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DEPARTMENT OF CITY
PLANNING

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ADDENDUM

Addendum to the Final Environmental Impact Report for the LA Metro Transportation Communication Network

State Clearinghouse No. 2022040363

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1. Introduction

This document is an addendum (Addendum) to the previously certified Final Environmental Impact Report (Certified Final EIR) for the Transportation Communication Network (TCN) Program, State Clearinghouse No. 20220403636, which was certified by the Los Angeles County Metropolitan Transportation Authority (Metro) in January 2023. As analyzed in the Certified Final EIR, the TCN Program included the installation of 56 transportation communication network support structures and digital displays (collectively, TCN Structures) with intelligent technology components to promote roadway efficiency, improve public safety, augment Metro's communication capacity, provide for outdoor advertising where revenues would fund new and expanded transportation programs consistent with the goals of the Metro 2028 Vision Plan, and result in an overall reduction in static signage displays throughout the City of Los Angeles (City). The Certified Final EIR analyzed the installation of up to 34 Freeway Facing (FF) TCN Structures and 22 Non-Freeway Facing (NFF) TCN Structures with a total of 97 digital displays, all on Metro-owned property.¹ The corresponding total maximum amount of digital signage associated with digital displays on the TCN Structures was approximately 55,000 square feet. The sign-reduction component of the TCN Program included the removal of at least 110,000 square feet (based on a 2:1 square footage removal ratio) of existing off-site static signs.² Signage to be removed included a minimum of approximately 200 off-site, static signs located within the City. The project as analyzed in the Certified Final EIR is herein referred to as the EIR Project.

This Addendum includes minor modifications and clarifications to the Certified Final EIR to address the proposed modifications to the EIR Project. These project modifications would reduce the total number of TCN Structures from 56 to 49, reduce the number of digital displays from 97 to 86, make minor height revisions for three TCN Structures compared to the EIR Project, a revision to the dimensions for one TCN Structure (sign area would remain the same), modify the static signage reduction requirements, and modify the assessor parcel numbers (APNs) for 21 TCN Structures. These updates to the APNs do not reflect any changes in the general locations of the TCN Structures but, instead, correctly identify the APNs as the location analyzed in the Certified Final EIR, or would allow for minor adjustments in the placement of the proposed TCN Structures. The project, as so modified, is referred to as the Modified Project.

¹ A copy of the Certified Final EIR for the Metro Transportation Communication Network Project can be found at [Metro.net/TCN](https://metro.net/TCN).

² Off-site advertising would include information related to a business, commodity, industry or other activity which is sold, offered or conducted elsewhere than on the premises upon which the TCN Structure is located.

This addendum clarifies or amplifies the information contained in the Certified Final EIR and demonstrates that none of the conditions described in the California Environmental Quality Act (CEQA) as identified in California Public Resource Code (PRC) Section 21166 and CEQA Guidelines Section 15162 requiring the preparation of a subsequent or supplemental EIR have occurred. In particular, the analysis in this Addendum demonstrates that: (1) there are no new significant environmental effects or substantial increase in the severity of previously identified significant effects associated with the Modified Project; (2) there are no known mitigation measures or alternatives that were previously considered infeasible but are now considered feasible that would substantially reduce one or more significant effects on the environment previously identified in the Certified Final EIR; and (3) there are no known mitigation measures or alternatives that are considerably different than those required by the Certified Final EIR that would substantially reduce one or more significant effects on the environment identified in the Certified Final EIR.

2. 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 the following:

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 requires the preparation of a subsequent EIR when an EIR has been certified or a negative declaration has been adopted for a project 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, PRC Section 21166 states that unless one or more of the following events occur, no supplemental or subsequent EIR shall be required by the lead agency or by any responsible agency:

- Substantial changes are proposed in the project which will require major revisions of the environmental impact report;
- 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
- New information, which was not known and could not have been known at the time the EIR was certified as complete, becomes available.

As demonstrated by the analysis herein, the Modified Project would not result in any new significant impacts or substantially increase the severity of previously identified significant impacts. Furthermore, the Modified Project would be subject to all applicable and feasible mitigation measures. Therefore, the changes resulting from the Modified Project do not meet the standards for a supplemental or subsequent EIR.

3. Certified Final EIR and Approved Project

On January 26, 2023, the Metro Board certified the Final EIR, and approved the TCN Program with minor changes to the EIR Project. As analyzed in the Certified Final EIR, the original TCN Program included the installation of 56 TCN Structures with intelligent technology components to promote roadway efficiency, improve public safety, augment Metro's communication capacity, provide for outdoor advertising where revenues would fund new and expanded transportation programs consistent with the goals of the Metro 2028 Vision Plan, and result in an overall reduction in static signage displays throughout the City. The Certified Final EIR analyzed the installation of up to 34 Freeway Facing (FF) TCN Structures and 22 Non-Freeway Facing (NFF) TCN Structures with a total of 97 digital displays, all on Metro-owned property.³ The corresponding total maximum amount of digital signage associated with digital displays on the TCN Structures was approximately 55,000 square feet. The sign-reduction component of the TCN Program included the removal of at least 110,000 square feet (based on a 2:1 square footage sign-reduction ratio) of existing off-site static signs.⁴ Signage to be removed included, a minimum of approximately 200 off-site, static signs located within the City.

The FF TCN Structures include digital displays that would be viewed from freeways, while NFF TCN Structures would be viewed from major arterial streets. Each TCN Structure would have one or two digital display faces depending on the location and line-of-sight visibility. The digital display faces would be designed to provide efficient and effective illumination while minimizing light spillover, reducing skyglow, and improving nighttime visibility through glare reduction. The digital displays on the TCN Structures would use light emitting diodes (LED) lighting with a daytime maximum up to 6,000 maximum candelas and 300 maximum candelas at nighttime, with some locations having specific standards for luminance. Louvers would be installed to shade the LED lights from creating unintentional light spillage and assist in reducing reflection, and in turn would create a sharper image. Further, the digital displays would be set to refresh every eight seconds and transition instantly with no motion, moving parts, flashing, or scrolling messages. Illumination of the digital displays would conform to applicable federal and State regulations for signs oriented towards roadways and freeways. The digital displays would be in compliance with Metro's System Advertising Content Restrictions, which prohibits advertisement of alcohol, smoking, and cannabis, and any content containing violence, obscenities, and other related subject matters. In addition, each TCN Structure would include security features, including elevated ladders at surface grade. Additionally, the

³ A copy of the Certified Final EIR for the Metro Transportation Communication Network Project can be found at [Metro.net/TCN](https://metro.net/TCN).

⁴ Off-site static signs include advertising related to a business, commodity, industry or other activity which is sold, offered or conducted elsewhere than on the premises.

TCN Structures and related digital displays would be constructed to incorporate environmentally sustainable features and construction protocols required by Metro's Green Construction Policy, the Los Angeles Green Building Code, the California Green Building Standards (CALGreen) Code, and the California Code of Regulations (CCR) Title 24 standards (as adopted by the City).

As part of the necessary approvals for the TCN Program, the City must amend its sign regulations in Chapters I and IA of the Los Angeles Municipal Code (Zoning Code) through zoning ordinances to create a mechanism to establish the TCN Program and review and approve the TCN Structures, including related digital displays (such amendments to the Zoning Code are collectively defined as the Zoning Ordinance). The Zoning Ordinance would not authorize new signage other than the TCN Structures. The Zoning Ordinance would address the time, manner, and place aspects of the TCN Program, including the allowable locations, size and height limitations, urban design requirements, and applicable community benefits, such as sign-reduction requirements for the removal of existing static off-site signs. The Zoning Ordinance would create a new class of signage for the TCN Structures given their unique attributes and intelligent technology. However, due to inclusion of off-site advertising as part of the TCN Program, an exception to the City's general ban on new off-site signs outside of Sign Districts, Specific Plans, and Supplemental Use Districts is required.

After certifying the Final EIR, the Metro Board approved the TCN Program but removed TCN Structures FF-29, NFF-14 and NFF-15 from the program (Approved Project). Therefore, the Approved Project consists of 53 TCN Structures and 93 digital displays thereon, rather than 56 TCN Structures and 97 digital displays as included in the Certified Final EIR. In its CEQA Findings for the Approved Project, Metro found that the impacts of the Approved Project were adequately analyzed in the Final EIR, and that the modifications will reduce impacts as compared to the TCN Program as described in the Certified Final EIR.

Consistent with CEQA, this Addendum compares the impacts of the proposed Modified Project to the impacts described in the Certified Final EIR.

4. Proposed Modified Project

As described above, as part of the City's consideration of the Zoning Ordinance for the TCN Program, the City proposes to modify the EIR Project. Proposed modifications

include the following (described in more detail in Revised Table II-1 and Revised Table II-2 on pages 10 and 12 further below):⁵

- A reduction in the total number of TCN Structures from 56 to 49, eliminating TCN Structures FF-29, NFF-2, NFF-3, and NFF-14, NFF-15, NFF-16, and NFF-21 and reducing the number of digital displays from 97 to 86, which would result in a reduction in the total maximum amount of digital display sign area on the TCN Structures from 55,000 square feet to 51,000 square feet.
- Refinements to the sign-reduction elements described in the Certified Final EIR, which included the removal of existing static signs located anywhere in the City at a 2:1 ratio as compared to the proposed digital displays on TCN Structures (i.e., the sign area of removed existing static signs would be twice the sign area associated with the proposed digital displays), which would result in the removal of a minimum of approximately 200 existing static signs. As reflected in the Certified Final EIR, this sign reduction was not necessary to mitigate any significant environmental impact associated with the EIR Project, but was a project benefit that would result in an overall improvement in the City's sign environment.

The Modified Project refines these standards for distinctive application to FF TCN Structures and NFF TCN Structures. Specifically, with respect to the FF TCN Structures, a minimum of 200 existing static signs would be removed including all or substantially all of the existing static signs located on real property owned by Metro within the boundaries of the City, and the balance of the existing static signs would be located within the boundaries of the City.

With respect to NFF TCN Structures, the sign area of the digital displays thereon must be offset by the removal of existing static sign area at a 3:1 ratio. The existing static signs to be removed must be located within a half-mile of an existing or contemplated NFF TCN Structure, to the extent an adequate inventory of such signs exists within such area.

These refined sign-reduction requirements would result in the removal of more signs than contemplated in the Certified Final EIR, and it is anticipated that they would result in the removal of roughly the same amount of sign area as contemplated in the Certified Final EIR. In any event, it is again noted that the removal of existing static signs or sign area is not required to mitigate any

⁵ *This list of modifications identifies the changes made to the EIR Project inclusive of the changes associated with the Approved Project and the Modified Project.*

significant environmental impact associated with the proposed TCN Program and rather is just a component of the TCN Program.

- Minor height revisions for TCN Structures FF-1 from 40 feet to 55 feet, FF-6 from 85 to 88 feet, and FF-24 from 95 to 100 feet.
- Revisions to the dimensions of TCN Structure FF-1 from a 30-foot width and 40-foot height to a 20-foot width and 60-foot height (square footage would remain the same).
- Limitations on the hours of nighttime operation of signs.
- As with the EIR Project, the digital displays on the TCN Structures for the Modified Project would use LED lighting with a maximum daytime luminance of 6,000 candelas per square meter and a maximum nighttime luminance of 300 candelas per square meter. Louvers would be installed to shade the LED lights from creating unintentional light spillage and assist in reducing reflection, and in turn would create a sharper image. In particular, Project Design Feature AES-PDF-1 in the Certified Final EIR, as adopted by the Metro Board, continues to require such louvers to be incorporated into the design of the displays for TCN Structures FF-13, FF-14, FF-25, and FF-30 such that the light trespass illuminance on nearby environmentally sensitive properties does not exceed 0.02 foot-candle. This restriction has also been included in the proposed Zoning Ordinance. Furthermore, the digital displays would be set to refresh every eight seconds and transition instantly with no motion, moving parts, flashing, or scrolling messages. In addition, the proposed Zoning Ordinance includes the following illumination standards:
 - The brightness of any digital display that includes neon, neon-like or LED elements shall be fully dimmable and controlled by an automatic light meter and timer which shall be maintained in good working order.
 - No digital display shall use highly reflective materials such as mirrored glass.
 - Digital displays shall make a smooth transition at a consistent rate between the permitted daytime to nighttime brightness levels beginning no earlier than 45 minutes prior to sunset and concluding no later than 45 minutes after sunset.
 - All light emitting diodes (LEDs) used within any illuminated digital display shall have a maximum horizontal beam spread of 165 degrees. The maximum or peak light output of any digital display shall be at or below horizontal.

- Correct the APNs for the location analyzed in the EIR Project, or to allow for minor adjustments in the placement for the TCN Structures during final design, as shown in Revised Table II-1 and Revised Table II-2 on pages 10 and 12 further below. Modifications to the APNs are proposed for several locations that are within Metro’s railroad right-of-way or are near an active transit stop. For these locations, TCN Structures must be located so as to not interfere with rail activities and to accommodate circulation constraints. APNs have been added or modified to account for slight adjustments in the precise location of TCN Structures that may be necessary. For example, in some portions of the railroad right-of-way, the two sides of the rail line have different APNs. In those situations, the modifications to the APNs in Revised Table II-1 and Revised Table II-2 on pages 10 and 12 further below clarify that the TCN Structure could be located on either side of the rail line. Other APN modifications or additions account for including adjacent parcels, where other rail infrastructure or transit activity might require slight adjustments to the precise TCN Structure location. More specifically, the following briefly describes the reason for modifying the APNs for each identified TCN Structure location:
 - FF-5—To account for circulation constraints on an active transit stop.
 - FF-6—To account for location in an active railroad right-of-way.
 - FF-8—To account for location in an active railroad right-of-way.
 - FF-10—To account for location in an active railroad right-of-way.
 - FF-17—To account for location in an active railroad right-of-way.
 - FF-18—To account for location in an active railroad right-of-way.
 - FF-19—To account for location in an active railroad right-of-way.
 - FF-20—To account for location in an active railroad right-of-way.
 - FF-21—Included additional area of a Metro-owned parking area.
 - FF-22—To account for location in an active railroad right-of-way.
 - FF-24—To account for location in an active railroad right-of-way.
 - FF-28—To account for location in an active railroad right-of-way.
 - NFF-4—To account for circulation constraints on an active transit stop.
 - NFF-5—To account for circulation constraints on an active transit stop.

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- NFF-9—To account for location in an active railroad right-of-way.
 - NFF-10—To account for location in an active railroad right-of-way.
 - NFF-11—Adjust the location to include adjacent Metro-owned property along Metro’s railroad right-of-way.
 - NFF-12—To account for circulation constraints on an active transit stop.
 - NFF-13—Included additional area of a Metro-owned parking area.
 - NFF-19—To account for circulation constraints on an active transit stop.
 - NFF-20—To account for circulation constraints on an active transit stop.

To address the changes proposed by the Modified Project and clarify the modifications to the APNs, this addendum replaces Table II-1 and Table II-2 included in Section II, Project Description, of the Certified Final EIR, with Revised Table II-1 and Revised Table II-2 on pages 10 and 12, respectively, of this addendum. The proposed changes apply to the entirety of the Certified Final EIR. Deletions are shown in ~~strikethrough text~~, and additions are shown in underlined text.

**Revised Table II-1
Freeway Facing TCN Structure/Digital Display Locations**

Sign ID	Map No.	Location	Assessor Parcel Number	sf per Digital Display (No. of Digital Display Faces per TCN Structure)	Digital Display Height (ft)	Digital Display Width (ft)	Sign Height (from grade)
FF-1	3	US-101 North Lanes at Union Station	5409023941	1,200 (1)	30 <u>20</u>	40 <u>60</u>	40 <u>55</u>
FF-2	3	US-101 South Lanes at Center Street	5173019901	672 (2)	14	48	72
FF-3	3	US-101 North Lanes at Keller Street	5409021902	672 (2)	14	48	72
FF-4	3	US-101 South Lanes at Beaudry Street	5160024904	672 (2)	14	48	75
FF-5	1	US-101 North Lanes, Northwest of Lankershim Boulevard	2423038970 <u>2423037915</u> <u>2423037910</u> <u>2423037914</u> <u>2423038902</u> <u>2423038965</u>	672 (2)	14	48	65
FF-6	3	I-5 South Lanes at North Avenue 19	5415002903 <u>5415002801</u>	672 (2)	14	48	85 <u>88</u>
FF-7	3	I-5 North Lanes at San Fernando Road	5445007903	672 (2)	14	48	85
FF-8	3	I-5 South Lanes and Exit Ramp to I-10	5410009904 <u>5410009905</u>	672 (2)	14	48	85
FF-9	3	I-10 West Lanes (Bus Yard)	5410009901	672 (2)	14	48	50
FF-10	3	I-10 West Lanes and Entrance Ramp from I-5	5170010904 <u>5171024908</u>	672 (2)	14	48	95
FF-11	3	I-10 East Lanes and Exit Ramp to SR-60 and I-5	5170010901	672 (2)	14	48	95
FF-12	3	I-10 West Lanes at Griffin Avenue and East 16th Street	5132029905	672 (2)	14	48	80
FF-13	1	SR-2 South Lanes Northeast of Casitas Avenue	5436033906	672 (2)	14	48	85
FF-14	1	SR-2 North Lanes Northeast of Casitas Avenue	5442001900	672 (2)	14	48	85
FF-15	1	SR-170 South Lanes at Raymer Street	2324002901	672 (1)	14	48	40
FF-16	1	SR-170 North Lanes North of Sherman Way	2307021901	672 (1)	14	48	40
FF-17	1	I-5 North Lanes South of Tuxford Street	<u>2408038900</u> <u>2408038901</u>	672 (2)	14	48	85
FF-18	1	I-5 South Lanes South of Tuxford Street	<u>2632001901</u> <u>2632001900</u>	672 (2)	14	48	85
FF-19	1	SR-118 East of San Fernando Road	<u>2523001900</u> <u>2523001901</u>	672 (2)	14	48	80

Revised Table II-1 (Continued)
Freeway Facing TCN Structure/Digital Display Locations

Sign ID	Map No.	Location	Assessor Parcel Number	sf per Digital Display (No. of Digital Display Faces per TCN Structure)	Digital Display Height (ft)	Digital Display Width (ft)	Sign Height (from grade)
FF-20	1	SR-118 East of San Fernando Road	2523001900 <u>2523001901</u>	672 (2)	14	48	80
FF-21	2	I-110 South Lanes at Exposition Boulevard	5037030902 <u>5037030900</u>	672 (2)	14	48	80
FF-22	1	I-5 North Lanes at San Fernando Road	2603001901 <u>2603001900</u>	672 (2)	14	48	65
FF-23	2	I-110 North Lanes at Exposition Boulevard	5122024909	672 (2)	14	48	80
FF-24	1	I-5 South Lanes at San Fernando Road and Sepulveda Boulevard	2605001915 <u>2605001912</u> <u>2605001916</u>	672 (2)	14	48	95 <u>100</u>
FF-25	1	I-405 South Lanes at Victory Boulevard	2251002905	672 (2)	14	48	80
FF-26	2	I-405 North Lanes at Exposition Boulevard	4256010902	672 (2)	14	48	95
FF-27	2	I-405 South Lanes at Exposition Boulevard	4260039906	672 (1)	14	48	95
FF-28	2	I-10 West at Robertson Boulevard	4313024906 <u>4313024908</u>	672 (1)	14	48	80
FF-29 ^a	2	SR-90 East at Culver Boulevard	4211007907	672 (2)	14	48	80
FF-30	2	SR-90 West at Culver Boulevard	4223009906	672 (2)	14	48	80
FF-31	2	I-105 West Lanes at Aviation Boulevard	4129028901	672 (2)	14	48	95
FF-32	2	I-105 East Lanes at Aviation Boulevard	4138001902	672 (2)	14	48	95
FF-33	2	I-110 South Lanes at Slauson Avenue	5001037907	672 (1)	14	48	80
FF-34	2	I-110 North Lanes at Slauson Avenue	5101040900	672 (2)	14	48	80

sf = square feet

ft = feet

^a As described above, subsequent to the certification of the Final EIR, the Metro Board removed TCN Structures FF-29, NFF-14, and NFF-15 from the TCN Program, which comprises the Approved Project.

Source: *Eyestone Environmental, 2023.*

**Revised Table II-2
Non-Freeway Facing TCN Structure Locations**

Sign ID	Map No.	Location	Assessor Parcel Number	sf per Digital Display (No. of Digital Display Faces per TCN Structure)	Digital Display Height (ft)	Digital Display Width (ft)	Sign Height (from grade)
NFF-1	1	Northeast corner of Vermont Avenue and Sunset Boulevard	5542015900	300 (2)	10	30	30
NFF-2	3	Spring Street Bridge, 326 feet North of Aurora Street	5409002900	300 (2)	40	30	65
NFF-3	4	Northwest corner of Lankershim Boulevard and Chandler Boulevard	2350016906	300 (1)	40	30	30
NFF-4	1	Northwest corner of Lankershim Boulevard and Universal Hollywood Drive	2423036919 <u>2423037902</u> , <u>2423037908</u>	300 (1)	10	30	30
NFF-5	1	Southwest corner of Lankershim Boulevard and Universal Hollywood Drive	2423036919 <u>2423037911</u> <u>2423037919</u> <u>2423037912</u>	300 (1)	10	30	30
NFF-6	3	Southwest corner of 4th Street and Hill Street	5149015902	300 (1)	10	30	30
NFF-7	2	Venice Boulevard, 240 feet West of Robertson Boulevard	4313024909	300 (1)	10	30	30
NFF-8	3	Southeast corner of Alameda Street and Commercial Street	5173001901	672 (2)	14	48	60
NFF-9	1	Northeast corner of Van Nuys Boulevard and Orange Line Busline	2240008905 <u>2240008908</u>	300 (2)	10	30	30
NFF-10	1	Southeast corner of Sepulveda Boulevard and Erwin Street	2242001904; <u>2242001902</u>	300 (1)	10	30	30
NFF-11	2	Southwest of Crenshaw Boulevard, 175 feet South of 67th Street	4006025900 <u>4006024900</u>	300 (1)	10	30	30
NFF-12	2	Southeast corner of Crenshaw Boulevard and Exposition Boulevard	5044002900 <u>2044002901</u> <u>2044002903</u>	300 (2)	10	30	30
NFF-13	3	Southeast corner of East Cesar Chavez Avenue and North Vignes Street	5409023944 <u>5409025905</u>	300 (2)	10	30	30
NFF-14 ^a	2	Pico Boulevard and Exposition Boulevard, South of rail	4260025902	300 (1)	40	30	30
NFF-15 ^a	2	Pico Boulevard, 445 feet West of Sawtelle Boulevard	4260039906	300 (1)	40	30	30
NFF-16	3	Southeast corner of South Central Avenue and East 1st Street	5161018903	300 (2)	40	30	30

Revised Table II-2 (Continued)
Non-Freeway Facing TCN Structure Locations

Sign ID	Map No.	Location	Assessor Parcel Number	sf per Digital Display (No. of Digital Display Faces per TCN Structure)	Digital Display Height (ft)	Digital Display Width (ft)	Sign Height (from grade)
NFF-17	2	Century Boulevard, 152 feet West of Aviation Boulevard	4125026904	672 (2)	14	48	80
NFF-18	2	Southwest Aviation Boulevard and South of Arbor Vitae Street	4125020907	672 (2)	14	48	30
NFF-19	2	Northwest corner of Vermont Avenue and Beverly Boulevard	5520019900 <u>5520019902</u>	300 (2)	10	30	30
NFF-20	2	Southwest corner of Santa Monica Boulevard and Vermont Avenue	5538022903 <u>5538022909</u>	300 (2)	10	30	30
NFF-24	3	South of 4th Street 240 feet East of South Santa Fe Avenue	5163017900	300 (2)	40	30	65
NFF-22	3	Northwest corner of East 7th Street and South Alameda Street	5147035904	300 (2)	10	30	30

sf = square feet
ft = feet

^a As described above, subsequent to the certification of the Final EIR, the Metro Board removed TCN Structures FF-29, NFF-14, and NFF-15 from the TCN Program, which comprises the Approved Project.

Source: Eyestone Environmental, 2023.

5. Analysis of Proposed Modifications and Clarifications

The analysis provided below evaluates the proposed modifications to determine whether they would result in any new significant environmental impacts or a substantial increase in the severity of impacts previously evaluated. It should be noted that the Modified Project is substantially similar to Alternative 3 included in the Certified Final EIR. Alternative 3, the Reduced Project—Elimination of All Significant and Unavoidable Impacts Alternative, would eliminate TCN Structures NFF-2, NFF-3, NFF-16, and NFF-21, as well as eliminate or relocate TCN Structures FF-29 and FF-30 outside of the coastal area of the Palms–Mar Vista–Del Rey Community Plan. As described above TCN Structures NFF-2, NFF-3, NFF-16, and NFF-21 would be removed as part of the Modified Project. Additionally, while TCN Structure FF-29 was analyzed in the EIR Project, Metro omitted it from the TCN Program prior to its approval. Furthermore, TCN Structure FF-30 was

determined to be located outside of the Coastal Zone and, therefore, would not cause impacts related to inconsistencies with policies specifically related to the coastal area of the Palms–Mar Vista–Del Rey Community Plan.⁶ As such, the impact analysis for the Modified Project below is substantially similar and would result in the same impacts to those of Alternative 3, as described in the Certified Final EIR.

- **Aesthetics**—The Modified Project would reduce the total number of TCN Structures analyzed in the Certified Final EIR from 56 to 49, relatedly reduce the number of digital displays from 97 to 86, include refinements to the sign-reduction requirements, allow for minor modifications to some of the proposed TCN Structures, including minor height revisions for three TCN Structures, revisions to the dimensions for one TCN Structure (the square footage would remain the same), and modify the APNs for 21 TCN Structures. The Certified Final EIR conservatively concluded that the TCN Structures and related digital displays would result in significant impacts associated with views and visual character with respect TCN Structures NFF-2, NFF-3, NFF-16, and NFF-21. Specifically, five historical resources, including the North Spring Street Bridge (Caltrans Bridge No. 53C0859), Lankershim Depot, the Little Tokyo Historic District, the Japanese Village Plaza, and the Fourth Street Bridge (Caltrans Bridge No. 53C0044) are located in close proximity to these TCN Structures. While the TCN Structures and related digital displays would not physically impact any historical resources, the TCN Structures would impede visibility of and, thus, detract from the character-defining features of these five historical resources, which was determined to be a significant aesthetic impact. Therefore, the EIR Project would result in a significant and unavoidable visual impact in relation to historical resources.

The Modified Project eliminates TCN Structures NFF-2, NFF-3 NFF-16, and NFF-21 from the TCN Program, and they would not be constructed. Therefore, the Modified Project would eliminate the significant visual impact related to historical resources identified in the Certified Final EIR. Additionally, the Modified Project would no longer conflict with the Conservation Element’s applicable goals, objectives, and policies set forth in the Conservation Element adopted for the purpose of avoiding or mitigating an environmental effect with regard to visual impacts on historic resources.

The Certified Final EIR concluded that the EIR Project, as it relates to TCN Structures FF-29 and FF-30, would be inconsistent with the Palms–Mar Vista–

⁶ *Coastal Zone Boundary Determination 22-2022 by the California Coastal Commission, Assessor Parcel Numbers 4211-007-907 & 4223-009-906, Los Angeles County, November 17, 2022.*

Del Rey Community Plan policies regarding placement of off-site signs within the coastal area, which are intended to protect scenic resources and that the operation of those TCN Structures would result in a significant aesthetic impact). After receiving a formal coastal boundary line from the California Coastal Commission, it has been determined with this new information that TCN Structure FF-30 would not be located in the Coastal Zone. Additionally, the Modified Project would eliminate TCN Structure FF-29. Therefore, the Modified Project would no longer conflict with the coastal area development standard of the Palms–Mar Vista–Del Rey Community Plan prohibiting off-site commercial signs in coastal areas. Furthermore, the minor revisions to the APNs would not result in the location of TCN Structures in the Coastal Zone or near historical resources. Overall, the Modified Project’s impact related to visual character and consistency with plan policies regarding scenic quality would now be less than significant.

As discussed in the Certified Final EIR, long-range views of visual resources are present in the vicinity of several of the Site Locations. However, these views are limited due to intervening development located along the freeways and roadways. In particular, views of the Santa Monica Mountains, the Verdugo and San Gabriel Mountains, the Kenneth Hahn State Recreation Area, and the Downtown Los Angeles Skyline, are intermittently available along portions of the freeways and major roadways where the Site Locations are proposed. As part of the Modified Project, the heights of three TCN Structures (FF-1, FF-6, and FF-24) would increase. Based on the locations, size, and heights of the proposed structures, the proposed displays would not block views of long-range scenic vistas, such as the mountains or downtown skyline. Rather, the TCN Structures and related digital displays would be oriented to the freeway and roadway, where views of the digital displays would be brief and transitory. In addition, given the limited size and height of the TCN Structures, notwithstanding their obstruction of long-range scenic views from a public area, such as a sidewalk, would still allow for important visual features, be fleeting to motorists, and views would remain unobstructed/visible from other publicly accessible vantage points.

As described in the Certified Final EIR, the TCN Structures would be located within urban areas that have already been developed with roadway infrastructure; surrounding buildings; sources of light; and, in many cases, existing signage. Therefore, long-range views of the TCN Structures themselves would be limited due to the presence of existing surrounding development.

As demonstrated by the detailed light and glare analysis included in Appendices B and B.2 of the Certified Final EIR, potential light and glare impacts associated with implementation of the proposed TCN Program would be less than

significant. As with the EIR Project, the digital displays for the Modified Project would be designed to provide efficient and effective illumination while minimizing light spillover, reducing skyglow, and improving nighttime visibility through glare reduction. The digital displays on the TCN Structures would use LED lighting with a daytime maximum up to 6,000 maximum candelas and 300 maximum candelas at nighttime, depending on the location of the TCN Structure. As with the EIR Project, the Modified Project would require the installation of louvers to shade the LED lights from creating unintentional light spillage, assist in reducing reflection, and create a sharper image. Specifically, Project Design Feature AES-PDF-1 would continue to be implemented as part of the Modified Project to require the installation of state-of-the-art louvers or other equivalent design features into the design of TCN Structures FF-13, FF-14, FF-25, and FF-30, such that light trespass illuminance at nearby sensitive habitat locations would not exceed 0.02 foot-candle.

As with the EIR Project, the digital displays would be set to refresh every eight seconds and transition instantly with no motion, moving parts, flashing, or scrolling messages. Illumination of the digital displays would conform to applicable federal and State regulations for signs oriented towards roadways and freeways. Further, the TCN Structures and related digital displays would be located in urban areas with existing light sources used primarily for Metro operations, which include rail corridors, stations, parking, bus depots, and equipment lots. The proposed modifications to the TCN Program include additional requirements for illumination, materials, and displays. The brightness of any digital display that includes LED elements shall be fully dimmable and controlled by an automatic light meter and timer. No digital displays would use highly reflective materials, such as mirror glass. Digital displays would make a smooth transition at a consistent rate between the permitted daytime to nighttime brightness levels beginning no earlier than 45 minutes prior to sunset and concluding no later than 45 minutes after sunset. Additionally, all LEDs would have a maximum horizontal beam spread of 165 degrees. The additional proposed modifications for illumination, materials, and displays would further reduce the Modified Project's less than significant impact compared to the EIR Project.

The Certified Final EIR assumed that the digital displays would operate 24 hours a day. Under the Modified Project, hours of operation of the digital displays would be limited during the nighttime. The limited hours of operation during nighttime and reduction in the number of TCN Structures and related digital displays, would reduce the Modified Project's less-than-significant illumination impact compared to the EIR Project.

In summary, the Modified Project would eliminate the significant unavoidable impacts related to historical and coastal view resources described in the Certified Final EIR (*i.e.*, visual impacts and consistency with the Conservation Element's objectives and policies adopted for the purpose of avoiding or mitigating an environmental effect with regard to historic resources, and a coastal area development standard of the Palms–Mar Vista–Del Rey Community Plan). The Modified Project would not result in any new significant environmental impacts or substantially more severe environmental impacts than were identified in the Certified Final EIR. The Modified Project would not result in any new significant environmental impacts or substantially more severe environmental impacts than were identified in the Certified Final EIR, and modifications to the TCN Program would further reduce impacts identified in the Certified EIR as less than significant. Further, there is no 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 Final EIR was certified, showing any of the conditions identified in CEQA Guidelines Section 15162(a)(3) exist.

- **Air Quality**—The Modified Project would reduce the total number of TCN Structures analyzed in the Certified Final EIR from 56 to 49 and relatedly reduce the number of digital displays from 97 to 86, which would reduce excavation activities. Correspondingly, the overall amount of construction activities, along with associated air emissions, would be reduced in comparison to the EIR Project. Additionally, the intensity of construction activities (inclusive of removal of static signs as part of the sign-reduction program and installation of TCN Structures) and associated air emissions on a peak daily basis, which are used for measuring significance, would not increase and would remain similar to the EIR Project. Furthermore, Project Design Feature AIR-PDF-1 would continue to be implemented as part of the Modified Project to reduce the amount of temporary diesel and gasoline generators used during construction. Additionally, under the Modified Project, similar to the EIR Project, maximum construction emissions would not exceed the South Coast Air Quality Management District recommended localized screening thresholds for NO_x, CO, SO_x, PM₁₀, or PM_{2.5}. Further, as with the EIR Project, given the short-term construction schedule, as well as limited construction duration of up to four weeks for installation per location, the Modified Project would not result in a long term (*i.e.*, 70 year) source of Toxic Air Contaminants emissions, and that impact would be reduced in comparison to the EIR Project.

In addition, since fewer TCN Structures and related digital displays would be installed for the Modified Project, the proposed modifications would result in a reduction in the operational air emissions associated with vehicular trips and stationary sources, as compared to the EIR Project.

The determination of Air Quality Management Plan (AQMP) consistency is primarily concerned with the long-term influence of the Modified Project on air quality in the Air Basin. Similar to the EIR Project, the Modified Project would not increase the frequency or severity of an existing air quality violation or cause or contribute to new violations for these pollutants. As the Modified Project would not exceed any of the State and federal air quality standards, the Modified Project would also not delay timely attainment of air quality standards or interim emission reductions specified in the AQMP. In addition, as with the EIR Project, because the Modified Project would not conflict with growth projections that form the basis of the 2016 AQMP, the Modified Project would be consistent with the emissions forecasts in the AQMP. Thus, the Modified Project would not conflict with or obstruct implementation of the AQMP. With regard to the City's policies related to air quality, similar to the EIR Project, the Modified Project would serve to implement applicable goals, objectives, and policies of the City's Air Quality Element pertaining to the Modified Project. Based on the above, as with the EIR Project, the Modified Project would not conflict with or obstruct implementation of the applicable air quality plan.

Impacts related to the other proposed modifications, including minor height revisions for three TCN Structures, revisions to the dimensions for one TCN Structure (square footage would remain the same), refinements to the sign-reduction requirements, and revisions to the APNs for 21 TCN Structures, would be within the envelope of impacts identified in the Certified Final EIR. As such, overall air emissions generated during construction and operation of the Modified Project would be similar to or slightly less than those of the EIR Project and would continue to be less than significant. Therefore, there are no substantial changes in the EIR Project as analyzed in the Certified Final EIR, and the Modified Project would not result in any new significant environmental impacts or substantially more severe environmental impacts than were identified for the EIR Project. Further, there is no 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 Final EIR was certified, showing any of the conditions identified in CEQA Guidelines Section 15162(a)(3) exist.

- **Biological Resources**—The Modified Project would reduce the total number of TCN Structures analyzed in the Certified Final EIR from 56 to 49 and relatedly reduce the number of digital displays from 97 to 86, which would reduce the extent of construction activities for TCN Structures as compared to the EIR Project. As with the EIR Project, the Modified Project would implement Mitigation Measures BIO-MM-1 through BIO-MM-3 to address potential impacts on biological resources during construction of the proposed TCN Structures and related digital displays. As such, the reduction in the number of TCN Structures and related digital displays would reduce construction impacts to biological

resources, including impacts to riparian habitats, wetlands, and migratory corridors, and impacts would remain less than significant with mitigation. Additionally, as part of the Modified Project, TCN Structure FF-29 would be eliminated from the TCN Program. Potential suitable habitat for special-status plant species is located adjacent to the Biological Study Area (BSA) for TCN Structure FF-29, as well as suitable habitat adjacent to the BSA for Least Bell's Vireo. Therefore, with the removal of TCN Structure FF-29 from the TCN Program, the Modified Project's construction impacts on biological resources would be reduced compared to the EIR Project.

Similar to the EIR Project, the Modified Project includes the installation of louvers to shade the LED lights from creating unintentional light spillage, assist in reducing reflection, and create a sharper image. Specifically, Project Design Feature AES-PDF-1 would continue to be implemented as part of the Modified Project to require the installation of state-of-the-art louvers or other equivalent design features into the design of TCN Structures FF-13, FF-14, FF-25, and FF-30 and related digital displays such that light trespass illuminance at nearby sensitive habitat locations would not exceed 0.02 foot-candle. The Modified Project includes additional standards for the LEDs of digital displays and standards regarding illumination that could further reduce impacts related to biological resources. Further, the proposed TCN Structures and related digital displays would be located in urban areas with existing light sources used primarily for Metro operations, such as rail corridors, stations, parking, bus depots, and equipment lots, as well as near freeways and major arterial roadways. The analysis in the Certified Final EIR assumed that the digital displays would be operating for 24 hours a day. Under the Modified Project, operation of the digital displays would be limited during nighttime hours. The limited hours of operation during nighttime hours and the reduction of TCN Structures and related digital displays would reduce the impact from illumination near potential biological resources as compared to the EIR Project.

The Certified Final EIR explained that existing static signs could provide habitat for special status species, and removal of existing static signs could affect species. Mitigation Measures BIO-MM-1 through BIO-MM-4 would continue to apply to the Modified Project and would reduce impacts from removal of existing signs to a less-than-significant level.

Impacts related to the other proposed modifications, including minor height revisions for three TCN Structures, revisions to the dimensions for one TCN Structure (square footage would remain the same), refinements to the sign-reduction requirements, and modifications to the APNs for 21 TCN Structures, would be within the envelope of impacts identified in the Certified Final EIR. Therefore, there are no substantial changes to the EIR Project, and

the Modified Project would not result in any new significant environmental impacts or substantially more severe environmental impacts than were identified for the EIR Project. As with the EIR Project, with implementation of Mitigation Measures BIO-MM-1 through BIO-MM-3 identified in the Certified Final EIR, the Modified Project's impacts on biological resources would continue to be less than significant. Further, there is no 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 Final EIR was certified, showing any of the conditions identified in CEQA Guidelines Section 15162(a)(3) exist.

- **Cultural Resources**—The Modified Project would reduce the total number of TCN Structures analyzed in the Certified Final EIR from 56 to 49 and relatedly reduce the number of digital displays from 97 to 86, include refinements to the sign-reduction requirements, and allow for minor modifications to some of the proposed TCN Structures, including minor height revisions for three TCN Structures, revisions to the dimensions for one TCN Structure (square footage would remain the same), and modifications to the APNs for 21 TCN Structures. As described in the Certified Final EIR, the construction of TCN Structures NFF-2, NFF-3, NFF-16, and NFF-21 would result in significant and unavoidable impacts related to historical resources. Specifically, five historical resources, including the North Spring Street Bridge (Caltrans Bridge No. 53C0859), Lankershim Depot, the Little Tokyo Historic District, the Japanese Village Plaza, and the Fourth Street Bridge (Caltrans Bridge No. 53C0044) are located in close proximity to these TCN Structures. Therefore, the construction of TCN Structures NFF-2, NFF-3, NFF-16, and NFF-21 would likely result in a significant impact on historical resources by affecting the integrity of setting and feeling with respect to the proximate historical resources. Although these resources are within an urban setting subjected to the visual, atmospheric, and audible effects of the environment on a regular basis, the TCN Structures at these four locations would likely detract from the character-defining features and affect the viewsheds of the resources. As part of the Modified Project, TCN Structures NFF-2, NFF-3, NFF-16, and NFF-21 would be removed from the TCN Program and would not be constructed. Thus, the Modified Project would eliminate the significant and unavoidable impact of the EIR Project on historical resources.

With regard to archaeological resources and human remains, the Modified Project would reduce the total number of TCN Structures from 56 to 49 and, therefore, would reduce the amount of excavation activities as compared to the EIR Project. As such, the potential to encounter archaeological resources and human remains would be reduced. As with the EIR Project, the Modified Project would incorporate Mitigation Measure CUL-MM-1 to address potential impacts on archaeological resources. Additionally, as with the EIR Project, the Modified

Project would comply with existing regulatory requirements in the event human remains were to be discovered.

Impacts related to the other proposed modifications, including minor height revisions for three TCN Structures, revisions to the dimensions for one TCN Structure (square footage would remain the same), refinements to the sign-reduction requirements, and modifications to the APNs for 21 TCN Structures, would be within the envelope of impacts identified in the Certified Final EIR. Therefore, there are no substantial changes in circumstances, and the Modified Project would eliminate the significant unavoidable impacts related to historical resources and would not result in any new significant environmental impacts or substantially more severe environmental impacts than were identified for the EIR Project. As with the EIR Project, with implementation of Mitigation Measure CUL-MM-1, the Modified Project's impact on archaeological resources would continue to be less than significant with mitigation incorporated, and the impact on human remains would continue to be less than significant without mitigation. Further, there is no 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 Final EIR was certified, showing any of the conditions identified in CEQA Guidelines Section 15162(a)(3) exist.

- **Energy and Energy Infrastructure**—The Modified Project would reduce the total number of TCN Structures analyzed in the Certified Final EIR from 56 to 49 and relatedly reduce the number of digital displays from 97 to 86 and, therefore, would reduce the amount of energy compared to the EIR Project. Additionally, similar to the EIR Project, the Modified Project would comply with applicable energy requirements to reduce energy usage and ensure energy is not used wastefully, inefficiently, or unnecessarily.

The analysis in the Certified Final EIR assumed that the digital displays would be operating for 24 hours a day. Under the Modified Project, operation of the digital displays would be limited during nighttime hours. The limited hours of operation during nighttime and reduction in the total number of TCN Structures, would reduce the Modified Project's overall total energy consumption when compared to the EIR Project. Accordingly, as with the EIR Project, the existing energy infrastructure would similarly have capacity to support the Modified Project, and the Modified Project would not require the expansion of the existing main infrastructure or require relocation of the infrastructure. Impacts related to the other proposed modifications, including minor height revisions for three TCN Structures, revisions to the dimensions for one TCN Structure (square footage would remain the same), refinements to the sign-reduction requirements, and modifications to the APNs for 21 TCN Structures, would be within the envelope of impacts identified in the Certified Final EIR. The Modified Project's impacts

related to energy consumption and infrastructure would continue to be less than significant and less than those of the EIR Project. Therefore, there are no substantial changes in circumstances, and the Modified Project would not result in any new significant environmental impacts or substantially more severe environmental impacts than were identified for the EIR Project in the Certified Final EIR. Further, there is no 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 Final EIR was certified, showing any of the conditions identified in CEQA Guidelines Section 15162(a)(3) exist.

- **Geology and Soils**—The Modified Project would reduce the total number of TCN Structures analyzed in the Certified Final EIR from 56 to 49 and relatedly reduce the number of digital displays from 97 to 86 and, therefore, would reduce the amount of excavation activities compared to the EIR Project. Therefore, the number of sites that would be subjected to potential seismic hazards, as well as unstable geologic units or soil or soil erosion, would be reducing an already less than significant impact as determined in the Certified Final EIR. Project Design Feature GEO-PDF-1 would continue to be implemented as part of the Modified Project to incorporate the recommendations of a site location-specific, design-level geologic, and geotechnical investigation for each proposed TCN Structure. Further, the Modified Project would incorporate Mitigation Measure MM-GEO-1 to address potential impacts to paleontological resources. Impacts related to the other proposed modifications, including minor height revisions for three TCN Structures, revisions to the dimensions for one TCN Structure (square footage would remain the same), refinements to the sign-reduction requirements, and modifications to the APNs for 21 TCN Structures, would be within the envelope of impacts identified in the Certified Final EIR.

Therefore, there are no substantial changes in circumstances, and the Modified Project would not result in any new significant environmental impacts or substantially more severe environmental impacts than were identified for the EIR Project. As with the EIR Project, with implementation of Mitigation Measure GEO-MM-1 the Modified Project's impacts related to geology and soils would continue to be less than significant. Further, there is no 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 Final EIR was certified, showing any of the conditions identified in CEQA Guidelines Section 15162(a)(3) exist.

- **Greenhouse Gas Emissions**—The Modified Project would reduce the total number of TCN Structures analyzed in the Certified Final EIR from 56 to 49 and relatedly reduce the number of digital displays from 97 to 86 and, therefore, would reduce the amount of excavation activities as compared to the EIR

Project. Greenhouse gas (GHG) emissions from a development project are determined in large part by the number of daily vehicle trips generated, as well as by energy consumption from proposed land uses. With the reduction of TCN Structures, the total excavation for the Modified Project would be reduced by 651 cubic yards to 4,557 cubic yards and would therefore reduce the number of truck trips and vehicle miles traveled during construction. Thus, the amount of GHG emissions from construction of TCN Structures with the Modified Project would be reduced as compared to those in the Certified Final EIR. Further, the analysis in the Certified Final EIR assumed that, during operations, the digital displays would be operating for 24 hours a day. Under the Modified Project, operation of the digital displays would be limited during nighttime hours. The limited hours of operation during nighttime and the reduction in the total number of TCN Structures would reduce the Modified Project's overall total energy consumption associated with the Modified Project when compared to the EIR Project. Additionally, as with the EIR Project, the Modified Project would be designed to comply with the requirements of Metro's 2019 Climate Action and Adaptation Plan, CALGreen Code, and the Los Angeles Green Building Code. With compliance with applicable regulations and with implementation of comparable sustainability features as the EIR Project, the Modified Project would similarly be consistent with the GHG reduction goals and objectives included in adopted State, regional, and local regulatory plans. Impacts related to the other proposed modifications, including minor height revisions for three TCN Structures, revisions to the dimensions for one TCN Structure (square footage would remain the same), refinements to the sign reduction requirements, and modifications to the APNs for 21 TCN Structures, would be within the envelope of impacts identified in the Certified Final EIR.

Thus, as with the EIR Project, the Modified Project's impacts related to GHG emissions would continue to be less than significant. Therefore, there are no substantial changes in circumstances, and the Modified Project would not result in any new significant environmental impacts or substantially more severe environmental impacts than were identified for the EIR Project. Further, there is no 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 Final EIR was certified, showing any of the conditions identified in CEQA Guidelines Section 15162(a)(3) exist.

- **Hazards and Hazardous Materials**—Similar to the EIR Project, hazardous materials, such as fuel and oils associated with construction equipment, as well as coatings, paints, adhesives, caustic or acidic cleaners, and other cleaning products, would be used during construction and operation of the Modified Project and, therefore, would require proper handling and management and, in some cases, disposal. As with the EIR Project, the management of any resultant

hazardous wastes could increase the opportunity for hazardous materials releases and, subsequently, the exposure of the public to hazardous materials. However, all potentially hazardous materials would be used, stored, and disposed in accordance with manufacturers' specifications and instructions, thereby reducing the risk of hazardous materials use. As the Modified Project would reduce the total number of TCN Structures and related digital displays, impacts related to construction-related hazards and the use, handling, and disposal of hazardous materials during construction and operation would also be reduced. As with the EIR Project, the Modified Project would implement Mitigation Measures HAZ-MM-1 through HAZ-MM-3 to reduce potentially significant impacts related to the release of hazardous materials into the environment during project construction. Impacts related to the other proposed modifications, including minor height revisions for three TCN Structures, revisions to the dimensions for one TCN Structure (square footage would remain the same), refinements to the sign-reduction requirements, and modifications to the APNs for 21 TCN Structures, would be within the envelope of impacts identified in the Certified Final EIR.

As with the EIR Project, the Modified Project would implement Mitigation Measures HAZ-MM-1 through HAZ-MM-3. Thus, the Modified Project's impacts related to hazards and hazardous materials would continue to be less than significant. Therefore, there are no substantial changes in circumstances, and the Modified Project would not result in any new significant environmental impacts or substantially more severe environmental impacts than were identified for the EIR Project. Further, there is no 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 Final EIR was certified, showing any of the conditions identified in CEQA Guidelines Section 15162(a)(3) exist.

- **Land Use**—The Modified Project would reduce the total number of TCN Structures analyzed in the Certified Final EIR from 56 to 49 and relatedly reduce the number of digital displays from 97 to 86, include refinements to the sign-reduction requirements, and allow for minor modifications to some of the proposed TCN Structures, including minor height revisions for three TCN Structures, and revisions to the dimensions for one TCN Structure (square footage would remain the same), and modifications to the APNs for 21 TCN Structures. The Certified Final EIR determined that TCN Structures NFF-2, NFF-3, NFF-16, and NFF-21 would result in significant impacts associated with inconsistencies with applicable goals, objectives, and policies set forth in the Conservation Element of the City's General Plan related to historical resources. With regard to the Modified Project, TCN Structures NFF-2, NFF-3, NFF-16, and NFF-21 would be removed from the TCN Program and would not be constructed. Therefore, the TCN Program's significant land use impact related to impacts on

historical resources would be eliminated. Additionally, the Modified Project would no longer conflict with the Conservation Element's applicable goals, objectives, and policies set forth in the Conservation Element adopted for the purpose of avoiding or mitigating an environmental effect with regard to historic resources.

Further, the Certified Final EIR concluded that development of TCN Structures FF-29 and FF-30 would be inconsistent with the Palms–Mar Vista–Del Rey Community Plan development standard regarding placement of off-site signs within the coastal area, which is intended to protect scenic resources. After receiving a formal coastal boundary line from the California Coastal Commission, it has been determined with this new information that TCN Structure FF-30 would not be located in the Coastal Zone. Additionally, the Modified Project would eliminate TCN Structure FF-29. Therefore, the Modified Project would no longer conflict with the coastal area development standard of the Palms–Mar Vista–Del Rey Community Plan prohibiting off-site commercial signs in coastal areas.

As part of the necessary approvals for the EIR Project, the City must amend its sign regulations in Chapter I of the Zoning Code to create a mechanism to review and approve the TCN Structures. The Zoning Ordinance would not authorize new signage other than the TCN Structures. The Zoning Ordinance would address the time, manner, and place aspects of the TCN Program, including the allowable locations, size and height limitations, urban design requirements, and applicable community benefits including take-down requirements for the removal of existing static off-site signs. The Zoning Ordinance, and other potential associated Zoning Code and General and/or Specific Plan amendments, would create a new class of signage for the TCN Structures given their unique attributes and intelligent technology. However, due to its inclusion of off-site advertising, an exception to the City's general ban on new off-site signs outside of Sign Districts, Specific Plans, and Supplemental Use Districts would be needed. Importantly, the Zoning Ordinance would not authorize any signage beyond the potential 49 TCN Structures on Metro-owned property.

Impacts related to the other proposed modifications, including minor height revisions for three TCN Structures, revisions to the dimensions for one TCN Structure (square footage would remain the same), refinements to the sign-reduction requirements, and modifications to the APNs for 21 TCN Structures, would be within the envelope of impacts identified in the Certified Final EIR. Therefore, there are no substantial changes in circumstances, and the Modified Project would eliminate the EIR Project's inconsistency with the Conservation Element of the City's General Plan related to historical resources and potential inconsistency with the Palms–Mar Vista–Del Rey Community Plan policies regarding placement of off-site signs within the coastal area and would

not result in any new significant environmental impacts or substantially more severe environmental impacts than were identified for the EIR Project. Thus, the Modified Project's impacts associated with conflict with applicable land use plans would be reduced to a less-than-significant level when compared to the EIR Project. Further, there is no 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 Final EIR was certified, showing any of the conditions identified in CEQA Guidelines Section 15162(a)(3) exist.

- **Noise**—The Modified Project would reduce the total number of TCN Structures analyzed in the Certified Final EIR from 56 to 49 and relatedly reduce the number of digital displays from 97 to 86 and, therefore, would reduce the amount of excavation and construction activity as compared to the EIR Project. Accordingly, the overall amount of construction activities and construction duration would reduce the associated noise and vibration impacts. Additionally, Project Design Feature NOI-PDF-1 would continue to be implemented as part of the Modified Project to ensure power construction equipment will be equipped with state-of-the-art noise shielding and muffling devices. Further, the intensity of construction activities and associated noise and vibration on a peak daily basis, which are used for measuring significance, would not increase as the construction activity and duration would remain the same for each individual TCN Structure, and the total number of TCN Structures anticipated to be constructed at one time would remain unchanged. Further, modifications to the APNs for 21 TCN Structures would not relocate the TCN Structures in a manner that would substantially increase impacts to sensitive receptors for noise and vibration. As such, noise and vibration generated during maximum construction activity days would be similar to the EIR Project. Impacts related to the other proposed modifications, including minor height revisions for three TCN Structures, revisions to the dimensions for one TCN Structure (square footage would remain the same), and refinements to the sign-reduction requirements, would be within the envelope of impacts identified in the Certified Final EIR. Furthermore, Mitigation Measure NOI-MM-1 through NOI-MM-4 would continue to be implemented as part of the Modified Project to reduce construction noise and vibration impacts to a less-than-significant level.

Therefore, there are no substantial changes in circumstances, and the Modified Project would not result in any new significant environmental impacts or substantially more severe environmental impacts than were identified for the EIR Project. As with the EIR Project, with implementation of Mitigation Measures NOI-MM-1 through NOI-MM-4 the Modified Project's construction-related noise and vibration impacts would continue to be less than significant. Further, there is no 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

Final EIR was certified, showing any of the conditions identified in CEQA Guidelines Section 15162(a)(3) exist.

- **Transportation**—The Modified Project would reduce the total number of TCN Structures analyzed in the Certified Final EIR from 56 to 49 and relatedly reduce the number of digital displays from 97 to 86, refinements to the sign-reduction requirements and allow for minor modifications to some of the proposed TCN Structures, including minor height revisions for three TCN Structures, and revisions to the dimensions for one TCN Structure (square footage would remain the same), and modifications to the APNs for 21 TCN Structures. Overall, the Modified Project would be consistent with the goals, policies, and requirements of applicable plans, similar to the EIR Project. The Modified Project also would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. As with the EIR Project, the proposed modifications would not introduce hazardous design features.

Impacts related to the other proposed modifications, including minor height revisions for three TCN Structures, revisions to the dimensions for one TCN Structure (square footage would remain the same), refinements to the sign-reduction requirements, and modifications to the APNs for 21 TCN Structures, would be within the envelope of impacts identified within the Certified Final EIR. As analyzed in the Certified Final EIR, the FF TCN Structures were reviewed for consistency with Caltrans guidelines, and all of the TCN Structures were found to be compliant with the guidelines for digital signage adjacent to a freeway. Further, Caltrans regulates the placement of outdoor advertising displays visible from California highways, and the Modified Project would require an Outdoor Advertising (ODA) License issued by Caltrans. Additionally, the Certified Final EIR evaluated the NFF TCN Structures with the Hazard Review for Sign Permits Evaluation Checklist, which is an evaluation checklist provided by the Los Angeles Department of Transportation (LADOT) for potential hazards caused by signs and support structures. As with the EIR Project, none of the TCN Structures included within the Modified Project would conflict with the checklist, and Metro would continue to coordinate with LADOT to ensure no potential safety hazards would arise during the installation or operation of the signs. As with the EIR Project, the TCN Structures under the Modified Project, would be operated based on established industry standards for refresh rate and would not include any motion or flashing, which may increase distractions for nearby drivers. Similarly, the signs would also be positioned to focus on the intended roadways and minimize visibility from adjacent streets. Further, the results of the lighting study, included as Appendices B and B.2 to the EIR Project, demonstrates that the maximum luminance from the proposed TCN Structures is less than the limits established by the California Vehicle Code

(CVC) Section 21466.5 for excessive luminance, or glare, during night, twilight (sunset and sunrise), and during the day. Lastly, the proposed modifications would not interfere with emergency access. As with the EIR Project, impacts from the Modified Project would be less than significant.

Therefore, there are no substantial changes in circumstances, and the Modified Project would not result in any new significant environmental impacts or substantially more severe environmental impacts than were identified for the EIR Project. The Modified Project's transportation impacts would be similar to the EIR Project and would continue to be less than significant. Further, there is no 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 Final EIR was certified, showing any of the conditions identified in CEQA Guidelines Section 15162(a)(3) exist.

- **Tribal Cultural Resources**—The Modified Project would reduce the total number of TCN Structures analyzed in the Certified Final EIR from 56 to 49 and, therefore, would reduce the amount of excavation activity as compared to the EIR Project. As such, the potential to encounter tribal cultural resources would be reduced. As with the EIR Project, the Modified Project would incorporate Mitigation Measures TCR-MM-1 through TCR-MM-3 to address potential impacts on tribal cultural resources. Impacts related to the other proposed modifications, including minor height revisions for three TCN Structures, revisions to the dimensions for one TCN Structure (square footage would remain the same), refinements to the sign-reduction requirements, and modifications to the APNs for 21 TCN Structures, would be within the envelope of impacts identified in the Certified Final EIR. Therefore, there are no substantial changes in circumstances, and the Modified Project would eliminate the significant unavoidable impacts related to historical resources and would not result in any new significant environmental impacts or substantially more severe environmental impacts than were identified for the EIR Project. As with the EIR Project, with implementation of Mitigation Measures TCR-MM-1 through TCR-MM-3, the Modified Project's impact on tribal cultural resources would continue to be less than significant. Further, there is no 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 Final EIR was certified, showing any of the conditions identified in CEQA Guidelines Section 15162(a)(3) exist.
- **Utilities: Electric Power Infrastructure**—The Modified Project would reduce the total number of TCN Structures analyzed in the Certified EIR from 56 to 49 and relatedly reduce the number of digital displays from 97 to 86 and, therefore, would reduce the construction and operation impacts associated with electric power infrastructure. Impacts related to the other proposed modifications,

including minor height revisions for three TCN Structures, revisions to the dimensions for one TCN Structure (square footage would remain the same), refinements to the sign-reduction requirements, and modifications to the APNs for 21 TCN Structures, would be within the envelope of impacts identified in the Certified Final EIR. Therefore, there are no substantial changes in circumstances, and the Modified Project would not result in any new significant environmental impacts or substantially more severe environmental impacts than were identified for the EIR Project. As such, the Modified Project's impact regarding electric power infrastructure would be less than significant and less than the impact under the EIR Project. Further, there is no 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 Final EIR was certified, showing any of the conditions set forth in CEQA Guidelines Section 15162(a)(3) exist.

6. Conclusion

As demonstrated by the analysis herein, the proposed modifications and clarifications would not result in any additional significant impacts or substantially increase the severity of previously anticipated significant impacts. Rather, the impacts associated with the Modified Project would be similar to the impacts identified in the Certified Final EIR (i.e., daily maximum construction emissions and peak noise levels during construction), would be eliminated (i.e., visual impacts related to historic resources, historic resources, and land use), or would be reduced (i.e., air quality, biological resources, archaeological resources and human remains, energy, geology and soils, GHG emissions, noise, transportation, tribal cultural resources, and utilities related to electric power infrastructure) when compared to those impacts identified in the Certified Final EIR, and do not constitute a new or substantially increased significant impacts. Based on this determination, the proposed modifications and clarifications do not meet the requirements for preparation of a subsequent or supplemental EIR pursuant to CEQA Guidelines Sections 15162 and 15164 and PRC Section 21166.