

Addendum

to the certified

Final Environmental Impact Report

[Case No. ENV-2011-1965-EIR, State Clearinghouse No. 2012031055]

for

Los Angeles International Airport (LAX)

LAX Sign District Project

City of Los Angeles

February 2026

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1.0 Introduction

This document is an Addendum to the Environmental Impact Report (EIR) prepared for the LAX Sign District Project (Case No. ENV-2011-1965-EIR, State Clearinghouse No. 2012031055), which was certified by the City of Los Angeles (City) on June 17, 2015 (Certified EIR). In accordance with the California Environmental Quality Act (CEQA), this Addendum to the EIR analyzes proposed modifications (the Proposed LAX Sign District Project Modifications) to the LAX Sign District Project approved in 2015 (the Approved LAX Sign District Project) and demonstrates that the Proposed LAX Sign District Project Modifications do not meet the requirements for a Supplemental or Subsequent EIR pursuant to Public Resources Code (PRC) Section 21166 or State CEQA Guidelines Sections 15162 and 15163.

1.1 Background

The City prepared an EIR pursuant to CEQA for the LAX Sign District Project to assess potential environmental impacts of the Project, as described below. The certified Final EIR, including the Draft EIR, responses to comments on the Draft EIR, and all appendices (hereafter referred to as the Certified EIR), is available at <https://www.lawa.org/lawa-our-lax/environmental-documents/documents-certified/lax-sign-district>. The Certified EIR concluded that all of the LAX Sign District Project's environmental impacts would be less than significant.

In June 2015, the City certified the Final EIR and approved the LAX Sign District Project. The LAX Sign District Project EIR evaluated the development and implementation of new off-site signage within LAX. The LAX Sign District Project EIR included a maximum of approximately 81,522 square feet of proposed new off-site signage¹ within the LAX Landside Subarea and a maximum of approximately 289,600 square feet of proposed new off-site signage within the Airside Subarea (on passenger boarding bridges).² The Approved LAX Sign District Project allowed for the addition of off-site signage at LAX including supergraphics, wall signs, digital display signs, and other signs such as signs on passenger boarding bridges, pole signs,³ and column wraps. Subsequent to the approval of the Approved LAX Sign District Project, Los Angeles World Airports, the Project Applicant, has revised the Approved LAX Sign District Project. The Proposed LAX Sign District Project Modifications would change the LAX Sign District Ordinance (Ordinance No. 183737) to align with the methodologies of recently adopted sign districts throughout the City of Los Angeles and the evolving needs of the airport and its users since the 2015 certification of the Final EIR and approval of the Approved LAX Sign District Project.

The Proposed LAX Sign District Project Modifications would allow new digital display signage on the façade of the 1961 Airport Traffic Control Tower (ATCT) to promote welcome messages and imagery; LAX-related travel and tourism messaging; content celebrating commemorations, City-hosted events, and special occasions; and artistic displays. The Proposed LAX Sign District Project Modifications would also clarify

¹ Off-site signs are signs that advertise a business, use, facility, service, or product not found at LAX (non-airport-related signage). On-site signs are signs that promote a business, use, facility, service, or product located on-site at LAX or that are airport-related.

² As discussed below in Section 2, airports are generally divided into landside and airside areas. Landside areas are accessible to the public, whereas airside areas are restricted areas with access only to authorized personnel and ticketed passengers that have undergone security screening.

³ The Certified EIR referred to these as hanging signs.

allowable locations for certain off-site signage within the Central Terminal Area (CTA) within the identified location opportunity areas; clarify the permitted sign types allowed; modify digital signage Controlled Refresh standards and frequencies; remove the maximum permitted sign area provision (Ordinance Section 6.D.1)⁴ while maintaining the maximum permitted sign area for off-site signs at a total of 80,722 square feet within the Landside Subarea and 289,600 square feet within the Airside Subarea; and include a requirement to remove a total of 23,520 square feet of off-site signs outside of the CTA (referred to as “takedown”) in lieu of the previous removal ratio in the LAX Sign District Ordinance (Ordinance Section 8.A). The Proposed LAX Sign District Project Modifications would not change the maximum permitted sign area for off-site signs regulated by the Ordinance; the maximum permitted sign area would continue to be 80,722 square feet within the Landside Subarea and 289,600 square feet within the Airside Subarea.⁵

Both the Approved LAX Sign District Project (as analyzed in the Certified EIR) and the Proposed LAX Sign District Project Modifications (analyzed in this Addendum) are discussed further in Section 2.2 below.

1.2 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, Section 15164(a) of the State CEQA Guidelines 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.

State 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 the lead agency determines, on the basis of substantial evidence in light of the whole record, 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

⁴ The existing Ordinance provision limits the amount of signage permitted to be activated within the Landside Subarea to 60,542 square feet. The Proposed LAX Sign District Project Modifications would allow a total of 80,722 square feet within the Landside Subarea. The proposed new digital display signage on the façade of the 1961 ATCT would total up to approximately 25,725 square feet, leaving approximately 55,000 square feet of additional allowable signage. Therefore, with implementation of the 1961 ATCT digital signage as proposed, the amount of off-site signage within the CTA with implementation of the Proposed LAX Sign District Project Modifications would not exceed the amount allowed in the Certified EIR.

⁵ The LAX Sign District Project EIR evaluated a maximum of approximately 81,522 square feet of off-site signage within the Landside Subarea, whereas the LAX Sign District Ordinance identified a maximum of approximately 80,722 square feet. For purposes of this description of the Modified Project, the proposed modifications associated with the LAX Sign District Ordinance amendment retain 80,722 square feet as the maximum allowable signage within the Landside Subarea.

- 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:

- (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.

Pursuant to Section 15164 of the State CEQA Guidelines, if some changes or additions to a previously certified EIR are necessary but none of the above conditions have occurred, the lead agency (in this case the City of Los Angeles) may prepare an Addendum to document why no further environmental review is required. An addendum need not be circulated for public review, but can be included in or attached to the Certified EIR, which the decision-making body shall consider prior to making a decision on the project. A brief explanation supported by substantial evidence as to why an agency decided not to prepare a Subsequent EIR under Section 15162 of the State CEQA Guidelines is required to be prepared. This explanation is included in this Addendum.

As demonstrated by the analysis in this document, the Proposed LAX Sign District Project Modifications would not result in any new significant impacts, nor would it substantially increase the severity of previously identified significant impacts. Rather, all of the impacts associated with the Modifications are within the envelope of impacts addressed in the Certified EIR and do not constitute a new or substantially increased significant impact. Therefore, the modifications resulting from the Modifications do not meet the criteria for a Supplemental or Subsequent EIR pursuant to PRC Section 21166 and State CEQA Guidelines Section 15162 and 15163.

2.0 Project Description

2.1 Environmental Setting

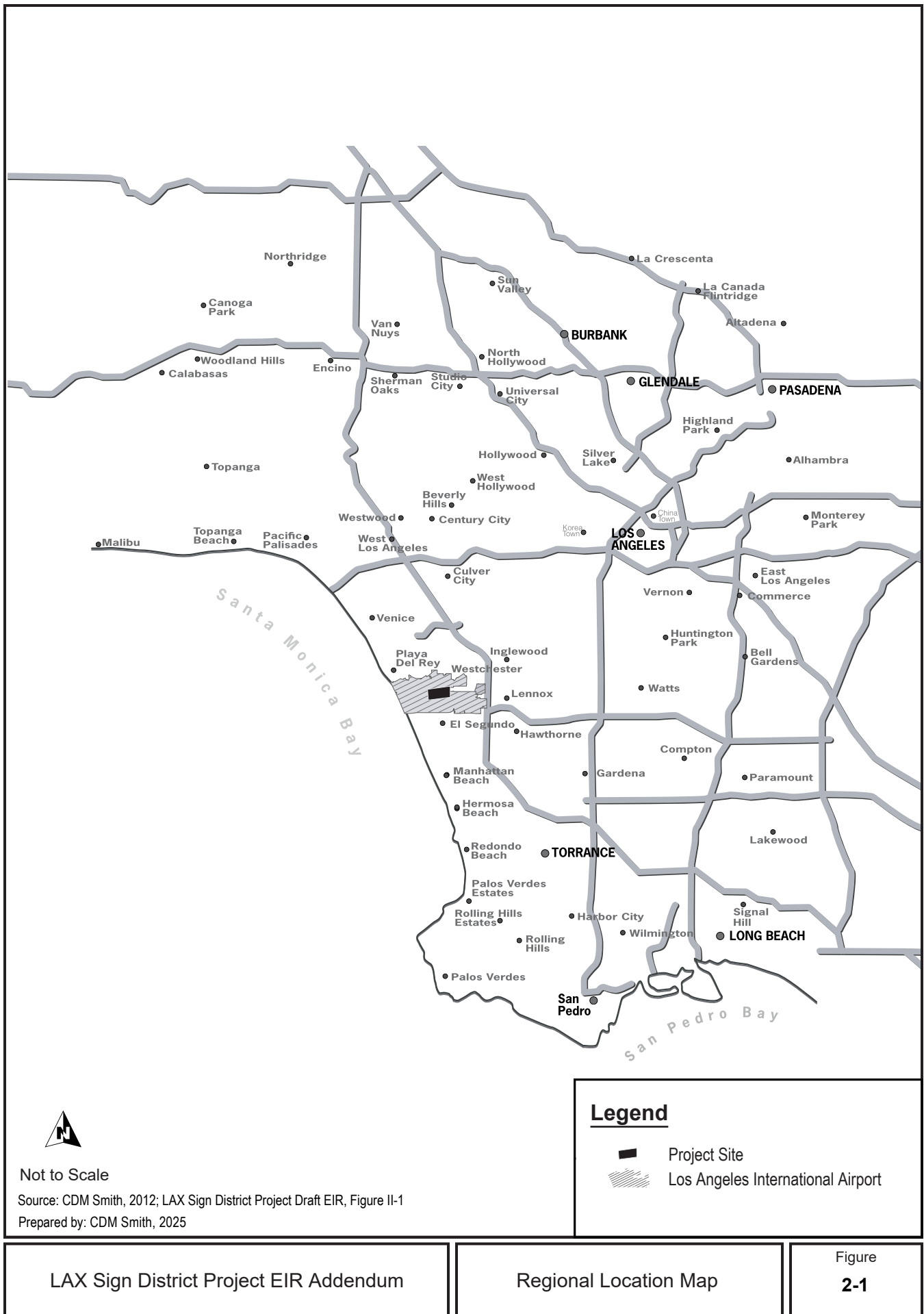
2.1.1 Project Location

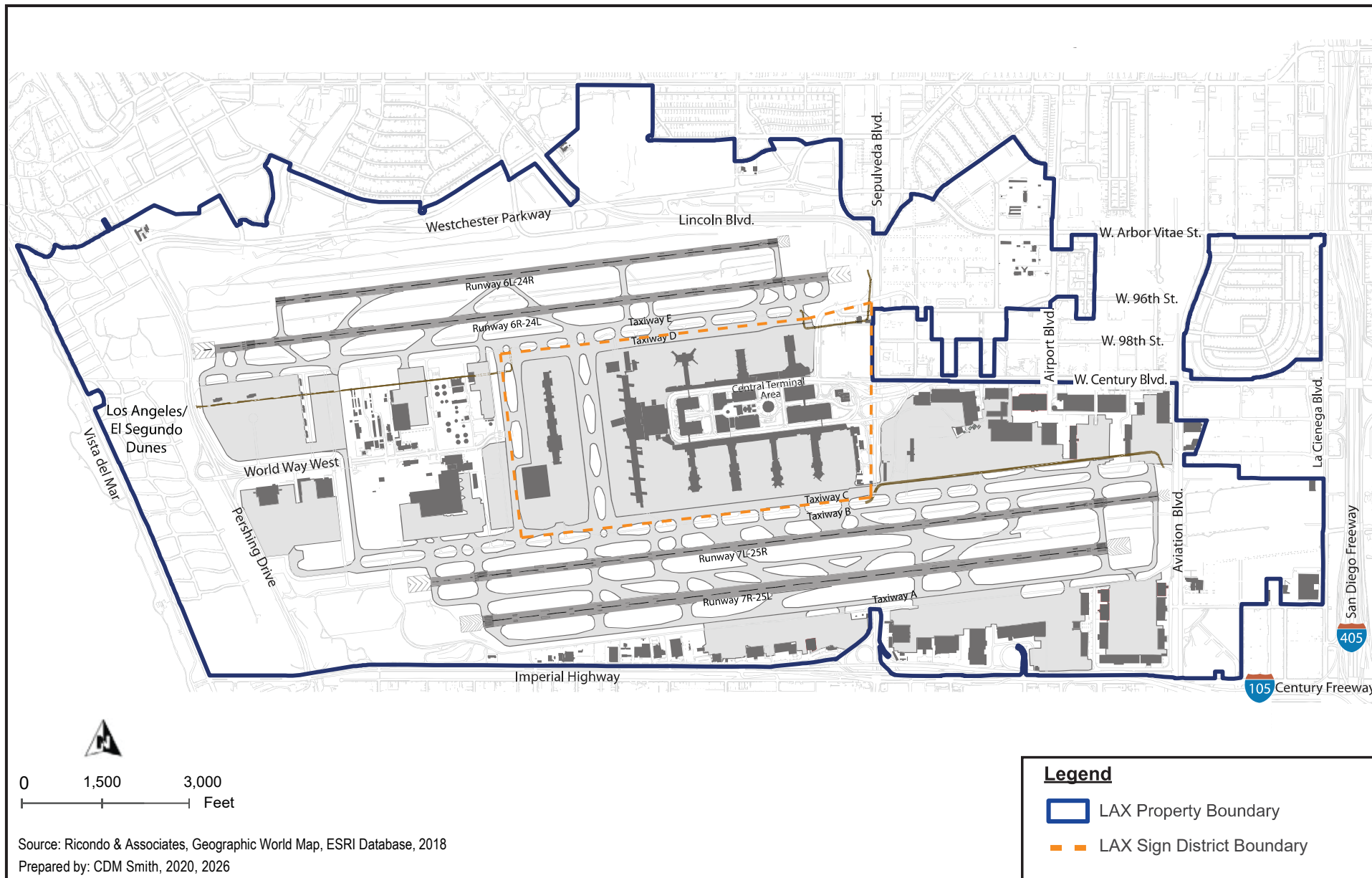
The Project site is located within the Los Angeles International Airport (LAX), which is located within the LAX Plan area in the City of Los Angeles. LAX encompasses approximately 3,800 acres and is situated at the western edge of the City of Los Angeles, as shown in **Figure 2-1**. To the north of LAX is the community of Westchester, to the south is the City of El Segundo, to the east is the City of Inglewood, and to the west is the Pacific Ocean. **Figure 2-2** illustrates the location of the LAX Sign District in the context of the airport and surrounding areas.

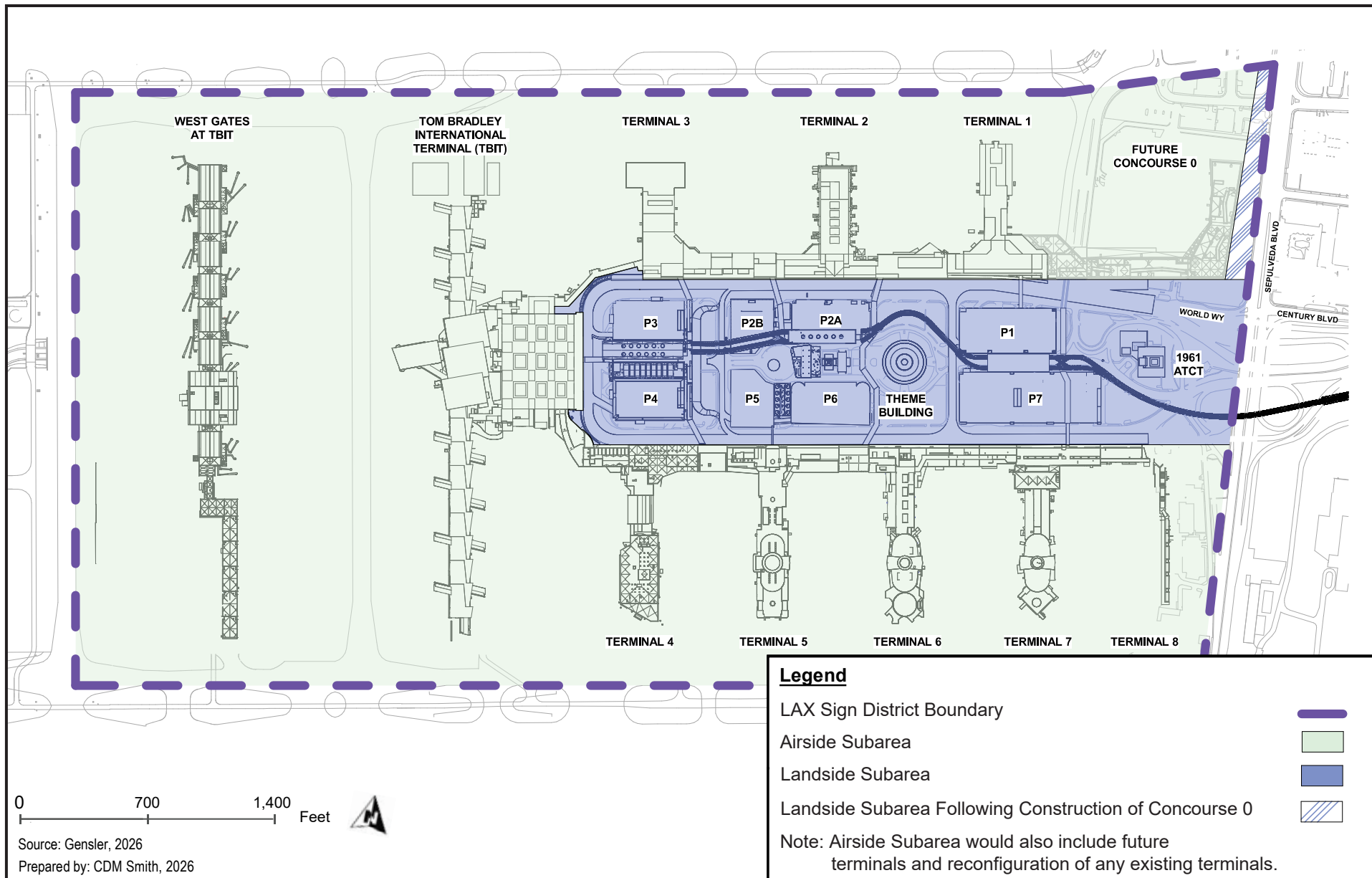
As shown in **Figure 2-3** the Project site (i.e., the boundaries of the LAX Sign District) encompasses an approximately 469-acre⁶ area within the interior of LAX that includes the CTA; the area along Sepulveda Boulevard north of Century Boulevard that currently accommodates LAXit, a taxi and ridesharing pickup lot; and the portion of the airfield that is situated between the north and south airfields and extends to the west of the West Gates at Tom Bradley International Airport (TBIT) and east of the LAX Fuel Farm and the crossfield taxiways that lie between the West Gates and the fuel farm. The Project site is comprised of portions of two distinct LAX subareas – Landside and Airside. The portion of the Landside Subarea that lies within the Project boundary includes the publicly-accessible areas associated with the CTA, including the lower and upper roadways associated with arrivals and departures, respectively; portions of the terminals facing the interior CTA roadways; the Automated People Mover (APM) and terminal pedestrian bridges; parking structures, columns, and the 1961 ATCT and area along Sepulveda Boulevard immediately adjacent to the CTA. The Landside Subarea is visible primarily to visitors, passengers, and airport employees. The portion of the Airside Subarea that lies within the Project boundary includes existing (as well as future) terminal concourses, including the future Concourse 0; gates; passenger boarding bridges; airport access ways; and equipment that allow for the safe and efficient operation of airport airfield activities.⁷ The Airside Subarea is primarily visible to passengers and employees who handle airfield operations.

⁶ Because the Project is limited to specific terminals, parking structures, sky bridges, columns, and passenger boarding bridges, the Approved LAX Sign District Project only affects a portion of the 469 acres (approximately 203 acres total). (Due to a different calculation methodology, the Certified EIR describes the site area as 502 acres. For purposes of this Addendum, the difference in calculation does not alter any of the analyses or impact conclusions.)

⁷ Following construction of Concourse 0, the portion of the current LAXit taxi and rideshare pickup lot that is located between the exterior of the east-facing Concourse 0 façade and Sepulveda Boulevard will be redesignated as Landside Subarea.







2.1.2 Existing Conditions

2.1.2.1 Regional and Local Settings

As noted above, the Project site is situated at the western edge of the City of Los Angeles, within the LAX CTA. LAX is located north of and adjacent to Interstate 105 (I-105), approximately 1.5 miles west of I-405, and approximately 2 miles south of State Route 90 (SR 90). These highways provide regional access to LAX. Major roadways serving LAX include Sepulveda Boulevard, which is State Route 1 in the Project vicinity and is a Class I Major Highway; and Century Boulevard and Imperial Highway, which are Class 2 Major Highways. In addition to regional highways and roads that directly serve LAX, the LAX Metro Connector Shuttle service is a free shuttle service which provides local connections between LAX and the Los Angeles County Metropolitan Transportation Authority's (Metro) C Line and K Line light rail transit lines as well as other public transit service providers via the LAX/Metro Transit Center, which is located at Aviation Boulevard and 96th Street. Regionally, the LAX FlyAway Bus offers regularly scheduled round-trip service between the CTA and the locations of Van Nuys and LA Union Station in downtown Los Angeles.

The Project site is located within the interior of LAX that includes the CTA. LAX has nine passenger terminals arranged in a U-shape with a two-level roadway layout separating departures and arrivals. The two-level airport roadway network is accessed from the following off-airport roadways: Century Boulevard, Sepulveda Boulevard, and 96th Street Bridge/Sky Way. Each of these roadways provides vehicular access to both the departures (upper) level and the arrivals (lower) level curbsides and roadways. Airport access from the departures level to the arrivals level is provided via a recirculation ramp located at the eastern end of the CTA and a ramp at the western end of Center Way, connecting to West Way. Access from the arrivals level to the departures level is provided via the ramp at the western end of Center Way, connecting to West Way (upper level).

2.1.2.2 Existing Land Use

The Project site is characterized by a built out environment. Activities within the CTA and on adjacent roadways, as well as airfield vehicle and passenger movements within and adjacent to the Project site, operate on a 24-hour basis. The Project site and its surrounding environment both on-airport and off-airport generate light emissions common in highly urbanized areas. Signage within the Project site includes wayfinding, terminal identification, traffic, parking, and tenant signage.

The Project site is located entirely within the LAX Plan⁸ area, as governed by the LAX Specific Plan.⁹ The Project site is in areas designated in the LAX Plan and LAX Specific Plan as "Airport Landside" and "Airport Airside." Existing zoning is LAX Zone. Section 14 of the LAX Specific Plan identifies the sign regulations associated with off-site signage within the area that lies within the LAX Sign District boundary, which are governed by the regulations of the LAX Sign District (Ordinance No. 183737).

⁸ City of Los Angeles, Department of City Planning, *Los Angeles International Airport LAX Plan*, adopted December 14, 2004, last amended June 7, 2017. Available: <https://www.lawa.org/en/lawa-our-lax/plan-and-ordinances>.

⁹ City of Los Angeles, Department of City Planning, *Los Angeles International Airport (LAX) Specific Plan*, Ordinance No.176,345 (as amended by Ordinance Nos. 173,148; 182,542; 184,348; and 185,164), adopted December 14, 2004, last amended September 8, 2017. Available: <https://www.lawa.org/en/lawa-our-lax/plan-and-ordinances>.

2.1.3 Surrounding Land Uses

The environmental setting of the Project site is characterized by a highly built environment with roadway and airfield vehicle and passenger movement activity within and adjacent to the Project site throughout the day and much of the night. The land uses immediately surrounding the Project site include airport operations and facilities (including taxiways and runways) in all directions, and off-airport commercial uses to the east (along Sepulveda Boulevard and Century Boulevard), predominantly including hotels, office buildings, and parking/ground transportation facilities.

Land uses north of the active airport operations area (AOA)¹⁰ include vacant land (portions of the area known as LAX Northside, a 340-acre area that lies between the north airfield and the Westchester and Playa del Rey communities), recreation (i.e., Westchester Golf Course, which is on LAX property), and residential (within the communities of Westchester and Playa del Rey). Land uses to the north range in height from one to five stories. Land uses surrounding LAX to the east primarily include hotels, office buildings, and parking, with buildings ranging in height from 1 to 17 stories. Land uses south of LAX are within the City of El Segundo and include predominately residential and commercial uses, consisting of single-family residential and multi-family residential uses, with some office, hotel, and retail land uses. Land uses to the south range in height from 1 to 11 stories. To the west of the AOA lie the Los Angeles/El Segundo Dunes, which form the western boundary of the airport. To the west of the western airport boundary are Dockweiler State Beach and the Pacific Ocean. Residential areas closest to the Project site are approximately 0.4 mile northeast and 0.6 mile north (community of Westchester) and 0.5 mile south (City of El Segundo).

2.2 Project Summary

2.2.1 Overview of Approved Project

The Approved LAX Sign District Project, as analyzed in the Certified EIR, entailed the development and implementation of a Sign District at LAX to permit new off-site signs (i.e., non-airport-related signage, which includes advertising)¹¹ within two distinctive subareas – Landside and Airside.¹² The Approved LAX Sign District Project EIR evaluated a maximum of approximately 81,522 square feet¹³ of new off-site signage within the Landside Subarea¹⁴ and a maximum of approximately 289,600 square feet of new off-

¹⁰ The AOA is a non-public area that includes paved or unpaved areas used or intended to be used for the unobstructed movement of aircraft, in addition to its associated runways, taxiways, or aprons.

¹¹ Because on-site signs (i.e., signs which promote a business, use, facility, service, or product located on-site at LAX or that are airport-related) are already allowed at LAX under the LAX Specific Plan, and tenant signage is allowed under LAX Tenant Signage Standards, on-site and tenant signage are not regulated by the Approved LAX Sign District Project.

¹² Airports are generally divided into landside and airside areas. Landside areas are accessible to the public, whereas airside areas are restricted areas with access only to authorized personnel and ticketed passengers that have undergone security screening.

¹³ The Certified EIR for the Approved LAX Sign District Project identified a maximum of approximately 81,522 square feet of new signage within the Landside Subarea; the adopted LAX Sign District Ordinance (Ordinance 183737) identifies a maximum of approximately 80,722 square feet of new signage within the Landside Subarea. Further, per the adopted LAX Sign District Ordinance, within the Landside Subarea, only 75 percent of the square footage—i.e., 60,542 square feet—may be activated at any one time. The Certified EIR evaluated impacts associated with implementation of the full 81,522 square feet of new signage.

¹⁴ In the context of the LAX Sign District Ordinance, the Landside Subarea at LAX includes the access areas associated with the Central Terminal Area (CTA) of LAX (i.e., lower and upper roadways associated with arrivals and departures, respectively), portions of the terminals facing the interior CTA roadway, parking structures, sky bridges, and roadway columns.

site signage within the Airside Subarea.¹⁵ In conjunction with the Approved LAX Sign District Project, an ordinance for the LAX Sign District¹⁶ was adopted, which established regulations regarding sign types, placement, number, dimensions, illumination, and animation throughout the LAX Sign District area (the “Project site”; see Figure 2-3).

The Approved LAX Sign District Project contains provisions that establish regulations such as sign types, number of signs, sign dimensions, sign placement, sign illumination, sign motion/animation, etc. The regulations of the Approved LAX Sign District (also known as a Supplemental Use District) superseded the regulations set forth in the Los Angeles Municipal Code (LAMC). As part of the Approved LAX Sign District Project, off-site signage is limited to the CTA (Landside Subarea) and portions of the Airside Subarea; no new off-site signage was proposed beyond these areas (see Figure 2-3). The Approved LAX Sign District Project was designed to limit visibility from off-airport locations (i.e., surrounding communities) and to not visually or negatively affect airport operations or affect or alter historical buildings within LAX. Specifically, the basic purpose of the Approved LAX Sign District Project was to allow and promote a variety of signage throughout the LAX Sign District boundaries (i.e., within the CTA and on passenger boarding bridges) in a manner that encourages and contributes to the modernization of LAX in an orderly and flexible way, without cluttering the visitor's visual environment or impacting the surrounding communities.

Under the Approved LAX Sign District Project, off-site signs are not permitted on a number of buildings within the Project site including the Theme Building, the Airport Traffic Control Tower, and the Clifton A. Moore Administration Building (which includes the former Airport Traffic Control Tower [1961]). In addition, as part of the Approved LAX Sign District Project, a number of off-site signs under LAWA’s control were removed in compliance with applicable requirements from the Department of City Planning.

The Approved LAX Sign District Project allows a range of off-site signage, including supergraphics, wall signs, digital display signs, signs on passenger boarding bridges, signs on columns, and pole signs. Under the Approved LAX Sign District Project, no new off-site signage is allowed to be placed along the Project boundary. Figures that illustrate the allowed signage types and locations under the Approved LAX Sign District Project are provided in **Attachment 1**. The Approved LAX Sign District allows flexibility to provide either a digital display or supergraphic sign at the locations where a digital display is shown in the Attachment 1 figures. The figures show the maximum amount of signage that could be displayed at one time throughout the Project site. The amount of signage visible to each visitor/passenger will vary depending upon their viewshed while at LAX (i.e., a visitor/passenger to LAX would not view all signage within the Project area, but only those signs that are within visual range.)

¹⁵ In the context of the adopted LAX Sign District Ordinance, the Airside Subarea at LAX includes existing (as well as future) terminal concourses, gates, passenger boarding bridges, runways, airport access ways, and equipment which allow for the safe and efficient operation of airport airfield activities.

¹⁶ City of Los Angeles, *Ordinance 183737, Los Angeles International Airport (LAX) Sign District Ordinance*, June 17, 2015. Available: <https://www.lawa.org/lawa-our-lax/plan-and-ordinances>.

2.2.2 Modifications to Approved Project

2.2.2.1 Overview of Proposed Project Modifications

This section describes the Proposed LAX Sign District Project Modifications to the Approved LAX Sign District Project that was described and analyzed in the LAX Sign District Certified EIR. These modifications are proposed to align the Project with the evolving needs of the airport and its users as well as the recently adopted sign ordinances approved in the City of Los Angeles since the 2015 certification of the Certified EIR and approval of the Project. Since 2015, LAX has undergone a multibillion-dollar modernization program that has delivered updated terminals, expanded concourses, reconfigured roadways, and new curbside and transit facilities. These facilities have modified the building façades and CTA features (e.g., light standards) where signage could be located as identified in the LAX Sign District Project EIR. Similarly, the addition of the Automated People Mover and its elevated guideway has modified the CTA's Sky Bridge locations and certain signage opportunities. Additional improvements will add Concourse 0 to the east of Terminal 1, introducing new building façades facing the CTA and Sepulveda Boulevard, and will reconfigure the roadways entering and exiting the CTA. The Proposed LAX Sign District Project Modifications respond to these changes within the CTA. The proposed modifications would not change the maximum permitted sign area for off-site signs regulated by the Ordinance; the maximum permitted sign area would continue to be 80,722 square feet within the Landside Subarea and 289,600 square feet within the Airside Subarea.¹⁷

Key components of the Proposed LAX Sign District Project Modifications include the following:

- Allowance of digital signage on the 1961 Airport Traffic Control Tower (ATCT) to display welcome messages and imagery; LAX-related travel and tourism messaging; content celebrating commemorations, City-hosted events, and special occasions; and artistic displays. Messages and imagery would be determined by LAWA and would be subject to applicable brightness, duration, and operational safety standards, and the City's federal grant obligations.
- Clarification that signage within the CTA would be permitted within the identified location opportunity areas.
- Clarification to the permitted sign types allowed under the LAX Sign District Ordinance.
- Modifications to digital signage Controlled Refresh standards and frequencies.
- Removal of the maximum permitted sign area provision in the adopted Ordinance that limited the amount of signage permitted to be activated within the Landside Subarea to no more than 60,542 square feet at any one time (Ordinance Section 6.D.1), thereby increasing the maximum amount of permitted signage to 80,722 square feet.¹⁸

¹⁷ As noted in Section 1.1, the LAX Sign District Project EIR evaluated a maximum of approximately 81,522 square feet of off-site signage within the Landside Subarea, whereas the LAX Sign District Ordinance identified a maximum of approximately 80,722 square feet. For purposes of this description of the proposed project modifications, the proposed modifications associated with the LAX Sign District Ordinance amendment retain 80,722 square feet as the maximum allowable signage within the Landside Subarea.

¹⁸ As explained in Section 2.2.2.3, although this change represents an increase in the amount of signage that may be activated at any one time per the adopted Ordinance, it does not represent an increase in the amount of signage evaluated in the Certified EIR.

- Replacement of the previous takedown ratio in the LAX Sign District Ordinance with a requirement to remove a total of 23,520 square feet of off-site signage outside of the CTA.

In conjunction with these modifications, LAWA is reorganizing and expanding on the development standards that are currently in the LAX Sign District Ordinance by creating the LAX Sign District Design Standards and Guidelines.

The proposed modifications to the LAX Sign District Ordinance identify the following sign types:

- Column Wrap Signs
- Digital Displays
- Pole Signs
- Supergraphic Signs
- Wall Signs

The type of signage allowed on the various locations within the CTA are shown in **Table 2-1**.

Table 2-1 LAX Sign District Sign Types and Locations under the Proposed LAX Sign District Project Modifications

Sign Type	Landside Subarea						Airside Subarea
	Arrival and Departure Level Roadway Light Poles	Arrival Level Roadway Columns	Terminal Building Façades	APM and Terminal Sky Bridges ¹	CTA Parking Structures	1961 ATCT	Passenger Boarding Bridges
Column Wrap		●					
Digital Displays			● ²	●	●	●	
Pole Signs	●						
Supergraphic Signs			●	●	●		●
Wall Signs			●	●	●		●

Notes:

¹ Terminal sky bridges are bridges from the parking structures and the terminals at Terminals 1 and 7. APM Terminal sky bridges are bridges from the APM stations within the CTA to the terminals.

² Digital displays would be permitted on the Concourse 0 east-facing façade and south-facing façade, when that facility is constructed. The location opportunities for digital display signage on Concourse 0 would depend on the final design of that facility. Prior to the construction of Concourse 0, digital displays would be permitted on the Terminal 1 east-facing façade. Digital displays would not be permitted on any other terminal façades.

Key: APM = Automated People Mover; ATCT = Airport Traffic Control Tower; CTA = Central Terminal Area

As with the Approved LAX Sign District Project, digital displays would continue to be subject to standard refresh rates.¹⁹ The LAX Sign District Project EIR identified two refresh standards: (1) Controlled Refresh I, with a refresh rate that is no more frequent than one refresh event every 8 seconds²⁰ and an instant transition between images (i.e., images would remain static between refreshes); and (2) Controlled

¹⁹ A refresh rate is the frequency that an image changes on a digital display.

²⁰ The existing Ordinance provides an exception for the single digital display authorized for the eastern facing façade of Parking Structure 1, which is limited to one refresh every 14 seconds in lieu of one refresh every 8 seconds.

Refresh III, with a frequency of one refresh event every 12 hours and an instant transition between images. Under the Proposed LAX Sign District Project Modifications, the Controlled Refresh III rate would be changed to a refresh rate that is no more frequent than one refresh event every 1 hour. In addition, under the Proposed LAX Sign District Project Modifications, a third refresh option would be added. Controlled Refresh II would have a refresh rate that is no more frequent than one refresh event every 16 seconds and would apply to the 1961 ATCT and the east-facing façades of Parking Structure 1, Terminal 1, and the future Concourse 0. The new Controlled Refresh II would require an instant transition between images (i.e., images would remain static between refreshes) on the east-facing façades of Parking Structure 1, Terminal 1, and the future Concourse 0. For the 1961 ATCT, although images would require an instant transition, colors would be allowed to fade similar to the way that fade currently occurs on the existing lighted pylons (although the minimum fade rate for the pylons is 5 seconds).

As with the Certified EIR, digital displays on parking structures would be limited to Controlled Refresh I, with the exception of the east-facing façade of Parking Structure 1, which would be subject to Controlled Refresh II. As with the Approved LAX Sign District Project, digital displays on sky bridges would be limited to Controlled Refresh III. The Proposed LAX Sign District Project Modifications would eliminate the simultaneous refresh of digital displays. Instead, with the exception of the 1961 ATCT, the refresh of digital displays within each refresh group would be coordinated among nearby digital displays, so that refresh of signs that are visible within the same field of view to an automobile driver or pedestrian (such as signs on parallel façades and signs in proximity to one another) would occur in a coordinated manner,²¹ to the extent feasible. None of the digital signage subject to the LAX Sign District would display moving images (e.g., video, motion, flashing, scrolling).²²

In conjunction with the proposed modifications to the LAX Sign District Project, the LAX Sign District Ordinance is being amended (see Section 2.3 below and **Attachment 2**). In addition, as noted previously, in conjunction with the Proposed LAX Sign District Project Modifications and amendments to the LAX Sign District Ordinance, LAWA is developing the LAX Sign District Design Standards and Guidelines in conformance with Section 5.A.2 of the original LAX Sign District Ordinance. These standards will implement the Ordinance by providing parameters for a sign program that responds to the complex and fluid nature of the airport environment by: (1) prioritizing wayfinding signage, which is not subject to the LAX Sign District Ordinance; (2) structuring the approach to placement of and restrictions to off-site signs to minimize distractions to drivers and pedestrians; and (3) providing signage opportunities within a visual field of a complementary size and type. Physical changes to signage that may occur as a result of proposed amendments to the LAX Sign District Ordinance or provisions included in the LAX Sign District Design Standards and Guidelines are consistent with the description of the Proposed LAX Sign District Project

²¹ For example, refresh events for signage on the north facing façade of Parking Structure 2 and on the Terminal 2 sky bridges would occur in conjunction with one another, to the extent feasible.

²² Other Ordinances in the City of Los Angeles use the terminology “full animation” for moving images. The Convention Center and Arena Sign District (Ordinance No. 188078), defines “full animation” as follows: “Full Animation shall permit images, videos, animation, parts and/or illumination that change, move, stream, scroll, or otherwise incorporate motion to change at an unrestricted rate.” The proposed amendments to the LAX Sign District Ordinance incorporate this definition. City of Los Angeles, *Convention Center and Arena Sign District* (Ordinance No. 188078), February 5, 2024. Available: https://planning.lacity.gov/odocument/4c8d9e6c-781d-49a9-aea5-4207f7775e4a/22-0536_ord_188078_02-05-2024_Sign%20District.pdf.

Modifications provided in this section. The environmental impacts of the Proposed LAX Sign District Proposed Modifications are addressed in Section 3 of this Addendum.

Figures that illustrate the areas within the CTA where signage would be allowed under the Proposed LAX Sign District Project Modifications are provided in **Figure 2-4** through **Figure 2-16**. These figures illustrate locations, referred to as “opportunity areas,” within the LAX Sign District boundary where signage subject to the LAX Sign District would be allowed. The total amount of square footage within the opportunity areas exceeds the total allowable square footage as dictated by the proposed LAX Sign District Ordinance amendments. However, as noted above, the total maximum allowable square footage of signage would remain at 80,722 square feet within the Landside Subarea and 289,600 square feet within the Airside Subarea.

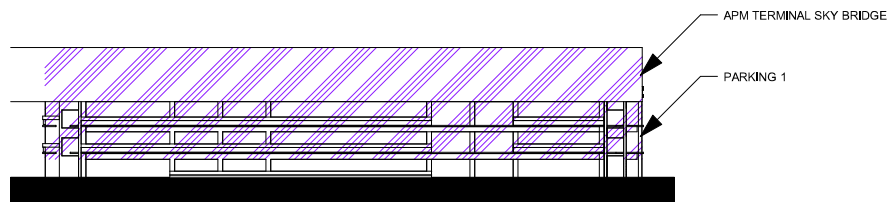
2.2.2.2 Proposed Signage on the 1961 ATCT

A key element of the Proposed LAX Sign District Project Modifications is the placement of artwork and signage on the 1961 ATCT to display welcome messages and imagery; LAX-related travel and tourism messaging; content celebrating commemorations, City-hosted events, and special occasions; and artistic displays. The 1961 ATCT was part of the original design for the CTA and served as the control tower for LAX until 1996, when it was replaced with a new ATCT. After this replacement, the 1961 ATCT building was used by LAWA for administrative offices. In recent years, use of the 1961 ATCT for offices was discontinued based on concerns about seismic and fire life safety. The 1961 ATCT does not meet modern seismic, life safety, accessibility, and building systems requirements for routine administrative use. Retrofitting the slender, small-floor-plate tower to current codes and workplace standards would require disproportionate structural and system upgrades, making continued occupancy impractical at this time. LAWA proposes to repurpose the building to support a new vision for the LAX gateway. With implementation of the Proposed LAX Sign District Project Modifications, digital displays would be added to all four sides of the tower façades. The digital displays would serve as a landmark and a welcome for airport users and visitors.

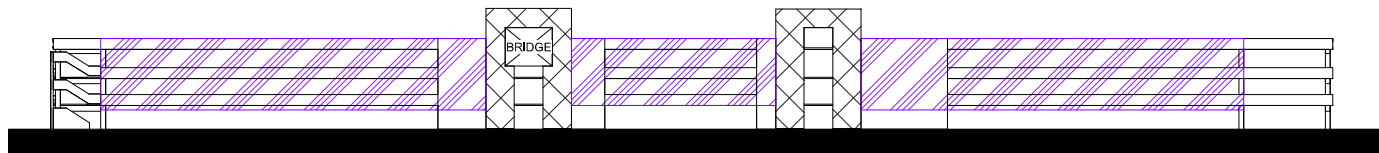
LAWA is proposing to install LED digital media displays on the 1961 ATCT structure below the cab element²³ on all four sides. The digital media displays would be designed to maintain transparency to the existing tower behind them, allowing the surviving historical elements of the tower to remain visible. The display dimensions on the north and south façades would be up to approximately 51 feet by up to 134 feet; the dimensions on the east and west façades would be up to approximately 45 feet by up to 134 feet. The total area of the signage on the 1961 ATCT would be up to approximately 25,725 square feet. The digital media displays would consist of separate horizontal bands, with intervals (i.e., a “reveal”) at every floor, to reflect the original structure of the tower building. The LED display would be hung on the exterior of the building attached to existing outriggers.²⁴ The existing, non-original metal railings would be removed and the existing steel would be refurbished, as needed.

²³ The ATCT cab is the uppermost portion of the tower where the air traffic controllers are located. The cab includes large windows on all sides that provide a panoramic view of the airport and surrounding airspace.

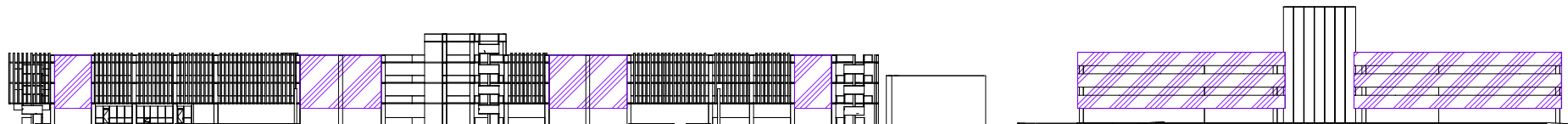
²⁴ An outrigger is a projecting rafter or truss that extends beyond the edge of a roofline.



PARKING 1 ELEVATION - EAST



PARKING 1 ELEVATION - NORTH



PARKING 2A ELEVATION - NORTH

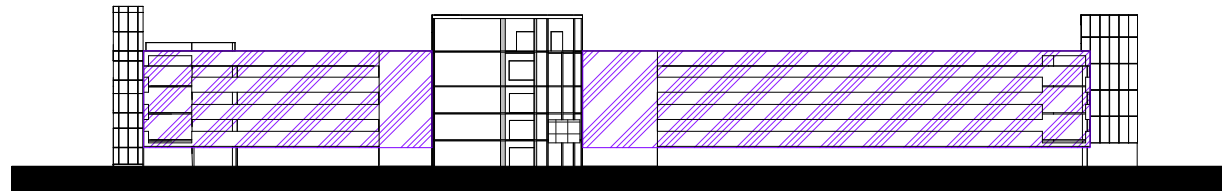
PARKING 2B ELEVATION - NORTH

0 80 160 Feet

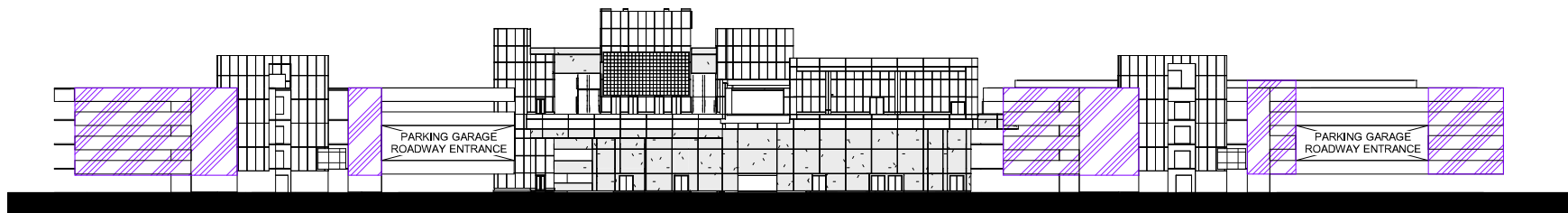
Source: Gensler, 2025
Prepared by: CDM Smith, 2025

Legend

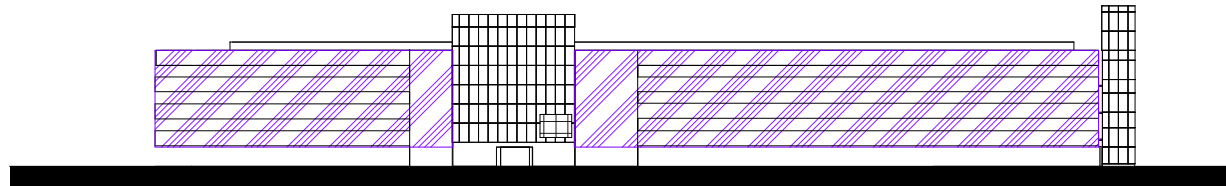
Location Opportunities 



PARKING 3 ELEVATION - NORTH



PARKING 3 & 4 ELEVATION - WEST



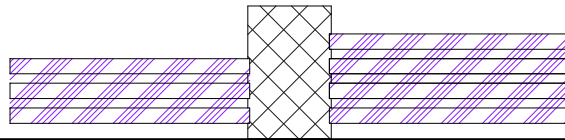
PARKING 4 ELEVATION - SOUTH

0 80 160 Feet

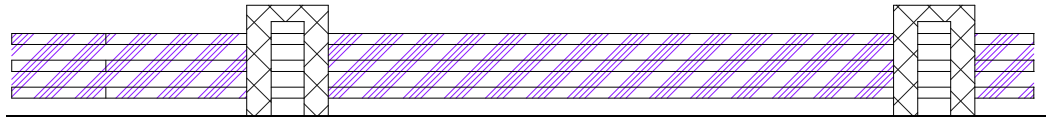
Source: Gensler, 2025
Prepared by: CDM Smith, 2025

Legend

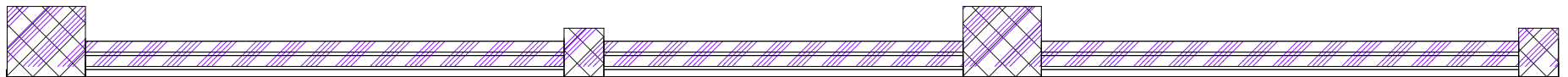
Location Opportunities 



PARKING 5 ELEVATION - SOUTH



PARKING 6 ELEVATION - SOUTH



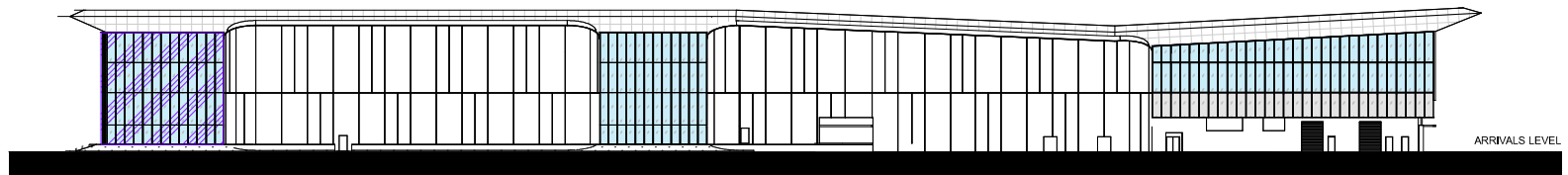
PARKING 7 ELEVATION - SOUTH

0 80 160 Feet

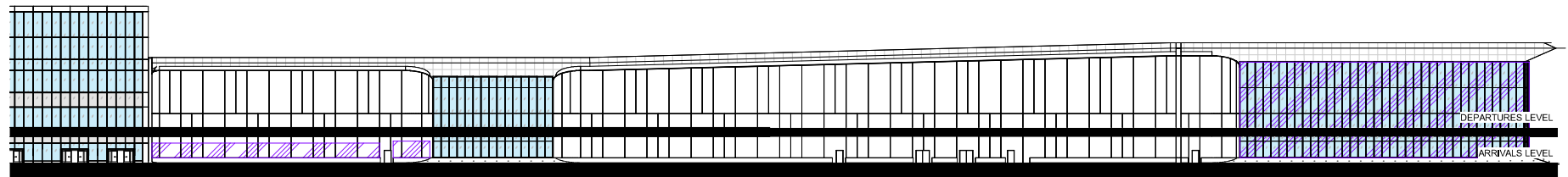
Source: Gensler, 2026
Prepared by: CDM Smith, 2026

Legend

Location Opportunities 



FUTURE CONCOURSE 0 ELEVATION - EAST



FUTURE CONCOURSE 0 ELEVATION - SOUTH

0 80 160
Feet

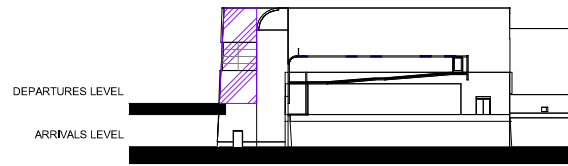
Source: Gensler, 2026
Prepared by: CDM Smith, 2026

Legend

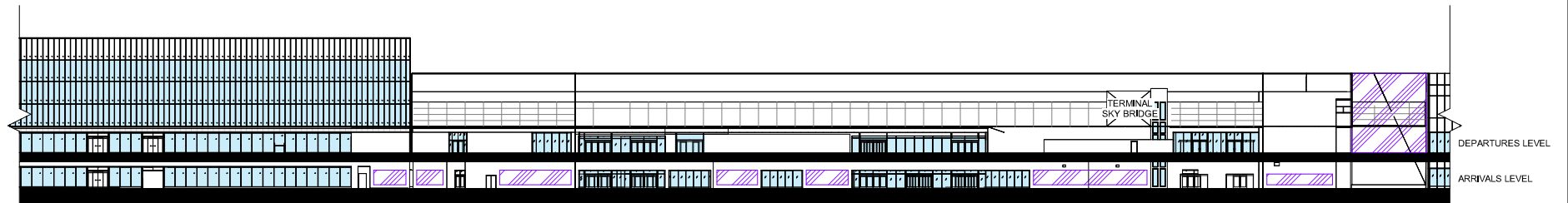
Glass Areas 

Location Opportunities 

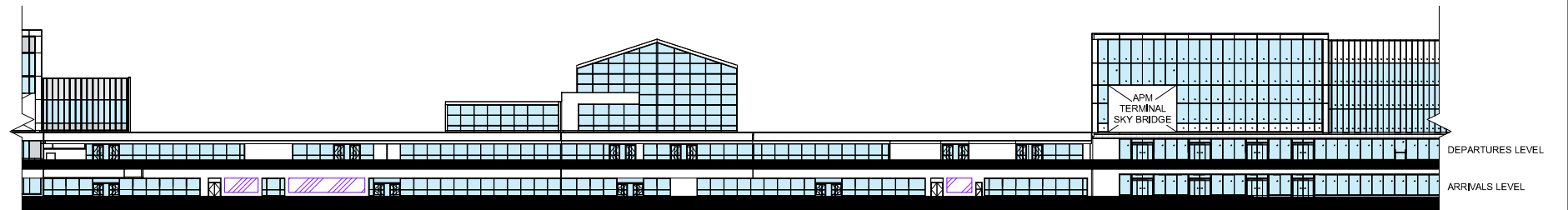
Note: Document is illustrative of potential
concourse facade to be designed.



TERMINAL 1 ELEVATION - EAST



TERMINAL 1 ELEVATION - SOUTH



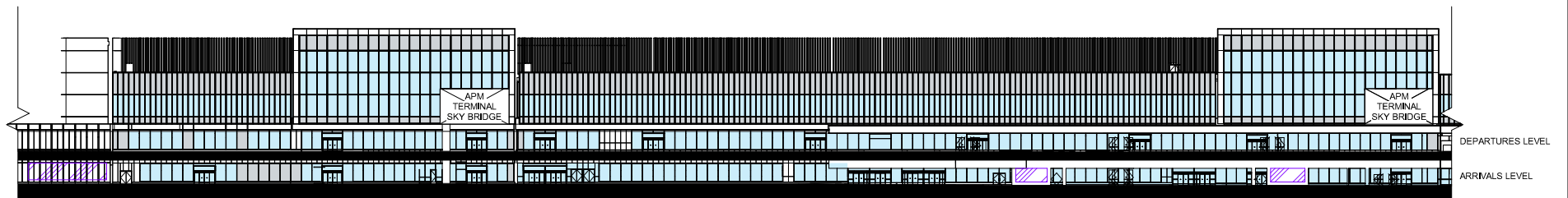
TERMINAL 2 ELEVATION - SOUTH

0 80 160 Feet

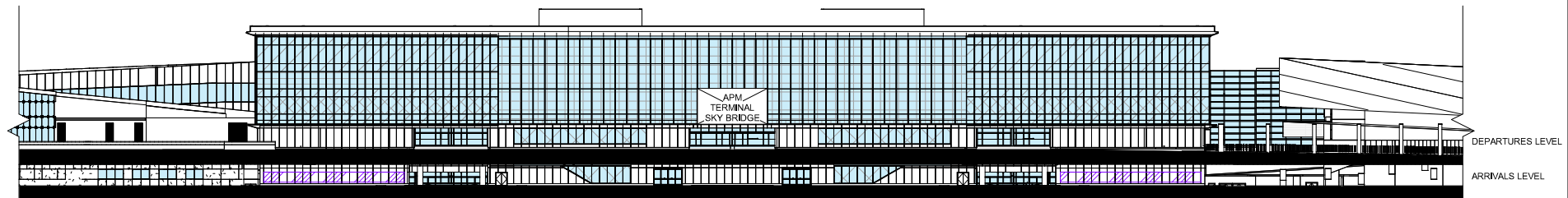
Source: Gensler, 2026
Prepared by: CDM Smith, 2026

Legend

- Existing Glass Areas
- Location Opportunities



TERMINAL 3 ELEVATION - SOUTH



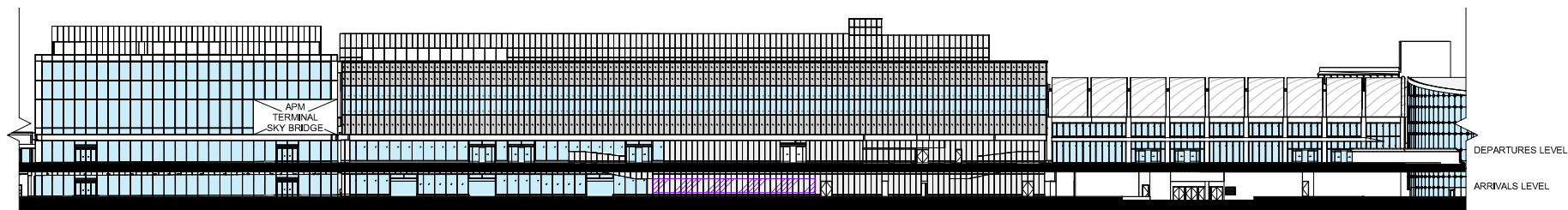
TBIT ELEVATION - EAST

0 80 160
Feet

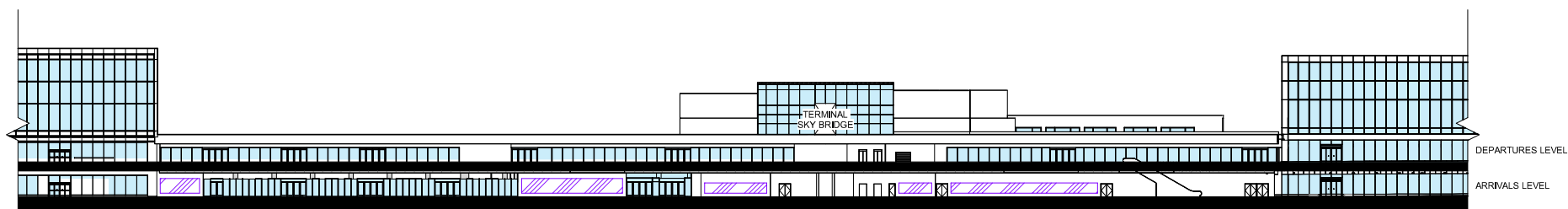
Source: Gensler, 2026
Prepared by: CDM Smith, 2026

Legend

Existing Glass Areas 
Location Opportunities 



TERMINAL 4 ELEVATION - NORTH



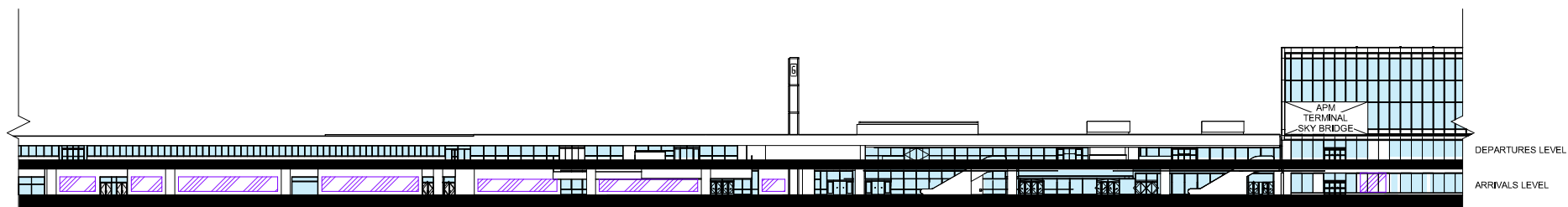
TERMINAL 5 ELEVATION - NORTH

0 80 160
Feet

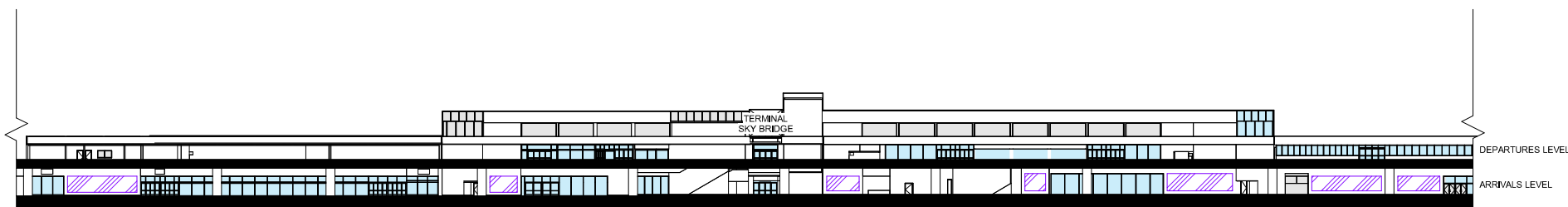
Source: Gensler, 2026
Prepared by: CDM Smith, 2026

Legend

Existing Glass Areas 
Location Opportunities 



TERMINAL 6 ELEVATION - NORTH



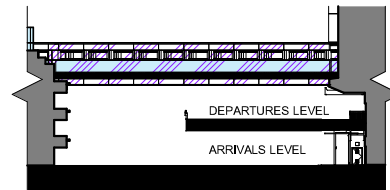
TERMINAL 7 ELEVATION - NORTH

0 80 160 Feet

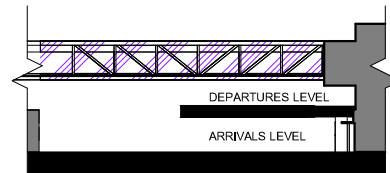
Source: Gensler, 2026
Prepared by: CDM Smith, 2026

Legend

Existing Glass Areas 
Location Opportunities 



TYPICAL APM TERMINAL SKY BRIDGE



TYPICAL TERMINAL SKY BRIDGE

0 80 160 Feet

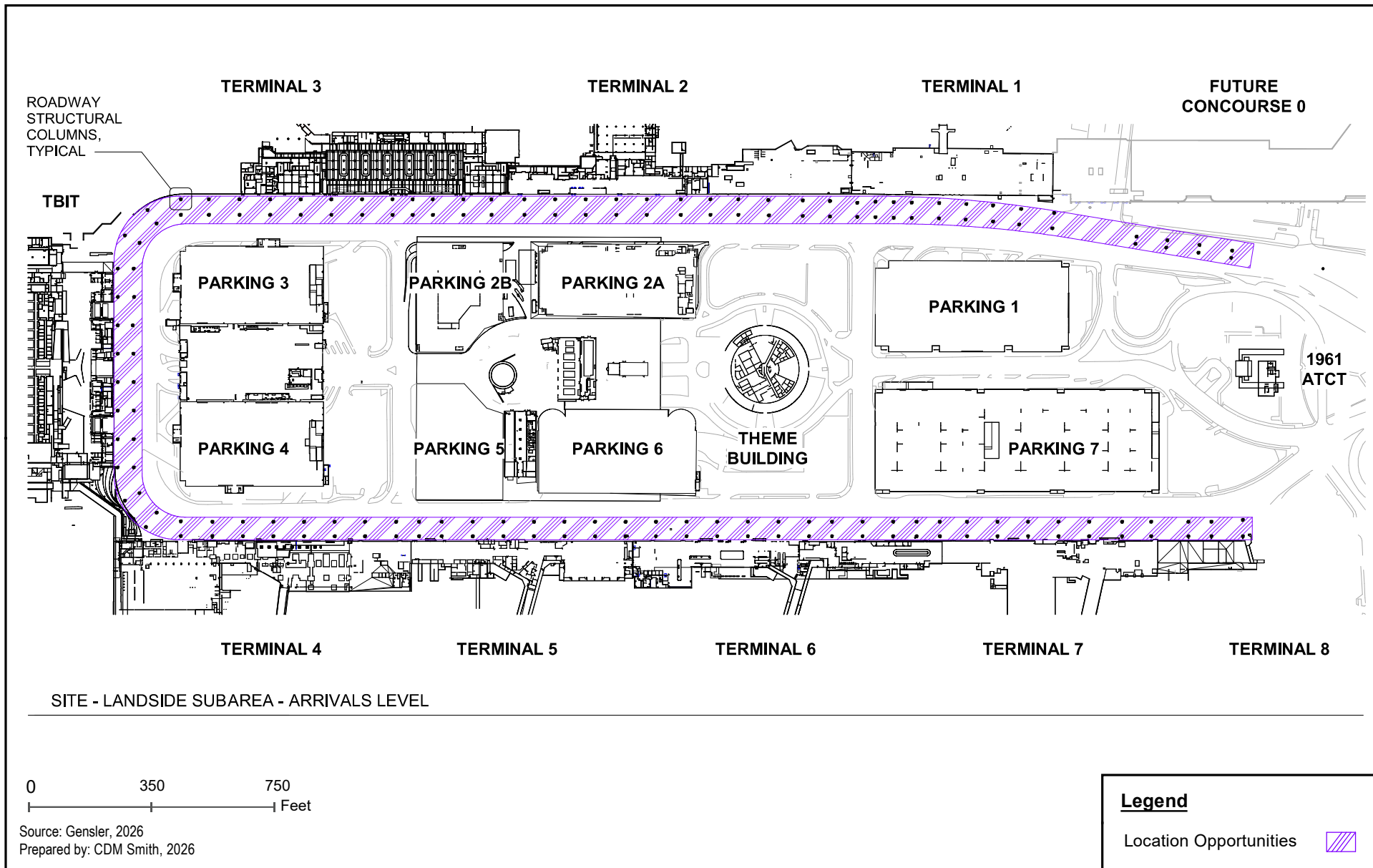
Source: Gensler, 2025
Prepared by: CDM Smith, 2025

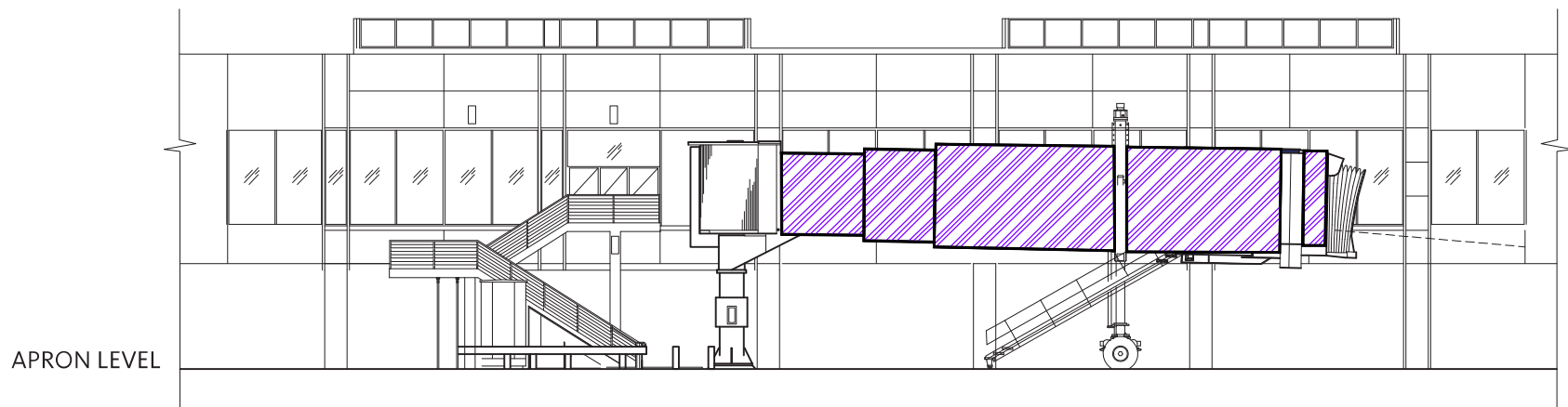
Legend

Existing Glass Areas 

Location Opportunities 

Note: Sky bridges would follow typical location opportunities shown.





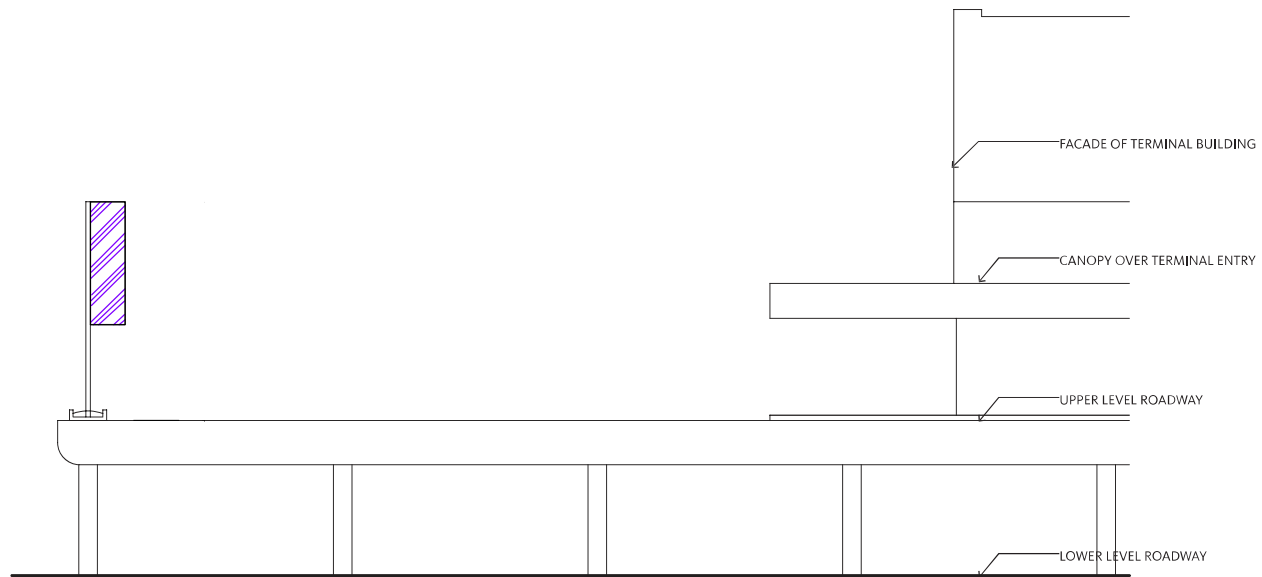
Not to Scale

Source: Gensler, 2026

Prepared by: CDM Smith, 2026

Legend

Location Opportunities 

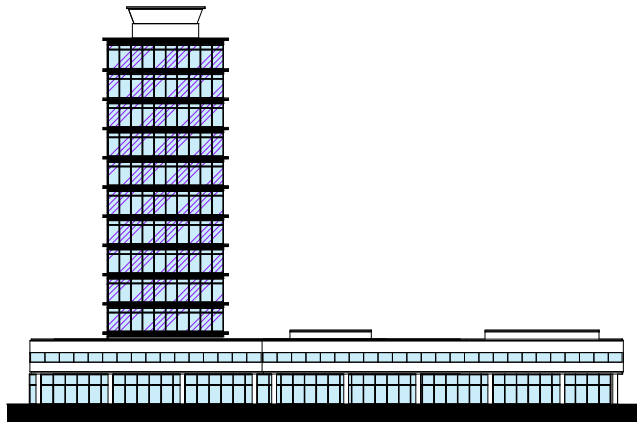


Not to Scale

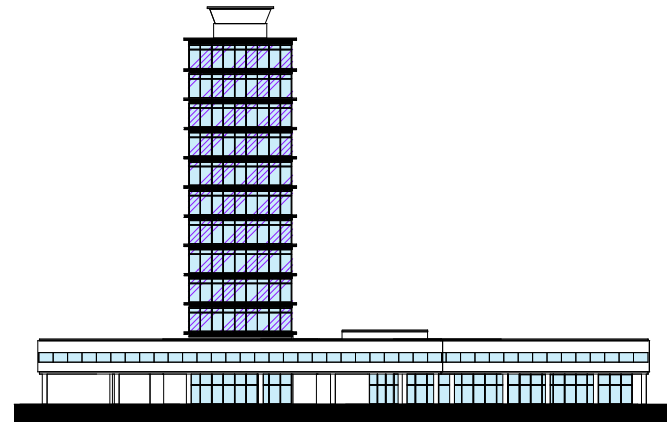
Source: Gensler, 2026
Prepared by: CDM Smith, 2026

Legend

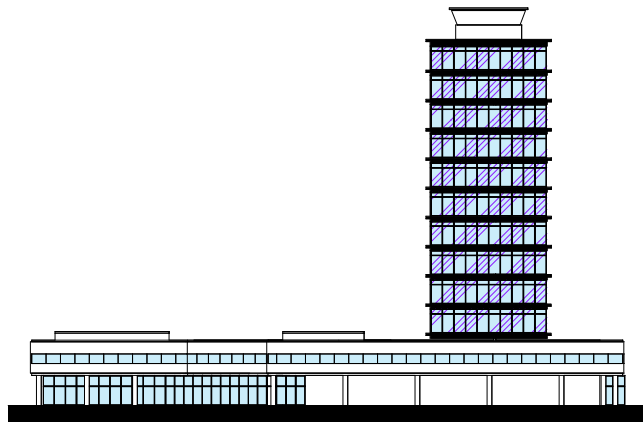
Location Opportunities 



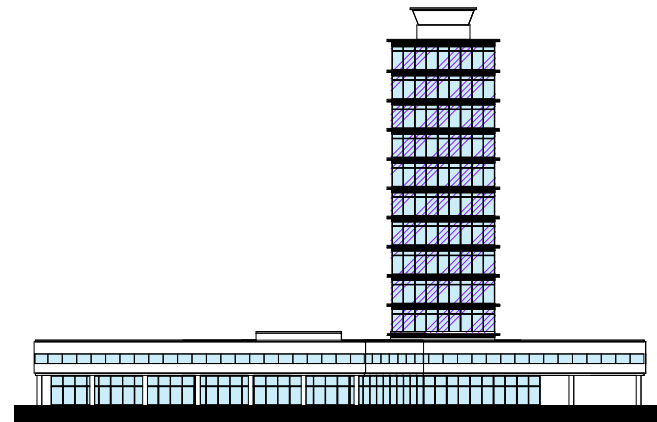
1961 ATCT ELEVATION - NORTH



1961 ATCT ELEVATION - EAST



1961 ATCT ELEVATION - SOUTH



1961 ATCT ELEVATION - WEST

0 80 160
Feet

Source: Gensler, 2026
Prepared by: CDM Smith, 2026

Legend

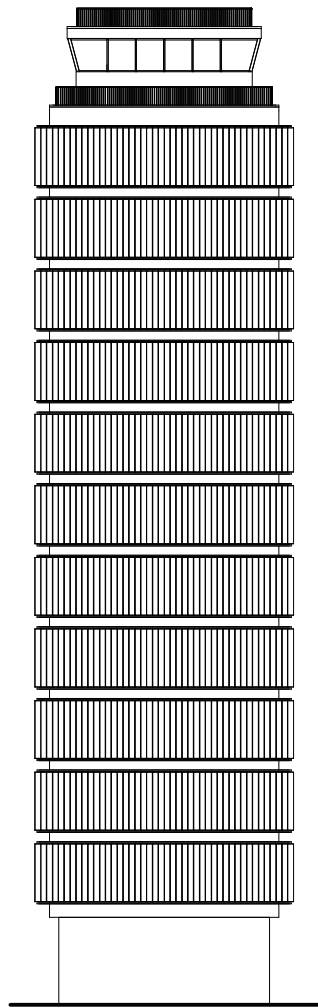
Existing Glass Areas 
Location Opportunities 

In 2016, Historic Resources Group determined the 1961 ATCT to be eligible for listing as a City of Los Angeles Historic-Cultural Monument (HCM).²⁵ As further addressed in the Historical Resources Evaluation Report for the Proposed LAX Sign District Project Modifications (**Attachment 5** of this Addendum), the placement of digital signage on the 1961 ATCT has the potential to adversely affect the historic significance of the 1961 ATCT by altering the building's profile and removing or obscuring its character-defining features. Consistent with LAWA's previous commitment as part of the LAX Preservation Plan and to ensure the 1961 ATCT retains its eligibility as a City of Los Angeles Historic-Cultural Monument, LAWA has developed design strategies to ensure that the proposed installation of signage on the tower would comply with rehabilitation standards established by the U.S. Secretary of the Interior's Standards for Historic Resources.²⁶

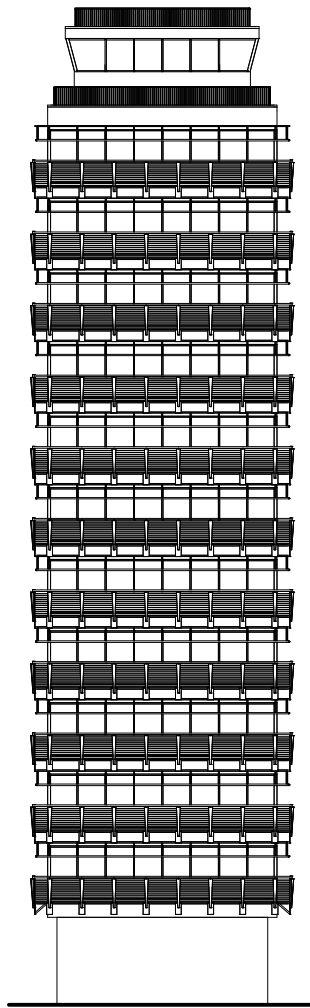
As noted above, signage proposed to be displayed on the 1961 ATCT would include welcome messages and imagery; LAX-related travel and tourism messaging; content celebrating commemorations, City-hosted events, and special occasions; and artistic displays. With respect to off-site signage on the 1961 ATCT, it is LAWA's intent to display messages and imagery pertaining to events or occasions of regional, national, or international significance, which could include sporting events, or other events or occasions of significance, as determined by LAWA. In addition, an electronic image of the 1961 ATCT's historic appearance would be displayed at intervals that would be determined by LAWA. The digital images to be displayed on the 1961 ATCT would not include moving images (e.g., video, motion, flashing, scrolling). However, colors would be allowed to fade similar to the manner in which fade currently occurs on the existing lighted pylons. **Figure 2-17** through **Figure 2-19** provide drawings and conceptual renderings of the proposed 1961 ATCT signage.

²⁵ City of Los Angeles, Los Angeles World Airports, *Final Environmental Impact Report for Los Angeles International Airport (LAX) Landside Access Modernization Program*, (SCH 2015021014), Appendix J, LAX Preservation Plan, prepared by Historic Resources Group, September 2016. Available: <https://www.lawa.org/en/lawa-our-lax/plan-and-ordinances>.

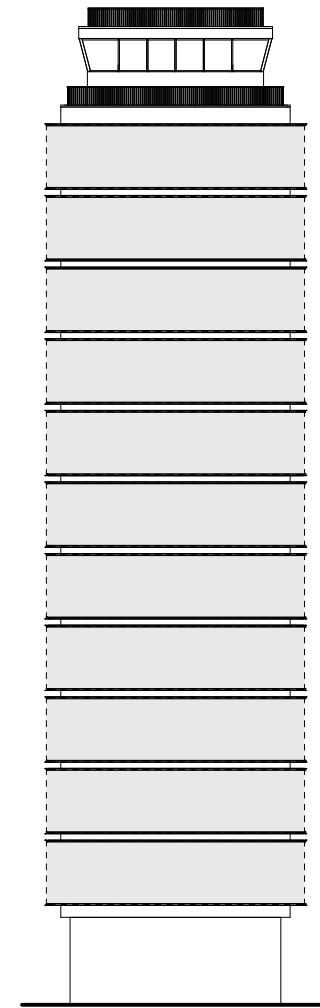
²⁶ U.S. Department of the Interior, National Park Service, *The Secretary of the Interior's Standards for Rehabilitation*. Available: <https://www.nps.gov/subjects/taxincentives/secretarys-standards-rehabilitation.htm>. Accessed November 12, 2025.



Original Bands of Vertical Louvers



1980s Balcony Guardrail Addition



Conceptual Bands of Digital Media Display

Not to Scale

Source: Flatiron, Skanska, HNTB, and Paul Murdoch Architects, 2025

Prepared by: CDM Smith, 2026



Daytime View



Nighttime View

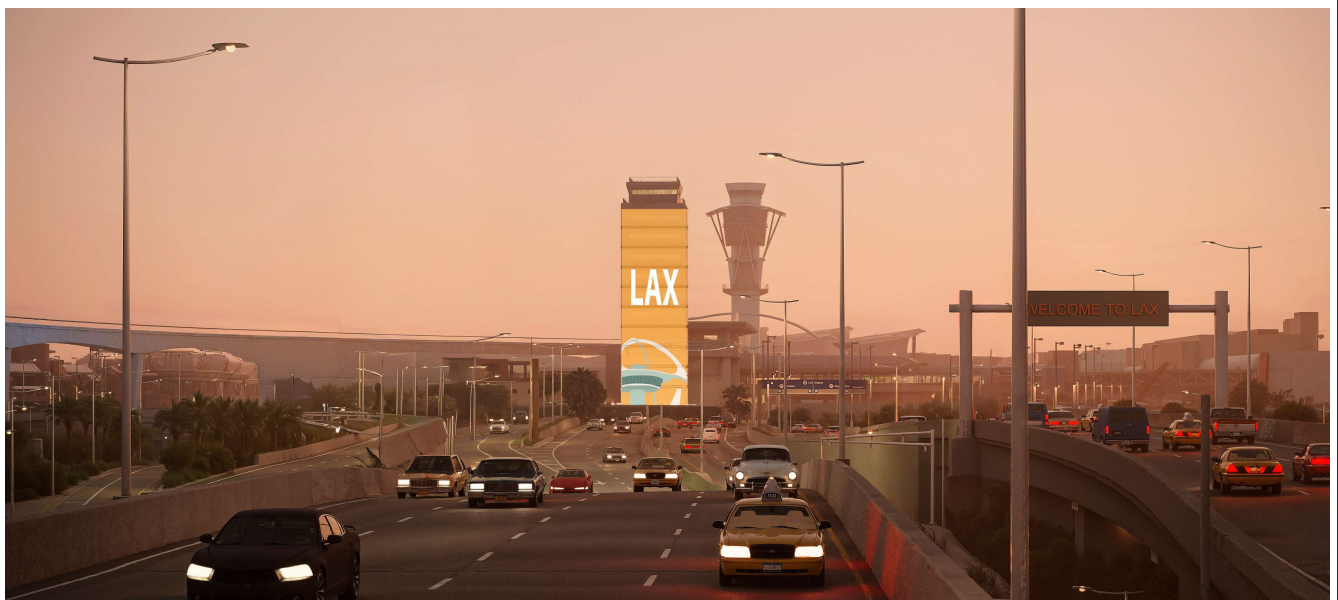
Not to Scale

Source: Flatiron, Skanska, HNTB, and Paul Murdoch Architects, 2025

Prepared by: CDM Smith, 2026



Daytime View



Dusk View

Not to Scale

Source: Flatiron, Skanska, HNTB, and Paul Murdoch Architects, 2025

Prepared by: CDM Smith, 2026

2.2.2.3 Other Proposed Project Modifications

As identified in Section 2.2.2.1, in addition to permitting signage on the 1961 ATCT, the Proposed LAX Sign District Project Modifications include other changes to the LAX Sign District and the related Ordinance. These changes are described below.

The LAX Sign District Project EIR included a series of exhibits that illustrated locations of digital display signs and supergraphic signs on various building façades. These locations were intended to show conceptual sign size, placement, orientation, and location on the façades, while allowing flexibility with respect to these details. The Proposed LAX Sign District Project Modifications identify opportunity areas on each façade; signage could be located anywhere within the defined opportunity areas. These modifications, by themselves, would not change the environmental impacts of the LAX Sign District Project as evaluated in the Certified EIR. Environmental impacts associated with new façades upon which signs could be located – such as the 1961 ATCT, east facing façade of the future Concourse 0, etc. – are addressed in Section 3 of this Addendum. The Proposed LAX Sign District Project Modifications would also change the type of signs allowed on various façades. The signage types allowed on the various façades are identified in Table 2-1. These changes could result in more digital signage on the parking structures and terminal buildings within the CTA. Environmental impacts associated with these changes are addressed in Section 3.

As noted in Section 2.2.1, whereas the Certified EIR for the Approved LAX Sign District Project identified a maximum of approximately 81,522 square feet of new signage within the Landside Subarea, the adopted LAX Sign District Ordinance identifies a maximum of approximately 80,722 square feet of new signage within the Landside Subarea. Further, per the adopted LAX Sign District Ordinance, within the Landside Subarea, only 75 percent of the square footage—i.e., 60,542 square feet—may be activated at any one time. Proposed amendments to the LAX Sign District Ordinance would remove this restriction, thus permitting the development of 80,722 square feet of signage within the Landside Subarea. The Proposed LAX Sign District Project Modifications reflect this change, and identify 80,722 square feet of allowable signage within the Landside Subarea. The signage that would be allowed on the 1961 ATCT would be included within the total 80,722 square feet of permitted signage. The Certified EIR evaluated impacts associated with implementation of the full 81,522 square feet of new signage. Therefore, for purposes of the environmental impact analysis, there is no material change in the amount of signage associated with the Proposed LAX Sign District Project Modifications.

The Approved LAX Sign District Project included a plan to remove a number of off-site signs in LAWA's control. These provisions were codified in the LAX Sign District Ordinance (Section 8.A). The Ordinance requires that, as part of the installation of up to 60,542 square feet of off-site signs in the Landside Subarea, LAWA will remove 23,520 square feet of off-site signs within the LAX Vicinity Sign Reduction Area, which includes areas within the LAX Plan, Westchester-Playa del Rey Community Plan, Palms-Mar Vista-del Rey Community Plan, Venice Community Plan, and West Los Angeles Community Plan. The Ordinance places a time limit of 5 years from issuance of the first building permit for new off-site signs for completion of the removal. The Ordinance also includes a provision (referred to as the "takedown ratio") that reduces the maximum allowable off-site signage within the Landside Subarea (referred to as the "Reduced Maximum") if the sign removals did not occur. Since adoption of the LAX Sign District Ordinance, LAWA has already completed the removal of approximately 15,000 square feet of off-site signs and is

actively working on removing up to another 15,000 square feet within the LAX Vicinity Sign Reduction Area. LAWA will provide the proper documentation of off-site signage removal consistent with the approved Ordinance. Since the work is near complete, the takedown ratio that would reduce the maximum allowable signage is no longer relevant. Nonetheless, the proposed Ordinance would retain the provision requiring the removal of 23,520 square feet of off-site signage to ensure compliance with this requirement.

2.2.3 Modifications to Approved Project Design Features

A number of Project Design Features were incorporated into the Approved LAX Sign District Project to reflect LAWA's project objectives and to reduce potential effects of the Project. With the passage of time and changes in signage technology, some of these Project Design Features are no longer applicable as written. Other Project Design Features are not consistent with the goals and purposes of the Proposed LAX Sign District Project Modifications or are not consistent with other recently adopted sign districts in the City. As part of the Proposed LAX Sign District Project Modifications, changes to the Project Design Features are proposed, as shown in **Table 2-2**. These changes also bring the Project Design Features into alignment with the thresholds of significance and planned Ordinance amendments. Equivalent language reflecting the purpose of these Project Design Features would be incorporated into the amended Ordinance, which would facilitate their implementation. The environmental analysis provided in Section 3 takes into account these proposed changes to the Project Design Features.

Table 2-2 Existing and Proposed Project Design Features

Project Design Features in the Adopted EIR	Proposed Project Design Features
The allowable locations and sizes of signs have been designed to limit visibility from off-airport locations (i.e., surrounding communities) and to not visually or otherwise negatively affect airport operations or affect or alter historical buildings within LAX.	This Project Design Feature is proposed to be removed.
No new off-site signage would be placed along the Project boundary, and no electronic or light enhanced signage would be visible from the adjacent residential areas (i.e., community of Westchester to the north and City of El Segundo to the south).	This Project Design Feature is proposed to be removed.
No electronic or light enhanced signage would be installed within or be visible from the Airside Subarea.	No electronic or light enhanced signage would be installed within ~~or be visible from~~ the Airside Subarea.
Off-site signs would not be permitted on a number of buildings within the Project site, including the Theme Building, the Airport Traffic Control Tower, and the Clifton A. Moore Administration Building (including the former Airport Traffic Control Tower [1961]).	Off-site signs would not be permitted on a number of buildings within the Project site, including the Theme Building, the current Airport Traffic Control Tower, and the Clifton A. Moore Administration Building (~~including~~ except the former Airport Traffic Control Tower [1961]).
Limit illuminance contribution of signage to 0.3 footcandle (fc) at 350 feet from face of sign.	Limit illuminance contribution of signage to 0.3 footcandle (fc) at ~~350 feet from face of sign~~ the property line of residentially zoned properties .
The proposed signage locations and their placement would be in a manner that would prevent automobile headlight-related glare. For example, signage would be placed at a higher level than the roadway or perpendicular to headlights (i.e., signage placed on sky bridges).	This Project Design Feature is proposed to be removed.

Project Design Features in the Adopted EIR	Proposed Project Design Features
The proposed Project would include a plan to remove a number of billboards in LAWA's control and comply with other applicable requirements from the Department of City Planning.	This Project Design Feature is proposed to be removed.
Digital displays signs would display static images only (i.e., restriction for any type of sign that contains images, text, parts, or illumination which flash, change, move, blink, or otherwise refresh in whole or in part).	Digital displays signs would display static images only (i.e., restriction for any type of sign that contains images, text, parts, or illumination which flash, change, move, blink, or otherwise refresh in whole or in part) and not include moving images (e.g., video, motion, flashing, scrolling). For the 1961 Airport Traffic Control Tower, colors would be allowed to fade.
The digital displays would have the light emitting diodes (LEDs) aimed horizontally towards the street view using a cubic louvering system to help to limit light trespass, direct the visual impact of the display to the appropriate audience, and direct light away from flight paths and highly focused driving tasks. Refer to Figure IV.C-2 for a typical light emitting diode beam spread and plan view of the layout for the directionality of the LEDs associated with the digital display signs.	This Project Design Feature is proposed to be removed.
The proposed location of the two types of digital display signs - Controlled Refresh (CR) I and CR III - have been chosen being mindful of driver, pedestrian, Air Traffic Control (ATC) personnel and pilot safety.	The proposed location of the ~~two~~ three types of digital display signs - Controlled Refresh (CR) I, CR II , and CR III - have been chosen being mindful of driver, pedestrian, Air Traffic Control (ATC) personnel, and pilot safety.
Digital display signs shall be limited in their refresh events. CR I images would refresh (change) no more than one event every eight seconds (with the exception being Parking Structure 1 which would refresh every 14 seconds). CR III images would refresh no more than one event every 12 hours. In addition, the CR III images on the sky bridges would refresh simultaneously no more than one event every 12 hours.	Digital display signs shall be limited in their refresh events. CR I images would refresh (change) no more than one event every ~~eight~~ 8 seconds ~~-(with the exception being Parking Structure 1 which would refresh every 14 seconds).~~ CR II images would refresh no more than one event every 16 seconds. CR III images would refresh no more than one event every ~~12~~ 1 hours. ~~In addition, the CR III images on the sky bridges would refresh simultaneously no more than one event every 12 hours.~~
Digital signage would be subject to limits on brightness levels (i.e., 4,500 candelas per meters squared [cd/m ²] during the daytime and 300 cd/m ² during the nighttime) and equipped with sensors that modify the brightness of the sign in response to ambient lighting conditions.	Digital signage would be subject to limits on brightness levels (i.e., ~~4,500~~ 6,000 candelas per meters squared [cd/m ²] during the daytime and 300 cd/m ² during the nighttime) and equipped ~~with sensors that to~~ to modify the brightness of the sign in response to ambient lighting conditions. Sign luminance would be reduced to the maximum nighttime brightness (300 cd/m²) at any time when ambient sunlight is less than 100 footcandles (fc).
Dim lights of digital displays slowly at dusk over a 45 minute fade rate, controlled by an astronomical time clock. The transition from day to nighttime brightness would be required to occur gradually, to prevent a sudden change in perceptible brightness levels by pedestrians and motorists.	Dim lights of digital displays slowly from their daytime luminance to their maximum nighttime luminance beginning not less than 45 minutes prior to sunset and concluding at sunset ~~at dusk over a 45 minute fade rate, controlled by an astronomical time clock.~~ After sunrise, increase the brightness of digital displays slowly from the maximum nighttime luminance to their maximum daytime luminance, concluding not less than 45 minutes after sunrise. The transition ~~from~~ between daytime to and nighttime brightness would be required to occur gradually, to prevent a sudden change in perceptible brightness levels by pedestrians and motorists.

Project Design Features in the Adopted EIR	Proposed Project Design Features
Digital displays would not include large areas of reflective elements and have a contrast ratio of less than 30:1 to eliminate glare.	~~Digital displays would not include large areas of reflective elements and have a~~ Sign lighting contrast ratios would be limited to a maximum of ~~less than~~ 30:1 to eliminate glare.
Supergraphic signage over 20-feet tall at parking structure locations would be illuminated with LED or metal halide floodlights consisting of adjustable floodlight fixtures mounted at the top of the signage element with a locking knuckle precisely aimed at the signage to eliminate any chance of throwing light into the flight path. Cantilever arms, louvers, barn doors and/or glare shields would be used to allow the fixture to be aimed towards the supergraphic to illuminate the signage element exclusively.	This Project Design Feature is proposed to be removed.
Supergraphic signage over 20-feet tall on terminal facades above canopy locations would be illuminated with LED or metal halide floodlights mounted to the adjacent canopy. Adjustable floodlight fixtures would be mounted above the canopy with a locking knuckle to precisely aim at the signage and eliminate any chance of throwing light into the flight path. Cantilever arms, louvers, barn doors, and/or glare shields would be used to allow the fixture to be aimed towards the supergraphic to illuminate the signage element exclusively.	This Project Design Feature is proposed to be removed.
Maximum vertical luminance of illuminated supergraphic signage would be 5 to 7 fc during nighttime.	This Project Design Feature is proposed to be removed.
Supergraphics/wall signs/column wraps would have matte finishes, which would prevent glare from the light fixtures.	This Project Design Feature is proposed to be removed.

2.2.4 Historical Resources Commitments

Consistent with the LAX Preservation Plan, and in coordination with the Department of City Planning's Office of Historic Resources, LAWA has committed to ensure that proposed signage on the 1961 ATCT respects the existing historic fabric, avoids adverse changes to historic resources, is compatible with the original design intent, and preserves the tower's integrity while accommodating contemporary airport needs. Specifically, LAWA would maintain visibility of the tower's historic form, using mounting systems that respect existing architectural rhythms, removing non-contributing elements, and incorporating interpretive content, as detailed in the following Commitments:

HR-1: Removal of Non-Contributing Elements

LAWA would remove the existing non-contributing exterior guardrails while retaining the original outriggers that the guardrails are attached to. Removal would be completed prior to installation of new signage components and would avoid any disturbance or damage to the historic fabric. If a replacement is deemed necessary to comply with safety codes, it would be designed such that its visual profile is minimal and does not add to or interfere with the overall form and massing of the tower. Any replacement solution must also be such that if removed in the future, the essential form and integrity of the historic resource would be unimpaired, consistent with the Secretary of the Interior's Standards for Rehabilitation.

HR-2: Visually Permeable LED Digital Media Displays

LAWA would require that any LED digital media display mounted to the exterior of the 1961 ATCT employ permeable technology that allows visibility of the building's original form and surviving features behind the added digital media display.

- The selected system would incorporate variable transparency that maintains discernible views of the original tower wall, including the existing ribbon windows and plaster spandrels, similar to the variable transparency afforded by the original louver system.
- LED modules, cabling, and structural attachments would be minimized, concealed, or integrated to avoid obscuring or altering historic materials to the maximum feasible extent.
- LAWA would work with the design team to evaluate digital media options that maintain visibility of the original tower's architectural elements while meeting functional display needs.

HR-3: Floor-by-Floor Horizontal Banding to Reflect Original Architectural Profile

In order to recall the visual delineation of each floor characteristic of the tower's 1961 appearance, the displays would be mounted as horizontal bands across each floor, from the bottom of the second floor to the top of the twelfth floor, using the existing outrigger structure that historically supported the tower's louvers, leaving a reveal between floors where no display is present. The displays would span the entire width of each façade.

- This floor-by-floor approach would re-establish the horizontal delineation of each floor, characteristic of the building's original louvered façade.
- The floor-by-floor approach, together with the visual permeability of the displays, would ensure that the displays do not obscure the full height of the tower, but instead recall the architectural rhythms of the tower's original design.
- Mounting systems would avoid attachment that would damage or obscure contributing historic materials.

HR-4: Interpretive and Educational Display Elements

To enhance public understanding of the 1961 tower's historic significance, LAWA would incorporate digital interpretive elements into the digital media display program.

- LED-based digital content, projection treatments, or programmed lighting would be used to periodically depict the tower's historic appearance and recall its former use as an airport traffic control tower.
- Interpretive content would be coordinated with LAWA's Art Program, LA Welcome Program, and Celebratory Program to ensure regular and meaningful public communication of the tower's history.
- Content frequency, duration, and placement would be established during final design to ensure that a meaningful interpretive component can be integrated with more expressive displays.

HR-5: Continued Coordination with Preservation Professionals

LAWA would engage qualified architectural historians and preservation architects who meet the Secretary of the Interior's professional standards²⁷ during the final design, installation, and programming of the digital media displays to ensure compliance with the Secretary of the Interior's Standards for Rehabilitation.

- Review would include structural attachments, transparency levels, lighting intensity, interpretive elements, and operational protocols.
- Recommendations would be incorporated into the final design to avoid adverse effects to the historical significance of the 1961 ATCT.

In addition to the Commitments listed above, a Historic Structure Report (HSR) would be prepared to document the 1961 ATCT in conformance with the LAX Preservation Plan. Development of the HSR would be concurrent with design development of the proposed digital media display system for the 1961 ATCT. The HSR would provide complete documentary, graphic, and physical information about the building's history, significance, and existing condition. The report would outline a recommended scope of work for exterior rehabilitation, and include recommendations for appropriate treatment and maintenance of existing historic fabric, and replication and replacement of damaged exterior features. This report would be prepared in accordance with the National Park Service's *Preservation Brief 43: The Preparation and Use of Historic Structure Reports*, by Deborah Slaton.²⁸

As discussed in the Historical Resources Evaluation Report for the Proposed LAX Sign District Project Modifications (Attachment 5 of this Addendum), the Commitments listed above, in concert with the HSR, would ensure that implementation of digital signage would maintain the integrity and historic significance of the 1961 ATCT and be in compliance with the Secretary of the Interior's Standards for Rehabilitation.

2.3 Requested Permits and Approvals

The discretionary entitlements, reviews, permits, and approvals required to implement the Proposed LAX Sign District Project Modifications include, but are not necessarily limited to, the following:

- Pursuant to Los Angeles Municipal Code (LAMC) Section 13.11, a Sign District Amendment to revise the LAX Sign District by updating procedural requirements and modernizing the Ordinance through clarified definitions, standards, and stated purposes, as well as including new signage on the 1961 ATCT tower. The amendment also includes referencing new LAX Sign District Design Standards and Guidelines.

²⁷ The Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation (36 CFR Part 61) define minimum education, training, and experience required to perform identification, evaluation, registration, and treatment activities. U.S. Department of the Interior, *The Secretary of the Interior Professional Qualifications Standards*. Available: <https://www.doi.gov/pam/asset-management/historic-preservation/PQS>. Accessed January 9, 2026.

²⁸ Slaton, Deborah, *National Park Service Preservation Brief 43: The Preparation and Use of Historic Structure Reports*, April 2005. Available: <https://www.nps.gov/orgs/1739/upload/preservation-brief-43-historic-structure-reports.pdf>.

Implementation of the Proposed LAX Sign District Project Modifications would require amendments to the LAX Sign District (Ordinance No. 183737). A summary of the amendments to the LAX Sign District Ordinance is provided in Attachment 2 of this Addendum.

3.0 Evaluation of Environmental Impacts

In performing the required analysis pursuant to CEQA and determining that the criteria are met for use of an addendum, this Addendum compares impacts of the Proposed LAX Sign District Project Modifications to impacts of the Approved LAX Sign District Project as previously analyzed in the Certified EIR. For purposes of determining whether the Proposed LAX Sign District Project Modifications trigger the need to prepare a subsequent EIR pursuant to State CEQA Guidelines Section 15162, this Addendum relies on the evaluation of the environmental resources/issues below and summarizes the responses to whether any of the criteria presented in Section 1.2 have been met. Justification for the appropriateness of an addendum is provided in Section 4. Finally, the conclusion associated with the analysis contained in this Addendum is provided in Section 5.

3.1 Environmental Topics/Resource Areas that would not be Affected by the Proposed Modifications

The Notice of Preparation/Initial Study for the Approved LAX Sign District Project and the Certified EIR analyzed the potential environmental impacts of the LAX Sign District Project and concluded that implementation of the Approved LAX Sign District Project would have no impact or a less than significant impact for a number of environmental topics/resource areas as follows and as identified in **Table 3-1**.

Environmental resources determined to have **No Impact** in the Initial Study:

- Agriculture and forestry resources
- Biological resources
- Cultural resources (archaeological and paleontological resources)
- Geology and soils
- Hydrology and water quality
- Land use
- Mineral resources
- Population and housing
- Recreation
- Wildfire

Environmental resources determined to have a **Less than Significant Impact** in the Initial Study:

- Air quality/human health risk
- Greenhouse gas emissions

- Noise and vibration

Environmental resources determined to have a combination of **No Impact** and **Less than Significant Impact** determinations in the Initial Study:

- Aesthetics (scenic vistas and scenic resources)
- Hazards and hazardous materials
- Public services
- Transportation (except transportation hazards/safety)
- Utilities/service systems

For reasons described in Table 3-1, the Proposed LAX Sign District Project Modifications would not alter the impact conclusions for the Approved LAX Sign District Project stated in the Initial Study. Therefore, the Proposed LAX Sign District Project Modifications would not trigger any of the conditions described in State CEQA Guidelines Section 15162 requiring the preparation of a subsequent EIR relative to these resource areas, and no further evaluation of these environmental resource topics is required in this Addendum.

Table 3-1 Environmental Resource Topics Not Affected by the Proposed LAX Sign District Project Modifications

Environmental Resource	Rationale
Aesthetics (scenic vistas and scenic resources)	The Initial Study concluded that the Project would have no impact on scenic vistas and a less than significant impact on scenic resources within a City-designated scenic highway; the Proposed LAX Sign District Project Modifications would not alter this conclusion.
Agriculture/Forestry Resources	The Initial Study concluded that, due to the Project's location, there would be no impacts to agricultural/forestry resources; the Proposed LAX Sign District Project Modifications would not alter this conclusion.
Air Quality/Human Health Risk	The Initial Study concluded that Project construction and operations would have less than significant impacts on air quality and human health risk. The analysis determined that construction-related emissions would be limited and would only consist of the equipment necessary to install signage on the face of the structures and equipment to remove off-site signs within LAWA's control. Construction would be relatively minor – involving light equipment such as cranes, utility trucks, and hand-held equipment – and would not require grading or trenching. One-time installation of framework to hold the supergraphic signs and digital displays would occur on parking structures, terminal facades, and some sky bridges. Long-term operational emissions would also be minor, consisting of maintenance of digital displays and periodic replacement of advertising materials. The Initial Study determined that both construction and operational emissions of all criteria pollutants would be well below thresholds of significance and that exposure to toxic air contaminants would similarly result in less than significant impacts. The Proposed LAX Sign District Project Modifications would require additional construction to install the proposed signage on the 1961 ATCT. As with the installation of signage within the CTA, construction would not involve grading, trenching, or demolition. Operational emissions would be associated with routine maintenance, which would generate minor amounts of emissions. The Proposed LAX Sign District Project Modifications would not alter the conclusions of the Initial Study that impacts to air quality and human health risk would be less than significant.
Biological Resources	The Initial Study concluded that, given its location within a highly-developed area lacking sensitive biological resources, the Project would have no impacts to sensitive species or habitats, including riparian/wetland areas. The Proposed LAX Sign District Project Modifications would not alter these conclusions.

Environmental Resource	Rationale
Cultural Resources (archaeological and paleontological resources)	The Initial Study concluded that the Project would have no impacts to archaeological or paleontological resources as the Project area is highly disturbed and no grading or excavation activities would be required; the Proposed LAX Sign District Project Modifications would not alter this conclusion.
Geology/Soils	The Initial Study concluded that, due to the Project's location, site geologic conditions, and compliance with Los Angeles Building Code (LABC) and Uniform Building Code (UBC) requirements, there would be no impacts related to geology/soils; the Proposed LAX Sign District Project Modifications would not alter this conclusion.
Greenhouse Gas Emissions	Greenhouse gas (GHG) emissions would result from the same construction and operational sources identified in the discussion of air quality/human health risk above. As noted in that discussion, construction would be relatively minor and would not require heavy equipment. The operational analysis considered maintenance and periodic replacement of advertising materials as well as indirect GHG emissions from purchased electricity necessary to operate the signs. Amortized construction emissions were added to operational emissions to identify total GHG emissions. The Initial Study determined that total GHG emissions would be well below the threshold of significance and concluded that Project impacts would be less than significant . The Proposed LAX Sign District Project Modifications would require additional construction to install the proposed signage on the 1961 ATCT and could increase indirect GHG emissions associated with purchased electricity to power signage. Even with these potential increases in total GHG emissions, the Proposed LAX Sign District Project Modifications would not alter the conclusions of the Initial Study that impacts associated with GHG would be less than significant.
Hazards and Hazardous Materials	The Initial Study concluded that the Project would have no impact on public or environmental hazards from the handling or release of hazardous materials, school exposure, private airstrip safety, or wildfire risk, and a less than significant impact on emergency response; the Proposed LAX Sign District Project Modifications would not alter these conclusions. Safety hazards to motorists and pilots/aircraft were evaluated in the Transportation Safety section of the Certified EIR and are addressed in Section 3.2.4 below.
Hydrology/Water Quality	The Initial Study concluded that, due to the Project's location and compliance with State and local water quality regulatory programs and requirements, the Project would have no impacts related to surface or groundwater quality, groundwater supplies/recharge, drainage patterns, or flooding/inundation, and would not violate any water quality standards or waste discharge requirements. The Proposed LAX Sign District Project Modifications would not alter these conclusions.
Land Use (physically divide a community or conflict with a habitat conservation plan)	This Initial Study concluded that, due to the Project's location, there would be no impacts to land use associated with physically dividing and established community or conflicting with a habitat conservation plan or natural community conservation plan. ¹ The Proposed LAX Sign District Project Modifications would not alter these conclusions.
Mineral Resources	The Initial Study concluded that, due to the Project's location, there would be no impacts to mineral resources; the Proposed LAX Sign District Project Modifications would not alter this conclusion.
Noise/Vibration	The Initial study concluded that the Project would have a less than significant impact on ambient noise levels or vibration relative to pre-Project levels. The Initial Study found that, due to construction equipment and installation procedures, occasional noise would be generated but would not exceed the City's threshold of significance. The Proposed LAX Sign District Project Modifications would not alter this conclusion.
Population and Housing	The Initial Study concluded that there would be no impacts to population and housing because the Project would not affect existing or planned housing and would not directly or indirectly induce any population growth in the area; the Proposed LAX Sign District Project Modifications would not alter this conclusion.

Environmental Resource	Rationale
Public Services	The Initial Study concluded that the Project would have no impact on police protection and a less than significant impact on fire protection. Although the Project would require occasional and partial road closures for construction and sign placement, all fire code requirements would be met. The Project would not require construction of new facilities or the expansion of existing facilities. The Proposed LAX Sign District Project Modifications would not alter these conclusions. The Initial Study also concluded that the Project would have no impact on schools, parks, or other public facilities, as the Project would not affect existing, or result in the need for new, schools, parks, or other public facilities; the Proposed LAX Sign District Project Modifications would not alter this conclusion.
Recreation	The Initial Study concluded that, due to the Project's location and because the Project would not directly or indirectly induce population growth in the area, there would be no impacts to recreation; the Proposed LAX Sign District Project Modifications would not alter this conclusion.
Transportation	The Initial Study concluded that the Project would have a less than significant impact on the performance of the circulation system (i.e., traffic levels/congestion)² and emergency access, and no impact on policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or the performance or safety of such facilities; the Proposed LAX Sign District Project Modifications would not alter these conclusions. Safety hazards to motorists and pilots/aircraft were addressed in the Transportation Safety section of the Certified EIR; see Section 3.2 below.
Tribal Cultural Resources	The Certified EIR was prepared prior to 2018 when Tribal Cultural Resources was added as a resource category to the State CEQA Guidelines Appendix G Environmental Checklist per Assembly Bill 52 (AB 52). As such, Tribal Cultural Resources were not addressed in the Initial Study or EIR. The Project site is in a highly disturbed area and no grading or excavation activities are proposed; therefore, Tribal Cultural Resources would not be affected and no evaluation in the addendum is required.
Utilities/Service Systems	The Initial Study concluded that the Project would have no impact relative to water supply and wastewater generation/treatment and a less than significant impact related to solid waste generation; the Proposed LAX Sign District Project Modifications would not alter these conclusions.
Wildfire	The Certified EIR was prepared prior to the 2018 revisions to the State CEQA Guidelines, which added wildfire as a stand-alone category to the State CEQA Guidelines Appendix G Environmental Checklist. However, the Initial Study addressed exposure of people or structures to hazards associated with wildland fires as part of the Hazards and Hazardous Materials discussion. The Initial Study concluded that, because the Project site is not located within a developed urban area and is not within a designated Wildfire Hazard Area, the Project would have no impact relative to wildfire risk; the Proposed LAX Sign District Project Modifications would not alter this conclusion.

Notes:

¹ Subsequent to publication of the LAX Sign District Project EIR, Appendix G of the State CEQA Guidelines was modified as part of the 2018 revisions to the State CEQA Guidelines. As part of the modifications, the question about whether a project would specifically conflict with a habitat conservation plan as related to land use and planning impacts was removed from the Appendix G checklist.

² The Certified EIR was prepared prior to the 2018 revisions to the State CEQA Guidelines, which established vehicle miles traveled (VMT) as the primary metric for evaluating transportation impacts rather than Level of Service (LOS).

3.2 Environmental Topics/Resource Areas that would be Affected by the Proposed Modifications but would not Result in any New Significant or Substantially More Severe Impacts

In performing the required analysis pursuant to CEQA and determining that the criteria are met for use of an addendum, this Addendum compares impacts of the Proposed LAX Sign District Project Modifications to impacts of the Approved LAX Sign District Project as previously analyzed in the Certified EIR (including the Initial Study, which was appended to the EIR). For purposes of this Addendum, the following environmental topic/resource areas evaluated in the Certified EIR were reviewed through use of an Environmental Review Checklist:

- Land Use and Planning
- Visual Resources
- Artificial Light and Glare
- Transportation Safety
- Cultural Resources (Historical Resources)

Additionally, the following environmental topic/resource area was reviewed through use of an Environmental Review Checklist and is included in this Addendum. This topic was not included in the Certified EIR:

- Energy²⁹

The Environmental Review Checklist provided below follows the basic format of a typical CEQA Initial Study environmental checklist but has been tailored to review whether any of the conditions set forth in Section 15162 of the State CEQA Guidelines requiring preparation of a subsequent EIR are met.

As demonstrated in the evaluation in the Environmental Review Checklist, none of the CEQA criteria presented in Section 1.2 requiring the preparation of a subsequent EIR would occur as a result of the Proposed LAX Sign District Project Modifications.

²⁹ The Certified EIR was prepared prior to the 2018 revisions to the State CEQA Guidelines, which added analysis of energy impacts as a consideration when determining a project's significant environmental impacts (State CEQA Guidelines Section 15126.2(b)) and added energy as a resource category to the State CEQA Guidelines Appendix G Environmental Checklist. As such, energy impacts were not specifically addressed in the LAX Sign District Initial Study or EIR, although energy consumption was briefly addressed in terms of irreversible environmental changes due to use of nonrenewable resources (Chapter VIII of the Certified EIR). The Proposed LAX Sign District Project Modifications have the potential to increase energy demands related to digital displays, including the proposed digital displays on the 1961 ATCT. This Addendum addresses the Proposed LAX Sign District Project Modifications with respect to energy consumption.

Environmental Review Checklist

3.2.1 Land Use and Planning

	Yes	No
Are substantial changes proposed in the project that would require major revisions of the environmental impact report due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects?		X
Will substantial changes occur with respect to the circumstances under which the project is undertaken that will require major revisions in the environmental impact report due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects?		X
Has new information of substantial importance become available indicating new or substantially more severe significant impacts or new/different mitigation measures or alternatives for significant impacts?		X

Section IV.A, Land Use and Planning, of the Certified EIR addresses potential impacts related to land use plans and land use compatibility from implementation of the Approved LAX Sign District Project. The following evaluates the extent to which the Proposed LAX Sign District Project Modifications would change the impact conclusions in the Certified EIR.

■ **Would the proposed Project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?**

The Certified EIR analyzed the compatibility of the Approved LAX Sign District Project with numerous land use plans, policies, and regulations including, but not limited to, the Southern California Association of Government's (SCAG) Regional Comprehensive Plan, the Southern California Compass Blueprint Growth Vision, the SCAG Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), the Airport Land Use Plan (ALUP) and 2011 California Airport Land Use Planning Handbook, the City of Los Angeles General Plan Framework Element, the LAX Plan, the LAX Specific Plan, City of Los Angeles Planning and Zoning Requirements, and the LAX Street Frontage and Landscape Development Plan Update. The Certified EIR concluded that the Approved LAX Sign District Project would not cause a significant environmental impact due to a conflict with land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect.

A number of these plans have been updated since certification of the LAX Sign District Project EIR. However, these updates did not add new policies or regulations aimed at avoiding or mitigating environmental effects that the Proposed LAX Sign District Project Modifications would conflict with. Moreover, the proposed modifications would not alter the conclusions regarding land use plan consistency in the Certified EIR. As discussed in Section 2.2 of this Addendum, the Proposed LAX Sign District Project Modifications include new digital displays on the façade of the 1961 ATCT and other areas within the Landside Subarea of the CTA. The proposed signage would be located fully within the boundaries of LAX and would not result in regional implications. Specifically, the Project would not result in any change of use or affect passenger or activity levels at LAX, nor would it affect population trends or traffic patterns throughout the region.

As with the Approved LAX Sign District Project, the Proposed LAX Sign District Project Modifications would result in installation of signage within designated Landside and Airside Subareas of LAX. The Proposed LAX Sign District Project Modifications would not change the maximum permitted sign area for off-site signs regulated by the LAX Sign District Ordinance; the maximum permitted sign area would continue to be 80,722 square feet within the Landside Subarea and 289,600 square feet within the Airside Subarea. As discussed in Sections 3.2.2, *Visual Resources*, 3.2.3, *Artificial Light and Glare*, and 3.2.4, *Transportation Safety*, the Proposed LAX Sign District Project Modifications would not establish new uses or alter existing facilities at LAX that could create new incompatibilities or safety concerns relative to surrounding land uses. Additionally, the Proposed LAX Sign District Project Modifications would not affect future visual improvements to the surrounding buffer area, streets, and open space associated with the LAX Street Frontage and Landscape Development Plan. The proposed modifications to the LAX Sign District are substantially similar to the Approved LAX Sign District Project in terms of consistency with land use plans, policies, and regulations.

Based on the above, implementation of the Proposed LAX Sign District Project Modifications would not conflict with any land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, the Proposed LAX Sign District Project Modifications would not result in a new significant impact or a substantial increase in the severity of impacts identified in the Certified EIR related to land use, and the impact to land use would be less than significant.

Therefore, the Proposed LAX Sign District Project Modifications would not result in any of the conditions set forth in PRC Section 21166(c) or State CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

3.2.2 Visual Resources

	Yes	No
Are substantial changes proposed in the project that would require major revisions of the environmental impact report due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects?		X
Will substantial changes occur with respect to the circumstances under which the project is undertaken that will require major revisions in the environmental impact report due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects?		X
Has new information of substantial importance become available indicating new or substantially more severe significant impacts or new/different mitigation measures or alternatives for significant impacts?		X

Section IV.B, Visual Resources, of the Certified EIR addresses potential impacts to visual resources from implementation of the Approved LAX Sign District Project. The following evaluates the extent to which the Proposed LAX Sign District Project Modifications would change the impact conclusions in the Certified EIR. The threshold of significance used in the Certified EIR, and evaluated below, was based the version of Appendix G of the State CEQA Guidelines in effect at the time. The State CEQA Guidelines have since been modified. However, the modifications to the State CEQA Guidelines do not alter the impact conclusions in this Addendum.

■ **Would the proposed Project substantially degrade the existing visual character or quality of the site and its surroundings?**

The Project site is limited to the CTA and portions of the airfield (i.e., passenger boarding bridges) within LAX, a busy international airport in a heavily urbanized area. Land uses immediately surrounding the Project site include airport operations and facilities (including taxiways and runways) to the north, west, and south, and commercial and public facilities to the east along Sepulveda Boulevard and its intersection with Century Boulevard. The Project site is characterized by a highly-built environment, with terminals, parking structures, and other airport-related buildings of a functional nature and relatively utilitarian in appearance, with roadway, airfield vehicle, and passenger movement activity within and adjacent to the Project site throughout the day and much of the night. Notable buildings from a visual resources perspective within the Project site include the Theme Building and the 1961 ATCT, both historical resources discussed in more detail in Section 3.2.5 below and in **Attachment 5** of this Addendum; the current ATCT; and the TBIT concourse and West Gates at TBIT roof tops which appear as flowing waves inspired by the Pacific Ocean to the west of the airport. As discussed in Attachment 5, the 1961 ATCT has been altered by the removal of the original aluminum vertical louvers and the addition of metal railings at each floor but otherwise retains most of its original features – refer to Appendix A of Attachment 5, which includes photographs of the 1961 ATCT as originally constructed, and the first page of Appendix B of Attachment 5, which is a photograph of the 1961 ATCT, altered as described above, that is reflective of the ATCT 1961 as it appears today.

The Certified EIR concluded that construction activities for the Approved LAX Sign District Project would result in temporary changes as viewed from nearby vantage points. Given the short duration of construction for each sign and the limited amount of construction equipment and workers needed, impacts to the visual character of the site would be less than significant. Under the Proposed LAX Sign District Project Modifications, construction of the digital displays on the 1961 ATCT would, due to their scale, require more time and more workers than signage contemplated in the Approved LAX Sign District Project. However, as with the Approved LAX Sign District Project, construction of the Proposed LAX Sign District Project Modifications, including digital displays on the 1961 ATCT, would be temporary and would be consistent with existing ongoing construction activities for improvement projects at LAX. Therefore, construction of the Proposed LAX Sign District Project Modifications would not substantially degrade the existing visual character or quality of the site and its surroundings.

Regarding operations, within the Airside Subarea, the Certified EIR concluded that the Approved LAX Sign District Project would add to the complex visual imagery occurring in this area and would not change the utilitarian and active character of the site and, thus, would not substantially degrade the existing visual character or quality of the site and its surroundings. Therefore, impacts to aesthetic and visual resources from the Approved LAX Sign District Project relative to the Airside Subarea would be less than significant. The Proposed LAX Sign District Project Modifications would not alter this conclusion.

Within the Landside Subarea, proposed signage under the Approved LAX Sign District Project would be similar to existing on-site signage and primarily located on existing structures that are largely functional in nature (terminal buildings, sky bridges, parking structures, and columns) without extensive architectural features, and thus, they do not contribute meaningfully to the aesthetic quality of the CTA. A Project Design Feature in the Certified EIR for the Approved LAX Sign District Project prohibited off-site

signage on the Theme Building, the current ATCT, and the Clifton A. Moore Administration Building (including the 1961 ATCT). The Certified EIR determined that the introduction of new well-designed signage proposed under the Approved LAX Sign District Project would add new and variable visual elements to the functional structures in the CTA, contributing to the overall aesthetic of LAX. As such, the Certified EIR concluded that the Approved LAX Sign District Project would not substantially degrade the existing visual character or quality of the site and its surroundings. Therefore, impacts to aesthetic and visual resources from the Approved LAX Sign District Project relative to the Landside Subarea would be less than significant.

As discussed in Section 2.2.2 of this Addendum, the Proposed LAX Sign District Project Modifications would not change the boundaries of the LAX Sign District as regulated by the LAX Sign District Ordinance. However, under the Proposed LAX Sign District Project Modifications, the Project Design Feature in the Certified EIR prohibiting signage on certain buildings would be revised to allow signage on the 1961 ATCT; the prohibition of off-site signage on the Theme Building, the current ATCT, and the remaining portions of the Clifton A. Moore Administration Building would be retained (see Section 2.2.3). The Proposed LAX Sign District Project Modifications do not identify the TBIT concourse and West Gates at TBIT roof tops as locations for signage.

As discussed in Section 2.2.4 of this Addendum, consistent with the LAX Preservation Plan, LAWA has committed to ensure that proposed signage on the 1961 ATCT respects the existing historic fabric, avoids adverse changes to historic resources, is compatible with the original design intent, and preserves the tower's integrity while accommodating contemporary airport needs. Specifically, LAWA would maintain visibility of the tower's historic form, using mounting systems that respect existing architectural rhythms, removing non-contributing elements, and incorporating interpretive content, as detailed in Historical Resources Commitments HR-1 through HR-5 in Section 2.2.4. As discussed in Section 3.2.5 below and Attachment 5 of this Addendum, digital displays would not remove any of the 1961 ATCT's remaining original materials or character-defining features and would remove non-original features that have compromised its integrity as a historical resource. As originally designed, the 1961 ATCT façades were shaded by bands of vertical metal louvers across each floor. The louvers were adjustable to adapt to changing light conditions throughout the day, creating a permeable screen in front of the building's exterior walls. In accordance with Historical Resources Commitment HR-2, the digital displays under the Proposed LAX Sign District Project Modifications would employ a permeable technology that allows visibility of the building's original form and surviving features behind the added digital media display. As required by Historical Resources Commitment HR-3, in order to recall the visual delineation of each floor characteristic of the tower's 1961 appearance, the displays would be mounted as horizontal bands across each floor using the existing outrigger structure that historically supported the tower's louvers, leaving a reveal between floors where no display is present (refer to Figures 2-17, 2-18, and 2-19). These measures would largely restore the original profile and form of the 1961 ATCT as it appeared prior to removal of the louvers and addition of the guardrails in 1996. In addition, per Historical Resources Commitment HR-4, to enhance public understanding of the 1961 tower's historic significance, LED-based digital content, projection treatments, or programmed lighting would be used to periodically depict the tower's historic appearance and recall its former use as an airport traffic control tower. Therefore, even with the revision of the Project Design Feature to allow signage of the 1961 ATCT, the Proposed LAX Sign District Project

Modifications would not alter the conclusions of the Certified EIR with respect to visual resources relative to the Landside Subarea and impacts would remain less than significant.

As discussed in Section 2.2, the approved LAX Sign District Ordinance included a limitation on the amount of signage permitted to be activated within the Landside Subarea of 60,542 square feet. The Proposed LAX Sign District Project Modifications would allow a total of 80,722 square feet within the Landside Subarea. The proposed new digital display signage on the façade of the 1961 ATCT would total up to approximately 25,725 square feet, leaving approximately 55,000 square feet of additional allowable signage. Therefore, with implementation of the 1961 ATCT digital signage as proposed, the amount of off-site signage within the CTA with implementation of the Proposed LAX Sign District Project Modifications would not exceed the amount allowed in the approved Ordinance.³⁰ As a result, the Proposed LAX Sign District Project Modifications would not alter the amount of signage located on façades throughout the CTA and impacts to the visual character of the CTA would remain less than significant.

Regarding views from the surrounding off-airport areas, the Certified EIR determined that signage within the Landside Subarea would only be somewhat visible from the eastern boundary. The Approved LAX Sign District Project signage would be located on existing facilities, separated from the viewer by intervening development or features. The signage would not be visually prominent and would not change or detract from the existing urban character of the site or of the surrounding vicinity. Airside Subarea signage on passenger boarding bridges would be in some fields of view from residential uses on the northern and southern boundaries of LAX; however, the signage would be a small component of limited long-distance views of the Airside Subarea facilities, and signage on passenger boarding bridges would not be illuminated. Signage would blend into this distant background and would not change the visual character or aesthetics of the Project site. The signage would not be visible to any sensitive receptors along the western boundary of LAX or any off-airport areas (i.e., surrounding communities). Therefore, the Certified EIR determined that Approved LAX Sign District Project signage would not substantially degrade the existing visual character or quality of the site and its surroundings; impacts to aesthetic and visual resources from the Approved LAX Sign District Project relative to the views from off-airport locations would be less than significant.

With implementation of the Proposed LAX Sign District Project Modifications, signage within the Landside Subarea would be more visible to off-site land uses to the north, east, and south of the site as compared to the Approved LAX Sign District Project. Signage on the 1961 ATCT and on the east facing façades of Parking Structure P1, Terminal 1, and the future Concourse 0 would be visible to motorists on roadways to the east and to commercial uses in this area. However, the signage would not change or detract from the existing urban character of the site or of the surrounding vicinity. Airside Subarea signage on passenger boarding bridges would be the same as with the Approved LAX Sign District Project. As described above, signage on the passenger boarding bridges would be a small component of limited long-distance views of the Airside Subarea facilities and the signage would not be illuminated. Signage would

³⁰ The Certified EIR for the Approved LAX Sign District Project identified a maximum of approximately 81,522 square feet of new signage within the Landside Subarea; the adopted LAX Sign District Ordinance (Ordinance 183737) identifies a maximum of approximately 80,722 square feet of new signage within the Landside Subarea. Further, as noted herein, per the adopted LAX Sign District Ordinance, within the Landside Subarea, only 75 percent of the square footage—i.e., 60,542 square feet—may be activated at any one time. However, the Certified EIR evaluated impacts associated with implementation of the full 81,522 square feet of new signage.

blend into this distant background and would not change the visual character or aesthetics of the Project site. Similarly, signage on the 1961 ATCT would be visible to off-site land uses to the north, east, and south, but would be consistent with the visual landscape of the airport. For these reasons, the Proposed LAX Sign District Project Modifications would not substantially degrade the existing visual character or quality of the site and its surroundings; impacts to aesthetic and visual resources from the Proposed LAX Sign District Project Modifications relative to the views from off-airport locations would be less than significant.

Project Design Features in the Certified EIR limited the visibility of signs from off-airport locations and prevented signage along the Project boundary. As discussed in Section 2.2.3, these Project Design Features are proposed to be removed. As noted above, the land uses surrounding the LAX Sign District Project site are highly urbanized. Tall buildings, lights, and signage are common. Therefore, even with removal of these Project Design Features, the Proposed LAX Sign District Project Modifications would not alter the conclusions of the Certified EIR with respect to visual resources and impacts would remain less than significant.

The Approved LAX Sign District Project included a requirement to remove a number of billboards in LAWA's control. In addition, the Ordinance requires LAWA to implement a Visual Blight Reduction Program. These provisions have been retained in the proposed Ordinance amendments. Moreover, as noted in Section 2.2.2, LAWA has already completed the removal of approximately 15,000 square feet of off-site signs outside the CTA, and is actively working on removing up to another 15,000 square feet, which has improved visual conditions in the Project area.

Based on the above, the Proposed LAX Sign District Project Modifications would not result in a new significant impact or a substantial increase in the severity of the impacts identified in the Certified EIR related to visual resources. Therefore, the Proposed LAX Sign District Project Modifications would not result in any of the conditions set forth in PRC Section 21166(c) or State CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

3.2.3 Artificial Light and Glare

	Yes	No
Are substantial changes proposed in the project that would require major revisions of the environmental impact report due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects?		X
Will substantial changes occur with respect to the circumstances under which the project is undertaken that will require major revisions in the environmental impact report due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects?		X
Has new information of substantial importance become available indicating new or substantially more severe significant impacts or new/different mitigation measures or alternatives for significant impacts?		X

Section IV.C, Artificial Light and Glare, of the Certified EIR addresses potential impacts related to artificial light and glare from implementation of the Approved LAX Sign District Project. The following evaluates the extent to which the Proposed LAX Sign District Project Modifications would change the impact conclusions in the Certified EIR. Details regarding this evaluation are provided in **Attachment 3** of this Addendum.

The thresholds of significance used in the Certified EIR, and evaluated below, were based on factors identified in the *L.A. CEQA Thresholds Guide*,³¹ as well as thresholds used in the LAX Master Plan EIR, and standards incorporated into EIRs for similar projects and into other City documents. In some cases, the lighting study included in Attachment 3 evaluated more technical criteria than the Certified EIR thresholds of significance. The analysis provided below identifies instances in which the criteria used in the lighting study are more specific than the thresholds.

- **Would the proposed Project result in substantial changes to existing artificial light conditions (i.e., going from a large, unlit, or dimly lit portion of the Project site to a highly lit condition)?**
- **Would the proposed Project interfere with the performance of an off-airport activity?**
- **Would the proposed Project result in an increase in lighting sources that generate light intensity of more than 0.3 fc above ambient lighting as measured at the property line of a residential property?**

The Certified EIR analyzed lighting and glare impacts of the Approved LAX Sign District Project by comparing existing ambient lighting levels in the Landside Subarea, Airside Subarea, and surrounding areas to proposed lighting levels resulting from the Approved LAX Sign District Project.

The Certified EIR concluded that the Approved LAX Sign District Project would have a less than significant impact related to artificial light and glare during construction and operations. The Certified EIR further concluded that lighting associated with the Approved LAX Sign District Project would not generate light intensity of more than 0.3 fc above ambient lighting as measured at the property line of a residential property. The surrounding area is already characterized by high ambient light levels and, therefore, a change in brightness and light trespass would not occur, and the contributions of the Approved LAX Sign District Project to increased ambient glow would not be perceptible from residential uses, the closest of which are located approximately 0.4 mile northeast, 0.6 mile north, and 0.5 mile south. As determined in the Certified EIR, lighting associated with the Approved LAX Sign District Project would not introduce a substantial new source of artificial light that could substantially increase or change the existing ambient light levels, nor would the lighting interfere with the performance of an off-airport activity.

As with the Approved LAX Sign District Project, the Proposed LAX Sign District Project Modifications would result in installation of signage within designated Landside and Airside Subareas of LAX. Digital displays would be limited to the Landside Subarea. A lighting study (see Attachment 3) was prepared in January 2026 which evaluated the existing lighting conditions (illuminance) within and surrounding the Project site in comparison to the potential lighting environmental impacts of the Proposed LAX Sign District Project Modifications. The lighting study analyzed the potential for light trespass illuminance (measured in footcandles [fc]) from digital displays associated with the Proposed LAX Sign District Project Modifications onto adjacent sensitive use properties, including residentially zoned properties located in the Project vicinity.³² The calculated illuminance was evaluated with respect to the maximum light trespass threshold of 0.3 fc above ambient lighting conditions at residentially zoned properties. The

³¹ City of Los Angeles, *L.A. CEQA Thresholds Guide, Your Resource for Preparing CEQA Analysis in Los Angeles*, 2006.

³² In addition to considering residential properties to the north and south, as was done in the Certified EIR, the current lighting study also considered potential impacts to affordable housing units proposed to be located at the former Four Points by Sheraton at Airport Boulevard and W. 98th Street approximately 0.6 mile east of the LAX Sign District boundary.

potential for the proposed digital displays, including those proposed on the 1961 ATCT, to create light trespass impacts at residentially zoned properties was calculated for conditions before and after the construction of the future Concourse 0. Under both scenarios, the maximum light trespass illuminance from the Proposed LAX Sign District Project Modifications would be less than the threshold of 0.3 fc at all vertical planes³³ analyzed and at residentially zoned properties in the Project vicinity. In addition, the calculated maximum illuminance values from the Proposed LAX Sign District Project Modifications would be less than the existing maximum measured existing illuminances within the Project site. Therefore, light trespass from the Proposed LAX Sign District Project Modifications would not create a new illuminance impact or a significant increase in illuminance at residentially zoned properties in the Project site vicinity.

The lighting study also evaluated whether light trespass illuminance from the digital displays would adversely affect airside operations. Airside operations at the current ATCT and at the airfield (i.e., taxiway) receptors are not adversely impacted by the presence of light. Therefore, the 0.3 fc maximum illuminance threshold does not apply at the airside taxiway receptor locations. In fact, additional illuminance at the taxiways would supplement the high intensity floodlights used to illuminate the taxiway for aircraft and maintenance crews. Therefore, light trespass from the Proposed LAX Sign District Project Modifications would not interfere with airfield operations, including the visibility of aircraft and airside personnel from the current ATCT or the taxiways, either before or after construction of Concourse 0.

Although commercial properties are not subject to the 0.3 fc threshold, the lighting study also evaluated light trespass at the Hyatt Regency LAX, which is across Sepulveda Boulevard from the easternmost boundary of the LAX Sign District. Prior to construction of Concourse 0, the maximum light trespass illuminance from the Proposed LAX Sign District Project Modifications would be 0.24 fc; after Concourse 0 construction, the maximum light trespass illuminance would be 0.76 fc. As noted, this land use is not subject to the 0.3 fc threshold and would not be adversely affected by light trespass. Furthermore, this hotel property has no guest room windows facing west toward the 1961 ATCT. The existing vertical illuminance at this location is 1.40 fc. The addition of either 0.24 fc or 0.76 fc at this location would not be perceptible to the human eye.

The Proposed LAX Sign District Project Modifications would allow flexibility of sign sizes and locations throughout the CTA, which could result in digital displays being concentrated in one or several locations within the CTA. In order to provide a conservative analysis, the lighting study evaluated the maximum sign area facing the nearest residentially zoned properties, which are located to the north and east of the Project site. For purposes of this analysis, the maximum sign area included all four sides of the 1961 ATCT; the north façade of Parking Structure P1; the east façades of P1, the P1 Sky Bridge, and Terminal 1; and, after Concourse 0 is constructed, the east façades of Concourse 0 and the Concourse 0 APM Sky Bridge. The evaluation of this sign configuration represents a very conservative analysis of the maximum possible light trespass illuminance that digital displays would generate at sensitive use properties. Under this scenario, the highest maximum calculated light trespass illuminance would be 0.35 fc at the vertical plane located adjacent to the Hyatt Regency LAX without Concourse 0 and 1.33 fc with Concourse 0. As noted above, the Hyatt Regency LAX is a commercial property and is not subject to the 0.3 fc threshold;

³³ A vertical plane represents an imaginary upright surface used to measure the amount of light that lands on a vertical surface (known as vertical illuminance), such as a wall.

therefore, the hotel would not be adversely affected by light trespass. Furthermore, as previously stated, this hotel property has no hotel guest room windows facing west toward the 1961 ATCT and existing ambient illumination at this location is 1.40 fc. At this level of illumination, the addition of 1.33 fc would not be perceptible to the human eye. At all vertical planes adjacent to residentially zoned properties, the calculated maximum trespass illuminance would be less than the threshold of 0.3 fc. Therefore, even with a scenario in which digital displays are concentrated within a limited portion of the CTA with the greatest potential for off-site effects, the Proposed LAX Sign District Project Modifications would not create a light trespass impact.

Based on the above, implementation of the Proposed LAX Sign District Project Modifications would not result in substantial changes to existing artificial light conditions or change a large unlit or dimly lit area to a highly lit condition. Moreover, the Proposed LAX Sign District Project Modifications would not interfere with the performance of an on- or off-airport activity or result in an increase in lighting sources that generate light intensity of more than 0.3 fc above ambient lighting as measured at the property line of a residential property. Therefore, the Proposed LAX Sign District Project Modifications would not result in a new significant impact or a substantial increase in the severity of impacts identified in the Certified EIR related to artificial light.

■ **Would the proposed Project cause any digital display to exceed a maximum brightness of 300 cd/m² during the nighttime and 6,000 cd/m² during the daytime?³⁴**

The Certified EIR specified that lighting associated with the Approved LAX Sign District Project would not exceed 4,500 candelas per meter squared (cd/m²) during the daytime and 300 cd/m² during the nighttime. Under the Approved LAX Sign District Project, the transition from day to nighttime brightness would occur smoothly at a consistent rate beginning 45 minutes prior to sunset and concluding 45 minutes after sunset. Similar lighting standards were also reflected in the Project Design Features associated with the Approved LAX Sign District Project.

Under the Proposed LAX Sign District Project Modifications, the luminance (brightness level) threshold of significance for digital displays would increase to no more than 6,000 cd/m² during the daytime. The Project Design Features for the Proposed LAX Sign District Project Modifications have been altered to bring them into alignment with the threshold used for the analysis and to clarify transition procedures between daytime and nighttime lighting levels. As previously discussed, the lighting study concluded that the light trespass illuminance from the Proposed LAX Sign District Project Modifications would be less than the maximum light trespass threshold of 0.3 fc at all vertical planes adjacent to residentially zoned properties in the Project vicinity, even under a scenario in which digital displays are concentrated within a limited portion of the CTA with the greatest potential for off-site effects. This analysis was based on

³⁴ This threshold is updated and text pertaining to transition is corrected in this Addendum. The Certified EIR luminance threshold was 4,500 cd/m² during the daytime. This level was based on a draft citywide standard under consideration at the time of EIR preparation. This threshold was never adopted by the City. The luminance level proposed in this Addendum, 6,000 cd/m², is comparable to other sign districts in the Los Angeles area and is appropriate for a bright urban area such as LAX. The portion of the threshold concerning transition has been removed from the threshold. Requirements pertaining to the transition between daytime and nighttime luminance levels are now included solely as a Project Design Feature (see Section 2.2.3). The transition text in the Certified EIR has been modified in this Addendum. In the Certified EIR, the threshold stated "The transition from day to nighttime brightness would occur smoothly at a consistent rate beginning 45 minutes prior to sunset and *concluding 45 minutes after sunset*" (emphasis added). The transition from daytime brightness to nighttime brightness must conclude at sunset to avoid potential high contrast, glare conditions at sunset or during twilight. The modification in this Addendum corrects this and also addresses the transition from nighttime to daytime.

daytime lighting levels of 6,000 cd/m². Similarly, the analysis of glare below concluded that the maximum luminance with implementation of the Proposed LAX Sign District Project Modifications would not exceed the thresholds for glare. Therefore, the proposed increase in daytime luminance would not create a new significant impact or a substantial increase in the severity of impacts identified in the Certified EIR related to artificial light and glare.

Digital displays would operate at a maximum luminance of 6,000 cd/m² during the day and 300 cd/m² at night, with a smooth transition from the daytime maximum luminance to nighttime maximum luminance beginning 45 minutes prior to sunset and concluding at sunset. Additionally, after sunrise, digital displays under the Proposed LAX Sign District Project Modifications would transition smoothly from the nighttime maximum luminance to daytime maximum luminance, concluding 45 minutes after sunrise. Sign luminance on the digital displays would be reduced in response to ambient lighting conditions.

Based on the above, implementation of the Proposed LAX Sign District Project Modifications would not cause any digital display to exceed a maximum brightness of 300 cd/m² during the nighttime and 6,000 cd/m² during the daytime. Therefore, the Proposed LAX Sign District Project Modifications would not result in a new significant impact or a substantial increase in the severity of impacts identified in the Certified EIR related to artificial light and glare.

- **Would the proposed Project include lighting or signage that would make it difficult for pilots to distinguish between said lights and aeronautical lights, or result in glare in the eyes of pilots that would impair their ability to operate aircraft?**
- **Would the proposed Project implement signage which incorporates substantial amounts of reflective materials in close proximity to glare-sensitive uses, including on-or off-airport vehicle traffic, or if glare-sensitive uses are illuminated by high brightness lighting or special effects?**

These thresholds pertain to impacts related to glare. The lighting study analyzed impacts related to glare based on the following criteria:

- Project Sign luminance visible from residentially zoned properties must be less than high contrast conditions, i.e., less than 30 to 1 (30:1) contrast ratios.
- Project luminance visible within 10 degrees from the driver's normal field of view must be less than 500 footlamberts (fL) and or less than 1,000 times the minimum measured brightness in the driver's field of view, except that when the minimum measured brightness in the field of view is 10 footlamberts or less, the measured brightness of the light source in footlambert shall not exceed 500 plus 100 times the angle, in degrees, between the driver's field of view and the light source.
- Project luminance must not introduce a new source of glare with new high contrast conditions, with luminance greater than 300 cd/m² at night and contrast ratio greater than 30:1, visible from a field of view within the airfield operations, including the visibility of aircraft and airside personnel from the current ATCT or the taxiways.

The potential impacts of the Proposed LAX Sign District Project Modifications relative to glare, as measured against these criteria, are evaluated below.

3.2.3.1 Impacts of the Approved LAX Sign District Project

The Certified EIR concluded that there would be less than significant impacts related to glare from signage in both the Landside and Airside Subareas. Project Design Features for the Approved LAX Sign District Project would limit the location of the proposed signage and illumination, brightness, or special effects associated with lighting, including prohibiting electronic or light enhanced displays in the Airside Subarea in compliance with Los Angeles Municipal Code Section 12.50. Lighting or signage in the Landside Subarea would not extend above the height of structures within the CTA and would not be in direct view of pilots or the current ATCT and therefore would not result in glare in the eyes of pilots or current ATCT personnel that would impair their ability to operate or guide aircraft.

By design, signage under the Approved LAX Sign District Project would not incorporate reflective building materials that could be a source of glare. Additionally, digital displays would have a contrast ratio of less than 30:1 to eliminate glare. Given the distance to sensitive receptors and intervening structures, neither daytime nor nighttime glare impacts of the Approved LAX Sign District Project would be significant because the signage would not incorporate substantial amounts of reflective materials in close proximity to glare sensitive uses, including off-airport vehicle traffic and residential communities.

3.2.3.2 Impacts of the Proposed LAX Sign District Project Modifications

The lighting study (Attachment 3) evaluated glare at residentially zoned properties in the Project vicinity and on adjacent roadways. In addition, the potential for the Proposed LAX Sign District Project Modifications to result in light and glare impacts to pilots and to operations at the current ATCT was also analyzed.

Glare Impacts on Residentially Zoned Properties

Glare impacts on residential uses were evaluated by analyzing contrast ratios, which is the ratio of the maximum sign luminance as compared to the average luminance within the field of view. A high contrast ratio, greater than 30:1, indicates a potential glare condition. The lighting study (Attachment 3) determined that the maximum nighttime luminance from the proposed digital displays would result in contrast ratios ranging from 1.3:1 to 3.1:1, which is considered to be a low contrast level and would not create a new source of glare at any off-site monitoring site or at surrounding residentially zoned properties in the Project vicinity.

Glare Impacts on Roadways – CVC Standards

The lighting study for the Proposed LAX Sign District Project Modifications (Attachment 3) conducted a glare analysis for roadways at night, twilight, and during the day with respect to the most stringent requirements of the California Vehicle Code (CVC) to determine if the Proposed LAX Sign District Project Modifications would introduce a source of distracting glare to drivers. The CVC stipulates limits pertaining to luminance that are based on a formula comprised of a number of variables. During night and twilight under conservative conditions, the maximum allowable luminance per the CVC is 500 fL, equivalent to 1,713 cd/m², as defined by CVC Section 21466.5. The Proposed LAX Sign District Project Modifications include a maximum nighttime luminance of 300 cd/m², equivalent to 87.6 fL, which is 17.5 percent of the maximum allowable luminance as defined by CVC. With the proposed nighttime luminance maximum, the Proposed LAX Sign District Project Modifications would not introduce a new source of glare within drivers' field of view during nighttime.

At 45 minutes prior to sunset, the proposed digital displays would be specified to begin the transition from the maximum daytime luminance of 6,000 cd/m² to the maximum nighttime luminance of 300 cd/m². Similarly, the proposed digital displays would be specified to transition from the nighttime maximum luminance of 300 cd/m² to the daytime maximum luminance of 6,000 cd/m² beginning no earlier than sunrise. By adhering to these transition requirements, the proposed digital displays would not exceed a maximum luminance of 300 cd/m² during evening twilight (i.e., after sunset) or morning twilight (i.e., before sunrise). Thus, the Proposed LAX Sign District Project Modifications would not exceed the threshold of 500 fL (1,713 cd/m²) and, therefore, would not introduce a new source of glare within the drivers' field of view during twilight.

During the daytime, the maximum luminance limit under conservative conditions as defined by CVC is 10,000 fL. The Proposed LAX Sign District Project Modifications include a maximum daytime luminance of 6,000 cd/m², equivalent to 1,751 fL, which is less than 18 percent of the maximum permitted by the CVC. With the proposed daytime luminance maximum, the Proposed LAX Sign District Project Modifications would not introduce a new source of light or glare within the drivers' field of view during the daytime.

Glare Impacts on Roadways – Contrast Ratio

The lighting study estimated that the maximum nighttime luminance for the Proposed LAX Sign District Project Modifications of 300 cd/m² would result in contrast ratios less than 3.5:1 at adjacent roadways, far less than the 30:1 contrast ratio for glare conditions. Therefore, the Proposed LAX Sign District Project Modifications would not create a significant source of nighttime glare at roadways.

Glare Impacts on Airport Operations

The potential for glare from the Proposed LAX Sign District Project Modifications to affect pilots operating aircraft on taxiways and runways was evaluated by calculating the contrast ratio at two on-site locations. With implementation of the Proposed LAX Sign District Project Modifications, the contrast ratio for the two locations would be 0.9:1 and 0.7:1, which indicates a very low contrast ratio. The analysis determined that the maximum luminance associated with the Proposed LAX Sign District Project Modifications would be much lower than the surrounding existing conditions within the taxiway areas, which includes high intensity floodlights to illuminate the taxiways for aircraft and maintenance crews. Because the proposed signs would be much less bright than ambient conditions, they would not introduce a new source of glare for pilots operating on airport taxiways or runways.

Glare impacts to operations at the current ATCT were evaluated by considering signage luminance levels, the distance between the 1961 ATCT and the current ATCT, and the differential in elevation between the two towers. The 1961 ATCT is more than 1,750 feet away from the current ATCT, and more than 100 feet below the observation level of the current ATCT. The Proposed LAX Sign District Project Modifications would not introduce a new source of glare with new high contrast conditions (i.e., with luminance greater than 300 cd/m² and a contrast ratio greater than 30:1) visible from a field of view within the airfield operations, including from the current ATCT or the taxiways. While the maximum luminance of 300 cd/m² would make the proposed digital display on the 1961 ATCT clearly legible at night, it would not introduce a new source of glare to the current ATCT or at the LAX airfield operations areas. Therefore, glare from the Proposed LAX Sign District Project Modifications would not interfere with airfield operations, including the visibility of aircraft and airside personnel from the current ATCT or the taxiways.

3.2.3.3 Summary

Based on the above, implementation of the Proposed LAX Sign District Project Modifications would not result in a light trespass impact at residentially zoned properties; implement signage that would result in high levels of contrast or incorporate substantial amounts of light or reflective materials in close proximity to glare-sensitive uses, including on- or off-airport vehicle traffic; introduce lighting or signage that would make it difficult for pilots to distinguish between said lights and aeronautical lights or result in glare in the eyes of pilots that would impair their ability to operate aircraft; or impact operations at the current ATCT. Therefore, the Proposed LAX Sign District Project Modifications would not result in a new significant impact or a substantial increase in the severity of impacts identified in the Certified EIR related to artificial light and glare.

Therefore, the Proposed LAX Sign District Project Modifications would not result in any of the conditions set forth in PRC Section 21166(c) or State CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

3.2.4 Transportation Safety

	Yes	No
Are substantial changes proposed in the project that would require major revisions of the environmental impact report due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects?		X
Will substantial changes occur with respect to the circumstances under which the project is undertaken that will require major revisions in the environmental impact report due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects?		X
Has new information of substantial importance become available indicating new or substantially more severe significant impacts or new/different mitigation measures or alternatives for significant impacts?		X

Section IV.D, Transportation Safety, of the Certified EIR addresses the potential for implementation of the Approved LAX Sign District Project to result in driver distraction that compromises the safety of motorists and pedestrians within the CTA, and the potential for Air Traffic Control (ATC) or pilot distraction to occur to a degree that compromises aviation safety. The following evaluates the extent to which the Proposed LAX Sign District Project Modifications would change the impact conclusions in the Certified EIR. Details regarding this evaluation are provided in **Attachment 4** of this Addendum.

- **Would the proposed Project constitute a hazard to the safe and efficient operation of vehicles upon a street or a freeway or the safe and efficient operation of aircraft during takeoff and landing or ground maneuvers, or which creates a condition that endangers the safety of persons or property?**

The Certified EIR analyzed potential impacts from implementation of the Approved LAX Sign District Project relative to the significance threshold stated above. Under the Approved LAX Sign District Project, signage allowed under LAX Sign District includes a range of new off-site signage, including supergraphics, wall signs, digital display signs, signs on passenger boarding bridges, signs on columns, and pole signs. The transportation safety impacts analysis, provided in Attachment 4 and summarized herein, is based on the differences between the Approved LAX Sign District Project and the Proposed LAX Sign District Project

Modifications, as described in Section 2.2. Not all differences between the Approved LAX Sign District Project and the Proposed LAX Sign District Project Modifications would affect vehicular safety, aircraft operations safety, or safety of persons or property. The key changes in the Proposed LAX Sign District Project Modifications that warrant consideration relative to transportation safety are:

- **Modification of Permitted Refresh Rates.** The Modified Project would define a new Controlled Refresh (CR) standard, CR II, with a minimum 16-second static image duration, applied to the 1961 ATCT and the east-facing façades of Parking Structure P1, Terminal 1, and Concourse 0. It would also modify CR III to allow sign changes every 1 hour instead of every 12 hours. Finally, it would eliminate the requirement that all digital signage within a given Controlled Refresh group be updated simultaneously on the Controlled Refresh schedule. Instead, it would allow refreshes at longer intervals that are multiples of the Controlled Refresh rate and would require refreshes to be coordinated between signs within the same field of view to the extent feasible. These changes require analysis of transportation safety for the Landside Subarea and off-airport traffic.
- **Digital Signage on the 1961 ATCT.** The allowance of up to approximately 25,725 square feet of digital signage covering all four sides of the 1961 ATCT, subject to CR II, requires analysis of transportation safety for the Landside Subarea and off-airport traffic, aircraft operations safety, and construction.
- **Digital Signage on the Future Concourse 0.** The allowance of digital signs on the east-facing façade of Concourse 0, subject to CR II, requires analysis of transportation safety for the Landside Subarea, off-airport traffic, and aircraft operations safety.
- **Sky Bridges and Columns.** The allowance of signs on any column (rather than every other column) and on sky bridges between the APM stations and terminals requires analysis of transportation safety for the Landside Subarea.
- **Modification of Project Design Features.** A number of Project Design Features were incorporated into the Approved LAX Sign District Project to reflect LAWA's project objectives and to reduce potential effects of the Project. As discussed in Section 2.2.3, and reflected in Table 2-2, as part of the Proposed LAX Sign District Project Modifications, changes to the Project Design Features are proposed. In some cases, the wording of the original Project Design Feature is proposed to be revised. In other cases, the Project Design Feature is proposed to be deleted or replaced. A table that compares the original Project Design Features and the Proposed Project Design Feature modifications is provided in Table 2-2. Because some of the Project Design Features are related to the visibility of signs to motorists, analysis of transportation safety for the Landside Subarea and off-airport traffic is required.

3.2.4.1 Construction Impacts

Impacts of the Approved LAX Sign District Project

The Certified EIR described construction activity for the Approved LAX Sign District Project signage as relatively minor work that would involve securing framework for digital displays, welding of signage supports (i.e., hooks and/or railing systems), and sign installation. The Certified EIR identified a range of construction/installation durations, from 6 hours for column and pole signs, to 2 days for digital signs and 1 week for supergraphic signs, with a maximum of six workers per sign. Installation of signs was assumed

to require the use of sidewalks and setbacks without affecting roadways, though temporary pedestrian rerouting or lane closures could be required in certain instances. The Certified EIR found the transportation safety impacts of construction to be less than significant due to the short duration of construction activities.

Impacts of the Proposed LAX Sign District Project Modifications

Only one feature of the Proposed LAX Sign District Project Modifications would result in different construction conditions than were analyzed in the Certified EIR; construction of the digital signage on the 1961 ATCT would, due to its scale, require more time and more workers than signage contemplated in the Approved LAX Sign District Project. However, given the 1961 ATCT's location in the atrium of the Clifton A. Moore Administration Building, the potential effects of construction beyond the limits of that building would be limited. The primary potential for construction effects on the transportation system relate to temporary sidewalk and/or lane closures to accommodate a crane that may be used to lift materials for installation to the building. Such closures, if needed, would occur over a period of several hours on any given day. Longer-term closures of pedestrian facilities or vehicle lanes, including overnight closures, are not anticipated.

There are pedestrian entrances on both sides of the Clifton A. Moore Administration Building and, therefore, a disruption to sidewalks at any one location would not prevent pedestrians from accessing the building. The portion of Center Way adjacent to the south side of the Clifton A. Moore Administration Building is the only roadway where a crane could need to be set up in a lane. That portion of the road has four lanes, and a temporary closure of one or two lanes would be minimally disruptive to airport traffic.

Based on the above, as with the Approved LAX Sign District Project, construction activities associated with the LAX Sign District Project Modifications would be less than significant due to the nature and short duration of these activities.

3.2.4.2 Operational Impacts

Landside Subarea

Impacts of the Approved LAX Sign District Project

The Certified EIR analyzed the addition of up to approximately 81,522 square feet³⁵ of new off-site signage within the CTA, including supergraphics, wall signs, column signs, pole signs, and digital display signs. These signs were intended to be visible primarily to motorists and pedestrians circulating within the CTA and not to surrounding off-airport roadways or communities. The Certified EIR identified a range of design and operational controls to reduce the potential for transportation safety impacts, including restrictions on sign placement, shielding and orientation of lighting, limits on illumination levels, requirements for static imagery, and controls on digital display refresh rates.

³⁵ The Certified EIR for the Approved LAX Sign District Project identified a maximum of approximately 81,522 square feet of new signage within the Landside Subarea; the adopted LAX Sign District Ordinance (Ordinance 183737) identifies a maximum of approximately 80,722 square feet of new signage within the Landside Subarea. Further, per the adopted LAX Sign District Ordinance, within the Landside Subarea, only 75 percent of the square footage—i.e., 60,542 square feet—may be activated at any one time. The Certified EIR evaluated impacts associated with implementation of the full 81,522 square feet of new signage.

Under the Approved LAX Sign District Project, digital signs in areas of the CTA where they would be directly in a driver's line of sight would be subject to CR III, allowing image changes every 12 hours, effectively functioning as static signs. Digital signs to the sides of the CTA roadways, such as on parking structure façades parallel to the roadway, would be subject to CR I, allowing image changes every 8 seconds. The east-facing façade of Parking Structure P1, which is adjacent to a high-traffic intersection and directly in a driver's line of sight for cars entering the CTA from Century Boulevard, would refresh as frequently as every 14 seconds. All digital signage would be equipped to modify the sign brightness in response to ambient lighting conditions to ensure that display brightness would not cause a traffic hazard.

The Certified EIR noted that independent regulatory review provides an additional safeguard. Under the Citywide Sign Ordinance and the LAX Specific Plan, proposed sign locations and sign support structures must be reviewed by the Department of Building and Safety, and any sign determined to pose a traffic hazard would not be permitted. Signage would also be prohibited from resembling official traffic control devices or interfering with wayfinding visibility.

Based on these factors, the Certified EIR concluded that the proposed signage within the Landside Subarea would not constitute a hazard to the safe and efficient operation of vehicles or pedestrians within the CTA and impacts to on-airport transportation safety would be less than significant.

Impacts of the Proposed LAX Sign District Project Modifications

Modification of Permitted Refresh Rates

As described above, the Proposed LAX Sign District Project Modifications would modify the permitted refresh rates. The newly defined CR II would permit a refresh rate that is no more frequent than 16 seconds for the east-facing façades of Parking Structure P1, Terminal 1, and Concourse 0 as well as for the 1961 ATCT. This would replace the 14-second frequency permitted on Parking Structure P1 under the Approved LAX Sign District Project. The purpose of this change is to coordinate the refreshes on these signs with those of the signs subject to CR I, which have a refresh rate that is no more frequent than every 8 seconds.

From a traffic safety standpoint, there are two benefits to this change. The first is that less frequent updates to the image displayed on the sign means fewer chances for drivers to be distracted by the image change itself. The second benefit, closely related, is that by coordinating image updates between CR I and II signs, fewer distinct change events would occur, which would further reduce the chances for drivers to be distracted.

The modification to CR III from a 12-hour schedule to a 1-hour schedule would not meaningfully change the potential for driver distraction within the CTA. Whether a 12-hour schedule or a 1-hour schedule, the vast majority of drivers in the CTA would pass through without witnessing a display update. For those that do, these signs are high above the roadway and would change instantly, without motion or transition effects. As discussed in Chapter 5 of Attachment 4, vehicle and pedestrian activity levels in the CTA necessitate driver attention to the road, and even those drivers who glance at the sign would do so briefly. Therefore, this would not cause a traffic safety hazard; the impact would be less than significant.

The Proposed LAX Sign District Project Modifications would also eliminate a requirement that all digital signs within each Controlled Refresh group would be required to refresh at the exact same instant. Instead, signs in proximity to each other would have coordinated refresh times to the extent feasible (i.e., within the limits of the available technology). With this change, it is possible that, from a given vantage point, a driver may experience uncoordinated refreshes of multiple signs within their field of view in a period shorter than the 8 second refresh rate. However, asynchronous refresh of multiple signs is a common sight along freeways, where different billboard operators typically have no requirement or incentive to synchronize their signs. The Proposed LAX Sign District Project Modifications' requirement to coordinate refreshes of closely-located signs would minimize the potential for driver distraction through asynchronous refreshes. Therefore, this would not cause a traffic safety hazard; the impact would be less than significant.

Digital Signage on the 1961 ATCT

The 1961 ATCT, as a 13-story tower located near the entrance of the CTA, is visible to drivers from various vantage points, including on-airport and off-airport locations (off-airport traffic safety is separately analyzed below). From on-airport roadways, it is visible from:

- World Way westbound (upper level) to drivers' left
- World Way eastbound (upper and lower levels) to drivers' left
- World Way return loop to drivers' left
- Center Way eastbound to drivers' front (impeded by APM support columns) and left
- CTA inbound ramps to drivers' front, slightly left
- ATMP CTA outbound ramps to southbound Sepulveda Boulevard to drivers' right as the ramp turns south onto Sepulveda Boulevard south of W. 98th Street³⁶

Signage on the 1961 ATCT would refresh as frequently as every 16 seconds under CR II, though in practice, given the intent to use it to promote welcome messages, travel and tourism messaging, celebratory content, City-hosted events, special occasions, and artistic displays, it is likely that it would typically remain static for much longer durations. Unlike other digital displays in the LAX Sign District, the refresh on the 1961 ATCT would not have to be coordinated with other digital displays and the display would be permitted to gradually fade from one color to another (without a change in overall message or image).

Four of the six driver vantage points listed above (along World Way and the CTA outbound ramps) would require a driver to look left or right to see the sign, and a fifth (Center Way eastbound) would only have an obstructed forward view. Those locations within the CTA are in areas of high complexity due to frequent vehicle lane changes and merges, as well as high pedestrian activity and, therefore, drivers would typically maintain most of their attention on the task of driving rather than looking at the signage on the 1961 ATCT. Additionally, due to the amount of traffic signals, pedestrian crossings, and vehicular activity,

³⁶ As shown in Figure 3 of Attachment 4, with implementation of the ATMP roadways, which are currently under construction, the CTA outbound ramps will exit the CTA heading eastward parallel to Century Boulevard, turn northward west of Jetway Boulevard, turn westward south of 96th Street, and then turn southward paralleling Sepulveda Boulevard before merging with Sepulveda Boulevard right after passing the 1961 ATCT, which will be on the drivers' right.

the speed of traffic on the CTA roadways is generally lower than the posted speed limit and much lower than on typical public streets. Further, the Proposed LAX Sign District Project Modifications retain the requirement that digital displays would be equipped to modify the brightness of the sign in response to ambient lighting conditions, thus ensuring that brightness of the displays at various times of day and night would not present a traffic hazard.

The vantage point from the CTA inbound ramps does not have the same complex driving environment. The ramps included in the LAX Airfield and Terminal Modernization Project (ATMP) Roadway Improvements³⁷ (like the existing CTA inbound ramps) provide two or three lanes³⁸ of single-directional traffic with no intersections, merges, traffic signals, or pedestrians. Combined with the fact that the 1961 ATCT signage would be closer to drivers' field of vision from this vantage point, drivers would have more flexibility to spend some attention on the sign. However, as discussed in Chapter 5 of Attachment 4, glances at digital signage tend to be brief (well under the 2-second threshold above which collision risk meaningfully increases.) Further, though this is a simple driving environment, it is still a low-speed driving environment, which not only reduces the risk of collision but also reduces the chances of a collision causing an injury.

With the conditions in place to prohibit video, motion, flashing, or scrolling, and with infrequent image refreshes, and in the slow-speed environment that the airport roadways require, the proposed signage on the 1961 ATCT would not cause a traffic safety hazard; the impact would be less than significant.

Digital Signage on Concourse 0

Like the 1961 ATCT and the east-facing façade of Terminal 1, digital signage on the east-facing façade of Concourse 0 would be subject to CR II. Signage on Concourse 0 would be only slightly over 100 feet west of Sepulveda Boulevard. Any signage on this structure would be visible from a limited number of on-airport roadways:

- World Way westbound (upper level) ramp from Century Boulevard to drivers' right
- CTA inbound ramps to drivers' right
- ATMP CTA outbound ramp to southbound Sepulveda Boulevard to drivers' right as the ramp turns south onto Sepulveda Boulevard south of W. 98th Street

All of these locations are on single-directional, low-speed facilities without merges, intersections, signals, or pedestrians. Further, as discussed in Chapter 5 of Attachment 4, glance duration at digital signage (even when in drivers' direct field of view) tends to be well under the 2-second threshold above which collision risk meaningfully increases. Therefore, as with the 1961 ATCT, signage on the east-facing façade of Concourse 0 would not result in a traffic safety hazard for on-airport transportation; the impact would be less than significant.

³⁷ The ATMP Roadway Improvements are shown and described in detail in Attachment 1 of the December 17, 2024 ATMP Final EIR Addendum available on LAWA's website at <https://www.lawa.org/lawa-our-lax/environmental-documents/documents-certified>. See also Figure 3 in Attachment 4 of this Addendum for the Proposed LAX Sign District Project Modifications.

³⁸ As opposed to as many as seven within the CTA.

Sky Bridges and Columns

At the time of the Certified EIR, there were a total of seven pedestrian sky bridges connecting parking structures to terminals within the CTA. As of February 2026, with primary APM construction complete, there are a total of nine sky bridges, with most of the original sky bridges replaced. The Proposed LAX Sign District Project Modifications would permit signage on the nine existing sky bridges and any future sky bridges that may be built in the future.

The APM sky bridges are substantially similar to the original terminal sky bridges in terms of elevation and span. Therefore, the analysis for terminal sky bridges from the Certified EIR is sufficient to conclude that no signs on any existing or future sky bridge under the Proposed LAX Sign District Project Modifications would cause a traffic safety hazard; the impact would be less than significant.

Aircraft Operations

Digital signs on the 1961 ATCT and the east-facing façade of Concourse 0 have the potential to be visible to aircraft pilots during takeoff, landing, and/or ground maneuvers. Neither of these locations would be in the pilots' forward line-of-sight during takeoff or landing, as they are between 1,300 and 2,000 feet south of the nearest runway. Therefore, they would only be visible to pilots during takeoff and landing if they were to look to the side. During ground maneuvers, there would be the potential for pilots to see the 1961 ATCT from certain locations on the runways, taxiways/taxilanes, and terminal apron areas. (The east-facing façade of Concourse 0 would not be visible from pilots on the ground from any vantage point).

As discussed further in the Certified EIR, lighting at LAX is not allowed to interfere with the nighttime visibility of air traffic control operators and incoming pilots, or interfere with lighting used to guide aircraft such as approach lighting, runway/taxiway guidance lighting, runway end identifier lights, and ground lighting/markings. Existing laws and regulations, as well as project design features for the Proposed LAX Sign District Project Modifications, which regulate sign location and brightness, would ensure the digital displays and lighted signs would not be located in such a manner to create a hazard to air traffic control operators, pilots or motorists.

Commercial pilots are highly trained to focus on the task of controlling the aircraft at all times. The CTA is already an area of high illumination, which does not currently interfere with aircraft operations. The presence of digital signage on the 1961 ATCT or the east-facing façade of Concourse 0, hundreds of feet to the side of any airborne aircraft, would not provide a distraction that could lead to unsafe aircraft operations. Therefore, the Proposed LAX Sign District Project Modifications would not cause a safety hazard due to this newly proposed digital signage; the impact would be less than significant.

Airside Subarea

The Certified EIR analyzed the addition of up to approximately 289,600 square feet of new off-site signage within the Airside Subarea. The Airside Subarea includes terminal concourses, gates, passenger boarding areas, runways, and airport access ways. The Certified EIR noted that the Airside Subarea is primarily visible to passengers and employees who handle airfield operations, including drivers of vehicles and equipment and pilots of aircraft arriving and departing from the gates and taxiing. Under the Approved LAX Sign District Project, signage in the Airside Subarea would not be illuminated and signage type, size, and placement would be in compliance with the regulations and standards for signage to be developed

by LAWA in accordance with the Ordinance so as to ensure that visual clutter would not occur and that there would be no distractions to pilots or air traffic controller personnel. As such, the Certified EIR concluded that the proposed signage within the Airside Subarea would not constitute a transportation safety hazard and impacts would be less than significant. It should be noted that off-site signage was installed on some passenger boarding bridges for several years in accordance with the Approved LAX Sign District Project (though none is currently in use). During the period when this signage was in place, there were no complaints and no traffic or safety issues associated with it.

The Proposed LAX Sign District Project Modifications would not impose any change on regulations for the Airside Subarea that would affect the previously conducted analysis in the Certified EIR. Therefore, consistent with the Approved LAX Sign District Project, the Modified Project would not result in a transportation safety hazard, and impacts would be less than significant.

Off-Airport Area

Off-airport traffic may be able to see some of the signage permitted under the LAX Sign District. This section analyzes potential impacts to off-airport traffic from each of the four directional boundaries of the LAX Sign District area.

The research in Chapter 5 of Attachment 4 demonstrates that signs following best practices regarding brightness and refresh rates, and which do not feature motion, flashing, or scrolling, do not result in statistically significant increases in collision risk. The Proposed LAX Sign District Project Modifications Project Design Features regulate all of these issues to ensure minimization of driver distraction and are considered in this analysis.

Eastern Boundary

The eastern boundary of the Project site is adjacent to a dense mix of roadways (including Sepulveda Boulevard), billboards and other signage, hotels and office buildings, and parking areas. The Certified EIR found that signage on the east-facing façades of Terminal 1 and Parking Structure P1 as well as on sky bridges would be visible from Sepulveda Boulevard, especially from north of Century Boulevard. However, given the distance and the many fences, buildings, and landscaping in the intervening space, the Certified EIR found that such signs would not typically attract the attention of a driver on Sepulveda Boulevard, especially as the CTA is already an area of high illumination. Therefore, the Certified EIR found that the Approved LAX Sign District Project would not constitute a transportation safety hazard for traffic on Sepulveda Boulevard and no significant impact would occur.

The Proposed LAX Sign District Project Modifications would bring digital signage closer to Sepulveda Boulevard through its proposed installation of signage on the 1961 ATCT and the east-facing façade of future Concourse 0. The 1961 ATCT is located approximately 450 feet west of Sepulveda Boulevard while the east-facing façade of Concourse 0, in its current design, could be just over 100 feet west of Sepulveda Boulevard. Such signs would be visible to a driver who chooses to look to their left or right and, therefore, has the potential to serve as a distraction. Additionally, portions of the 1961 ATCT and the east-facing façade of Concourse 0 may be visible from drivers traveling westbound on Century Boulevard. However, due to the limits on brightness and refresh rate (no more frequent than one change every 16 seconds, with no videos, motion, flashing, or scrolling), and the fact that these signs would not be oriented toward

any drivers' forward vision in nearly all cases,³⁹ these would not serve as unusual distractions that could cause a safety hazard. Though the design of Concourse 0, and any sign thereupon, has not been finalized, these limits ensure that any sign permitted under the Proposed LAX Sign District Project Modifications and City regulations would not result in a safety hazard. Therefore, as with the Approved LAX Sign District Project, the Proposed LAX Sign District Project Modifications would not result in driver distraction, and there would be no significant transportation safety impact.

Western Boundary

Pershing Drive is located along the western boundary of LAX, approximately 6,700 feet from the western boundary of the LAX Sign District. Due to the distance and topography (Pershing Drive is located at a lower elevation than the western boundary of LAX, preventing views across the airport property), no signage in the Landside Subarea or the Airside Subarea would be visible from Pershing Drive and, therefore, the Certified EIR found that no driver distraction could occur and no significant impact would occur.

Due to distance and intervening topography and structures, signage proposed under the Modified Project, including signage on the west façade of the 1961 ATCT, would not be visible from Pershing Drive. Therefore, as with the Approved LAX Sign District Project, the Proposed LAX Sign District Project Modifications would not result in driver distraction, and there would be no significant transportation safety impact.

Northern Boundary

Lincoln Boulevard and Westchester Parkway are the nearest streets north of LAX, approximately 1,900 feet north of the northern boundary of the LAX Sign District at its closest point. The Certified EIR found that digital signage in the Landside Subarea would not be readily visible to motorists north of LAX due to distance and the presence of fences at the LAX boundary and, therefore, would not pose a distraction. The Certified EIR found that signage within the Airside Subarea, which would not be illuminated, would be too far away to distinguish and therefore would not result in driver distraction.

The only substantive change resulting from the Proposed LAX Sign District Project Modifications is the addition of digital signage on the 1961 ATCT, which would be visible from Lincoln Boulevard and Westchester Parkway due to its height, size, and illumination. However, these streets are over 3,100 feet (approximately 0.6 mile) away from the 1961 ATCT at their nearest points, and the image or message would be too far away for drivers to identify or read. In terms of its size in a driver's field of view, it would appear substantially smaller than a standard billboard viewed from a typical freeway viewing distance of approximately 200 feet. Additionally, as described in the Lighting Study (Attachment 3 of this Addendum), light attenuates proportionally with the square of the distance from the source, so the amount of light reaching Lincoln Boulevard and Westchester Parkway would be approximately 2.1 percent of the amount visible from 450 feet away. Therefore, as with the Approved LAX Sign District Project, the Proposed LAX Sign District Project Modifications would not result in driver distraction, and there would be no significant transportation safety impact.

³⁹ For drivers traveling westbound on Century Boulevard, there may be digital signage directly in drivers' forward field of view, depending on the final design of Concourse 0 and the location of any potential signage on the east-facing façade. However, existing regulatory requirements would ensure that the Proposed LAX Sign District Project Modifications would not present a safety hazard.

Southern Boundary

Imperial Highway and I-105 are located to the south of LAX approximately 2,500 feet at their nearest point from the southern boundary of the LAX Sign District. As with the northern boundary, the Certified EIR found that these roadways would be too far away to see or distinguish any signage, and therefore the Certified EIR found that drivers on these roads would not be distracted by signs within the LAX Sign District.

The only substantive change resulting from the Proposed LAX Sign District Project Modifications is the addition of digital signage on the 1961 ATCT, which would be visible from I-105 (which is elevated over Imperial Highway and various airport structures on the south side of LAX) due to its height, size, and illumination. However, I-105 is nearly 4,700 feet (approximately 0.9 mile) south of the 1961 ATCT, and the image or message would be too far away for drivers to identify or read. It would appear even smaller and dimmer to a driver on I-105 than described above for a driver on Lincoln Boulevard or Westchester Parkway. Therefore, as with the Approved LAX Sign District Project, the Proposed LAX Sign District Project Modifications would not result in driver distraction, and there would be no significant transportation safety impact.

Modifications to Project Design Features

The Proposed LAX Sign District Project Modifications would change the Project Design Features in the Certified EIR. As noted previously, in some cases, the text of the Project Design Features would be modified; in other cases, the Project Design Feature would be eliminated or replaced. The Project Design Features with the potential to affect transportation safety would allow signage along the Project boundary and on the 1961 ATCT; eliminate several Project Design Features with specifications related to glare; add a new Controlled Refresh rate (CR II) and modify the refresh rates and procedures; change the luminance standard; clarify the transition between nighttime and daytime; and eliminate lighting specifications for supergraphic signage. It is noted that several Project Design Features regulating light and glare from signs and included in the LAX Sign District Ordinance are proposed to be removed as part of the Proposed LAX Sign District Project Modifications; however, these Project Design Features were determined not to be necessary or were replaced by a limitation on maximum daytime and nighttime brightness. As concluded in the Lighting Study (Attachment 3 of this Addendum), the use of a cubic louvering system on digital displays has no material bearing on the extent of light trespass at any sensitive use properties, and is therefore unnecessary. Additionally, the signs proposed in the study area are not reflective or a source of glare; therefore, it is not necessary to limit the placement of the signs relative to the roadway elevation.

The analysis above, which is based on the Transportation Safety Technical Memorandum (Attachment 4 of this Addendum), accounts for the modifications to Project Design Features. (See also Section 9 of the Lighting Study [Attachment 3 of this Addendum].) As discussed above and in Attachment 4, the Proposed LAX Sign District Project Modifications, inclusive of the proposed modifications to the Project Design Features, would not result in any significant impacts to transportation safety.

3.2.4.3 Cumulative Impacts

The LAX Sign District vicinity is a highly urbanized environment with a complex transportation network. The Certified EIR found that the Approved LAX Sign District Project, considered cumulatively with other construction and infrastructure projects within and adjacent to LAX, would not lead to a cumulatively

significant transportation safety impact because those other projects themselves would be required to comply with applicable federal, State, and local design guidelines and regulations. Further, since many of the other airport projects currently being planned involve improvements to landside and airside operations and safety, the Certified EIR concluded that there would be no cumulatively significant transportation safety hazard and no significant impact.

The analysis above found that the Proposed LAX Sign District Project Modifications would not cause a new transportation safety hazard or a substantial increase in the severity of impacts identified in the Certified EIR. Applying the same methodology as the Certified EIR, the Proposed LAX Sign District Project Modifications would similarly not result in any new cumulative transportation safety hazard or a substantial increase in the severity of cumulative impacts identified in the Certified EIR.

3.2.4.4 Conclusion

As discussed in the sections above, the Proposed LAX Sign District Project Modifications would not constitute a hazard to the safe and efficient operation of vehicles upon a street or a freeway, the safe and efficient operation of aircraft during takeoff and landing or ground maneuvers, or create a condition that endangers the safety of persons or property. Therefore, the Proposed LAX Sign District Project Modifications would not result in a new significant impact or a substantial increase in the severity of impacts identified in the Certified EIR related to transportation safety.

Therefore, the Proposed LAX Sign District Project Modifications would not result in any of the conditions set forth in PRC Section 21166(c) or State CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

3.2.5 Cultural Resources (Historical Resources)

	Yes	No
Are substantial changes proposed in the project that would require major revisions of the environmental impact report due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects?		X
Will substantial changes occur with respect to the circumstances under which the project is undertaken that will require major revisions in the environmental impact report due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects?		X
Has new information of substantial importance become available indicating new or substantially more severe significant impacts or new/different mitigation measures or alternatives for significant impacts?		X

Section V, Cultural Resources, of the Initial Study, included as Appendix A of the Certified EIR, addresses potential impacts to historical resources from implementation of the Approved LAX Sign District Project. The following evaluates the extent to which the Proposed LAX Sign District Project Modifications would change the impact conclusions in the Certified EIR. Details regarding this evaluation are provided in Attachment 5 of this Addendum.

- **Would the project cause a substantial adverse change in the significance of a historical resource pursuant to State CEQA Guidelines Section 15064.5?**

At the time the Initial Study was prepared for the LAX Sign District Project (March 2012), one property within the Project site was identified as eligible for historical listing and considered a historical resource for the purposes of CEQA: the Theme Building (eligible for listing in the National Register of Historic Places [National Register] and the California Register of Historical Resources [California Register]; designated as a City of Los Angeles Historic-Cultural Monument in 1992). Due to alteration of the 1961 ATCT after the relocation of Federal Aviation Administration (FAA) operations to the new 1996 ATCT, the Certified EIR stated that the 1961 ATCT was not considered potentially eligible for listing in the National Register or California Register and, therefore, not considered a historical resource for the purposes of CEQA. The March 2012 Initial Study did not identify or discuss the eligibility of the 1961 ATCT for listing as a City of Los Angeles Historic-Cultural Monument. The Certified EIR concluded that the Approved LAX Sign District Project would have a less than significant impact on historical resources.

Subsequent to the 2015 certification of the Certified EIR for the Approved LAX Sign District Project, as part of the LAX Landside Access Modernization Program (LAMP) EIR certification in 2017, LAWA adopted the LAX Preservation Plan, which identifies historic resources across the LAX campus, including the 1961 ATCT and Theme Building, that are eligible for historic designation.

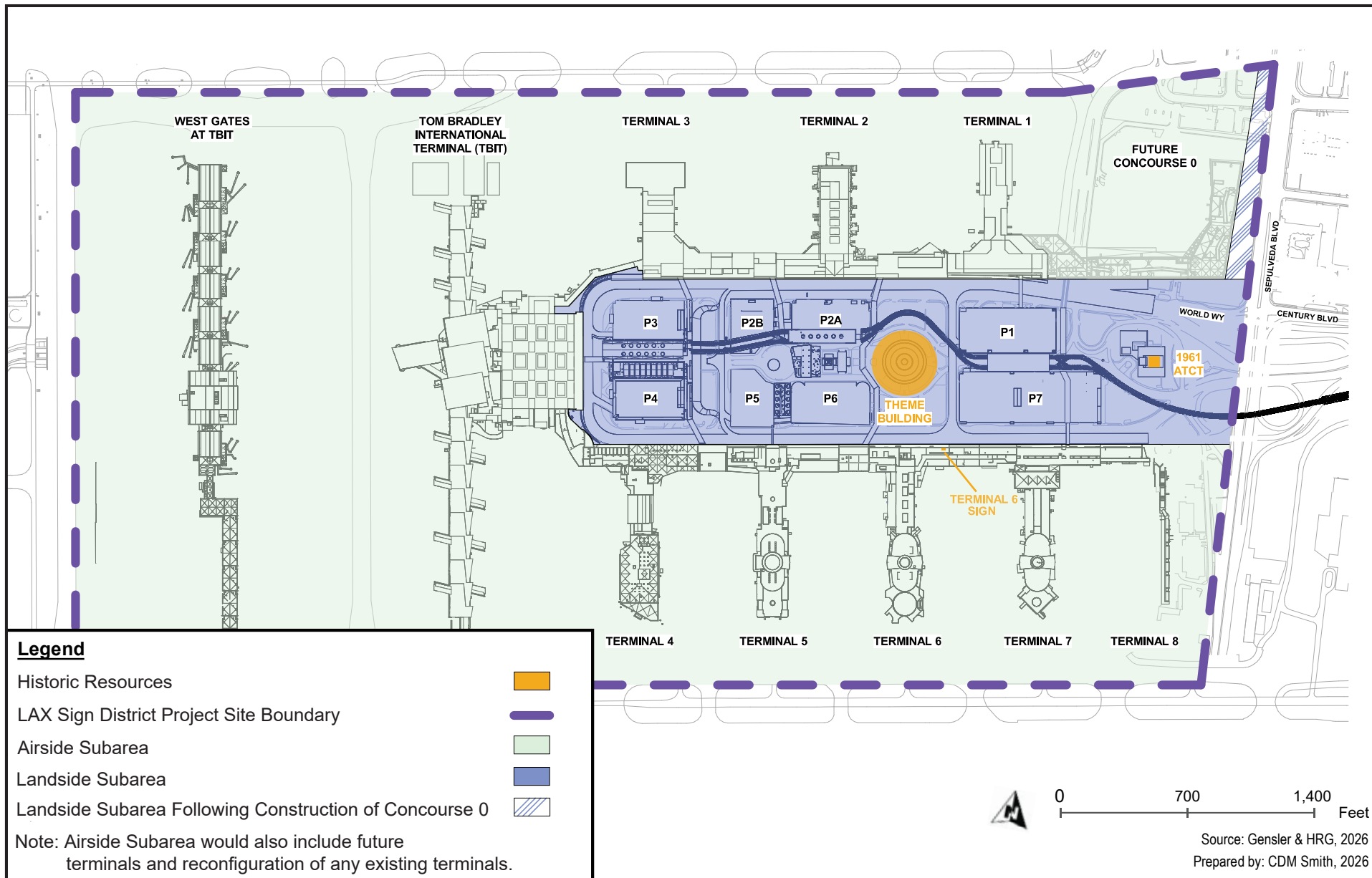
Attachment 5 of this Addendum evaluates the impacts of the Proposed LAX Sign District Project Modifications on the three historical resources currently determined to be present within the Project site (refer to **Figure 3-1**):

- Theme Building located in the center of the CTA [eligible for listing in the National Register, listed in the California Register, and designated as City of Los Angeles Historic-Cultural Monument #570]
- 1961 ATCT at the eastern end of the CTA [eligible for listing as a City of Los Angeles Historic-Cultural Monument]
- Terminal 6 Sign Tower located adjacent to the north façade of Terminal 6, on the south side of World Way [eligible for listing as a City of Los Angeles Historic-Cultural Monument]

3.2.5.1 Theme Building

As with the Approved LAX Sign District Project, signage would be prohibited on the Theme Building; the Proposed LAX Sign District Project Modifications do not identify the Theme Building as a location for signs.

As discussed in Attachment 5, the Proposed LAX Sign District Project Modifications would not affect the integrity of *location, design, materials, workmanship, or association* of the Theme Building. It would remain intact in its current location and would not be materially altered by the installation of signs in its immediate surroundings. Therefore, integrity of *feeling* would also remain unaffected because all the existing physical elements that characterize the Theme Building would continue to convey their historic significance. Integrity of *setting* for the Theme Building has already been substantially compromised by continued alterations and new construction throughout the CTA since the 1970s. The effects of the Proposed LAX Sign District Project Modifications, which would effectively distance signage in the immediate vicinity of the Theme Building, would have a minimal effect to the setting of the Theme Building.



As noted above, six of the seven aspects of integrity for the Theme Building would be unaffected by the Proposed LAX Sign District Project Modifications, and its historic integrity would be retained. After implementation of signage in accordance with the Proposed LAX Sign District Project Modifications, the Theme Building would remain intact and continue to convey its architectural significance. For these reasons, the significance and integrity of the Theme Building would not be materially impaired by the installation of signs in its broader surroundings caused by the Proposed LAX Sign District Project Modifications.

After installation of signage in accordance with the Proposed LAX Sign District Project Modifications, the Theme Building would retain its listing in the California Register and designation as a City of Los Angeles Historic-Cultural Monument. The Proposed LAX Sign District Project Modifications would not result in significant adverse impacts to the Theme Building as defined by CEQA.

3.2.5.2 1961 ATCT

As discussed in Section 2.2.2.2, a key element of the Proposed LAX Sign District Project Modifications is the placement of artwork and signage on the 1961 ATCT to display welcome messages and imagery; LAX-related travel and tourism messaging; content celebrating commemorations, City-hosted events, and special occasions; and artistic displays. Although the 1961 ATCT was used for offices in the past, the building does not meet modern seismic, life safety, accessibility, and building systems requirements for routine administrative use. LAWA proposes to repurpose the building to support a new vision for the LAX gateway. With implementation of the Proposed LAX Sign District Project Modifications, digital displays would be added to all four sides of the tower façades. The digital displays would serve as a landmark and a welcome for airport users and visitors.

Recognizing that the 1961 ATCT has been assessed as eligible for designation as a City of Los Angeles Historic-Cultural Monument and identified to be preserved in the LAX Preservation Plan, Historical Resources Commitments have been proposed as part of the Proposed LAX Sign District Project Modifications to ensure that the addition of digital media displays to the 1961 ATCT would conform with the Secretary of the Interior's Rehabilitation Standards⁴⁰ and, therefore, that significant impacts to the 1961 ATCT would be avoided (refer to Section 2.2.4 above).

As discussed in Attachment 5, an important principle stated in the Secretary of the Interior's Rehabilitation Standards is the retention of remaining original fabric and features and removal of non-original elements. All of the 1961 ATCT's remaining original fabric and features would be retained, including the rooftop control cab with fixed aluminum-framed ribbon windows and surrounding roof deck, aluminum-framed ribbon windows, scored cement plaster spandrels, continuous aluminum grates, and exposed concrete piloti. As detailed in Historical Resources Commitment HR-1, the non-original exterior guardrails, added in 1996, would be removed. The added guardrails, canted outward at a diagonal, visually alter the original shape and profile of the building. Removal of the guardrails would return the 1961 ATCT closer to its original appearance.

⁴⁰ U.S. Department of the Interior, National Park Service, Technical Preservation Services, *The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring & Reconstructing Historic Buildings*, 2017. Available: <https://www.nps.gov/orgs/1739/upload/treatment-guidelines-2017-part1-preservation-rehabilitation.pdf>.

As originally designed, the 1961 ATCT façades were shaded by bands of vertical metal louvers across each floor. The louvers were adjustable to adapt to changing light conditions throughout the day, creating a permeable screen in front of the building's exterior walls. In accordance with Historical Resources Commitment HR-2, LAWA would require that any digital signage system employ permeable technology that allows visibility of the building's original form and surviving features behind the added digital media display, similar to the original louvered condition.

The louvers were attached to metal outriggers that project perpendicular from the building's façade at each floor. The original outriggers remain and would be either preserved or replicated depending on their individual conditions. The proposed displays would attach to the outriggers, effectively restoring the original profile and form of the 1961 ATCT as it appeared prior to removal of the louvers and addition of the guardrails in 1996.

The original louver system was mounted as horizontal bands that delineated each floor of the 1961 ATCT tower. As required by Historical Resources Commitment HR-3, the displays added to the 1961 ATCT would be mounted as horizontal bands across each floor using the existing outrigger structure that historically supported the tower's louvers and leaving a reveal between floors where no display is present. This installation would recall the visual delineation of each floor and architectural rhythms characteristic of the tower's 1961 appearance. In addition, digital interpretive elements would be incorporated into the digital media display to enhance public understanding of the history and significance of the 1961 ATCT, as discussed in Historical Resources Commitment HR-4.

In compliance with the LAX Preservation Plan, a Historic Structure Report (HSR) for the 1961 ATCT would be prepared as the design of the digital media display system is underway. Before construction commences, LAWA would submit the HSR to the City Planning Department's Office of Historic Resources and City of Los Angeles Cultural Heritage Commission. The HSR would provide complete documentary, graphic, and physical information about the building's history, significance, and existing condition, and include recommendations for appropriate treatment and maintenance of existing historic fabric. The HSR would inform the design and installation of the digital media display system.

Finally, in accordance with Historical Resources Commitment HR-5, the final design, installation, and programming of the 1961 ATCT digital media display system would be overseen by qualified architectural historians and preservation architects to ensure that the final result complies with the Secretary of the Interior's Rehabilitation Standards and avoids adverse effects to the historical significance of the 1961 ATCT.

In summary, the evaluation in Attachment 5 determined that the addition of digital signage would not result in significant impacts to the 1961 ATCT. Digital displays would not remove any of the building's remaining original materials or character-defining features and would remove non-original features that have compromised its integrity. The digital displays would employ permeable technology that allows visibility of the building's original form and surviving features behind the added digital display system. The proposed displays would attach to the original outriggers and would be mounted as horizontal bands that delineate each floor of the 1961 ATCT tower. These measures would largely restore the original profile and form of the 1961 ATCT as it appeared prior to removal of the louvers and addition of the guardrails in 1996.

As discussed in Attachment 5, after implementation of digital signs, the 1961 ATCT would retain integrity of *location, design, materials, workmanship, feeling, and association*. With regards to the seventh aspect of integrity, *setting* (the physical environment of a historic property), the immediate surroundings of the 1961 ATCT have been substantially altered since its original construction in 1961; these changes over time have substantially changed the physical environment of the CTA such that it no longer contributes to the historic significance or integrity of the 1961 ATCT. Therefore, integrity of *setting* has already been substantially compromised prior to installation of the proposed digital media displays and would remain compromised with implementation of the Proposed LAX Sign District Project Modifications.

As discussed in Attachment 5, the digital signage system would comply with all ten of the Secretary of the Interior's Rehabilitation Standards. As such, the 1961 ATCT would continue to convey its overall historic character, appearance, and association with the Jet Age and the transformative effects of jet air travel during the mid-20th century and would retain its eligibility for designation as a City of Los Angeles Historic-Cultural Monument. Consistent with the LAX Preservation Plan, LAWA would pursue historic designation (nomination) of the 1961 ATCT prior to undertaking any alterations, seeking to ensure the resource is formally recognized and that any subsequent work is evaluated and carried out in compliance with the Secretary of the Interior's Standards.

For these reasons, installation of digital signage to the 1961 ATCT would not result in significant impacts to historical resources as defined by CEQA.

3.2.5.3 Terminal 6 Sign Tower

No signage is proposed on or connecting to the Terminal 6 Sign Tower under the Proposed LAX Sign District Project Modifications. As such, the Proposed LAX Sign District Project Modifications would not physically alter or change the Terminal 6 Sign Tower in any way that would adversely impact its historic significance or integrity.

As discussed in Attachment 5, the Proposed LAX Sign District Project Modifications would not affect the integrity of *location, design, materials, workmanship, or association* of the Terminal 6 Sign Tower. It would remain intact in its current location and would not be materially altered by the installation of signs in its immediate surroundings. Therefore, integrity of *feeling* would also remain unaffected because all the existing physical elements that characterize the Terminal 6 Sign Tower would continue to convey their historic significance. Integrity of *setting* for the Terminal 6 Sign Tower has already been substantially compromised by alterations to Terminal 6 as well as continued alterations and new construction throughout the CTA since the 1970s. The effects of the Proposed LAX Sign District Project Modifications would not affect the setting of the Terminal 6 Sign Tower in any meaningful way.

As discussed above, six of the seven aspects of integrity for the Terminal 6 Sign Tower would be unaffected by the Proposed LAX Sign District Project Modifications, and its historic integrity would be retained. After implementation of signage in accordance with the Proposed LAX Sign District Project Modifications, the Terminal 6 Sign Tower would remain intact, and continue to convey its architectural significance. For these reasons, the significance and integrity of the Terminal 6 Sign Tower would not be materially impaired by the installation of signs that would be permitted with implementation of the Proposed LAX Sign District Project Modifications.

After installation of signage in accordance with the Proposed LAX Sign District Project Modifications, the Terminal 6 Sign Tower would retain its eligibility for designation as a City of Los Angeles Historic-Cultural Monument. The Proposed LAX Sign District Project Modifications would not result in significant adverse impacts to the Terminal 6 Sign Tower as defined by CEQA.

3.2.5.4 Summary

As discussed above, the Proposed LAX Sign District Project Modifications would not result in a new significant impact or a substantial increase in the severity of the impacts identified in the Certified EIR to historical resources. Therefore, the Proposed LAX Sign District Project Modifications would not result in any of the conditions set forth in PRC Section 21166(c) or State CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

3.2.6 Energy

	Yes	No
Are substantial changes proposed in the project that would require major revisions of the environmental impact report due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects?		X
Will substantial changes occur with respect to the circumstances under which the project is undertaken that will require major revisions in the environmental impact report due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects?		X
Has new information of substantial importance become available indicating new or substantially more severe significant impacts or new/different mitigation measures or alternatives for significant impacts?		X

As previously discussed in Section 3.2, the Certified EIR was prepared prior to the 2018 revisions to the State CEQA Guidelines, which required analysis of energy impacts (State CEQA Guidelines Section 15126.2(b)) and added energy as a resource category to the State CEQA Guidelines Appendix G Environmental Checklist. As such, energy impacts were not specifically addressed in the LAX Sign District Initial Study or EIR, although energy consumption was briefly addressed in terms of irreversible environmental changes due to use of nonrenewable resources (Chapter VIII of the Certified EIR).⁴¹ The Proposed LAX Sign District Project Modifications would increase energy demands related to digital displays, as compared to energy demands associated with the Approved LAX Sign District Project, primarily associated with operation of the proposed digital displays on the façade of the 1961 ATCT. The following evaluates the potential energy impacts of the Proposed LAX Sign District Project Modifications and identifies plans, programs, and policies that would preclude the wasteful, inefficient, and unnecessary consumption of energy. Because impacts related to energy were not evaluated in the Certified EIR, this Addendum qualitatively evaluates energy consumption that would result from full build-out of the Approved LAX Sign District Project as well as the Proposed LAX Sign District Project Modifications.

⁴¹ As noted above, the Certified EIR for the Approved LAX Sign District Project is conclusively presumed to comply with CEQA, including the adequacy of the environmental impact analysis, because the time to challenge that document's compliance with CEQA has passed. (Pub. Resources Code, § 21167.2.)

3.2.6.1 Methodology

Short-term energy demand would result from construction of the Proposed LAX Sign District Project Modifications, including energy demand from worker vehicle trips, as well as construction equipment usage. Long-term energy consumption would occur from operation of digital displays on the façade of the 1961 ATCT and other areas within the CTA. Construction and operation for the Proposed LAX Sign District Project Modifications is not anticipated to require use of natural gas; therefore, the analysis of energy impacts focuses on consumption of electricity and transportation-related fuels (gasoline and diesel).

Electricity

The Proposed LAX Sign District Project Modifications would result in an increase in operational electricity consumption due to the increase in digital displays as compared to the Approved LAX Sign District Project. While new digital displays for the 1961 ATCT would be up to approximately 25,000 square feet, the total square footage of signage that would operate throughout the rest of the CTA would depend on the demand for advertising signage, which is not currently known. Electricity consumption was therefore evaluated qualitatively based on the following assumptions:

- In accordance with both the Approved LAX Sign District Project and the Proposed LAX Sign District Project Modifications, lighting for the purpose of illuminating signage would only be allowed in the Landside Subarea (i.e., the CTA); lighting of signage on passenger boarding bridges within the Airside Subarea would not be permitted. This Addendum assumes that most signage in the Landside Subarea would be illuminated in some manner.
- The projected increase in electricity consumption was also evaluated in the context of existing and planned regulations, policies, and programs addressing energy conservation, as well as features of the Proposed LAX Sign District Project Modifications that would serve to reduce energy consumption, to determine if the Project would result in wasteful, inefficient, or unnecessary consumption of energy resources, or would conflict with or obstruct a State or local plan for renewable energy or energy efficiency.

Mobile Source and Transportation-Related Fuels

Fuel consumption associated with construction activities would result from the construction worker vehicle trips, and use of equipment and other on-site vehicles. The Initial Study determined that construction activities would be relatively minor – involving light equipment such as cranes, utility trucks, and hand-held equipment – and would not require grading or trenching. Fuel consumption associated with operational activities would result from worker trips to maintain signage and periodically replace advertising materials. Fuel consumption is addressed qualitatively.

3.2.6.2 Existing Conditions

Regulatory Setting

Federal

- **Federal Energy Policy and Conservation Act:** The Energy Policy and Conservation Act of 1975 created the Corporate Average Fuel Economy (CAFE) standards for passenger cars, light trucks, and heavy-duty pickup trucks and vans, which are updated periodically. Individual cities, counties, and states lack the authority to regulate fuel economy standards (42 U.S.C. Section 7543(a)). The current federal administration recently rolled back these standards, lowering miles per gallon targets among other changes.
- **Energy Independence and Security Act of 2007:** This legislation sought to provide the nation with greater energy independence and security by increasing the production of clean renewable fuels; improving vehicle fuel economy; and increasing the efficiency of products, buildings, and vehicles. It also sought to improve the energy performance of the federal government. The act set increased CAFE standards; expanded and strengthened the Renewable Fuel Standard; adopted appliance energy-efficiency standards and building energy-efficiency standards; and accelerated research and development tasks related to renewable energy sources (e.g., solar energy, geothermal energy, and marine and hydrokinetic renewable energy technologies), carbon capture, and sequestration. The current federal administration recently rolled many of the regulations and policies that stemmed from this act, including weakening fuel efficiency standards and targeting renewable energy subsidies, among other changes.
- **Energy Policy Act of 2005:** Includes a comprehensive set of provisions to address energy issues. This act included tax credits for purchasing hybrid and alternative fuel vehicles and promoting alternative fuels.

State

- **California Energy Commission:** The California Energy Commission (CEC) is the State's principal energy planning organization and is charged with forecasting statewide electricity needs and promoting energy conservation and efficiency measures, among other responsibilities.⁴²
- **2023 Integrated Energy Policy Report:** The CEC is required to prepare a biennial report assessing energy issues in the State. The most recent report (2023)⁴³ identifies pathways to deeply decarbonize the State's electricity system to meet the Senate Bill (SB) 100 goal of zero-carbon by 2045 (discussed below). The report provides an analysis of electricity sector trends, building decarbonization and energy efficiency, zero-emission vehicles (ZEVs), energy equity, climate change adaptation, electricity reliability, natural gas assessment, and electricity, natural gas, and transportation energy demand forecasts.

⁴² California Energy Commission, About webpage. Available: <https://www.energy.ca.gov/about>. Accessed December 1, 2025.

⁴³ California Energy Commission, *2023 Integrated Energy Policy Report*, February 2024. Available: <https://www.energy.ca.gov/data-reports/reports/integrated-energy-policy-report-iepr/2023-integrated-energy-policy-report>.

- **California Public Utilities Commission:** The California Public Utilities Commission (CPUC) regulates privately-owned electric, natural gas, telecommunications, water, railroad, rail transit, and passenger transportation utilities. In August 2025, CPUC adopted new long-term energy efficiency goals for the State’s investor-owned utilities. These goals aim to promote cost-effective energy-saving programs that reduce energy use, lower customer costs, and support California’s climate and clean energy commitments.⁴⁴
 - **California Building Code Title 24, Part 6, Energy Efficiency Standards:** The California Building Standards Code (California Code of Regulations [CCR], Title 24) contains the implementing regulations for building standards in California. CCR Title 24 Part 1 Chapter 10 and CCR Title 24 Part 6 are known collectively as the California Energy Code. Section 130.2 provides requirements for outdoor lighting controls and equipment on non-residential buildings.
 - **California Building Code Title 24, Part 11, Green Building Standards:** The California Green Building Standards Code (24 CCR, Part 11, known as “CALGreen”), identifies mandatory building measures as well as voluntary measures that may be incorporated into building design. CALGreen also includes requirements for exterior lighting, which aim to make outdoor lighting more efficient and less intrusive on the night sky.
 - **Carbon Neutrality Regulations:** The California Renewables Portfolio Standard (RPS) program sets continuously escalating renewable energy procurement requirements for all electric utilities in the State, including publicly owned utilities, investor-owned utilities, electric service providers, and community choice aggregators. Current requirements were established by SB 100, which increased the RPS targets to 44 percent renewable energy by 2024, 52 percent by 2027, and 60 percent by 2030. SB 100 also requires that renewable energy and zero-carbon resources supply 100 percent of electric retail sales by 2045.⁴⁵ Subsequently, SB 1020 established specific interim targets, requiring renewable energy and zero-carbon resources to supply 90 percent of all retail electricity sales by 2035 and 95 percent by 2040. Additionally, SB 1020 requires all State agencies to procure 100 percent of electricity from renewable energy and zero-carbon resources by 2035.⁴⁶
- The Los Angeles Department of Water and Power (LADWP), the utility provider for the City of Los Angeles, including LAX, achieved the RPS target of 33 percent by 2020. By the end of 2024, LADWP’s power mix was comprised of 59 percent carbon-free resources, including 41 percent renewables.⁴⁷

⁴⁴ California Public Utilities Commission, *CPUC Sets New Energy Efficiency Targets to Continue California Leadership in Energy Efficiency news release*, August 28, 2025. Available: <https://www.cpuc.ca.gov/news-and-updates/all-news/cpuc-sets-new-energy-efficiency-targets-to-continue-california-leadership-in-energy-efficiency>.

⁴⁵ California Energy Commission, SB 100 Joint Agency Report webpage. Available: <https://www.energy.ca.gov/sb100>. Accessed December 9, 2025.

⁴⁶ State of California, *Senate Bill No. 1020 - Clean Energy, Jobs, and Affordability Act of 2022*. Available: https://leginfo.ca.gov/faces/billNavClient.xhtml?bill_id=202120220SB1020.

⁴⁷ City of Los Angeles Department of Water and Power, Renewable Energy Program webpage. Available: <https://www.ladwp.com/who-we-are/power-system/renewable-energy/renewable-energy-program>. Accessed December 9, 2025.

- **Regulations on Greenhouse Gas Emissions:** In addition to the plans, policies, and regulations listed above, California has adopted a wide range of plans, policies, and regulations focused specifically on reducing point and nonpoint source GHG emissions. Although such regulations are not specifically focused on reducing energy use, a primary method used to reduce GHG emissions is to reduce fuel input and improve fuel efficiency. As a result, many of these plans, policies, and regulations indirectly reduce energy use and are, therefore, relevant to the analysis of energy. Such plans, policies, and regulations include various Executive Orders, Assembly Bills, and Senate Bills; and the California Air Resources Board's California Advanced Clean Cars Program, Zero Emission Airport Shuttle Bus regulation, Zero Emission Airport Ground Support Equipment measure, and proposed Advanced Clean Trucks Rule.

Local

- **City of Los Angeles Green Building Code:** The LAGBC⁴⁸ is based on CALGreen, which was developed and mandated by the State to attain consistency among the various jurisdictions within the State, reduce a building's energy and water use, reduce waste, and reduce the carbon footprint. Plans submitted for all new construction, additions, and alterations that increase a building's conditioned volume, or alterations with a valuation greater than \$200,000 for a building permit, are required to be reviewed for compliance to the LAGBC.⁴⁹ The LAGBC contains a wide range of codes related to energy, including measures to directly and indirectly reduce electricity and fuel consumption.
- **Sustainable City pLAN/Green New Deal:** In 2014, Mayor Eric Garcetti launched the City of Los Angeles' first-ever Sustainable City Plan ("pLAN"). The pLAN was a comprehensive and actionable policy roadmap intended to prepare the City for an environmentally healthy, economically prosperous, and equitable future for all.⁵⁰ In 2019, Mayor Garcetti launched the *Green New Deal* as a comprehensive update to the 2015 pLAN.⁵¹ With respect to energy, the *Green New Deal* goals include acceleration of renewable energy targets, acceleration of energy efficient building targets, and increases in zero emission vehicles (ZEVs), among others. On February 20, 2020, Los Angeles Mayor Eric Garcetti issued Executive Directive No. 25 to accelerate the Green New Deal and adopt new steps and stronger accountability measures to achieve the City's climate objectives.⁵²

⁴⁸ City of Los Angeles, Los Angeles Municipal Code, Chapter IX, Article 9, *Green Building Code*, as amended. Available: https://codelibrary.amlegal.com/codes/los_angeles/latest/lamc/0-0-0-214608#JD_C9A9.

⁴⁹ City of Los Angeles, Department of Building & Safety, Green Building Code webpage. Available: <https://dbs.lacity.gov/services/plan-review-permitting/green-building-code>. Accessed December 2, 2025.

⁵⁰ City of Los Angeles, Office of the Mayor, Mayor Eric Garcetti, *Sustainable City pLAN, Transforming Los Angeles, Environment - Economy - Equity*, April 8, 2015. Available: <https://www.dropbox.com/s/e768n31r3k379w7/the-plan.pdf?dl=0>.

⁵¹ City of Los Angeles, Office of the Mayor, Mayor Eric Garcetti, *L.A.'s Green New Deal: Sustainable City pLAN*, 2019. Available: https://plan.mayor.lacity.gov/sites/g/files/wph2176/files/2022-12/pLAN_2019_final.pdf.

⁵² City of Los Angeles, Office of the Mayor, Mayor Eric Garcetti, *Executive Directive No. 25, Subject: L.A.'s Green New Deal: Leading by Example*, February 10, 2020. Available: <https://lacity.gov/sites/g/files/wph2281/files/2021-04/20200210executivedirective25.pdf>.

- **Los Angeles Department of Water and Power Plan:** The 2022 Power Strategic Long-Term Resource Plan (SLTRP) is an energy resource planning document whose goal is to meet the City's future energy needs at the lowest cost and risk consistent with LADWP's environmental priorities and reliability standards.⁵³ The SLTRP builds upon the prior Power Integrated Resource Plan (IRP), and includes updated renewable energy requirements, electrical load forecasts, and revenue and rate impacts. The SLTRP outlines adequate electricity supply and transmission capability to meet the needs of its customers within the Los Angeles area, including LAX, through 2045.

LAWA

- **LAWA's Sustainable Design and Construction Policy:** This policy incorporates sustainability concepts from the Leadership in Energy and Environmental Design (LEED) system, LAGBC, Envision, and other airport sustainability guidelines. The policy applies to non-building Landside and Airside projects, including exterior lighting projects, which includes the Proposed LAX Sign District Project Modifications.⁵⁴
- **LAWA's Sustainable Design and Construction Requirements:** Non-building projects must comply with LAWA's Sustainable Design and Construction Requirements, which establish technical standards for new construction and renovation projects.⁵⁵ The following energy efficiency and renewable energy requirements are applicable to the Proposed LAX Sign District Project Modifications:
 - Ensure newly installed outdoor lighting power is no greater than 90% of the Title 24, Part 6 calculated value of allowed outdoor lighting power.
 - Use on-site renewable energy for at least 10% of the annual energy use.
 - Participate in the local utility's renewable energy portfolio program that provides a minimum of 50% electrical power from green power, carbon offsets, or renewable energy certificates that are Green-e Energy certified and with GHG offsets from projects within the U.S. Maintain documentation through utility billings.
 - Reduce overall operation and maintenance energy consumption by at least 10% throughout the project lifecycle.

⁵³ City of Los Angeles Department of Water and Power, *2022 Power Strategic Long-Term Resource Plan*, December 2022. Available: https://www.ladwp.com/sites/default/files/2023-08/2022%20LADWP%20Power%20Strategic%20Long-Term%20Resource%20Plan_0.pdf.

⁵⁴ City of Los Angeles, Los Angeles World Airports, *LAWA Sustainable Design and Construction Policy*, September 7, 2017. Available: <https://www.lawa.org/sites/lawa/files/documents/LAWA%20Sustainable%20Design%20and%20Construction%20Policy.pdf>.

⁵⁵ City of Los Angeles, Los Angeles World Airports, *Los Angeles International Airport Sustainable Design & Construction Requirements*, August 4, 2017. Available: <https://www.lawa.org/sites/lawa/files/documents/Sustainable%20Design%20Construction%20Requirements.pdf>.

- **2022 LAWA Design and Construction Handbook (DCH):** Designed to help implement LAWA's 2016 Strategic Plan and ensure that all construction activities on LAWA property conform to a consistent standard of safety, quality, sustainability, resiliency, maintainability, and efficiency. The DCH includes LAWA Wayfinding and Signage Standards which provides uniform and consistent wayfinding signage and guidelines.⁵⁶
- **LAWA Sustainability Action Plan:** In 2019, LAWA adopted a *Sustainability Action Plan* to address climate change and ensure a healthy, prosperous future for the region.⁵⁷ The *Sustainability Action Plan* contains goals and implementation actions to improve energy efficiency, increase renewable energy dependence, improve energy resilience, and demonstrate leadership in energy sustainability.

Environmental Setting

Electricity

Regional Electricity Consumption and Supply

Electrical power within the City of Los Angeles (including LAX) is supplied by LADWP, which serves approximately 4.0 million people.⁵⁸ LADWP's annual sales exceed 20.9 million megawatt-hours (MWh) and it is the third largest California electric utility in terms of consumption. LADWP obtains electricity from various generating sources that utilize coal, nuclear, natural gas, hydroelectric, and renewable resources to generate power.

LADWP reports on existing and projected electricity demand in the SLTRP. In Fiscal Year 2020-2021, the LADWP service area supplied approximately 20,936 gigawatt-hours (GWh) of electricity. LADWP's load forecast in the SLTRP indicates that the total electricity sales within the service area will be approximately 29,294 GWh by 2044-2045. LADWP experienced an all-time net energy for load peak demand of 6,431 megawatts (MW) on August 31, 2017, and an instantaneous peak demand of 6,555 MW on September 1, 2017. LADWP's projected peak demand growth through 2032 is estimated to be -0.4 percent, or a reduction of approximately 20 MW per year, with negative growth due to the steady growth of energy efficiency and solar PV programs. By 2044-2045, LADWP projects a Peak Demand of 7,237 MW. As noted above, approximately 41 percent of LADWP's power resources in the year 2024 were renewable energy resources.

LADWP has committed to increasing its share of renewable energy and promoting increased energy efficiency and conservation by its customers. Diversification of LADWP's energy portfolio, increasing electricity from renewable energy, LADWP's demand response program, and new customer energy efficiency measures will help meet all the City's needs through the SLTRP's planning horizon of 2050. LADWP has adopted a number of initiatives to increase its use of renewable energy resources to support

⁵⁶ City of Los Angeles, Los Angeles World Airports, *2022 Design and Construction Handbook (DCH)*, June 2022. Available: <https://cloud1lawa.app.box.com/s/kyzz7xe4x1vgthvim9lvrju0w12wt45v>.

⁵⁷ City of Los Angeles, Los Angeles World Airports, *LAWA Sustainability Action Plan*, 2019. Available: <https://cloud1lawa.app.box.com/s/63i2teszgnld5aws68xbou6yc0inl5rp>.

⁵⁸ Los Angeles Department of Water and Power, *2022 Power Strategic Long-Term Resource Plan*, December 2022. Available: https://www.ladwp.com/sites/default/files/2023-08/2022%20LADWP%20Power%20Strategic%20Long-Term%20Resource%20Plan_0.pdf.

the goals of reducing GHG emissions, reducing reliance on fossil fuels, meeting State mandates requiring all utilities to provide 60 percent of their energy from renewable resources by 2030, and meeting the Los Angeles City Council's directive to explore pathways for LADWP to achieve a 100 percent renewable energy portfolio.

LAX Baseline Electricity Consumption and Supply

Electricity is primarily used at LAX for lighting, cooling, and equipment operation in buildings. Electricity is also used for airfield lighting and operations and indirectly in the delivery, treatment, and distribution of water used at the airport and the treatment of wastewater. In 2024, energy consumption per passenger decreased by 19.1 percent since 2011, and 39.5 percent of electricity consumed was sourced from renewable energy sources.⁵⁹

LADWP supplies electrical power to the Project area primarily through Receiving Station "N" (RS-N), which is located on the north side of West Florence Avenue at Isis Avenue, approximately one-half mile north of the Project site. LAWA has constructed a new electrical Receiving Station "X" (RS-X) and associated electrical infrastructure improvements in order to address persistent power reliability and capacity issues at LAX. The new RS-X is located in the northwest corner of LAX property, near the intersection of Westchester Parkway and Pershing Drive, and will accommodate the electrical demand of future infrastructure projects at LAX, including the Proposed LAX Sign District Project Modifications. The new RS-X became operational in 2025.

In 2015, LAWA completed construction of a new highly energy-efficient Central Utility Plant (CUP) to replace LAX's 50-year-old CUP. The new CUP received Leadership in Energy & Environmental Design (LEED) Gold certification and is 25 percent more energy efficient and more environmentally sustainable than the former facility.⁶⁰ In 2024, LAWA began updating its Utility Strategic Plan to guide future investments and energy strategy. This plan will lay out a 20-year roadmap to increase resilience, including the integration of microgrids and battery storage and explore electrification of the CUP.⁶¹

Mobile Source and Transportation-Related Fuels

A variety of mobile source and transportation-related fuels are used at LAX: Jet A for aircraft and gasoline, diesel, and alternative fuels for automobiles, trucks, auxiliary power units (APUs), and other ground support equipment. In addition, passenger vehicle trips associated with the airport require fuel, mainly gasoline and diesel. LAX's gasoline consumption accounted for less than half of total energy consumption

⁵⁹ City of Los Angeles, Los Angeles World Airports, *Los Angeles World Airports 2024 Sustainability Report*. Available: <https://www.lawa.org/sites/lawa/files/2025-09/8.8.2025%202024%20ASR.pdf>.

⁶⁰ For example, the CUP's use of high-efficiency motors and variable-frequency drives reduces electricity use by half; the pumping system for chilled and heated water was changed from constant flow to variable flow, allowing the system to respond to actual demand load, which saves energy; the hot water system temperature was reduced; the natural gas turbine generators are substantially more efficient than the old turbines, and use a regenerative cycle that requires less fuel; the turbines and boilers are outfitted with state-of-the-art pollution-control equipment, reducing annual carbon dioxide emissions by 4,890 tons; the electric chillers are 20 percent more efficient than the old ones, saving an estimated 5 million kilowatt-hours a year; heat-recovery steam generators recover exhaust heat from the natural-gas turbines to heat water for domestic hot water and to use for space heating in the passenger terminals; and the plant's thermal-energy storage tank holds 1.6 million gallons of chilled water that is produced at night when electrical costs are lowest, and then stored until the hottest hours of the next day to cool passenger terminals and other buildings in the CTA. Source: City of Los Angeles, Los Angeles World Airports, *Los Angeles World Airports 2014 Sustainability Report*. Available: <https://www.lawa.org/sites/lawa/files/2025-09/8.8.2025%202024%20ASR.pdf>.

⁶¹ City of Los Angeles, Los Angeles World Airports, *Los Angeles World Airports 2024 Sustainability Report*. Available: <https://www.lawa.org/sites/lawa/files/2025-09/8.8.2025%202024%20ASR.pdf>.

in 2024, reflecting a shift towards electrification and decarbonization efforts. Additionally, LAWA's Rideshare Program resulted in 68,628 fewer trips to and from LAX for Fiscal Year 2024-2025, translating to a savings of 160,060 gallons of gasoline and a reduction of over 3.4 million vehicle miles traveled (VMT).⁶²

3.2.6.3 Project Impacts

- **Would the proposed Project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?**

Construction

Electricity would be consumed during construction in association with electric power tools/equipment, portable lighting, and portable arrowboards (to direct traffic). Construction practices to promote energy efficiency may include solar-powered light towers for night work, if feasible, and use of scaffolding in lieu of powered-equipment to access vertical façades. Electricity consumption associated with the Proposed LAX Sign District Project Modifications construction would be relatively small. As required by State and local regulations and policies, electricity supplied to the Proposed LAX Sign District Project Modifications would comply with California's Renewable Portfolio Standard. Moreover, in accordance with LAWA's DCH, efforts would be made to use grid-based electric power at the construction sites, where feasible. Grid based power would be from a direct hookup or a tie-in to electricity from power poles. The Proposed LAX Sign District Project Modifications would be constructed in accordance with State regulations for renewable energy and energy efficiency, including Title 24 Building Energy Efficiency Standards and CALGreen. Construction of the Proposed LAX Sign District Project Modifications would also proceed in compliance with local regulations that include requirements for renewable energy and energy efficiency, including the LAMC and the LAGBC. With adherence to these codes and with compliance with LAWA's DCH, the Proposed LAX Sign District Project Modifications would not result in wasteful, inefficient, or unnecessary consumption of electricity during construction.

Mobile source and transportation related fuels would be consumed during Project construction by construction equipment and construction worker vehicle trips to and from construction sites. Vehicle and transportation-related fuels would primarily include diesel and gasoline. Construction activities for the Proposed LAX Sign District Project Modifications would comply with federal and State vehicle fuel efficiency standards. The Proposed LAX Sign District Project Modifications' construction activities would also comply with LAWA's *Sustainable Design and Construction Policy* and the *Los Angeles International Airport Sustainable Design and Construction Requirements*, as applicable. With compliance with federal and State standards and LAWA sustainability requirements, construction of the Proposed LAX Sign District Project Modifications would not result in wasteful, inefficient, or unnecessary consumption of mobile source and transportation-related fuels.

⁶² City of Los Angeles, Los Angeles World Airports, *Los Angeles World Airports 2024 Sustainability Report*. Available: <https://www.lawa.org/sites/lawa/files/2025-09/8.8.2025%202024%20ASR.pdf>.

Therefore, the Proposed LAX Sign District Project Modifications would not result in wasteful, inefficient, or unnecessary consumption of energy resources during the construction period and the impact to energy resources would be less than significant.

Operation

The Proposed LAX Sign District Project Modifications would consume electricity during operations, primarily from powering the digital displays located on the 1961 ATCT and throughout the CTA. In accordance with LAWA's *Sustainable Design and Construction Policy*, digital displays would incorporate energy efficiency measures, including the use of LED lights, which require up to 90 percent less energy than incandescent bulbs.⁶³ In accordance with LAWA's *Sustainable Design and Construction Requirements*, new lighting power would be no greater than 90 percent of the Title 24, Part 6 calculated value of allowed outdoor lighting power. Additionally, the LAX Sign District Design Standards and Guidelines being developed separately from this project would also comply with these requirements and policies. Energy-efficient features that would be incorporated into the 1961 ATCT digital media displays design to reduce energy consumption during operations include dimming at night and during the day, if feasible, while maintaining quality of graphics. In addition, on/off time schedules would be included per LAWA requirements. As noted above, electricity would be sourced from LADWP, which has adopted initiatives to provide 60 percent of their energy from renewable resources by 2030 and is working to achieve a 100 percent renewable energy portfolio. Due to the increasing adoption of renewables and the implementation of Title 24 requirements, the Proposed LAX Sign District Project Modifications would not result in wasteful, inefficient, or unnecessary consumption of electricity during operations.

The Proposed LAX Sign District Project Modifications would consume mobile source and transportation-related fuels during operational worker trips to maintain the digital displays and periodically, but infrequently, to replace advertising materials. Due to infrequency of worker trips and the increasing efficiency of the vehicle fleet that would be used during operational worker trips, the Proposed LAX Sign District Project Modifications would not result in wasteful, inefficient, or unnecessary consumption of mobile source and transportation-related fuels.

Therefore, the Proposed LAX Sign District Project Modifications would not result in wasteful, inefficient, or unnecessary consumption of energy resources during operations and the impact to energy resources would be less than significant.

■ Would the proposed Project conflict with or obstruct a State or local plan for renewable energy or energy efficiency?

Construction and Operations

As discussed in Section 3.2.6.2, there are numerous adopted State and local plans that include policies, strategies, and other measures supportive of renewable energy and energy efficiency.

⁶³ U.S. Department of Energy, Lighting Choices to Save You Money webpage. Available: <https://www.energy.gov/energysaver/lighting-choices-save-you-money>. Accessed December 9, 2025.

During construction, the Proposed LAX Sign District Project Modifications would comply with State regulations for renewable energy and energy efficiency, including Title 24 Part 6 and Part 11, CALGreen, and applicable regulations related to GHG emissions that also pertain to energy consumption. The Proposed LAX Sign District Project Modifications would also comply with local regulations for renewable energy and energy efficiency, including LAWA's sustainability plans, including the *Sustainable Design and Construction Policy Sustainable Design and Construction Requirements*, and *Sustainability Action Plan*. Moreover, the Proposed LAX Sign District Project Modifications would not interfere with LADWP's work towards meeting the Renewable Portfolio Standard targets.

Project operations would comply with requirements pertaining to energy efficiency in outdoor lighting, including Title 24 Part 6 and Part 11, CALGreen, and the LAGBC. Project design would also comply with LAWA sustainability policies, including the *Sustainable Design and Construction Policy*. Additionally, the LAX Sign District Design Standards and Guidelines being developed separately from this Project would also comply with these requirements and policies. Energy efficiency and conservation measures implemented as part of the Proposed LAX Sign District Project Modifications would reduce energy use associated with the proposed Project. The Proposed LAX Sign District Project Modifications would incorporate measures that would be supportive of State and local efforts to increase use of renewable energy and improve energy efficiency. Therefore, the Proposed LAX Sign District Project Modifications would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency, and the impact to energy resources would be less than significant.

Therefore, the Proposed LAX Sign District Project Modifications would not result in any of the conditions set forth in PRC Section 21166(c) or State CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

4.0 Assessment of Changes in Impacts

Section 15164 of the State CEQA Guidelines identifies the circumstances that permit the preparation of an addendum. The State CEQA Guidelines state that, "[t]he 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." The State CEQA Guidelines also require that a brief explanation of the decision not to prepare a subsequent EIR pursuant to Section 15162 be included in an addendum to an EIR, the lead agency's findings on the project, or elsewhere in the record. The explanation must be supported by substantial evidence.

An explanation of why none of the conditions described in Section 15162 calling for the preparation of a subsequent EIR have occurred is provided below.

- 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) The Proposed LAX Sign District Project Modifications analyzed in this Addendum do not constitute substantial changes to the overall Approved LAX Sign District Project that would involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects. As stated in Section 1.1 of this Addendum, the Certified EIR concluded that all of the Approved LAX Sign District Project's environmental impacts would be less than significant. Section 2 of this Addendum describes the nature of the proposed changes to the Approved LAX Sign District Project. For purposes of CEQA, project changes are "substantial" when they "require major revisions of the previous EIR" due to the creation of new or substantially more severe environmental effects. As discussed in Section 3 of this Addendum, the proposed changes would not cause any new or substantially more severe environmental effects. Therefore, the Proposed LAX Sign District Project Modifications are not substantial, for purposes of State CEQA Guidelines Section 15162.
- 3) 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.
- 4) There have not been any substantial changes with respect to the circumstances under which the Approved LAX Sign District Project, including the Proposed LAX Sign District Project Modifications, will be undertaken, which would result in a new significant environmental impact or a substantially more severe previously identified environmental effect that would require major revisions of the previous EIR. As noted above, the Certified EIR for the Approved LAX Sign District Project did not identify any significant impacts. Additionally, Section 3 of this Addendum describes any changes in circumstances that are relevant to the environmental analysis and concludes there would be no new or substantially more severe environmental effects associated with the Approved LAX Sign District Project, including the Proposed LAX Sign District Project Modifications. Therefore, there are no substantial changes with respect to the circumstances under which the Project will be undertaken that would involve a substantial increase in the severity of previously identified significant effects.
- 5) 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.

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 previous EIR was certified, that shows that the Approved LAX Sign District Project, including the Proposed LAX

Sign District Project Modifications, would result in a new significant environmental impact or a substantial increase in the severity of previously identified significant effects. As discussed above, Section 3 of this Addendum evaluates the potential environmental effects of the Proposed LAX Sign District Project Modifications and concludes that there would be no new significant effects not discussed in the previous EIR and that no previously examined environmental effects would be substantially more severe. Moreover, as noted above, no significant impacts were identified in the EIR for the Approved LAX Sign District Project; thus, no mitigation measures were required in the EIR. Lastly, the previous EIR analyzed three alternatives to the Approved LAX Sign District Project, including a No Project Alternative, a Reduced Signage Alternative, and a No Digital Signage Alternative. The EIR also considered, but rejected as infeasible, alternative sites. The City, in adopting the Approved LAX Sign District Project, rejected the three alternatives analyzed in the EIR. There is no evidence that any of the alternatives previously found infeasible would, in fact, be feasible.

- (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.

No significant impacts were identified in the EIR for the Approved LAX Sign District Project; thus, no mitigation measures were analyzed in the EIR. Moreover, no new alternatives are required to reduce significant effects on the environment. Lastly, there is no evidence of any new mitigation measures or alternatives that are considerably different from those analyzed in the previous EIR that would substantially reduce one or more significant effect on the environment. As stated above, the Approved LAX Sign District Project, including the Proposed LAX Sign District Project Modifications, would not have any significant environmental effects.

5.0 Conclusion

Based on this analysis and the information contained in this Addendum, the design, layout, and implementation of the Proposed LAX Sign District Project Modifications would not result in a new significant impact or substantial increase in the severity of previously identified impacts in the LAX Sign District Project Certified EIR. There are also no substantial changes to the circumstances under which the Proposed LAX Sign District Project Modifications would be undertaken that would result in a new significant impact or substantial increase in the severity of previously identified impacts in the LAX Sign District Project Certified EIR, and no new information of substantial importance, which was not known and could not have been known when the LAX Sign District Project EIR was certified, would result in a new significant impact or substantial increase in the severity of previously identified impacts in the LAX Sign District Project Certified EIR. Therefore, substantial evidence, including the analysis and information contained in this Addendum, supports the conclusion that none of the conditions described in State CEQA Guidelines Section 15162 calling for preparation of a subsequent EIR have occurred and, pursuant to Section 15164 of the State CEQA Guidelines, preparation of an Addendum to the LAX Sign District Project Certified EIR fully satisfies the CEQA review requirements for the Proposed LAX Sign District Project Modifications.