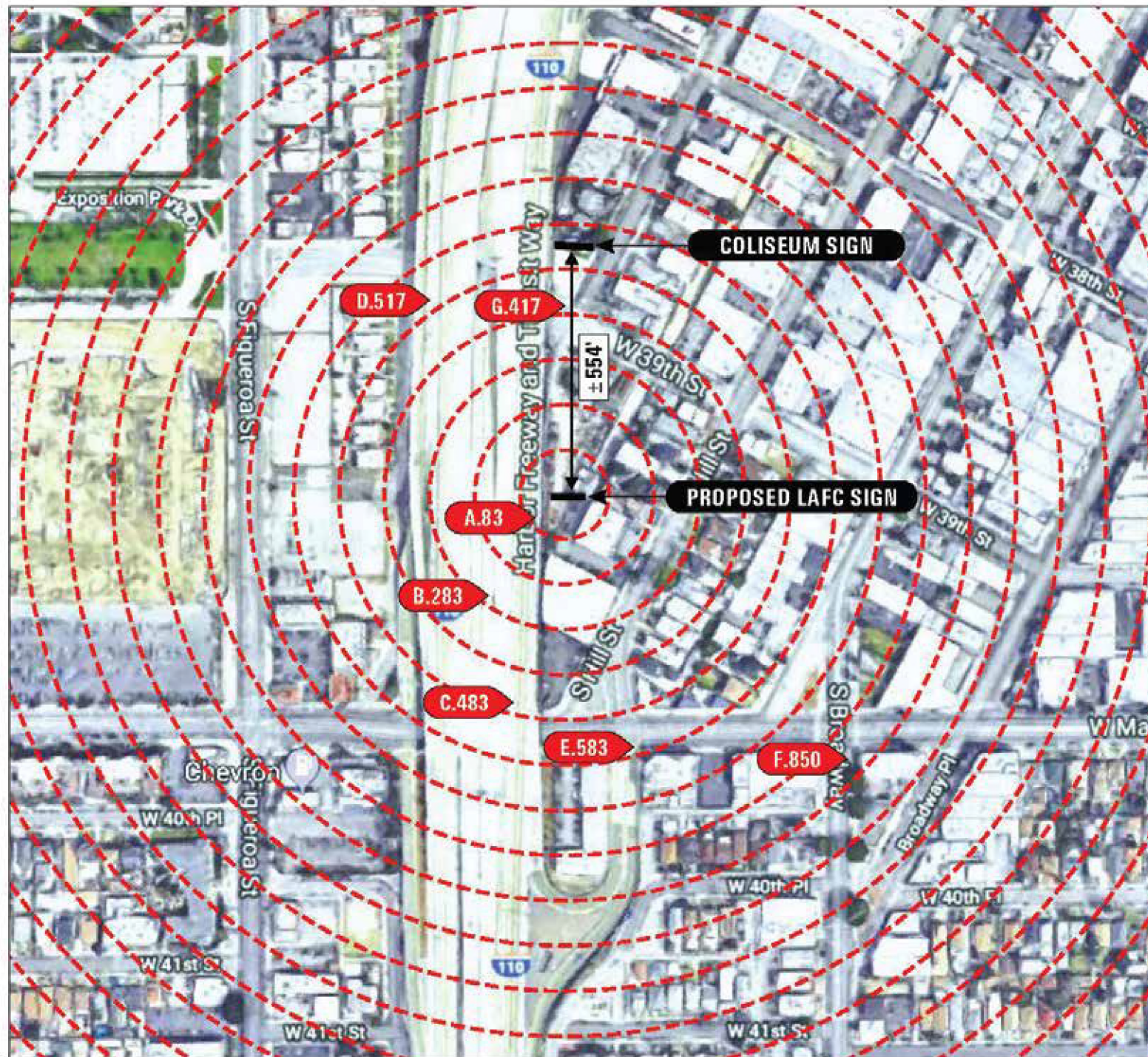


Sign District area and set forth regulations for the two proposed freeway signs. As part of the proposed Sign District Amendment, LAFC would remove exterior digital and static signage approved for the Expo Park Site such that with the addition of the freeway signs there would be no increase to the approximately 44,500 square feet of total signage, including the maximum of approximately 18,300 square feet of exterior digital signage that is permitted within the Expo Park Site under the Sign District.

As part of this analysis, simulated photographs showing future conditions (i.e., with the proposed freeway signs) from representative locations were generated. A photo location map is provided in Figure 5 on page 23. Visual simulations of the Grand Avenue Sign as viewed from nearby viewpoints are provided in Figure 6 and Figure 7 on pages 24 and 25; simulations of the 12th Place Sign are provided in Figure 8 and Figure 9 on pages 26 and 27. As shown, the freeway signs would be visually prominent from locations in close proximity but would begin to blend with the surrounding commercial and industrial development with distance. Both signage sites represent highly urbanized areas where large scale freeway signage and other signs are already present. Specifically, free-standing sports and entertainment-oriented freeway signage already exists near the Grand Avenue Site and the 12th Place Site. The Grand Avenue Site is located south of the Coliseum sign, as shown in Figure 5. In addition, substantial entertainment-oriented signage exists near the 12th Place Site due to the presence of the STAPLES Center and L.A. Live on the east side of the 110 Freeway, as shown in Figure 927. Similar to the findings in the First Addendum, the proposed signage would be consistent with the character of a sports and entertainment venue (i.e., a well-lit and active environment with substantial pedestrian activity including nighttime activity), such as that which already exists on-site and within the surrounding area, including at the Coliseum and STAPLES Center. In addition, as discussed below, the proposed signs would not result in significant light or glare impacts. Thus, the freeway signs would not result in significant impacts to the existing visual character of the Project Site or surrounding area.

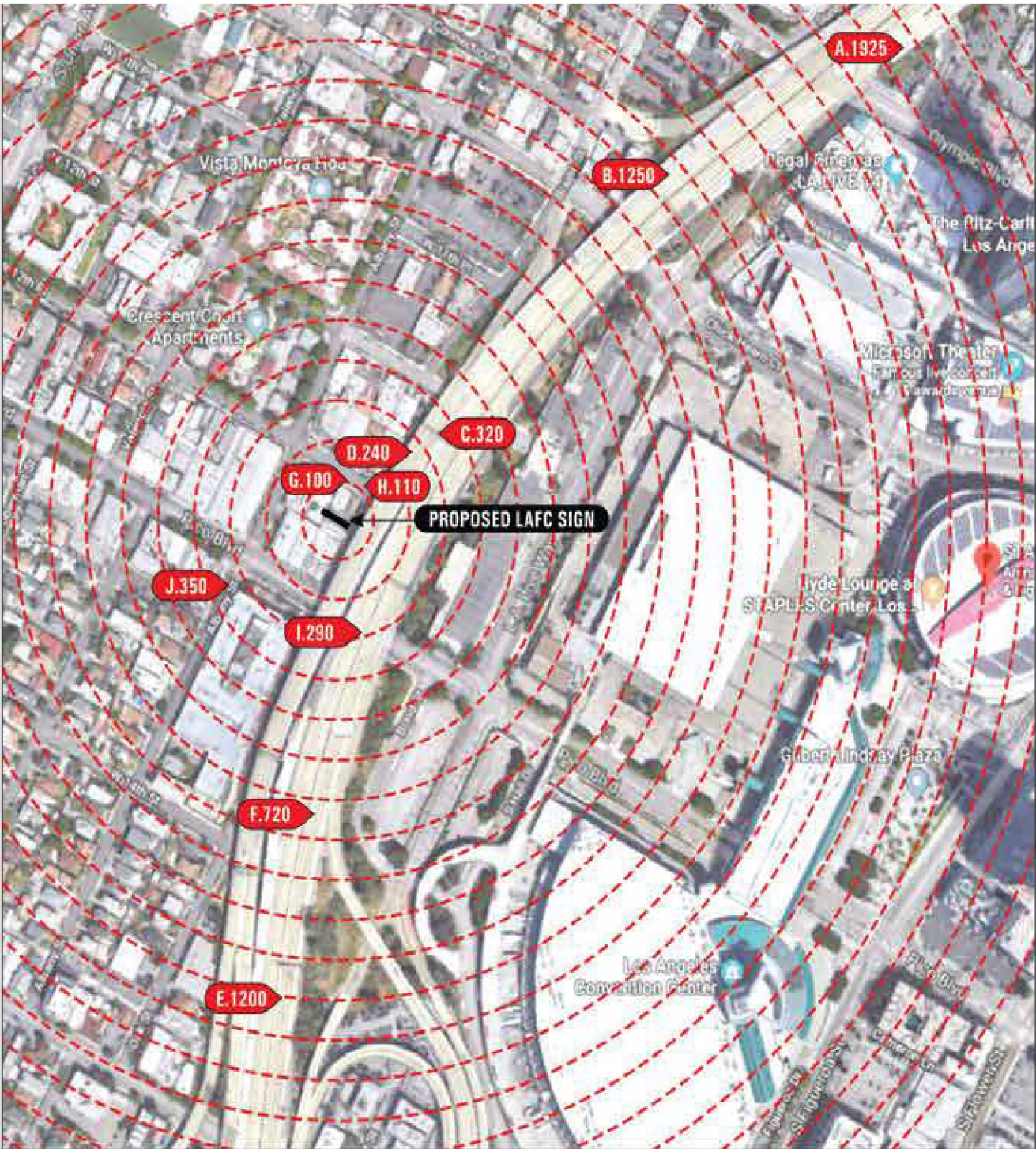
As it relates to views, visual resources in the general Project area, including within and around the MLS stadium, the Grand Avenue Site, and the 12th Place Site, include the Coliseum and landscaped open space areas within Exposition Park, the Coliseum sign located on the east side of the 110 Freeway, the downtown skyline to the north and east, and the distant San Gabriel Mountains to the north. Figure 6 through Figure 9 illustrate representative views of the proposed freeway signs in the context of some of the surrounding visual resources. 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





PLAN VIEW EACH RING REPRESENTS 100' INCREMENTS

Photo Locations For Grand Avenue Sign



EACH RING REPRESENTS 100' INCREMENTS

Photo Locations For 12th Place Sign

Figure 5  
Photo Location Maps





Photo A.83: I-110 Northbound view at 83 feet from Grand Avenue Sign  
(approximately 637 feet from Coliseum sign)



Photo B.283: I-110 Northbound view at 283 feet from Grand Avenue Sign  
(approximately 837 feet from Coliseum sign)

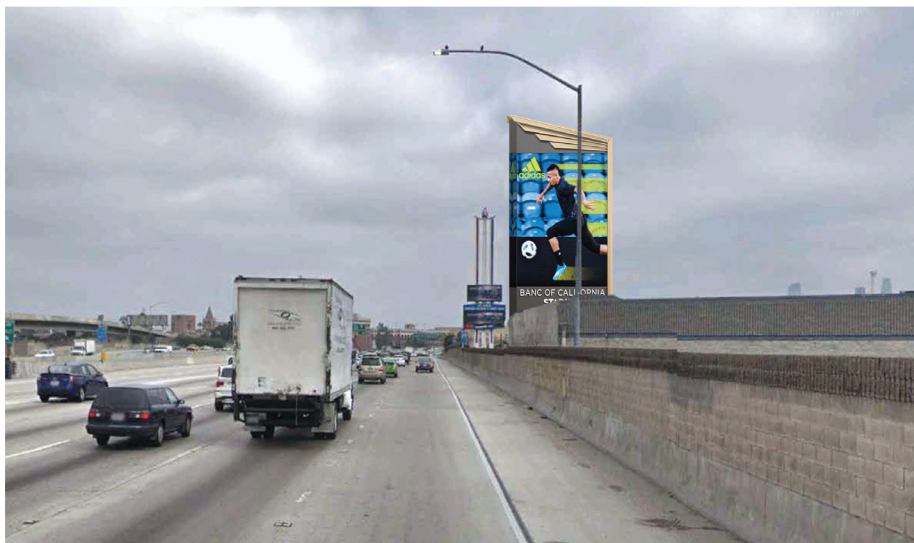


Photo C.483: I-110 Northbound view at 483 feet from Grand Avenue Sign  
(approximately 1,037 feet from Coliseum sign)

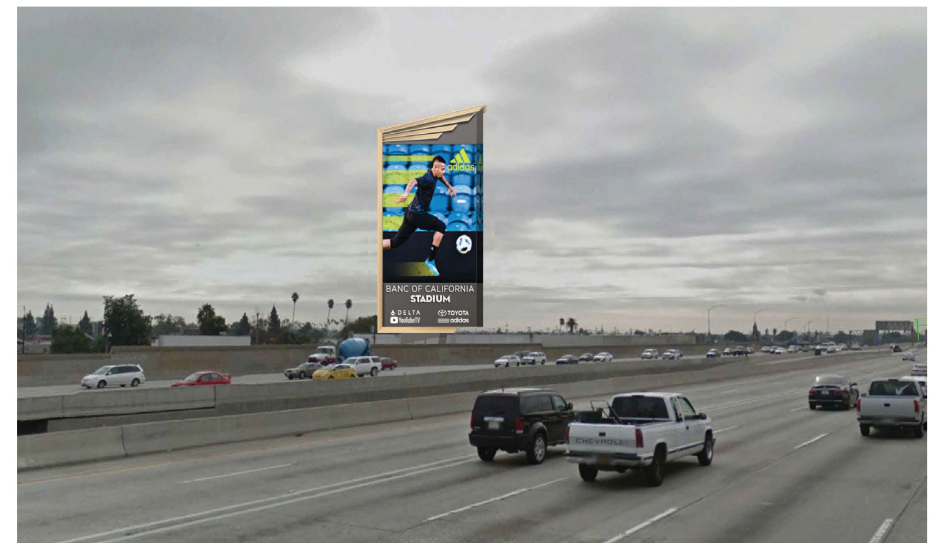


Photo D.517: I-110 Southbound view at 517 feet from Grand Avenue Sign  
(approximately 297 feet from Coliseum sign)

**Figure 6**  
Visual Simulations of Grand Avenue Sign





Photo E.583: Northwesterly view from 351 W. Martin Luther King Jr. Boulevard, located 583 feet from Grand Avenue Sign



Photo F.850: Northwesterly view from 302 W. Martin Luther King Jr. Boulevard, located 850 feet from Grand Avenue Sign

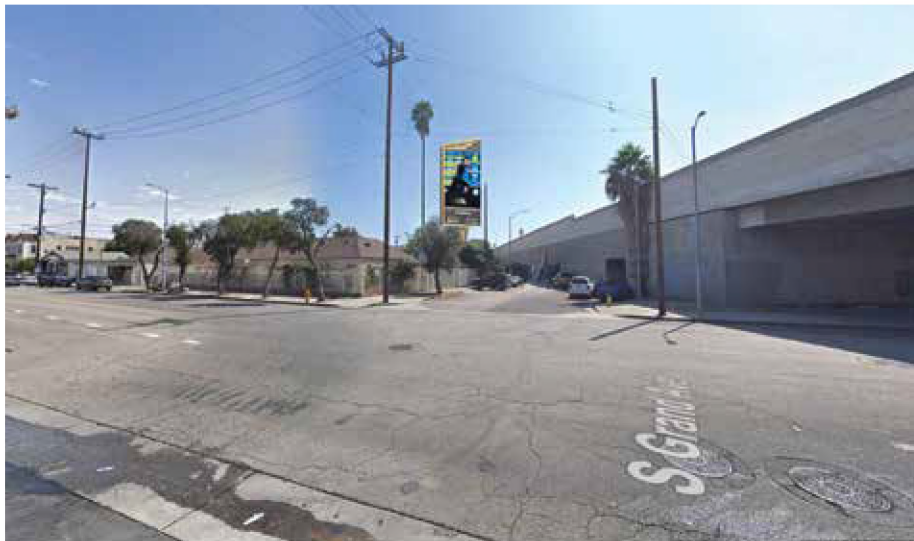


Photo G.417: Southerly view from 3899 S. Grand Avenue, located 417 feet from Grand Avenue Sign

**Figure 7**  
Visual Simulations of Grand Avenue Sign





Photo A.1925: I-110 Southbound view at 1,925 feet from 12th Place Sign



Photo B.1250: I-110 Southbound view at 1,250 feet from 12th Place Sign



Photo C.320: I-110 Southbound view at 320 feet from 12th Place Sign



Photo D.240: I-110 Southbound view at 240 feet from 12th Place Sign

**Figure 8**  
Visual Simulations of 12th Place Sign





Photo E.1200: I-110 Northbound view at 1,200 feet from 12th Place Sign



Photo F.720: I-110 Northbound view at 720 feet from 12th Place Sign



Photo G.290: I-110 Northbound view at 290 feet from 12th Place Sign

**Figure 9**  
Visual Simulations of 12th Place Sign

northbound views of the downtown skyline and the San Gabriel Mountains in the distance.<sup>14</sup>

With respect to the Grand Avenue Sign, as shown in Figure 6 on page 24, northerly views of the Coliseum sign, downtown skyline, and distant mountain ridges from specific vantage points along the 110 Freeway could be minimally affected, but any obstruction would be limited, intermittent, and transitory in nature, and views of these resources would continue to be available to motorists. With respect to the Coliseum sign in particular, view obstruction generally would be limited to locations where the Coliseum sign is barely visible (i.e., distant vantages of over 3,000 feet away) and where existing freeway overpasses already block views of the sign. Views of visual resources within Exposition Park, located west of the 110 Freeway, would not be affected due to the intervening freeway. Similarly, as shown in Figure 8 on page 26, 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.

Refer to the analysis of historic resources, below, for further discussion of potential impacts to the Coliseum sign. Also refer to the analysis of land use, below, for discussion of the Revised Project's consistency with applicable regulatory requirements related to visual character.

## 2. Light and Glare

### *(a) Construction*

Potential impacts associated with construction-related lighting and glare were not assessed in detail in the Certified EIR. The First Addendum and subsequent 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 (see Appendix A of this Fourth Addendum),

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<sup>14</sup> City of Los Angeles, *Southeast Los Angeles Community Plan, General Plan Land Use Map, August 22, 2013*; and *Westlake Community Plan, General Plan Land Use Map, February 24, 2015*.

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 anticipated to 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 Revised Project would not result in any new significant impacts with respect to construction-related lighting. No additional mitigation measures are required.

*(b) Operation*

The Certified EIR concluded that impacts with respect to light and glare during operation would be less than significant with mitigation. The First Addendum determined the Modified Project's operational lighting impacts to be less than significant, although the adopted mitigation measures would still be implemented. As the Modified Project included signage to support stadium operations and the adoption of the Sign District, the First Addendum specifically addressed signage lighting 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. In the context of this threshold and based on criteria set forth in the L.A. CEQA Thresholds Guide, as well as applicable LAMC requirements and relevant Sign District regulations, the Revised Project would have a significant impact with regard to artificial light or glare if the proposed freeway signs would result in any of the following:

- The generation of light emissions that produce a light intensity exceeding 3.0 foot-candles (fc) at the property line of a residence or other sensitive receptor.
- The generation of a light intensity exceeding 0.6 fc above ambient illuminance or a brightness after sunset and before sunrise that exceeds 600 candelas per



square meter ( $\text{cd}/\text{m}^2$ , also sometimes referred to as nits) when measured for each sign individually at an angle that is within 6 degrees perpendicular to the sign face and from a distance defined by the following formula:

$$\text{Measurement Distance (in feet)} = \sqrt{\text{DisplayArea} \times 100}$$

where Display Area is the area of the sign display in square feet.

- The creation of new high contrast conditions visible within a field of view from a sensitive receptor.
- The incorporation of substantial amounts of highly reflective building materials or signage (i.e., daytime glare) in areas that are highly visible to off-site glare-sensitive uses.

The proposed freeway signs would not include any highly reflective building materials or signage that might reflect sun light and cause glare. Therefore, impacts with respect to the latter significance threshold would not occur as a result of the Revised Project.

A detailed analysis of the potential light and glare impacts associated with the Revised 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, which are provided in Appendix B and Appendix B1, respectively, of this Fourth Addendum. 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 discussed in the 2018 Lighting Report, illuminance is defined as the measured amount of illumination that falls on a given area from a light source, and glare (also referred to as contrast) is defined as the magnitude of the sensation that results when an individual views a surface from which light comes to the eye. 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 summary of these analyses is provided below for each of the two freeway signs proposed under the Revised Project.

(i) *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.

The following light-sensitive receptors were identified and evaluated in the 2018 Lighting Report, as shown in Figure 3 therein:

- **Receptor Site B1:** Receptor B1 is located west of the Grand Avenue Site, to the west of I-110 and on the west side of Flower Street. This receptor represents the nearest residential use to the west.
- **Receptor Site B2:** Receptor B2 is located adjacent to the northern property line of the Grand Avenue Site. This receptor represents the nearest residential use to the north.
- **Receptor Site B3:** Receptor B3 is located near the eastern property line of the Grand Avenue Site, across an alley. This receptor represents the nearest residential use to the east.

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 the I-110 freeway, and medium to high illuminance within commercial and industrial properties to the immediate southeast as well as north of 39th Street 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 receptor site, 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 for the human eye to perceive and indicate a potential glare condition); medium (between 10:1 and 30:1, which will not introduce a new source of glare); and low (under 10:1, which also will not introduce a new source of glare). Contrast ratios less than 3:1 are not visible and are considered to be 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. At all three receptor sites, the contrast ratio based on existing measured luminance is considered low, with ratios ranging from 2.7 to 5.3.

#### Illuminance/Light Trespass

The potential brightness of the Grand Avenue Sign at full power in an all-white setting would be 7,500 cd/m<sup>2</sup>. The Grand Avenue Sign would be limited to 6,750 cd/m<sup>2</sup>

during the daytime. In accordance with proposed Project Design Feature (PDF) A-7 (set forth below and incorporated into the MMP provided in Appendix A of this Fourth Addendum), at night, the sign would be limited to a maximum of 300 cd/m<sup>2</sup>, consistent with the January 10, 2019 recommendation of the Los Angeles City Planning Commission. However, a nighttime luminance of 600 cd/m<sup>2</sup> is evaluated below, as that was the maximum proposed brightness, consistent with the approved Sign District, prior to the City Planning Commission recommendation which is now reflected in PDF A-7.<sup>15</sup> 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.

Table 8 of the 2018 Lighting Report summarizes the results of the illuminance calculations and identifies the maximum, minimum, and average illuminance light trespass resulting from the Grand Site Sign. As detailed therein, the maximum illuminance would be 0.31 fc at Receptor B1, 1.94 fc at Receptor B2, and 1.81 fc at Receptor B3. Thus, the Grand Avenue Sign's illuminance would fall below the LAMC significance threshold of 3.0 fc for signs at all three receptors. 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. At the revised maximum nighttime luminance of 300 cd/m<sup>2</sup> for all sign faces per PDF A-7, impacts would be further reduced.

The Grand Avenue Sign also was analyzed for consistency with the approved Sign District's requirement that signs not generate light intensity exceeding 0.6 fc above ambient illuminance or a brightness after sunset and before sunrise that exceeds 600 cd/m<sup>2</sup> when measured for each sign individually at an angle that is within 6 degrees perpendicular to the sign face and from a distance defined by the following formula:

$$\text{Measurement Distance (in feet)} = \sqrt{\text{DisplayArea} \times 100}$$

where Display Area is the area of the sign display in square feet.

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<sup>15</sup> The 2018 Lighting Report evaluated the freeway signs with a maximum luminance of 600 cd/m<sup>2</sup> during nighttime hours for the Grand Avenue Sign and a maximum luminance of 600 cd/m<sup>2</sup> during nighttime hours for the 12th Place Sign's south-facing sign face and 450 cd/m<sup>2</sup> for the north- and east-facing sign faces. On January 10, 2019, the Los Angeles City Planning Commission recommended that the maximum luminance during nighttime hours be limited to 300 cd/m<sup>2</sup> for all sign faces of both the Grand Avenue Sign and the 12th Place Sign. Reducing the maximum luminance of the freeway signs to 300 cd/m<sup>2</sup> would further reduce the light trespass and glare impacts at light-sensitive land uses than were analyzed in the 2018 Lighting Report (as summarized above) and which the 2018 Lighting Report concluded would be less than significant under applicable thresholds. Accordingly, lighting impacts to light-sensitive land uses would be further reduced and would remain less than significant.

Consistency with the Sign District was analyzed using two methods of calculations: (1) inverse square law calculations; and (2) computer model illuminance calculations. Based on the first method and assuming a maximum sign luminance or brightness of 600 cd/m<sup>2</sup> (per approved Sign District requirements), the calculated illuminance for each sign face would be 0.56 fc, which would fall below the Sign District maximum of 0.6 fc. Based on the second method, the calculated illuminance would be 0.29 fc for the north and south sign faces and 0.54 fc for the west sign face, all of which would fall below the Sign District maximum of 0.6 fc. Accordingly, the Grand Avenue Sign would comply with the approved Sign District threshold, and light trespass impacts with respect to Sign District requirements would be less than significant. At the revised maximum nighttime luminance of 300 cd/m<sup>2</sup> for all sign faces per PDF A-7, impacts would be further reduced.

Therefore, light trespass impacts for the Grand Avenue Sign would be less than significant under the applicable LAMC and Sign District requirements.

### Glare

The potential for glare is determined by the calculated contrast ratio, which is measured as a comparison of the Grand Avenue Sign's maximum light output (luminance) of 600 cd/m<sup>2</sup> at night with the average luminance within the surrounding field of view. As detailed in the 2018 Lighting Report, the calculated contrast ratio would be 0.8 at Receptor B1, 3.0 at Receptor B2, and 0.9 at Receptor B3, all of which would represent low contrast conditions. Therefore, the Grand Avenue Sign would have a less than significant glare impact. At the revised maximum nighttime luminance of 300 cd/m<sup>2</sup> for all sign faces per PDF A-7, impacts would be further reduced.

### *(ii) 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. The following light-sensitive receptors were identified and evaluated in the 2018 Lighting Report, as shown in Figure 2 therein:

- **Receptor Site A1:** Receptor A1 is located at the northwest corner of Albany Street and 12th Place. This receptor is located at the nearest point of a residential development within that city block.
- **Receptor Site A2:** Receptor A2 is located on the north side of 12th Place, across the street from the 12th Place Site. This receptor represents the nearest residential use.

- **Receptor Site A3:** Receptor A3 is located northwest of the 12th Place Sign, at the northwest corner of Albany Street and West 12th Street. This receptor is located at the nearest point of a residential development within that city block.
- **Receptor Site A4:** Receptor A4 is located on the west side of Albany Street, south of Pico Boulevard. Located southwest of the 12th Place Sign, this receptor represents the nearest residential uses to the southwest.

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. As previously indicated, low contrast is defined as a ratio under 10:1, which also will introduce a new source of glare, while contrast ratios less than 3:1 are not visible and are considered to be uniform brightness. At all four receptor sites, the contrast ratio is considered low, with ratios ranging from 2.8 to 6.5.

#### Illuminance/Light Trespass

The potential brightness of the 12th Place Sign at full power in an all-white setting would be 7,500 cd/m<sup>2</sup>. The 12th Place Sign would be limited to 6,750 cd/m<sup>2</sup> during the daytime. In accordance with proposed PDF A-7 (set forth below and incorporated into the MMP provided in Appendix A of this Fourth Addendum), at night, the sign would be limited to 300 cd/m<sup>2</sup>, consistent with the January 10, 2019 recommendation of the Los Angeles City Planning Commission. However, nighttime luminance of 450 cd/m<sup>2</sup> for the sign's north and east faces and 600 cd/m<sup>2</sup> for the south face is evaluated below, as those were the maximum proposed brightness levels prior to the City Planning Commission recommendation which is now reflected in PDF A-7. 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.

Table 6 of the 2018 Lighting Report summarizes the results of the illuminance calculations and identifies the maximum, minimum, and average illuminance light trespass resulting from the 12th Place Sign. As detailed therein, the maximum illuminance would be 0.38 fc at Receptor A1, 2.98 fc at Receptor A2 (closest to the 12th Place Sign), 0.12 fc at Receptor A3, and 0.12 fc at Receptor A4. Thus, the 12th Place Sign's illuminance would fall below the LAMC significance threshold of 3.0 fc for signs at all four receptors. 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. At the revised maximum nighttime luminance of 300 cd/m<sup>2</sup> for all sign faces per PDF A-7, impacts would be further reduced.

The 12th Place Sign also was analyzed for consistency with the approved Sign District's requirement that signs not generate light intensity exceeding 0.6 fc above ambient illuminance or a brightness after sunset and before sunrise that exceeds 600 cd/m<sup>2</sup> when measured for each sign individually at an angle that is within 6 degrees perpendicular to the sign face and from a distance defined by the following formula:

$$\text{Measurement Distance (in feet)} = \sqrt{\text{DisplayArea} \times 100}$$

where Display Area is the area of the sign display in square feet.

Consistency with the Sign District was analyzed using two methods of calculations: (1) inverse square law calculations; and (2) computer model illuminance calculations. Based on the first method, the calculated illuminance for the north and east sign faces would be 0.42 fc, while the south sign face would be 0.56 fc, all of which would fall below the Sign District maximum of 0.6 fc. Based on the second method, the calculated illuminance would be 0.22 for the north face, 0.29 for the south face, and 0.41 for the east face, all of which would fall below the Sign District maximum of 0.6 fc. Accordingly, the 12th Place Sign would comply with the approved Sign District threshold, and light trespass impacts with respect to Sign District requirements would be less than significant. At the revised maximum nighttime luminance of 300 cd/m<sup>2</sup> for all sign faces per PDF A-7, impacts would be further reduced.

Therefore, light trespass impacts for the 12th Place Sign would be less than significant under the applicable LAMC and Sign District requirements.

### Glare

The potential for glare is determined by the calculated contrast ratio, which is measured as a comparison of the maximum light output (luminance) of each side of the 12th Place Sign with the average luminance within the surrounding field of view. The 2018 Lighting Report conservatively evaluated the sign's north and east faces with a luminance of 450 cd/m<sup>2</sup> and the south face at 600 cd/m<sup>2</sup>. Based on that analysis, the calculated contrast ratio would be 0.5 at Receptor A1, 0.4 at Receptor A2, 0.9 at Receptor A3, and 0.7 at Receptor A4, all of which would represent low contrast conditions. Therefore, the 12th Place Sign would have a less than significant glare impact. At the revised maximum luminance of 300 cd/m<sup>2</sup> for all sign faces per PDF A-7, impacts would be further reduced.

*(iii) 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 provided in Appendix B1 of this Fourth Addendum. 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, specifically CVC Chapter 2, Article 3 which prohibits light of such a brilliance as to impair the vision of drivers upon the highway. As summarized below, the freeway signs would meet the CVC standard for roadways and would not impair driver vision. The analysis assumes the luminance or brightness of every sign face on both freeway signs would be limited to 300 cd/m<sup>2</sup> during nighttime hours, consistent with the January 10, 2019 recommendation of the Los Angeles City Planning Commission and as set forth below in PDF A-7.<sup>16</sup>

To provide a conservative analysis, the 2019 Lighting Report evaluates the luminance of the freeway signs (300 cd/m<sup>2</sup>) 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. In addition, the analysis is based on conservative assumptions under which the freeway signs would be visible within the centerline of the driver's field of view (i.e., a viewing angle of 0 degree) and the minimum measured brightness (i.e., surface luminance) within the driver's field of view would be less than 10 footlamberts (fL), which together result in a maximum allowable luminance of 500 fL per the CVC.<sup>17</sup> Accordingly, the analysis of the most conservative conditions at night evaluates the proposed freeway signs against a maximum luminance threshold of 500 fL, which is equivalent to 1,579 cd/m<sup>2</sup>. Given that all sign faces on both freeway signs would be limited to 300 cd/m<sup>2</sup> (equivalent to 95.4 fL) during nighttime hours, as provided in PDF A-7, the

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<sup>16</sup> As discussed above, the 2018 Lighting Report evaluated the freeway signs with a maximum luminance of 600 cd/m<sup>2</sup> during nighttime hours for the Grand Avenue Sign and a maximum luminance of 600 cd/m<sup>2</sup> during nighttime hours for the 12th Place Sign's south-facing sign face and 450 cd/m<sup>2</sup> for the north- and east-facing sign faces. The Los Angeles City Planning Commission recommended that the maximum luminance during nighttime hours be limited to 300 cd/m<sup>2</sup> for both the Grand Avenue Sign and the 12th Place Sign. Reducing the maximum luminance of the freeway signs to 300 cd/m<sup>2</sup> would further reduce the light trespass and glare impacts at light-sensitive land uses than were analyzed in the 2018 Lighting Report (as summarized above) and which the 2018 Lighting Report concluded would be less than significant under applicable thresholds. Accordingly, lighting impacts to light-sensitive land uses would be further reduced and would remain less than significant.

<sup>17</sup> Measured brightness (in footlamberts) is the visible light energy reflected from a surface. The intensity of the measured brightness is a function of the incident light on a surface (measured in footcandles) and the reflectance properties of the surface. For example, black roadway asphalt pavement is a dark surface with a very low light reflectance of less than 10 percent. Therefore, only 10 percent of the light on a dark pavement surface is reflected back as visible light. When ambient light is approximately 100 footcandles, the measured brightness on black pavement will be less than 10 footlamberts because less than 10 percent of the light striking the pavement will be reflected back to the driver's eyes.

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 transition period from day to night, from 20 minutes before sunset to 20 minutes after sunrise), which represent a minimum ambient luminance condition (i.e., low level sunlight conditions). The freeway signs would be operated with an electronic control system that based on the 2019 Lighting Report must slowly dim the signs from the daytime luminance to 1,500 cd/m<sup>2</sup> (477.5 fL) 20 minutes prior to sunset and further dim the signs to 300 cd/m<sup>2</sup> by sunset.<sup>18</sup> 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/m<sup>2</sup> 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/m<sup>2</sup> 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/m<sup>2</sup>), the signs would not exceed the threshold and thus would not impair the vision of drivers during twilight.

The evaluation of glare during daytime (20 minutes after sunrise until 20 minutes before sunset) 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/m<sup>2</sup> during daytime hours, the signs' maximum brightness of 7,500 cd/m<sup>2</sup> was evaluated to provide a conservative analysis of daytime impacts.<sup>19</sup> This maximum luminance of 7,500 cd/m<sup>2</sup> (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/m<sup>2</sup> (2,381 fL) to 1,500 cd/m<sup>2</sup> (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.

Accordingly, the freeway signs would not create a new source of glare as defined by the CVC during any time of day or night. The freeway signs would not exceed the maximum allowable luminance thresholds, would not introduce a source of distracting glare

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<sup>18</sup> *An electronic control system is required by Sign District Section 8.1.*

<sup>19</sup> *The maximum potential brightness of each sign face of the freeway signs operating at full power in an all-white setting would be 7,500 cd/m<sup>2</sup>.*



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.

*(iv) Light and Glare Conclusion*

Based on the analysis in the 2018 Lighting Report and the 2019 Lighting Report, the Revised Project would not result in any new or more severe significant impacts with respect to operational light or glare. The Revised Project's light and glare impacts would be within the envelope of impacts evaluated in the Certified EIR and the Addenda, and no additional mitigation measures are required.

### 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).<sup>20</sup>

*(a) Grand Avenue Sign*

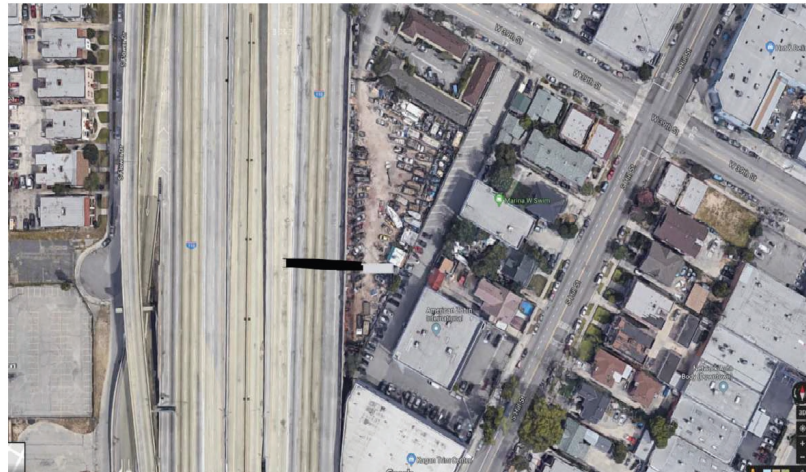
Shadow-sensitive uses in proximity to the Grand Avenue Site include multi-family residential uses to the immediate north, multi-family residential uses further north across 39th Avenue, and single- and multi-family residential uses to the east across an alley, as well as further to the east. The 110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

As described above, the Grand Avenue Sign would reach a maximum height of approximately 135 feet, with a maximum width of 46 feet (from west to east) and a depth of 12 feet (from north to south). 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 39 through 41. Given

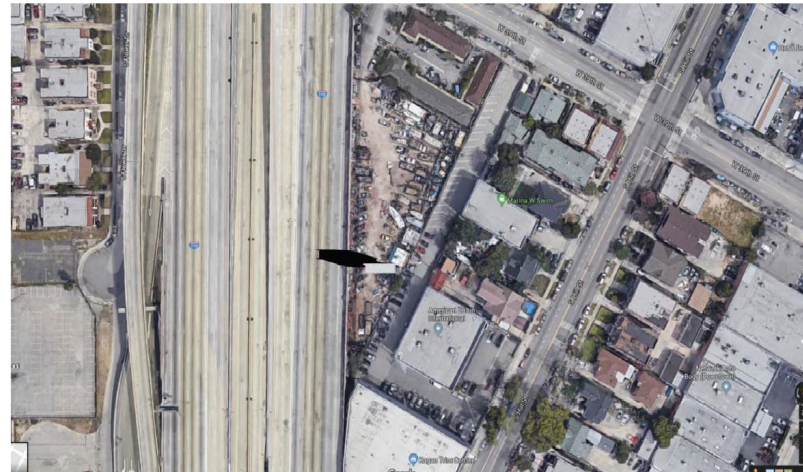
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<sup>20</sup> *Shade-sensitive uses under the L.A. CEQA Thresholds Guide include routinely useable outdoor spaces associated with residential, recreational, or institutional (e.g., schools, convalescent homes) land uses; commercial uses such as pedestrian-oriented outdoor spaces or restaurants with outdoor dining areas; nurseries; and existing solar collectors.*

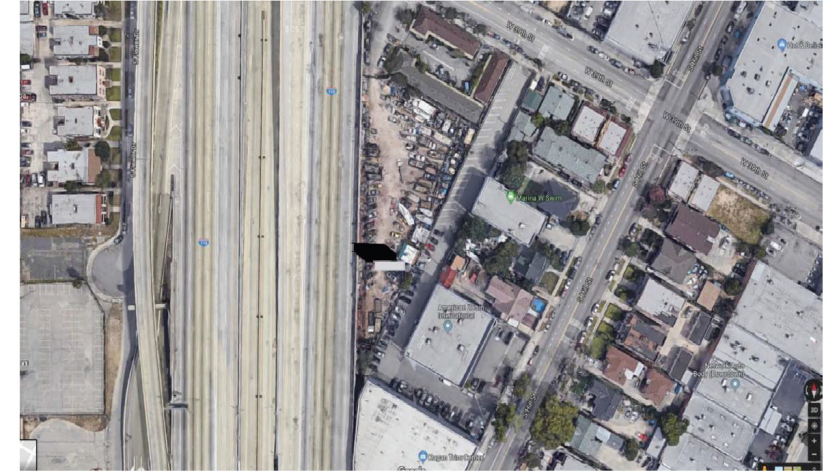




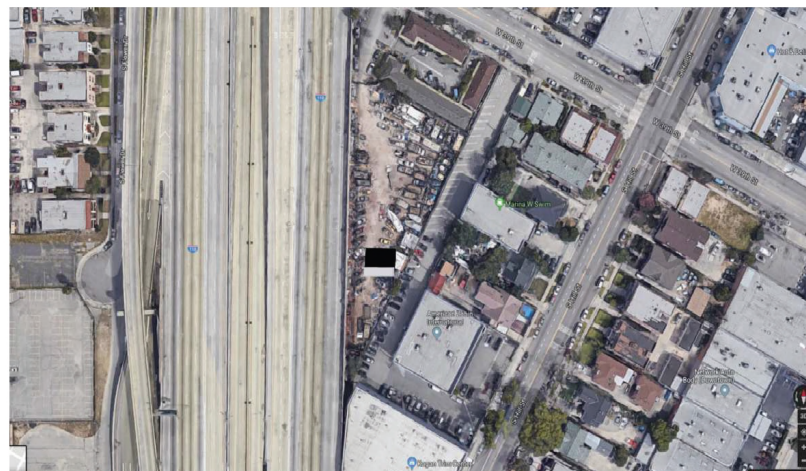
Summer Solstice - 9am shadows



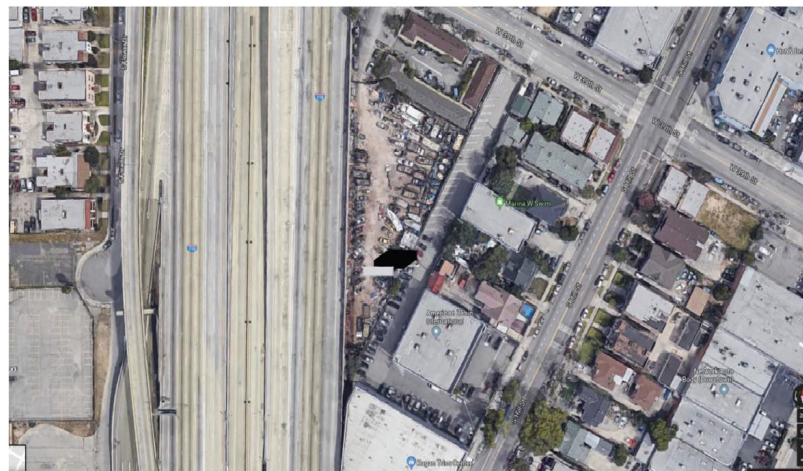
Summer Solstice - 10am shadows



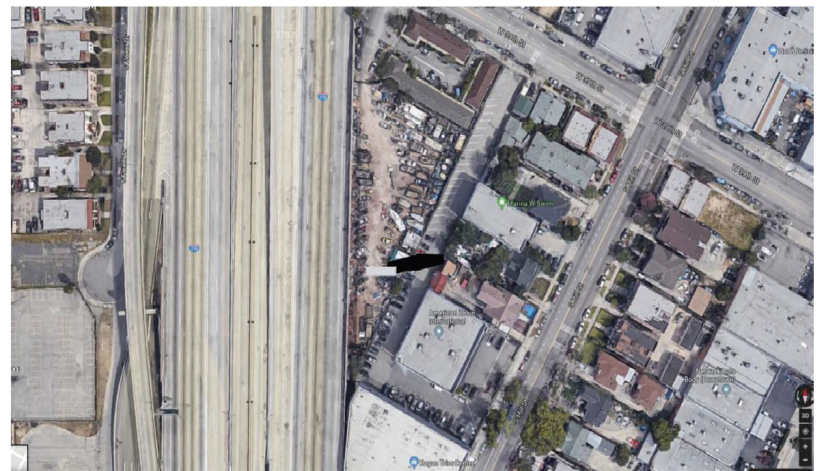
Summer Solstice - 11am shadows



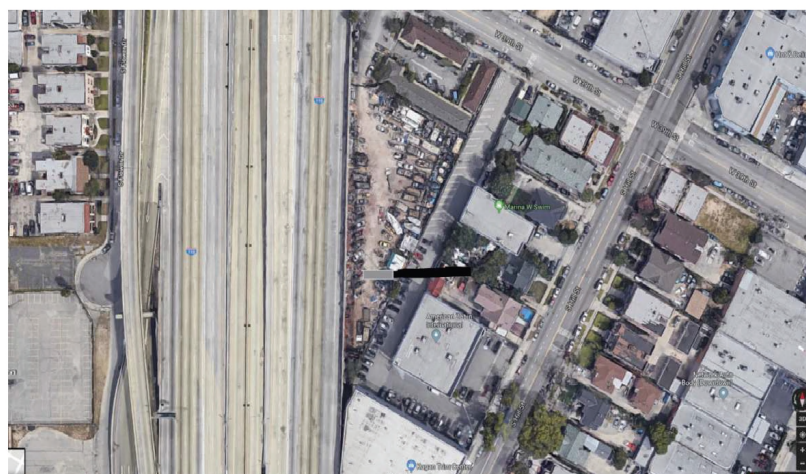
Summer Solstice - 12pm shadows



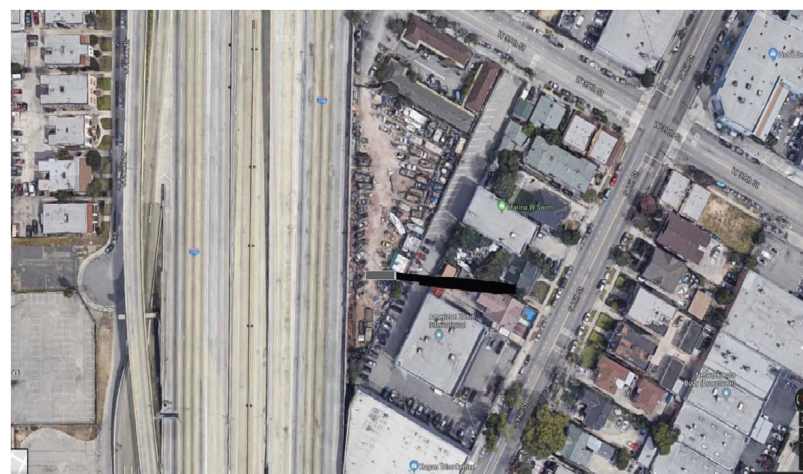
Summer Solstice - 1pm shadows



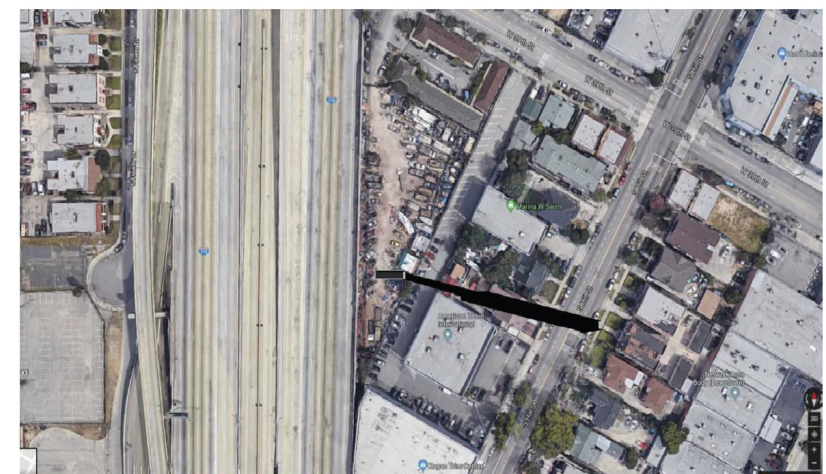
Summer Solstice - 2pm shadows



Summer Solstice - 3pm shadows



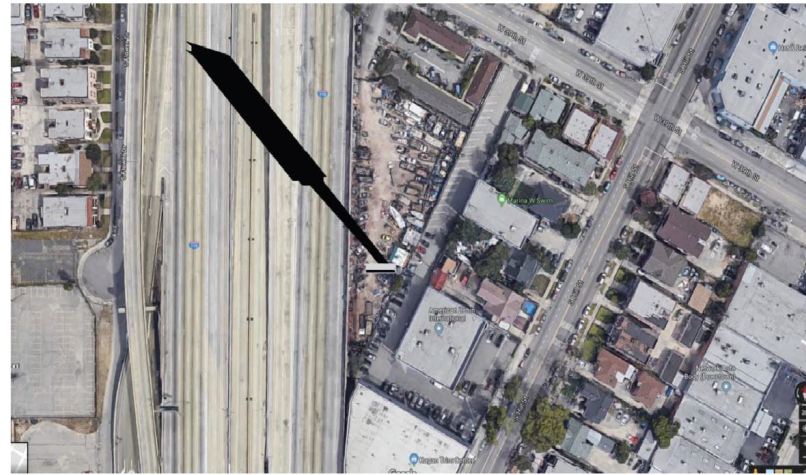
Summer Solstice - 4pm shadows



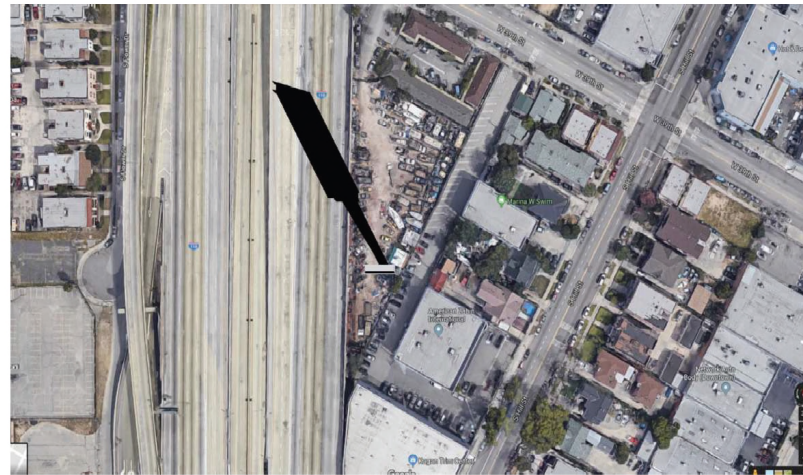
Summer Solstice - 5pm shadows

**Figure 10**  
Grand Avenue Sign—Summer Solstice Shadows

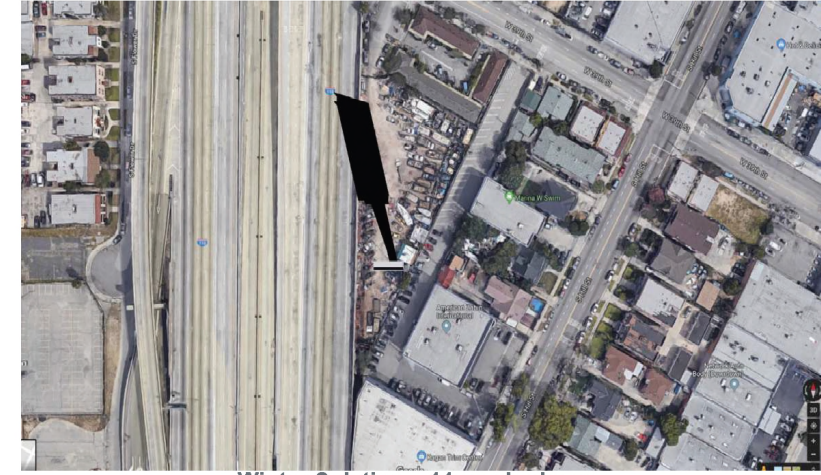




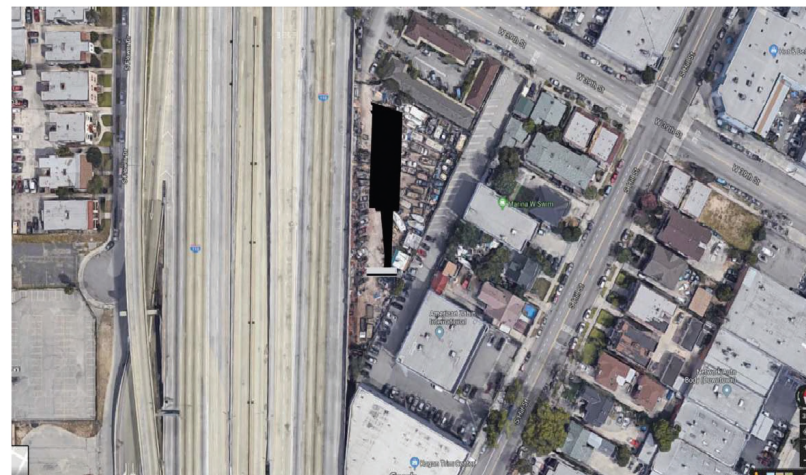
Winter Solstice - 9am shadows



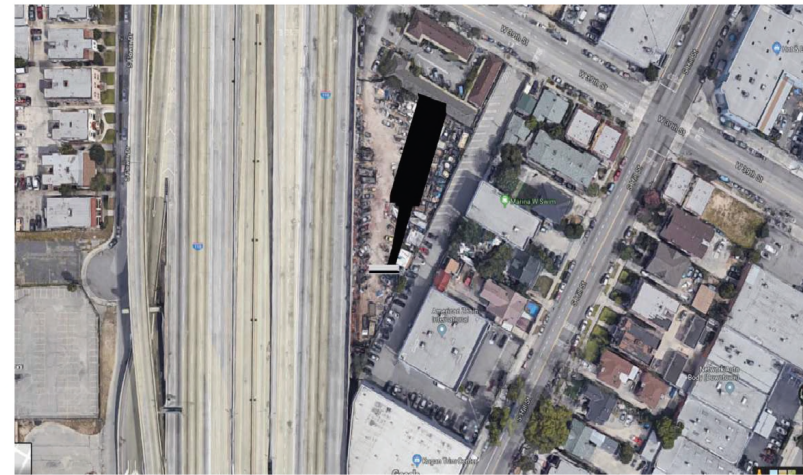
Winter Solstice - 10am shadows



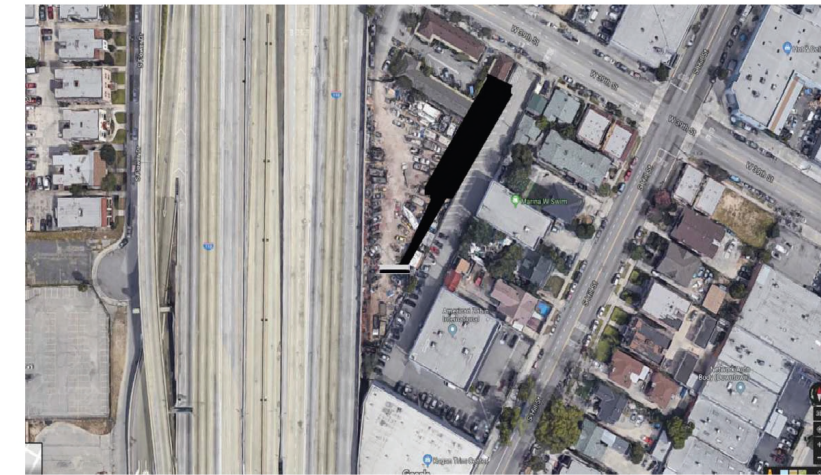
Winter Solstice - 11am shadows



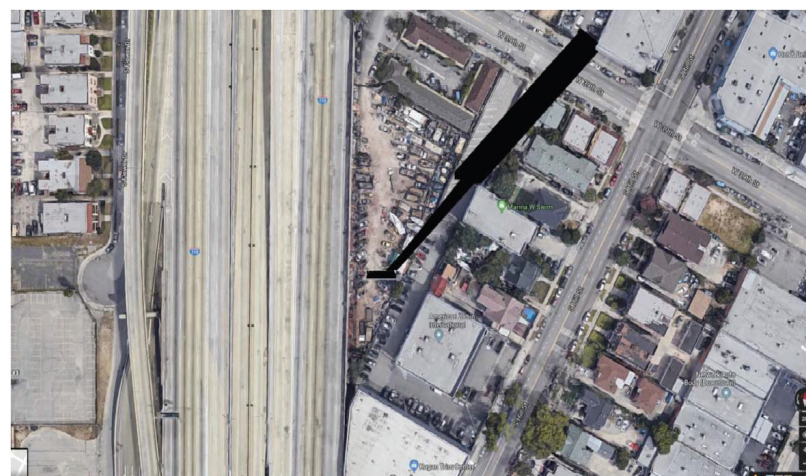
Winter Solstice - 12pm shadows



Winter Solstice - 1pm shadows



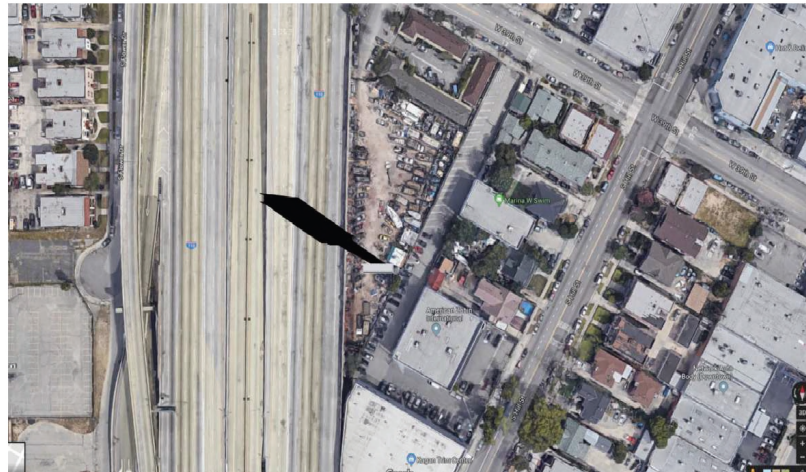
Winter Solstice - 2pm shadows



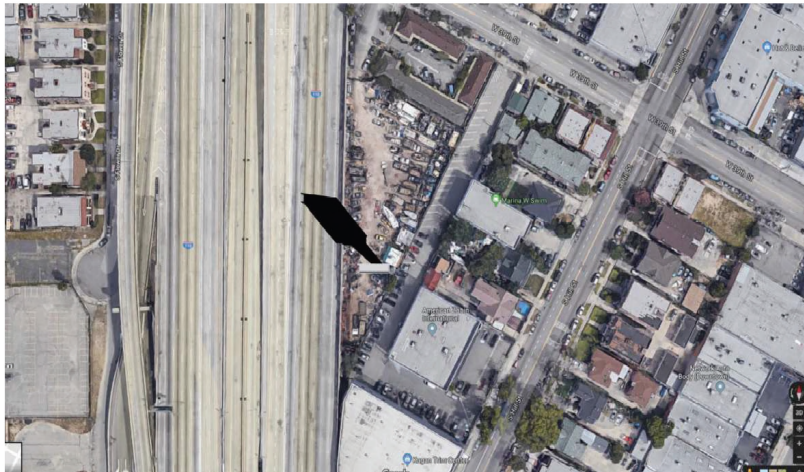
Winter Solstice - 3pm shadows

**Figure 11**  
Grand Avenue Sign—Winter Solstice Shadows

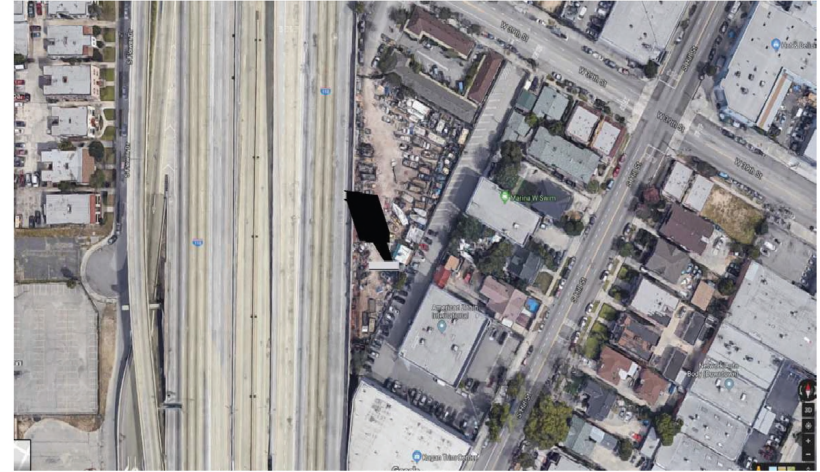




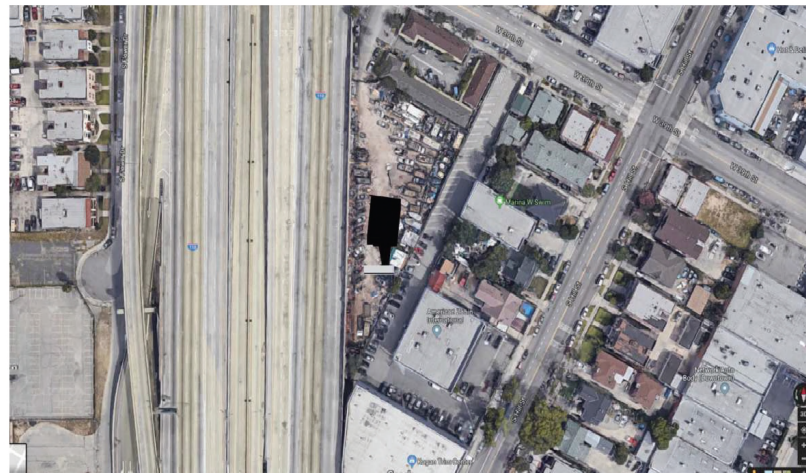
Spring/Fall -9am shadows



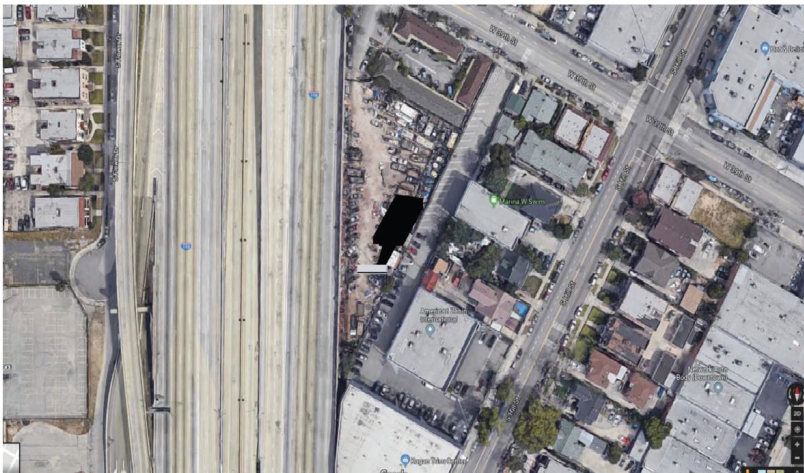
Spring/Fall -10am shadows



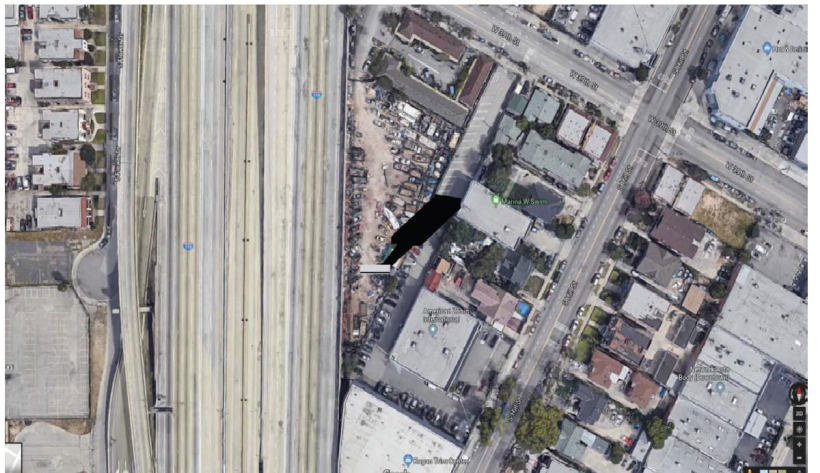
Spring/Fall -11am shadows



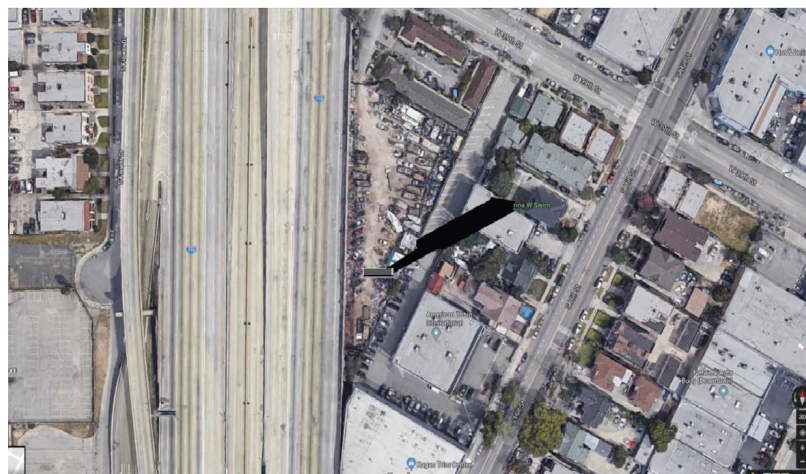
Spring/Fall - 12pm shadows



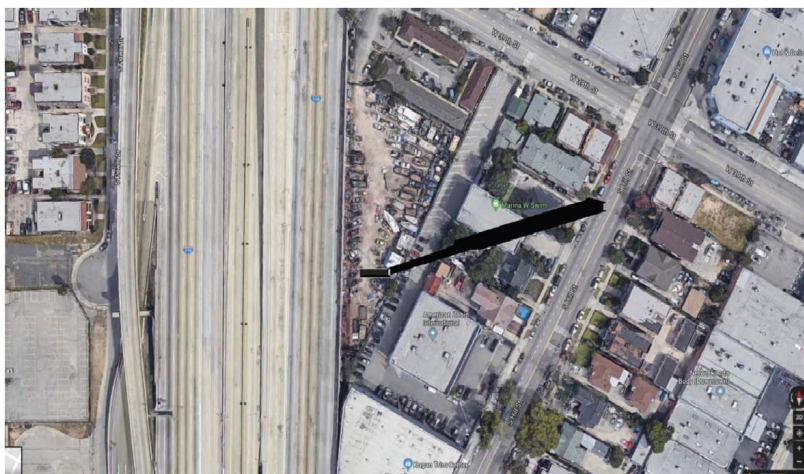
Spring/Fall - 1pm shadows



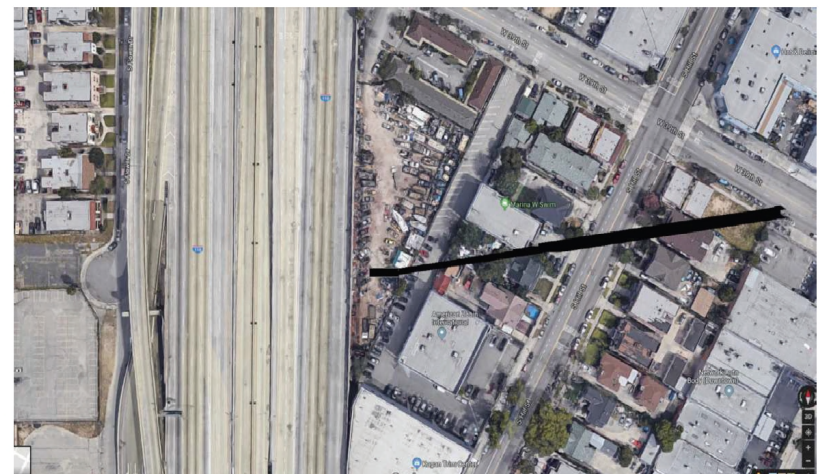
Spring/Fall - 2pm shadows



Spring/Fall - 3pm shadows



Spring/Fall - 4pm shadows



Spring/Fall - 5pm shadows

**Figure 12**  
Grand Avenue Sign—Spring/Fall Equinox Shadows



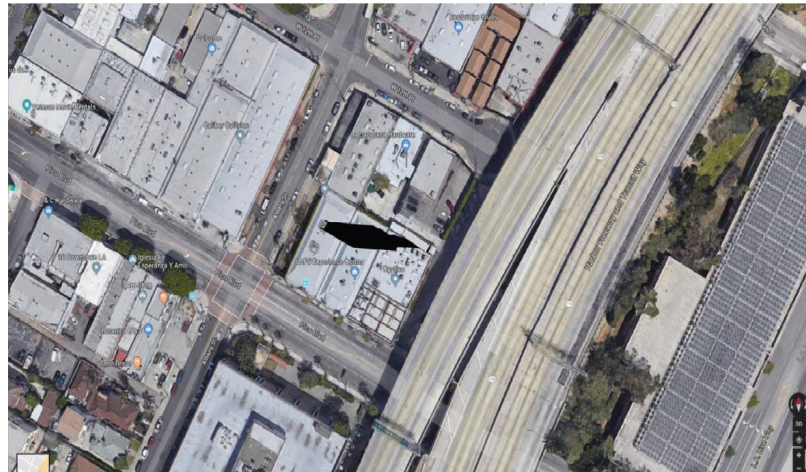
the slender profile of the sign, shadows would transition quickly across neighboring properties throughout the course of the day. Specifically, as shown in Figure 10 on page 39, summer shadows would not affect any shade-sensitive property or use until approximately 2:00 P.M.; accordingly, shading for more than four hours between the hours of 9:00 A.M. and 5:00 P.M. would not occur. As shown in Figure 11 on page 40, during winter portions of the residential property to the immediate north would be affected by shadows from just before 1:00 P.M. to sometime between 2:00 and 3:00 P.M.; therefore, shading for more than three hours between the hours of 9:00 A.M. and 3:00 P.M. would not occur. Finally, as shown in Figure 12 on page 41, spring and fall shadows would begin to affect residences to the east at approximately 2:00 P.M.; however, shading for more than four hours between the hours of 9:00 A.M. and 5:00 P.M. would not occur. 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*

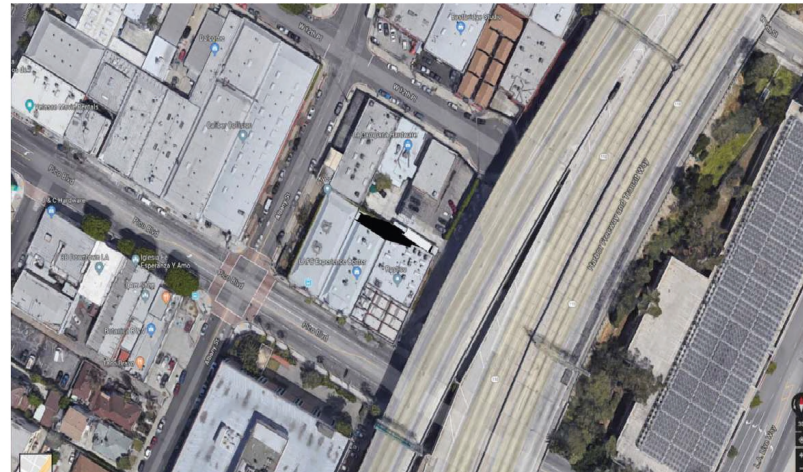
The 12th Place Site is nearly entirely surrounded by commercial and light industrial uses. Nearby shadow-sensitive uses include a small residential community one block to the northwest, and a series of small residential buildings within a commercial manufacturing (CM) zone to the immediate north across 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.

As previously described, the 12th Place Sign would reach a maximum height of approximately 135 feet, with a maximum width of 46 feet (from west to east) and a depth of 12 feet (from north to south). 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 43 through 45. Given the slender profile of the sign, shadows would transition quickly across neighboring properties throughout the course of the day. Specifically, as shown in Figure 13, summer shadows would not affect any shade-sensitive property or use at any time between the hours of 9:00 A.M. and 5:00 P.M. As shown in Figure 14, winter shadows would affect the residential uses to the immediate north from between 12:00 and 1:00 P.M. to between 2:00 and 3:00 P.M.; therefore, shading for more than three hours between the hours of 9:00 A.M. and 3:00 P.M. would not occur. Finally, as shown in Figure 15, spring and fall shadows would not affect any shade-sensitive property or use at any time between the hours of 9:00 A.M. and 5:00 P.M. 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.

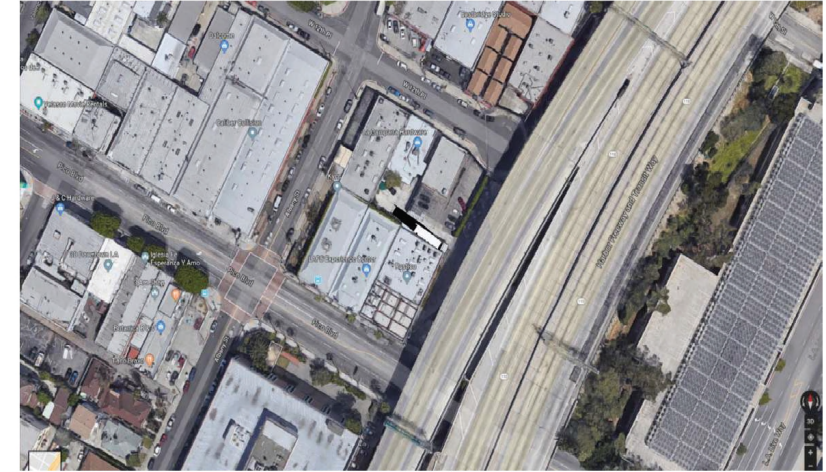




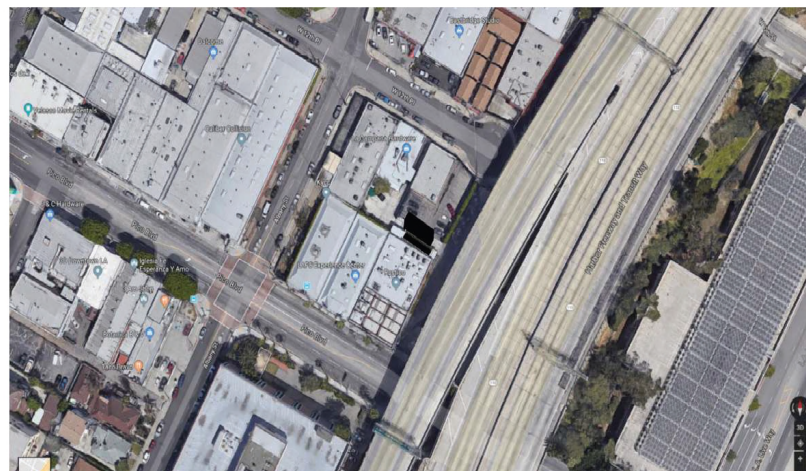
Summer Solstice - 9am shadows



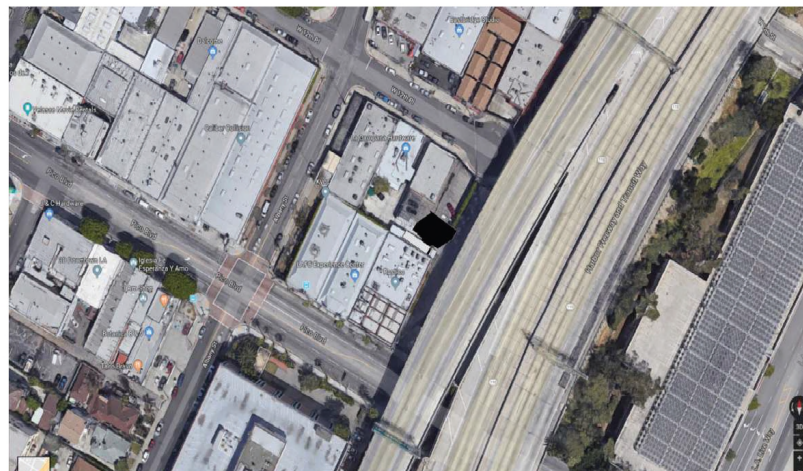
Summer Solstice - 10am shadows



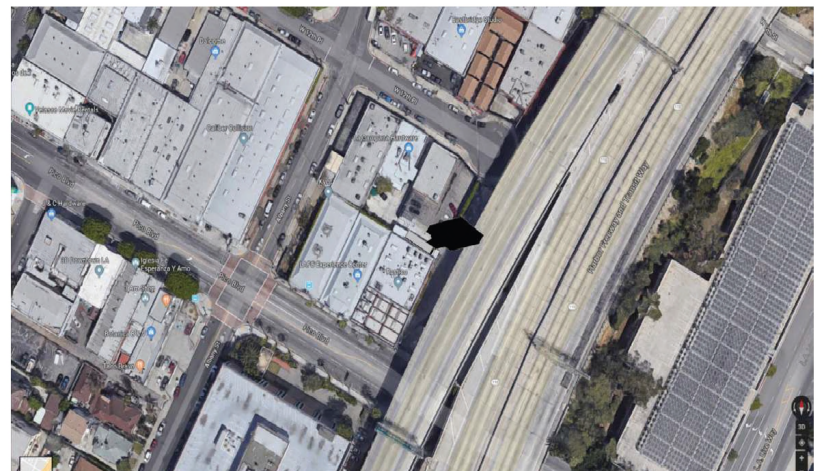
Summer Solstice - 11am shadows



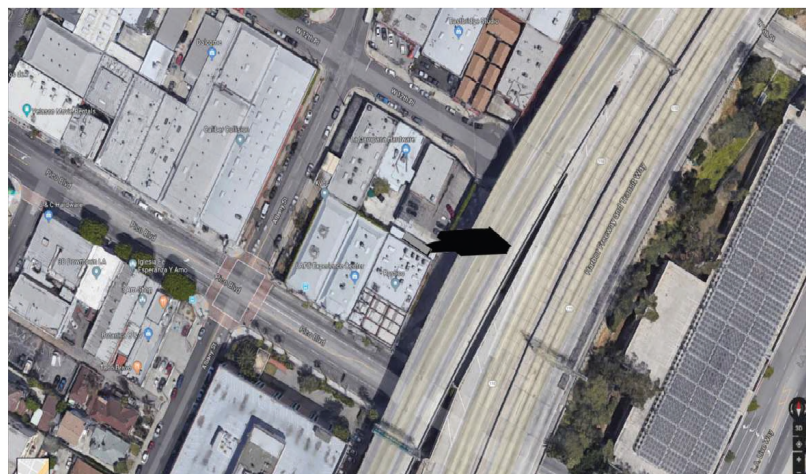
Summer Solstice - 12pm shadows



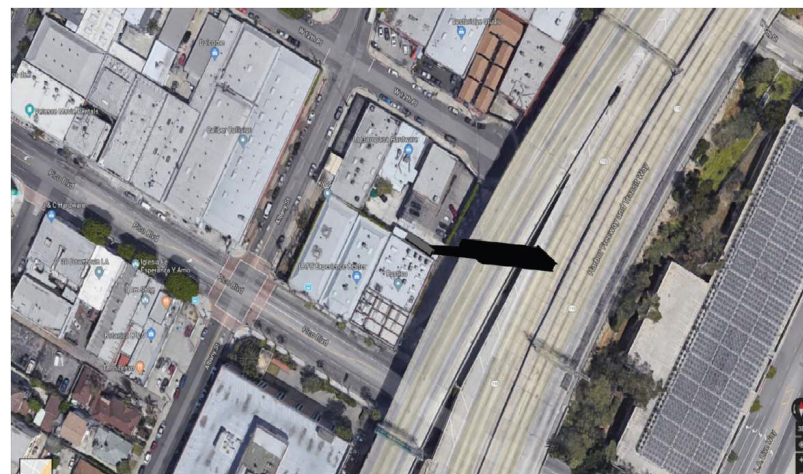
Summer Solstice - 1pm shadows



Summer Solstice - 2pm shadows



Summer Solstice - 3pm shadows



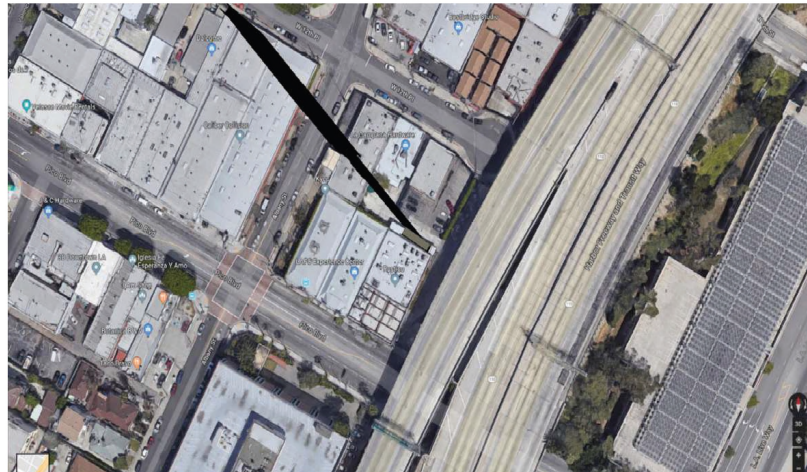
Summer Solstice - 4pm shadows



Summer Solstice - 5pm shadows

**Figure 13**  
12th Place Sign—Summer Solstice Shadows

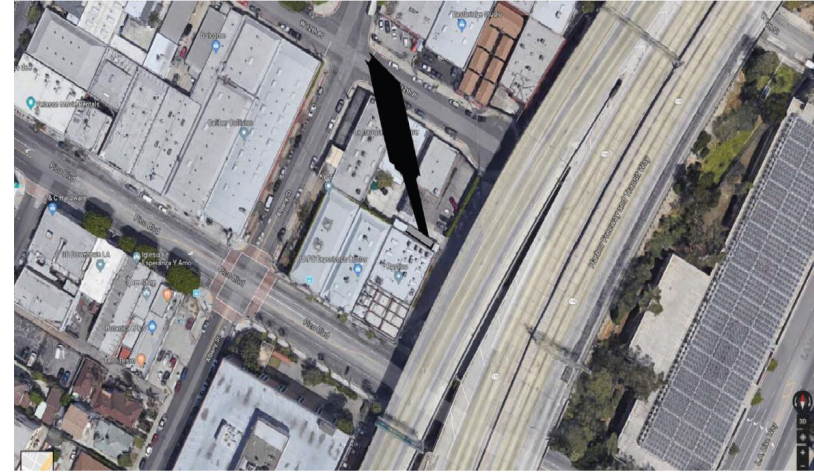




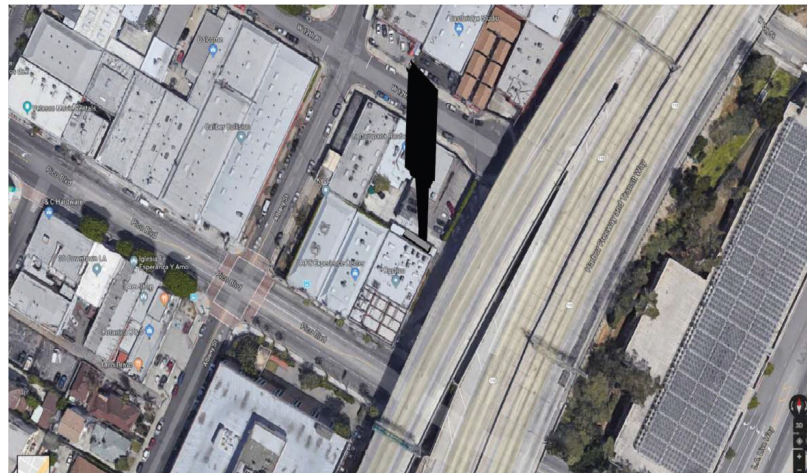
Winter Solstice - 9am shadows



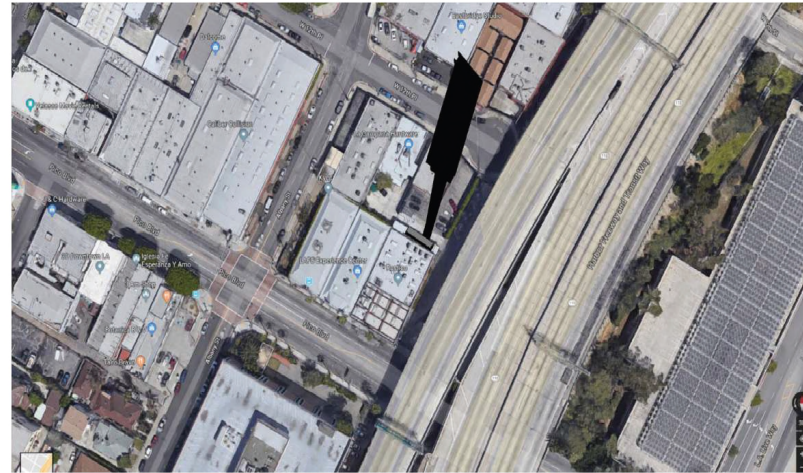
Winter Solstice - 10am shadows



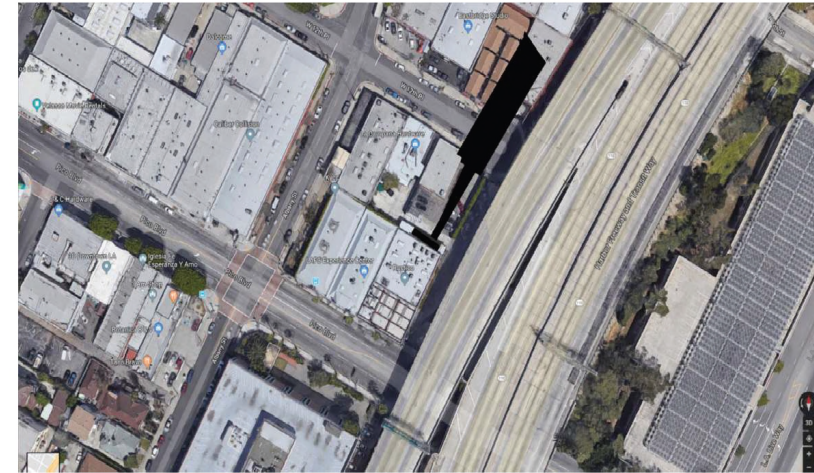
Winter Solstice - 11am shadows



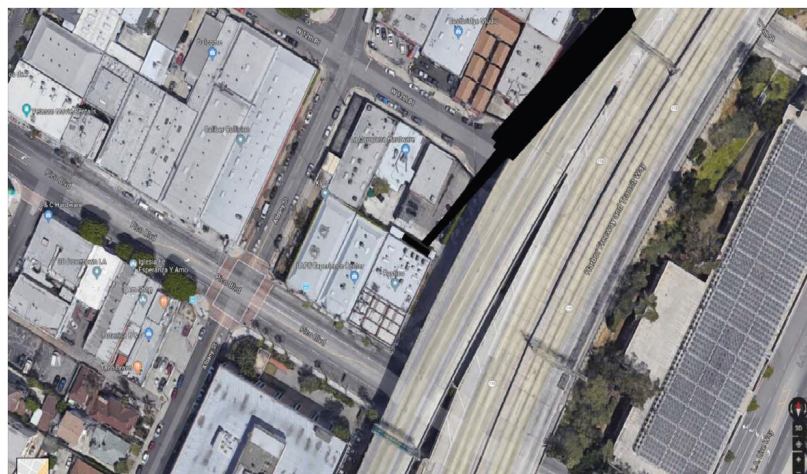
Winter Solstice - 12pm shadows



Winter Solstice - 1pm shadows



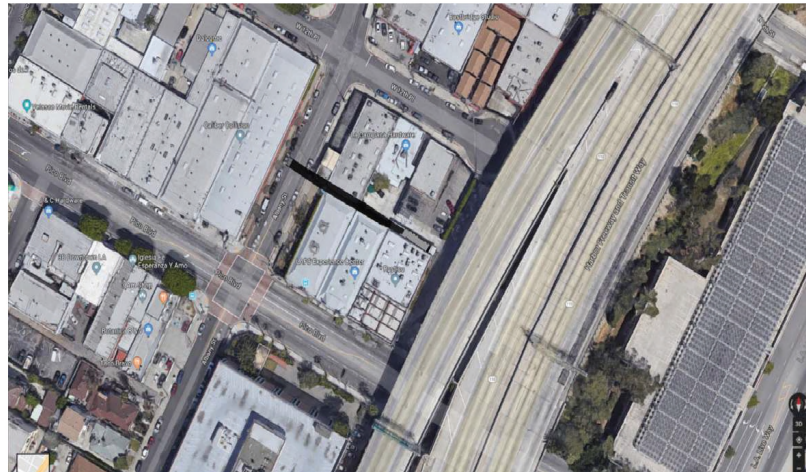
Winter Solstice - 2pm shadows



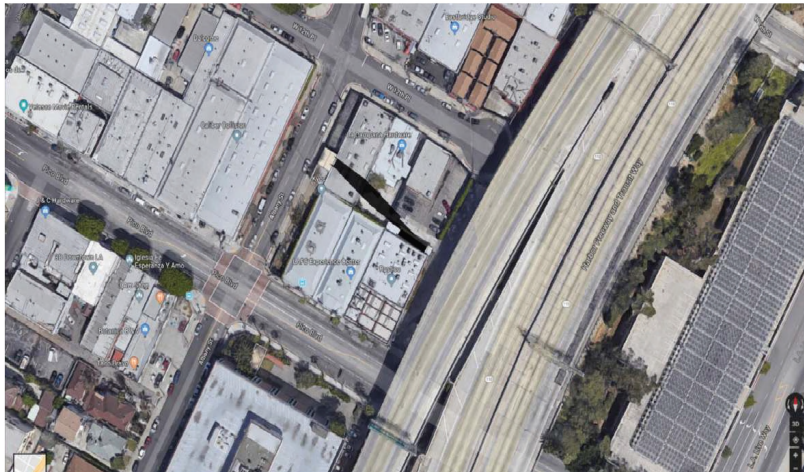
Winter Solstice - 3pm shadows

**Figure 14**  
12th Place Sign—Winter Solstice Shadows





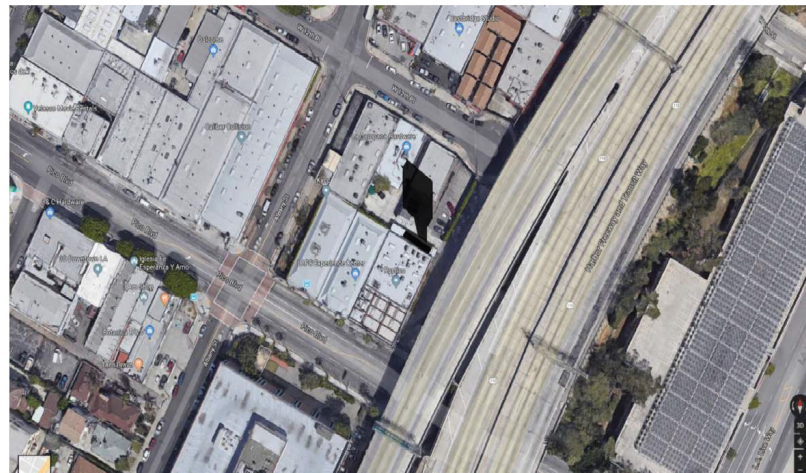
Spring/Fall - 9am shadows



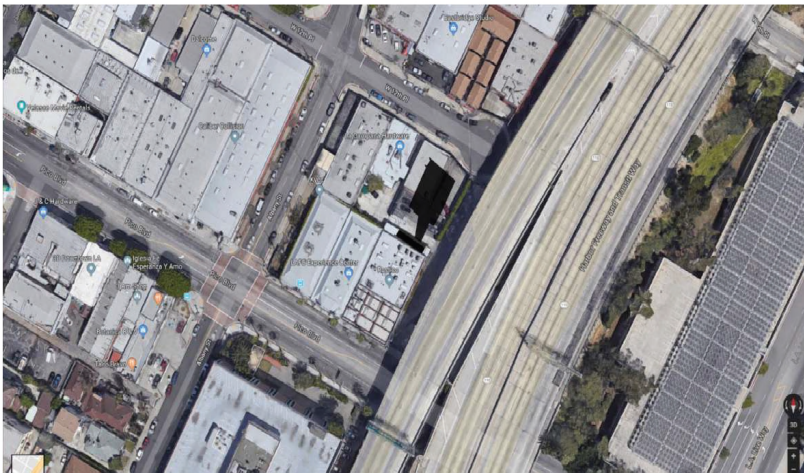
Spring/Fall - 10am shadows



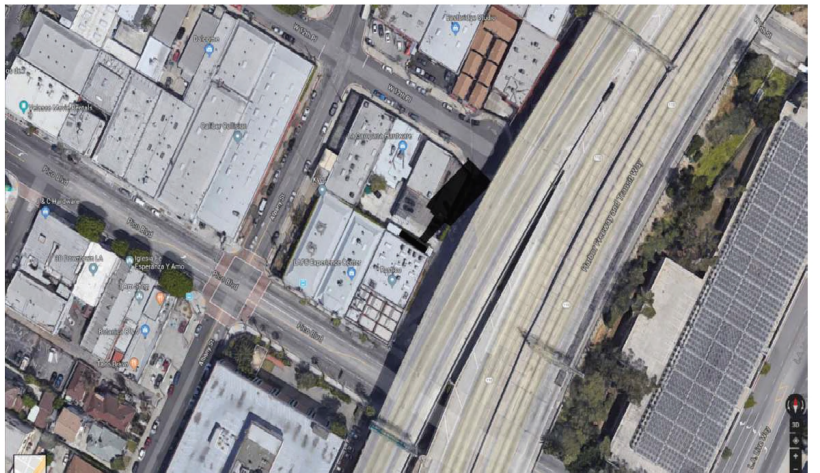
Spring/Fall - 11am shadows



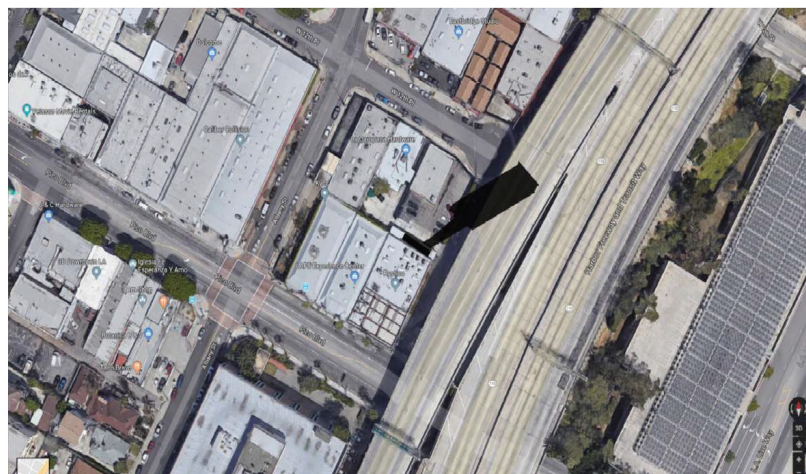
Spring/Fall - 12pm shadows



Spring/Fall - 1pm shadows



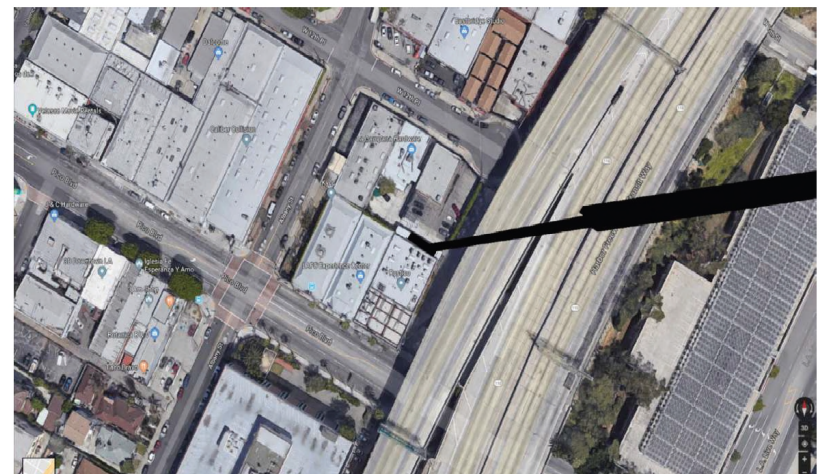
Spring/Fall - 2pm shadows



Spring/Fall - 3pm shadows



Spring/Fall - 4pm shadows



Spring/Fall - 5pm shadows

**Figure 15**  
12th Place Sign—Spring/Fall Equinox Shadows



#### 4. Aesthetics Conclusion

Based on the analysis above, through the implementation of project design features and mitigation measures identified in the adopted MMP, the Revised 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.

#### 5. Project Design Features and Mitigation Measures

Each of the project design features and mitigation measures (as applicable) set forth in the adopted MMP, including those from the Certified EIR and the Addenda, remain in effect for the Revised Project. In addition, the Revised Project would implement the following project design features, which are included in the revised MMP provided in Appendix A of this Fourth Addendum:

**Project Design Feature A-7:** The luminance of each sign face of the Grand Avenue Sign and the 12th Place Sign shall be limited to 300 cd/m<sup>2</sup> during nighttime hours, defined as between sunset and sunrise.

**Project Design Feature A-8:** During the 20 minutes before sunset, the 20 minutes after sunrise, and when the ambient sun light falls to less than 100 footcandles, the luminance of each sign face of the freeway signs shall be limited to 1,500 cd/m<sup>2</sup>.

### B. Air Quality (Construction)

The Certified EIR and First and Second Addenda concluded that air quality impacts associated with construction would be significant and unavoidable for regional emissions of nitrogen oxides (NO<sub>x</sub>) and reactive organic compounds (ROG)/volatile organic compounds (VOC) but less than significant for localized emissions of all pollutants.<sup>21</sup> Of note, the First 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

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<sup>21</sup> Note the SCAQMD significance threshold is expressed in terms of VOC, and CalEEMod calculates ROG emissions. VOC and ROG are used interchangeably for purposes of this analysis since ROG represents approximately 99.9 percent of VOC emissions.

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.

Moreover, as discussed earlier, 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 Revised 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 for the Expo Park Site, which was included as part of the Modified Project and addressed in the First Addendum, would instead occur on the Grand Avenue and 12th Place Sites. In other words, 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 Revised 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 NO<sub>x</sub> (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. Therefore, the proposed freeway signs would not result in any new significant construction-related impacts with respect to air quality, nor would they substantially increase the severity of any significant impacts previously identified in the Certified EIR or the Addenda.

## 1. Project Design Features and Mitigation Measures

Each of the project design features and mitigation measures (as applicable) set forth in the adopted MMP, including those from the Certified EIR and the Addenda, remain in effect for the Revised Project.

## C. Biological Resources

The Certified EIR and the First Addendum 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. Specifically, in accordance with the Migratory Bird Treaty Act, tree removal activities would take place outside of the nesting season (February 15–August 15), to the extent feasible. If vegetation removal activities must occur during the nesting season, a biological monitor would be present during the removal activities to ensure that no active nests would be impacted. If active nests are found, a 200-foot buffer radius (500 feet for raptors) would be established until the fledglings have left the nest. 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 the First Addendum, 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 this analysis, the Revised 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 First Addendum.

## **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 First 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.

As with construction of the MLS Stadium, 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.

To address the potential discovery of a paleontological resource during excavation, in accordance with Project Design Feature E-1, a qualified paleontologist would perform

periodic inspections where excavations into older Quaternary Alluvium may occur. As evaluated in the First Addendum, impacts with respect to paleontological resources would be less than significant with the implementation of Project Design Feature E-1.

Based on the analysis above, construction of the Revised 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 First Addendum.

## 2. Historic Resources

The Certified EIR and the First Addendum 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 First 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, which is provided in Appendix C of this Fourth Addendum.

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.<sup>22</sup> 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.” The South Grand Avenue streetlights were assigned a status code of 5S3 or “appears to be individually eligible for local listing or designation through survey evaluation.” 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 herein for the purposes of CEQA.

SurveyLA also identified the Coliseum sign located at 3843 South Grand Avenue as eligible for local listing; therefore, this analysis conservatively treats the sign as a historic resource for the purposes of CEQA. While the Coliseum sign has not been formally designated as a local Historic-Cultural Monument, SurveyLA found the Coliseum sign to be locally 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 35 years old. In addition, the Coliseum sign was altered for maintenance and upgrades in 2015, including replacement of all internal lighting components, upgrades with LED display technology, and repainting in the original 1984 colors. 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 during the past surveys. Although criteria for the California Register are

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<sup>22</sup> GPA Consulting, *March 2012 and December 2015*; see [http://preservation.lacity.org/sites/default/files/SELA%20Final%20Report\\_HPLAEdit.pdf](http://preservation.lacity.org/sites/default/files/SELA%20Final%20Report_HPLAEdit.pdf) and [http://preservation.lacity.org/sites/default/files/Westlake%20Report\\_0.pdf](http://preservation.lacity.org/sites/default/files/Westlake%20Report_0.pdf), accessed March 21, 2019.

somewhat less exacting in terms of age thresholds, it is likely the sign was not found eligible for the California Register for similar reasons.

As it relates to City of Los Angeles Historic-Cultural Monuments, the sign was assigned a status code of 5S3 or “appears to be individually eligible for local listing or designation through survey evaluation” by SurveyLA. 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. Therefore, the Coliseum sign appears significant under Historical-Cultural Monument Criterion 1. 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 as a Historic-Cultural Monument, this analysis 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. The significance of the streetlights is conveyed by the physical design of the fixtures themselves and their arrangement along both sides of South Grand Avenue; neither of these characteristics would change with the introduction of the Grand Avenue Sign to the south.

As indicated earlier in the analysis of view impacts, northerly views of the Coliseum sign from specific vantage points along the 110 Freeway could be affected by the Grand Avenue Sign, but any obstruction would be limited, intermittent, and transitory in nature and primarily would occur in areas where the Coliseum sign is barely visible (i.e., distant vantages of over 3,000 feet away). At these distances, the Coliseum sign text is not readable, and existing freeway overpasses already obstruct views of the sign. Based on view studies provided in Appendix D of the Historic Memo, at approximately 1,000 feet from

the Coliseum sign, the Grand Avenue Sign would not block the Coliseum sign when viewed from the far right lane of I-110 northbound. 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.<sup>23</sup>

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.

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<sup>23</sup> Historic Resources Group, April 2014; see [http://preservation.lacity.org/sites/default/files/Westlake%20Report\\_0.pdf](http://preservation.lacity.org/sites/default/files/Westlake%20Report_0.pdf), accessed March 21, 2019.



*(c) Historic Resources Conclusion*

Based on the analysis above, the Revised 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.

### 3. Project Design Features and Mitigation Measures

Each of the project design features and mitigation measures (as applicable) set forth in the adopted MMP, including those from the Certified EIR and the Addenda, remain in effect for the Revised Project.

## E. Geology and Soils

Potential impacts related to geology and soils were not assessed in detail in the Certified EIR. However, the First 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, which is provided in Appendix D of this Fourth Addendum. 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, site elevations range from approximately 187 to 188 feet with respect to the North American Vertical Datum (NAVD). 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. Additional technical details regarding subsurface conditions, including standard penetration test results, blowcounts, moisture content, plasticity index, and cohesion values, are provided in Appendix D.

Within the 12th Place Site, site elevations range from approximately 230 to 232 feet NAVD. 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. Additional technical details regarding subsurface conditions are provided in Appendix D.

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 First Addendum.<sup>24</sup>

Based on the information provided herein and in the Geotech Report, the Revised 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.

## 1. Project Design Features

The project design feature (as applicable) set forth in the adopted MMP remains in effect for the Revised Project.

## F. Greenhouse Gas Emissions

The Certified EIR and the First Addendum 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.

As previously indicated, 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.<sup>25</sup>

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<sup>24</sup> According to the California Geological Survey (CGS), no faults traverse either of the two signage sites or are adjacent to them. Source: CGS, *Earthquake Zones of Required Investigation*, <https://maps.conservation.ca.gov/cgs/EQZApp/app/>, accessed August 7, 2018.

<sup>25</sup> For example, installation of the freeway signs under the Revised Project is estimated to require fewer than 100 haul truck trips over the entire one- to two-month construction period. For comparison, the Modified Project evaluated in the First Addendum was estimated to involve approximately 36 haul truck trips per hour assuming an even distribution of haul trucks throughout an 11-hour workday over a 20-month construction period. As such, the mobile emissions associated with the freeway signs would represent less than a single day of construction emissions that were evaluated and disclosed under the First Addendum's GHG analysis of the Modified Project.

Moreover, as discussed earlier, 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 Freeway Zone which would be amended to include the proposed freeway sign sites. In essence, the Revised 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 for the Expo Park Site, which was included as part of the Modified Project and addressed in the First 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.

In addition, in accordance with the SCAQMD's guidance, GHG emissions from construction are amortized (i.e., averaged annually) over the lifetime of a project, which is defined as 30 years.<sup>26</sup> Dividing total construction-related GHG emissions by 30 to determine an annual estimate comparable to operational emissions would render the GHG impacts associated with construction and installation of the signs nearly negligible.

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. Moreover, as discussed above, the Revised Project proposes to reallocate 15,804 square feet of signage previously approved but not constructed at the Expo Park Site to the Grand Avenue and 12th Place Sites. Electricity necessary for the operation of the previously approved signs would have generated substantially the same amount of indirect 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 analyzed and approved signage, had it been constructed within the Expo Park Site. Therefore, consistent with the conclusions in the Certified EIR and the First Addendum, 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 Revised Project would not result in any new significant impacts with respect to GHG emissions and would not substantially

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<sup>26</sup> SCAQMD, *Interim CEQA GHG Significance Threshold for Stationary Sources, Rules and Plans*, 2008.

increase the severity of any significant impacts previously identified in the Certified EIR or the First Addendum.

## 1. Project Design Features

The project design features (as applicable) set forth in the adopted MMP remain in effect for the Revised Project.

## G. Hazards and Hazardous Materials (Construction)

The Certified EIR concluded that impacts with respect to hazards and hazardous materials would be less than significant through compliance with applicable regulatory requirements for the Expo Park Site, while the First Addendum concluded such impacts would be less than significant with mitigation.

The following analysis is based in part on regulatory database reviews conducted for each sign site by Converse Consultants in August 2018, which are provided in Appendix E of this Fourth Addendum.

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.<sup>27</sup>

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.

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<sup>27</sup> City of Los Angeles Department of City Planning, *Zone Information and Map Access System (ZIMAS), Parcel Profile Report*, <http://zimas.lacity.org/>, accessed May 30, 2018.

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. Prior to closure, two soil samples were taken and analyzed for total petroleum hydrocarbons (TPH) and Benzene, Toluene, Ethylbenzene and Xylenes (BTEX), which were not detected in either sample. 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.<sup>28</sup> 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

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<sup>28</sup> *City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report, <http://zimas.lacity.org/>, accessed May 30, 2018.*

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 (see Appendix E of this Fourth Addendum) 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, set forth below, 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 Revised Project's MMP, which is included as Appendix A of this Fourth Addendum. 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 Revised 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 First Addendum.

## 1. Mitigation Measures

The Revised Project would implement the following mitigation measure, which is included in the revised MMP provided in Appendix A of this Fourth Addendum, to mitigate potential impacts related to hazards and hazardous materials to a less-than-significant level:

**Mitigation Measure H-3:** Prior to the issuance of a building permit, a geophysical survey shall be prepared for the sites of the Grand Avenue Sign and the 12th Place Sign. If any underground storage tank is identified during the geophysical survey or uncovered during subsequent construction activities, the tank shall be removed (abandoned) in

accordance with applicable federal, state, and local laws, to the satisfaction of the California Department of Conservation Division of Oil, Gas, and Geothermal Resources (DOGGR), the South Coast Air Quality Management District (SCAQMD), the Los Angeles Regional Water Quality Control Board (RWQCB), and/or the City of Los Angeles Fire Department (LAFD), as applicable. If any other subsurface feature is identified, it shall be removed in accordance with applicable federal, state, and local laws.

Soil sampling of the tank excavation site or any other removal site shall be completed by personnel appropriately trained in accordance with the Occupational Safety and Health Administration (OSHA) Hazardous Waste Operations and Emergency Response Standard (HAZWOPER). If contamination is detected above acceptable regulatory levels, remediation activities shall be conducted. The remediation shall consist of either excavation and disposal of impacted soil; in-situ treatment; and/or vapor extraction. If necessary, remedial efforts shall be conducted under the oversight of regulatory agencies including, but not limited to, the Department of Toxic Substances Control (DTSC); the LAFD; and the RWQCB.

## **H. Hydrology and Water Quality (Construction)**

The Certified EIR and the First Addendum 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.<sup>29</sup> 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 First Addendum, 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 Revised 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.

## 1. Mitigation Measures

The mitigation measures (as applicable) set forth in the adopted MMP, including those from the Certified EIR and the Addenda, remain in effect for the Revised Project.

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<sup>29</sup> 40 California Code of Regulations (CFR), Section 122.26(b)(15).

## I. Land Use and Planning

### 1. Consistency with Regulatory Framework

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.<sup>30</sup>

Given the locations and nature of the proposed freeway signs, of most relevance to this 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 (with respect to the Grand Avenue Sign; CD9 Corridors Redevelopment Plan), applicable signage regulations set forth in the LAMC, and the Outdoor Advertising Act (California Business & Professional Code Section 5200, et seq.).<sup>31</sup> As previously discussed, the entitlements requested to permit the proposed freeway signs include the following:

- Amendment to the Specific Plan to provide the land use regulations applicable to the Grand Avenue Site and 12th Place Site to allow development of the proposed freeway signs;

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<sup>30</sup> On December 29, 2011, the California Supreme Court issued its decision in the *California Redevelopment Association v. Matosantos* case, which challenged the constitutionality of Assembly Bill (AB) X1 26, the bill that dissolved all redevelopment agencies in California. The decision upheld AB X1 26, which led to the dissolution of the Community Redevelopment Agency of the City of Los Angeles. The dissolution of the agencies became effective February 1, 2012. However, AB X1 26 did not dissolve any redevelopment plans previously adopted by redevelopment agencies. Therefore, the Exposition/University Park Redevelopment Plan and its requirements for development are still in effect. The Redevelopment Plan is now administered by CRA/LA, a Designated Local Authority (DLA) and successor of the former Community Redevelopment Agency of the City of Los Angeles, until such time as plan administration is transferred to the Department of City Planning.

<sup>31</sup> The proposed signage sites are not located within the boundaries of the South Los Angeles Community Plan, Exposition/University Park Redevelopment Plan, or CMSI/Exposition Park Master Plan, which were previously evaluated in the Certified EIR and/or the Addenda.

- Director's Review (pursuant to the Specific Plan) to verify that the freeway signs would comply with the requirements of the Specific Plan as amended;
- Amendment to the Sign District to provide the signage regulations applicable to the Grand Avenue Site and 12th Place Site, and modify the signage provided in the Sign District for the MLS stadium to ensure there would be no increase in signage in the Sign District;
- Director's Sign-Off (pursuant to the Sign District) to verify the freeway signs would comply with the requirements of the Sign District, as amended;
- If required by CRA/LA, CRA/LA approval of an amendment to the Design for Development established for the Council for the District Nine Corridors South of the Santa Monica Freeway Recovery Redevelopment Project Area, and other approvals as may be required including without limitation potential consideration and approval of Site Plan Review.

The freeway signs' consistency with the applicable land use plans and policies noted above are addressed below.

*(a) 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 Revised Project would be consistent with the Specific Plan. Impacts would be less than significant, and no mitigation measures are required.

*(b) 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 “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.”<sup>32</sup> 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.”<sup>33</sup> Accordingly, a Sign District amendment is required 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.<sup>34</sup>

As previously discussed, 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. As signs located in the Freeway Zone are not subject to the signage area limits established for the other sign zones, the proposed freeway signs located within the expanded Freeway Zone would not count towards the permitted 44,500 square feet of signage for the MLS stadium. Further, as set forth in Sign District Section 8.E.5.b, freeway signs are not counted towards the total sign area limitation of 77,175 square feet for the entire Specific Plan area. Nonetheless, although not required by the Sign District, 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

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<sup>32</sup> *Coliseum and Soccer Stadium Sign District, Section 8.E.5.*

<sup>33</sup> *Coliseum and Soccer Stadium Sign District, Section 9.X.1.a.*

<sup>34</sup> *The proposed freeway sign are considered stadium freeway signs as defined in the Sign District ordinance and do not meet the Sign District definition of a billboard since they are not cantilevered or able to be cantilevered over a building or structure.*

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 Revised Project would be consistent with the Sign District. Impacts would be less than significant, and no mitigation measures are required.

*(c) Community Plans/Land Use and Zoning Designations*

*(i) 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. As previously discussed, the Southeast Los Angeles Community Plan provides a land use designation of Hybrid Industrial for the Grand Avenue Site. This land use designation does 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.<sup>35</sup> 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.<sup>36</sup> 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.

*(ii) 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.<sup>37</sup> 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 set forth the land use and signage regulations applicable to the 12th Place Site. Impacts would be less than significant, and no mitigation measures are required.

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<sup>35</sup> See LAMC Section 12.21.1.A: "The total Floor Area contained in all the main Buildings on a Lot in a commercial or industrial zone in Height District No. 1 shall not exceed one-and-one-half times the Buildable Area of the Lot."

<sup>36</sup> See Southeast Los Angeles Community Plan Implementation Overlay District, Section IV.2, December 2018 (Ordinance No. 185925); LAMC Section 13.14.B.

<sup>37</sup> See LAMC Section 12.21.1.A: "The total Floor Area contained in all the main Buildings on a Lot in a commercial or industrial zone in Height District No. 1 shall not exceed one-and-one-half times the Buildable Area of the Lot."

*(d) 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 that “[a]ll signs shall conform to City sign and billboard standards as they now exist or are hereafter amended. Design of all signing [sic] is subject to Agency approval prior to installation.”<sup>38</sup> Accordingly, the proposed Grand Avenue Sign would need 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.

In addition to the signage regulation provided in the Redevelopment Plan, the Redevelopment Plan includes a Design for Development for Placement, Design, and Operation of Pole Sign and Billboard Structures in the CD9 Corridors Recovery Redevelopment Project Area (Design for Development), adopted in 2001, which addresses the placement, design, and operation of pole signs and billboards within the Redevelopment Plan area.<sup>39</sup> 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. Because of the broad definition of pole signs and billboards in the Design for Development, if required by CRA/LA, an amendment to the Design for Development will be requested as part of the Revised Project to clarify that the restrictions on billboard and pole signs under the Design for Development do not apply to the Grand Avenue Sign.

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<sup>38</sup> CD9 Corridors Redevelopment Plan, Section 512.

<sup>39</sup> Pole signs are defined as any sign structure placed on or affixed to one or more poles or posts of greater than eight feet in height, measured from grade to the bottom of the sign, and which is structurally independent from a building or structure. Billboards are defined as any sign structure with a sign larger than 50 square feet that is placed on or affixed to one or more poles, columns, or posts and is structurally independent from a building or structure.

Therefore, if required by CRA/LA, with the amendment to the Design for Development, the Grand Avenue Sign would comply with the Redevelopment Plan. Impacts would be less than significant, and no mitigation measures are required.

*(e) 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 this analysis 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.

*(f) 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 2014. 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.<sup>40</sup> 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 Revised 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.

*(g) Conclusion*

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 First Addendum, impacts with respect to consistency with applicable land use plans and regulations would be less than significant. Accordingly, the Revised Project would not result in any new significant impacts with respect to land use consistency and would not substantially increase the severity of any significant impacts previously identified in the Certified EIR or the Addenda.

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<sup>40</sup> AB 700 was signed by the Governor of California on September 11, 2018 and extended the date of the exemption from January 1, 2019 to January 1, 2021.

## 2. 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 First 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 lighting. As discussed above, 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 this analysis, the Revised Project would not result in any new significant impacts with respect to land use compatibility and would not substantially increase the severity of any significant impacts previously identified in the Certified EIR or the Addenda.

### 3. Mitigation Measures

Although land use consistency impacts were determined to be less than significant in the Certified EIR and the Addenda, mitigation was provided to further reduce impacts. The mitigation measure (as applicable) set forth in the adopted MMP remains in effect for the Revised Project.

## J. Noise (Construction)

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

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 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 auger 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 forth below, 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. As shown in Table 1 on page 74, noise levels during sign installation would remain below the identified significance thresholds.

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 Revised 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.

As such, noise impacts associated with installation of the proposed freeway signs are anticipated to be less than those previously evaluated. Therefore, 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.

## 1. Project Design Features and Mitigation Measures

Each of the project design features and mitigation measures (as applicable) set forth in the adopted MMP, including those from the Certified EIR and the Addenda, remain in effect for the Revised Project. However, Mitigation Measure G-4 in the MMP, which requires a temporary barrier wall to be erected around the “Project Site” for noise reduction purposes, applies to construction within the MLS stadium site. Therefore, the following measure is proposed to reduce noise levels at the Grand Avenue Site and is included in the revised MMP provided in Appendix A of this Fourth Addendum:

**Project Design Feature L-2:** A 12-foot-high temporary and impermeable sound barrier shall be erected at the Grand Avenue Site along the eastern property line adjacent to the sign construction area. The length of the barrier shall be sufficient (approximately 100 feet) to block the line-of-sight between any construction equipment used on-site for sign installation and the residential uses located approximately 80 feet to the east. The temporary sound barrier shall be designed to provide a minimum 10-dBA noise reduction at ground level. At plan check, building plans shall include documentation prepared by a noise consultant verifying compliance with this measure.

**Table 1**  
**LAFC Sign Installation Noise Levels**

	<b>12th Place Site</b>	<b>Grand Avenue Site</b>
Distance to Receptor (feet)	160	80
Construction Leq (dBA)	61.6	67.6
Ambient Noise Level (dBA) <sup>a</sup>	59.4	64.8
Threshold (Ambient + 5 dBA) <sup>b</sup>	64.4	69.8
Over/(Under) Threshold	<b>(2.8)</b>	<b>(2.2)</b>
Significant?	<b>No</b>	<b>No</b>
<p><sup>a</sup> Ambient noise level for the 12th Place Site was measured on August 3, 2018. Ambient noise level for the Grand Avenue Site was obtained from The Fig Project EIR (SCH No. 2016071049); Receptor R3, residential use at the southeast corner of Grand Avenue and 39th Street, measured in September 2016.</p> <p><sup>b</sup> Significance threshold is 5 dBA over ambient levels in accordance with the L.A. CEQA Thresholds Guide.</p> <p>Source: Eyestone Environmental, 2018.</p>		

## K. Traffic/Transportation

### 1. Construction

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 First and Second Addenda.

As discussed above, 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 First Addendum; accordingly, the construction trips associated with this signage have been previously considered. Moreover, the Revised 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, construction traffic impacts associated with installation of the proposed freeway signs are anticipated to be less than significant.

## 2. Operational Safety Hazards

An analysis of the potential for traffic safety hazards to occur as a result of the Revised Project's two freeway signs is provided in the *Safety Impact Analysis Evaluation for Proposed LAFC Freeway Signs* (Traffic Hazard Memo) prepared by Fehr & Peers on March 19, 2019, which is provided in Appendix G of this Fourth Addendum. As discussed therein, there is not yet definitive guidance on all aspects of sign design and operations to address the potential traffic safety effects of digital signs. Further, this issue is not addressed by the CEQA Guidelines or the L.A. CEQA Thresholds Guide. Nevertheless, several research studies provide findings about strategies to reduce driver distraction. The Traffic Hazard Memo outlines many of the key literature findings and proposes recommendations for sign design based on these findings to reduce the potential for traffic safety hazards associated with the proposed freeway signs.

To briefly summarize the key points of the available literature regarding traffic safety hazards associated with digital signage, the typical eye glance duration for digital signs and standard billboards is less than 1.4 seconds, and it is recognized that distractions causing a driver to glance away from the roadway for more than two seconds increase the risk of accident. However, other factors such as driver characteristics (e.g., age, experience, sleepiness, personality) as well as roadway conditions such as roadway type (highway vs. urban arterial) and ambient lighting levels also influence driver distraction.

The freeway signs would include a number of design and operational restrictions that are expected to minimize the potential for traffic safety hazards caused by driver distraction. Specifically, Sign District Section 8.I includes regulations pertinent to driver safety that apply to illuminated signage; the following regulations would be applicable to the proposed freeway signs, as set forth in the Sign District amendment:

- **Refresh Rate:** The refresh rate of the freeway signs, inclusive of any change in whole or in part of the freeway sign image, shall be no more frequent than one refresh event every eight seconds, with an instant transition between images. The freeway sign image must remain static between refreshes.
- **Illuminance and Brightness:**
  - Illuminance from the freeway signs shall not exceed 0.3 footcandles above ambient illuminance.

- The freeway signs shall have a brightness after sunset and before sunrise of no greater than 300 candelas per square meter.
- **Brightness Transition:** The freeway signs shall transition smoothly at a consistent rate from the daytime brightness to the permitted nighttime brightness levels, beginning 45 minutes prior to sunset and concluding 45 minutes after sunset.
- **Photocell Technology:** The intensity of each freeway sign display shall be controlled with a photocell with an adjustable set-point that measures available daylight. This set-point shall be used to control the intensity of the freeway sign output to either the daytime or nighttime brightness standards.
- **Dimmer/Timer:** The brightness shall be fully dimmable and controlled by a timer, which shall be maintained in good working order.
- **Screening:** The freeway signs shall be designed, located, and/or screened so as to minimize light travel onto the exterior walls of residential units and the public right-of-way.
- **Horizontal Beam Spread:** All LEDs shall have a maximum horizontal beam spread of 165 degrees. The maximum or peak light output shall be at or below horizontal.

The Traffic Hazard Memo explains that the Sign District's design and operational restrictions, provided above, will minimize the potential for driver distraction and potential traffic safety hazards. The Traffic Hazards Memo also addresses the following signage characteristics: animation and movement; placement and spacing; message sequencing; message hold time/refresh rate; and transition method & duration. With regard to animation and movement, some types of movement are considered distracting, and flashing, strobing, or racing effects should be avoided. In particular, the Outdoor Advertising Act prohibits any "red or blinking or intermittent light likely to be mistaken for a warning or danger signal" on a sign visible from the highway.<sup>41</sup> In addition, the Sign District amendment provides that the freeway signs shall only show static images, which would avoid distracting movements in the illuminated content. Regarding placement and spacing, a sign's lateral placement should reduce a driver's need to turn his/her head in order to view the sign by minimizing the angle away from the forward view. Additionally, signage should not be placed in areas that are already visually cluttered or along segments that are highly demanding for drivers based on the geometry of the roadway. The Grand Avenue Sign would be located over 550 feet south of the Coliseum sign, and the 12th Place Sign

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<sup>41</sup> CCR Article 7, Section 5403.

would be located approximately 1,100 feet southwest of the existing Staples Center digital sign on the east side of the I-110 Freeway. Therefore, there would be adequate spacing and roadway geometry to require minimal view angling on the part of the driver and sufficient spacing from other existing digital signs to comply with the recommendations. Concern about message sequencing developed out of an understanding of the Zeigarnik Effect, which refers to the subconscious compulsion to wait until a message is complete before looking away. For signs with scrolling or sequential messages, this effect may encourage drivers to unexpectedly slow down to see the conclusion of the sequence. However, PDF O-7 detailed below, prohibits animated or sequenced content and thus would eliminate message sequencing hazards. In addition, the Sign District requires that the refresh rate of the freeway signs, inclusive of any change in whole or in part of the freeway sign image, shall be no more frequent than one refresh event every eight seconds, with an instant transition between images. Therefore, the message hold time, which refers to the length of time a message must remain fixed before transitioning to another message, would be consistent with the Federal Highway Administration (FHWA) recommendation of an eight-second duration of display or refresh rate. The eight-second refresh rate combined with instantaneous transitions is expected to keep eye glances to the typical 1.4 seconds. Finally, transition method refers to the way in which one message changes to another. This transition can occur instantaneously, via a dissolve effect, or through some other motion-dependent effect. The recommended duration of message transitions varies from instantaneous to the FHWA's guidance of one to two seconds in order to minimize the potential for involuntary distraction or prolonged driver dwell time. The Sign District requires the proposed freeway signs to have instantaneous transitions between images.

Accordingly, the Sign District's regulations would ensure that the design and operational characteristics of the freeway signs minimize driver distraction and the potential for traffic safety hazards. More specifically, 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 Revised Project would minimize the potential for traffic safety hazards associated with driver distraction.

Based on the analysis above, the Revised 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.

### 3. Project Design Features and Mitigation Measures

Each of the project design features and mitigation measures (as applicable) set forth in the adopted MMP, including those from the Certified EIR and the Addenda, remain in effect for the Revised Project. In addition, the Revised Project would implement the



following project design feature, which is included in the revised MMP provided in Appendix A of this Fourth Addendum:

**Project Design Feature O-7: Message Sequencing**—The freeway signs shall not include animated or sequenced content in order to avoid any driver compulsion to reduce speed until the conclusion of a message sequence.

## **L. Utilities and Service Systems—Energy**

The Certified EIR and the First Addendum 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. With respect to operation, the Certified EIR determined that peak and average electricity and natural gas demand at the Expo Park Site would not increase compared to the then-existing conditions since average and maximum attendance levels at the Expo Park Site would be substantially similar to operation of the (now former) Sports Arena. The First 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 Revised 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 First 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 Revised Project represents the reallocation of 15,804 square feet of signage that was previously proposed for the Expo Park Site, evaluated in the First 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 Revised Project's energy demand, and impacts related to energy conservation would be less than significant.

Based on this analysis, energy impacts associated with the proposed freeway signs are anticipated to be less than significant. Therefore, the Revised 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.

## **1. Project Design Features and Mitigation Measures**

Each of the project design features and mitigation measures (as applicable) set forth in the adopted MMP, including those from the Certified EIR and the Addenda, remain in effect for the Revised Project.

## **M. Other Impact Categories**

As discussed above, the analyses presented herein address only those environmental issues whose impacts could be different than evaluated in the Certified EIR and Addenda as a result of the installation and operation of the two proposed freeway signs. For example, impacts that are influenced by population or habitable building square footage (e.g., public services, most utilities) are not addressed, since the Revised Project would not affect population or building size. Also, several of the analyses herein focus strictly on construction-related impacts, as operational impacts would be negligible for most issues (e.g., negligible traffic trips generated during operation of the two freeway signs).

Furthermore, given that 15,804 square feet of signage previously approved for the Expo Park Site would be reallocated to the Grand Avenue Site and the 12th Place Site, the

Revised Project would essentially relocate signage that was previously proposed, evaluated and approved, but that has not yet been constructed. The original signage program was included as part of the Modified Project and addressed in the First Addendum, and thus to a large extent, many of the impacts associated with that approved signage would simply be shifted to slightly different locations that are in the same general vicinity as the Expo Park Site.

Accordingly, the proposed freeway signs do not involve any changes to the previously evaluated Original Project or Modified Project that would affect the analysis of the following issues: agricultural or forestry resources; air quality (operation); hazards and hazardous materials (operation); hydrology and water quality (operation); mineral resources; noise (operation); population, housing, and employment; public services; traffic/transportation (operation); or utilities and service systems (water, wastewater, solid waste), as provided in the Certified EIR or the Addenda. As such, implementation of the Revised Project would not result in any new significant impacts with respect to these issues, nor would it substantially increase the severity of any significant impacts previously identified in the Certified EIR or the Addenda.

## **N. 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 Revised Project would be within the envelope of impacts evaluated in the Certified EIR and the Addenda, and as such, the Revised Project's contribution to potential cumulative impacts would remain unchanged from that previously evaluated. Furthermore, as previously discussed, the Revised Project represents the relocation of 15,804 square feet of signage that was previously proposed for the Expo Park Site, evaluated in the First 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 proposed freeway signs. As such, the Revised 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.

## **M. Mandatory Findings of Significance**

1. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a

fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

As discussed above in Section C, Biological Resources, both the Grand Avenue Site and the 12th Place Site are located within developed properties in 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. Further, compliance with Migratory Bird Treaty Act requirements would preclude potential impacts to nesting birds. As such, consistent with the conclusions in the Certified EIR and the First Addendum, no impact with respect to sensitive species, sensitive habitats, wildlife movement corridors, or habitat conservation plans would occur, and no mitigation measures are required.

As discussed in Section D, Cultural Resources, 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. As evaluated above, through regulatory compliance, impacts with respect to archaeological resources would be less than significant, and no mitigation measures are required. In addition, to address the potential discovery of a paleontological resource during excavation, in accordance with Project Design Feature E-1, a qualified paleontologist would perform periodic inspections where excavations into older Quaternary Alluvium may occur. As evaluated in the First Addendum, impacts with respect to paleontological resources would be less than significant with the implementation of Project Design Feature E-1.

Relative to Historic Resources, there are no listed, designated, or eligible historic resources located within either sign site; thus, direct impacts to historic resources would not occur as a result of the Revised Project. However, two resources located in the area surrounding the Grand Avenue Site are treated as historic resources herein for the purposes of CEQA and were evaluated for indirect impacts. These include the South Grand Avenue streetlights and the Coliseum sign. As evaluated above, the historic significance of the streetlights is conveyed by the physical design of the fixtures themselves and their arrangement along both sides of South Grand Avenue; neither of these characteristics would change with the introduction of the Grand Avenue Sign to the south. Similarly, 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. 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.

Based on this analysis, the Revised Project would not substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory. The Revised Project would not result in any new significant impacts and would not substantially increase the severity of any significant impacts previously identified in the Certified EIR or the Addenda.

## 2. Does the project have impacts that are individually limited, but cumulatively considerable?

As discussed above in Section N, Cumulative Impacts, in each of the analyses provided above, impacts associated with the Revised Project would be within the envelope of impacts evaluated in the Certified EIR and the Addenda, and as such, the Revised Project's contribution to potential cumulative impacts would remain unchanged from that previously evaluated. Therefore, the Revised Project would not have new or more severe impacts that are individually limited, but cumulatively considerable beyond those previously identified in the Certified EIR or the Addenda.

## 3. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

Environmental effects that have the potential to cause substantial adverse effects on human beings, either directly or indirectly, such as air quality and hazards impacts, are evaluated throughout this Fourth Addendum. As demonstrated in the analyses herein, all impacts associated with the Revised Project would be within the envelope of impacts evaluated in the Certified EIR and the Addenda. As such, the Revised Project would not have any new or more severe environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly, beyond those previously identified in the Certified EIR or the Addenda.

## **VI. Conclusion**

This Fourth Addendum provides necessary information regarding the requested approvals for the Grand Avenue Sign and the 12th Place Sign. Based on the analysis above, the implementation of the Revised Project would not result in any new significant impacts, and it would not substantially increase the severity of any significant impacts previously identified in the Certified EIR or Addenda. In addition, no substantial change in circumstances or new information not previously available with the exercise of reasonable diligence exists that would trigger additional environmental review under CEQA Guidelines Section 15162 or Public Resources Section 21166 prior to the City's action on the Specific Plan and Sign District Amendments and other associated discretionary approvals. Moreover, both the Coliseum District Specific Plan (Ordinance No. 184289) and the Coliseum and Soccer Stadium Sign District (Ordinance No. 184290) explicitly state that the Freeway Zone may be expanded to allow for new freeway signs, in compliance with the Outdoor Advertising Act, as applicable. Therefore, consideration by the Los Angeles Department of City Planning of this Fourth Addendum to the previously Certified EIR is the appropriate CEQA review required prior to making a decision on the currently proposed freeway signs.