

Notice of Exemption

Appendix E

To: Office of Planning and Research
P.O. Box 3044, Room 113
Sacramento, CA 95812-3044

County Clerk

County of: Los Angeles

12400 Imperial Highway

Norwalk, CA 90650

From: (Public Agency): City of Inglewood

One Manchester Blvd.

Inglewood, CA 90301

(Address)

Project Title: The Forum Design project

Project Applicant: MSG Forum, LLC, 2 Pennsylvania Plaza, New York, NY, 10121

Project Location - Specific:

3900 West Manchester Blvd., Inglewood, California

Project Location - City: Inglewood

Project Location - County: Los Angeles

Description of Nature, Purpose and Beneficiaries of Project:

Zoning/Ordinance Amendments to: 1) establish a sign overlay zone (SOZ), 2) permit signage in the public right-of-way in connection with a SOZ, 3) add the SOZ to the underlying C-R Zone for the 29.5-acre project site; a Special Use Permit to clarify areas of liquor service; and a Development Agreement.

Name of Public Agency Approving Project: City of Inglewood

Name of Person or Agency Carrying Out Project: MSG Forum, LLC

Exempt Status: (check one):

☐ Ministerial (Sec. 21080(b)(1); 15268);

☐ Declared Emergency (Sec. 21080(b)(3); 15269(a));

☐ Emergency Project (Sec. 21080(b)(4); 15269(b)(c));

☒ Categorical Exemption. State type and section number: Class 1, 8, 11, 23 (Sec. 15301, -8, -11, -23)

☐ Statutory Exemptions. State code number: _____

Reasons why project is exempt:

(see attached Technical Memorandum)

Lead Agency

Contact Person: Linda F. Tatum, AICP

Area Code/Telephone/Extension: 310-412-5230

It filed by applicant:

1. Attach certified document of exemption finding.

2. Has a Notice of Exemption been filed by the public agency approving the project? ☐ Yes ☐ No

Signature: Linda F. Tatum Date: 4/19/2012 Title: Acting Ec. & Com. Dev. Dir.

☒ Signed by Lead Agency ☐ Signed by Applicant

Authority cited: Sections 21083 and 21110, Public Resources Code.

Reference: Sections 21108, 21152, and 21152.1, Public Resources Code.

Date Received for filing at OPR: _____



Technical Memorandum

DATE April 12, 2012

TO City of Inglewood, One Manchester Boulevard, Inglewood, CA

CONTACT Linda F. Tatum, AICP, Acting Economic and Community Development Director

FROM William Halligan, Esq., Vice President, Environmental Services

SUBJECT The Forum Design project: Project description and reasons why the project is categorically exempt (attachment to Notice of Exemption)

PROJECT NO. IGL-02

The Planning Center|DC&E prepared a Notice of Exemption (NOE) for the Forum Design project located at 3900 Manchester Blvd., Inglewood, California. The project description, types of exemptions, and reason why the project is exempt is discussed below.

PROJECT DESCRIPTION

The proposed project includes the following discretionary actions:

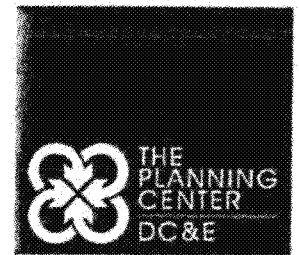
- Zoning Ordinance Amendments to:
 - Establish a Sign Overlay Zone (SOZ) and
 - Permit Signage in the Public Right-of-Way in connection with an SOZ,
- Zone Change to add the SOZ to the underlying C-R Zone for the 29.8-acre Project Site (3900 West Manchester Boulevard) and accompanying Master Sign Plan,
- Special Use Permit to clarify and expand the boundaries of allowable liquor sales, and
- Development Agreement.

1a. Zoning Ordinance Amendment to Establish a Sign Overlay Zone (SOZ)

The project would amend the Inglewood municipal Code (IMC) to establish a SOZ zone to provide for the orderly, efficient, and harmonious approval of signs, sign structures, and other exterior advertising devices that allow greater flexibility for large scale/major developments and active entertainment uses in the "C-R" zone. The SOZ zone shall promote appropriate signage that:

- Uses clear graphics;
- Coordinates with the architectural elements of the building(s) at or near which the signage is located;
- Reflects a modern, vibrant image of Inglewood; and,
- Enhance overall site aesthetics by regulating the number, size and location of signs.

The SOZ zone ordinance shall specify the general types of signage and shall include a Master Sign Plan that specifies the size, illumination, type, and location of all signage.



1b. Ordinance Amendment to Permit Signage in the Public Right-of-Way in connection with a SOZ

This Ordinance may allow signage in the public right-of-way that is approved as part of a Master Sign Plan in connection with a Sign Overlay Zone as set forth in the proposed Article 17.3 of Chapter 12 of the IMC.

2. Zone Change to add the SOZ to the underlying C-R Zone for the 29.8-acre Project Site (3900 West Manchester Boulevard) and the Master Sign Plan (the Forum SOZ) and the accompanying Master Sign Plan

This Ordinance (the Forum SOZ) adds a SOZ to the underlying C-R Zone for the 29.8-acre project site. The Forum SOZ, in conjunction with the Master Sign Plan, establishes the sign provisions for the Forum property. In accordance with the proposed ordinance, if signage is illuminated, spotlight devices shall not shine directly upon any public right-of-way or upon neighboring property or be inconsistent with the requirements of Los Angeles World Airports. The maximum brightness level for signage shall be no more than 400 candelas/m² and light sources from any lighting on the project shall not result in more than two (2.0) footcandles of lighting intensity at the property line of any residential use. The ordinance sets forth specific procedures to determine the illumination levels. In addition, the refresh rate of the message on a sign, exclusive of any change in whole or in part of the sign image, shall be no more frequent than one refresh event every eight seconds, with an instant transition between images.

3. Special Use Permit

The project includes a special use permit to clarify and expand the boundaries of allowable liquor sales on the project site.

4. Development Agreement

The project includes a development agreement which would provide for vested rights with respect to the use and operation of the Forum, in exchange for commitments to a specified level of annual ticket sales (300,000) relative to events at the Forum.

MASTER SIGN PLAN

The project proposes to include new signage, in the form of both onsite signage and advertising signage (known as "non-premise related advertising"). Implementation of the signage is proposed through an overlay zone that could permit a variety of sign types to activate the site. The final signage plans are not yet complete, but for purposes of analysis the proposed signage is assumed to include a roof, marquee, banner, and digital signs.¹ The assumed approximate sizes of the possible signage are shown in Table 1. Final signage may vary, but would be within the envelope of the intensity analyzed in this categorical exemption.

¹ Sussman/Prejza & Company, Inc. Forum Signage Plan, November 9, 2011.

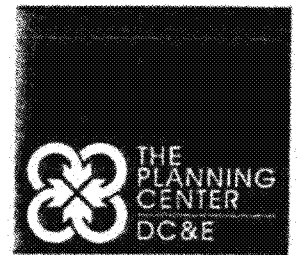


Table 1
Proposed Signage

| <i>Perimeter and Internal Site Signage</i> | <i>Size (sf)</i> |
|---|-------------------------|
| Primary Project ID (1) | 3,500 |
| Parking Entrance Signs (4) | 2,400 |
| Perimeter Site Banners (38) | 9,576 |
| <i>Subtotal Perimeter Site Signage</i> | <i>15,476</i> |
| | |
| Rooftop Graphic (1) | 37,000 |
| Building Top Sign (4) | 24,000 |
| Parking Surface Graphics (Directional Signage) (24) | 23,232 |
| Building Banner Graphics (27) | 21,870 |
| Pedestrian Entrance Signs (4) | 1,120 |
| Terrace Sponsorship (1) | 500 |
| <i>Subtotal Internal Site Signage</i> | <i>107,722</i> |
| | |
| TOTAL | 123,198 |
| Source: Sussman/Prejza & Company, Inc. | |

Perimeter Site Signage

Primary Project ID

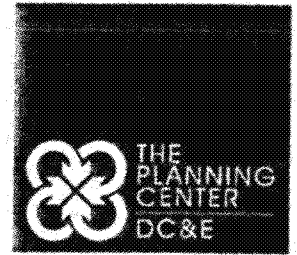
The one primary project ID may be located at the corner of Manchester Boulevard and Prairie Avenue (at the same location as the existing marquee sign). The sign could be 100 feet tall, but in no event higher than Federal Aviation Administration regulations would permit, with internally illuminated graphics (2 sign faces, each 12 ft x 40 ft) for a total area of 960 sf. There could also be 3 electronic display screens integrated into the sign (each screen 35 ft x 21 ft) for a total area of 2,205 sf. The screen height may be 35 feet above ground. The total graphic sign area could be a maximum of 3,500 sf, and offsite advertising would be permitted.

Parking Entrance Signs

There are currently 3 parking arches defining the entrances off of Prairie Avenue, Kareem Court, and Pincay Drive. A new arch could be added at Manchester Boulevard, where there is an existing curb cut. New signage atop and on the sides of each arch could be included. The signage could include sponsorship identification and promotion. Each structure may be 30 feet tall and 88 feet wide, spanning the driveway entrances to the surface parking lot. The gate may contain an illuminated sign graphic of 600 sf (60 ft x 10 ft).

Perimeter Site Banners

Festive banners featuring locational and sponsorship related messages could ring the surface parking lot on existing light poles along Prairie Avenue, Manchester Boulevard, and Pincay Drive, in the existing City right-of-way. Each banner may have a graphic (2 sides, each 9 ft x 14 ft) totaling 252 sf. No additional lighting would be provided.



Internal Site Signage Rooftop Graphic

There may be an aerial view sign totaling 37,000 sf on the Forum's roof. This will include the name of the venue as well as the presenting sponsor.

Building Top Sign

Building Top Signs may be provided in four locations (north, south, west, and east) above the exterior column arches. Each could be 30 ft x 200 ft (6,000 sf). This may include the name of the venue as well as the presenting sponsor.

Parking Surface Graphics (Directional Signage)

Parking surface graphics may be located within the surface parking lot. For analysis each banner is assumed to contain an upper permanent graphic (4 sides, each 7 ft x 6 ft) totaling 168 sf, graphic banner (4 sides, each 7 ft x 2 ft) totaling 560 sf and a lower permanent graphic (4 sides, each 10 ft x 6 ft) totaling 240 sf. The parking graphic may be 45 feet in height and have a total graphic area of 968 sf. The signage could include sponsorship identification and promotion.

Building Banner Graphics

Vinyl banners could be suspended between every two columns around the exterior of the Forum, totaling 27 banners. Each banner may be approximately 810 sf (18 ft x 45 ft). The banner could include sponsorship identification and promotion.

Pedestrian Entrance Signs

Pedestrian Entrance Signs may be provided in four locations (north, south, west, and east) around the Forum at the main pedestrian building entrances. Each sign would be a gateway through which pedestrians walk through (36 ft wide with a decorative element on one side 38 ft in height). Internally illuminated graphics could total 280 sf.

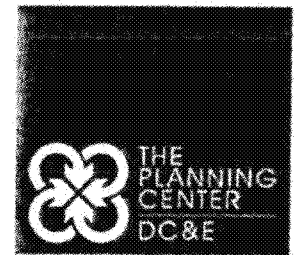
Terrace Sponsorship

Along the south side of the Forum, a terrace sign could feature large lettering in the sponsor's name totaling approximately 500 sf.

EXEMPT STATUS

The Forum Design Project qualifies for a CEQA Categorical Exemption under the following exemptions:

- Class 1 – Existing Facilities (Sec. 15301)
- Class 8 – Actions by Regulatory Agencies for Protection of Natural Resources (Sec. 15308)
- Class 11 – Accessory Structures (Sec. 15311)
- Class 23 – Normal Operations of Facilities for Public Gatherings (Sec. 15323)



Reason Why the Project is Exempt

Article 19 (Categorical Exemptions) of the State CEQA Guidelines lists classes of projects that are exempt from the requirements of CEQA. This section provides an analysis of why this project meets the conditions for a Class 1, Class 8, Class 11 and Class 23 exemption along with the reasons why none of the possible exceptions to Categorical Exemptions, found in Section 15300.2 Exceptions, apply to this project. The statutory language of each condition and possible exception is printed in bold italics below, followed immediately by the project-related analysis for each condition and exception.

Categorical Exemption Analysis

15301. Existing Facilities

Class 1 consists of the operation, repair, maintenance, permitting, leasing, licensing, or minor alteration of existing public or private structures, facilities, mechanical equipment, or topographical features, involving negligible or no expansion of use beyond that existing at the time of the lead agency's determination. The types of "existing facilities" itemized below are not intended to be all-inclusive of the types of projects which might fall within Class 1. The key consideration is whether the project involves negligible or no expansion of an existing use...

The proposed project meets this condition. The Project would consist of vesting of current regulations and minor alteration of an existing private structure involving negligible or no expansion of use or additions to the building beyond what was existing at the time of the lead agency's determination.

CEQA Guideline 15301 (a) through (p) describes examples of projects that might be considered exempt under Class 1. The Forum Design project would be consistent with the following examples:

(a) Interior or exterior alterations involving such things as interior partitions, plumbing, and electrical conveyances;

(d) Restoration or rehabilitation of deteriorated or damaged structures, facilities, or mechanical equipment to meet current standards of public health and safety, unless it is determined that the damage was substantial and resulted from an environmental hazard such as earthquake, landslide, or flood;

(e) Additions to existing structures provided that the addition will not result in an increase of more than:

(1) 50 percent of the floor area of the structures before the addition, or 2,500 square feet, whichever is less; or

(2) 10,000 square feet if:

(A) The project is in an area where all public services and facilities are available to allow for maximum development permissible in the General Plan and

(B) The area in which the project is located is not environmentally sensitive.



(g) New copy on existing on and off-premise signs;

(l) Demolition and removal of individual small structures listed in this subdivision;

(1) One single-family residence. In urbanized areas, up to three single-family residences may be demolished under this exemption.

(2) A duplex or similar multifamily residential structure. In urbanized areas, this exemption applies to duplexes and similar structures where not more than six dwelling units will be demolished.

(3) A store, motel, office, restaurant, or similar small commercial structure if designed for an occupant load of 30 persons or less. In urbanized areas, the exemption also applies to the demolition of up to three such commercial buildings on sites zoned for such use.

(4) Accessory (appurtenant) structures including garages, carports, patios, swimming pools, and fences.

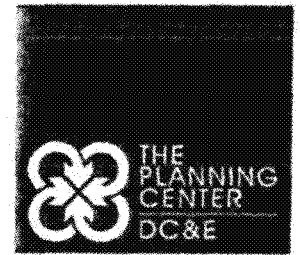
The addition of signage to the existing venue would not result in an increase of more than 50 percent of the floor area or 2,500 square feet (Section 15301(e)(1)) or 10,000 square feet (Section 15301(e)(2)). In addition the special use permit to define the areas of allowable liquor sales would not affect the size or operation of the Forum. The physical structure of the Forum would remain the same. In accordance with the regulations vested by the proposed Development Agreement, the venue would be used for the same types of events that have been accommodated at the Forum since it was built in 1967.

Exterior additions would include rooftop signage, integrated electronic displays, terrace sponsorship, and building top signs. These signs and displays would not increase the size in square feet or usable area of the structure itself. The primary ID sign would replace an existing marquee sign, and additional sponsorship signage would be located on existing light standards and poles or other existing structures. Therefore, the Project would meet the conditions for a Class 1 Categorical Exemption.

15308. Actions by Regulatory Agencies for Protection of the Environment

Class 8 consists of actions taken by regulatory agencies, as authorized by state or local ordinance, to assure the maintenance, restoration, enhancement, or protection of the environment where the regulatory process involves procedures for protection of the environment. Construction activities and relaxation of standards allowing environmental degradation are not included in this exemption.

The Forum Design project includes approval of an ordinance to create a Sign Overlay Zone (SOZ) in the City. The ordinance would allow specialized signage for sports and entertainment-oriented infill projects in the City subject to approval of a Master Sign Plan. The SOZ shall promote appropriate signage that meets all of the following criteria: 1) uses clear graphics; 2) coordinates with the architectural elements of the building(s) on or near which the signage is located; 3) reflects a modern, vibrant image of Inglewood; and, 4) enhance overall site aesthetics by regulating the number, size and location of signs. Further, the Master Sign Plan shall specify the standards, general types and location of all signage. The proposed SOZ would not relax any standards to allow



environmental degradation. Therefore, the project would meet the conditions for a Class 8 Categorical Exemption.

The proposed ordinances implementing the Forum SOZ and allowing signage in a public right-of-way, limit the light spillover and intensity of the proposed signs included in the signage plan. The City's current zoning code does not have a quantitative maximum limit on light spillover or intensity for signage. The Forum SOZ limits the maximum light intensity/brightness of LED signage to 400 candelas/m² and limits spillover light to 2.0 footcandles at a residential property line. Therefore, the Forum SOZ would provide for greater protection of the environment by placing restrictions on signage/lighting intensity and spillover. In addition, the proposed requirements are consistent with the recommendations of the Illuminating Engineering Society of North America (IESNA).²

15311. Accessory Structures

Class 11 consists of construction, or placement of minor structures accessory to (appurtenant to) existing commercial, industrial, or institutional facilities, including but not limited to:

(a) On-premise signs;

(b) Small parking lots; and

(c) Placement of seasonal or temporary use items such as lifeguard towers, mobile food units, portable restrooms, or similar items in generally the same locations from time to time in publicly owned parks, stadiums, or other facilities designed for public use.

The proposed project meets this exemption. The Forum Design project would consist of installation of minor accessory structures on the venue, including rooftop signage, building banners and terrace overhang as well as on-premise signs (parking lot graphics, a perimeter site ID, parking entrance structures and banners). The signs would be consistent with CEQA Guideline 15311 (a) for on-premise signs.

Class 11 Categorical Exemptions are subject to exceptions based on location if a project that is ordinarily insignificant in its impact on the environment may be significant in a particularly sensitive environment. This exception is discussed below in "Exceptions to Categorical Exemption Analysis," and as described therein, the proposed project would not meet this exception. Therefore, the project would meet the conditions for a Class 11 Categorical Exemption.

15323. Normal Operations for Facilities for Public Gatherings

Class 23 consists of the normal operations of existing facilities for public gatherings for which the facilities were designed, where there is a past history of the facility being used for the same or similar kind of purpose. For the purposes of this section, "past history" shall mean that the same

² IESNA sets general guides for sign brightness in a retail area. The best level of brightness depends primarily upon the desired sign visibility, its use and the surrounding environment. In areas of "Low" brightness where signs are relatively isolated or have dark surrounds, IES recommends a sign luminance of 450 – 700 c/m² and it recommends a luminance of 700-1,000 c/m² for an average commercial sign. (Fig. 29-9. Recommended Luminous Background Sign Luminances, IES *Lighting Handbook*.)



or similar kind of activity has been occurring for at least three years and that there is a reasonable expectation that the future occurrence of the activity would not represent a change in the operation of the facility. Facilities included within this exemption include, but are not limited to, racetracks, stadiums, convention centers, auditoriums, amphitheaters, planetariums, swimming pools, and amusement parks.

The proposed project meets this condition. The Forum Design project would qualify for a Class 23 Categorical Exemption because it would not change the normal activity of the facility for which it was designed. The Forum has hosted concerts and numerous public and private gatherings in the past and would continue to do so after project implementation. Class 23 defines past history as the same or similar kinds of activity for at least three years. The Forum has been in continuous operation since it opened in 1967. There were more than 23 concerts in 2011, as well as rehearsals and additional special events.³ The Development Agreement for the project requires a minimum of 300,000 ticket sales. Based on the seat layout of the Forum, this would equate to approximately 22 events per year.⁴ The proposed zoning ordinance amendments and special use permit would allow the Forum to continue to be used as an entertainment venue and to attract musical performances. Therefore, the Forum Design project would meet the conditions for a Class 23.

Exceptions to Categorical Exemption Analysis

15300.2 Exceptions

(a) Location. Classes 3, 4, 5, 6, and 11 are qualified by consideration of where the project is to be located -- a project that is ordinarily insignificant in its impact on the environment may in a particularly sensitive environment be significant. Therefore, these classes are considered to apply all instances, except where the project may impact on an environmental resource of hazardous or critical concern where designated, precisely mapped, and officially adopted pursuant to law by federal, state, or local agencies.

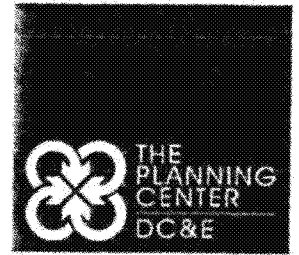
This exception does not apply to the proposed project. The project is located on a developed site in an urbanized area in the City of Inglewood. The project site is not located on a hazardous site and there are no wetlands, endangered species, or wildlife habitats on the site. As a result, this exception is not applicable to the project.

(b) Cumulative Impact. All exemptions for these classes are inapplicable when the cumulative impact of successive projects of the same type in the same place, over time is significant.

This exception does not apply to the proposed project. The Forum Design project including the installation of new signage would be implemented on a developed site surrounded by urban uses. There would be no major ground disturbing activities associated with the project. The project's use and intensity is consistent with the current uses of the site and would not result in any significant impacts. Therefore, the project would not contribute to any

³ City of Inglewood, *The Forum Renovation Categorical Exemption*, January 2012.

⁴ As part of The Forum Renovation approved in January 2012, seating would be arranged in 6 different layouts ranging from 12,640 to 14,587 seats. The number of events assumed were based on the median number of seats available or $300,000/13,523 = 22$.



cumulative traffic, air quality, greenhouse gas or noise impacts. Further, there are no other projects of this type pending or proposed in the surrounding area. As a result, this exception is not applicable to the project.

(c) Significant Effect. A categorical exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.

This exception does not apply to the proposed project. An initial study was prepared for the project and determined that there are no unusual aspects to the project site or planned project operations that would create a reasonable possibility of significant effects to the environment.⁵ The Forum site has been in operation since 1967. Operations have continued since that time. The Forum site is surrounded on all sides by development and is located within a highly urbanized area. Physical impacts to the site would include installation of signage which is consistent with the current operation of the site and consistent with the architectural details of the Forum building.

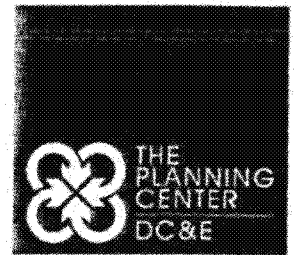
IESNA sets general guides for sign brightness in a retail area. The best brightness depends primarily upon the desired sign visibility, its use and the surrounding environment. In areas of "Low" brightness where signs are relatively isolated or have dark surrounds IES recommends a sign luminance of 450 – 700 cd/m² and 700-1,000 cd/m² for an average commercial sign. (Fig. 29-9. Recommended Luminous Background Sign Luminances, IES Lighting Handbook.) The proposed signage would have a maximum target luminance of 400 cd/m². In addition, the increased illumination associated with the signage is consistent with lighting levels in similar urban locations and is not considered substantial and will not adversely affect day or nighttime views.

A lighting study was prepared to measure the amount of potential spillover onto adjacent properties as a result of the proposed signage and shows that all proposed signage would not increase light levels as measured in footcandles (fc) at the project's site boundary, except in the areas of the parking entrances and the primary ID sign at the intersection of Prairie Avenue and Manchester Blvd. However, lighting from the primary ID sign is significantly reduced within 100 feet from the sign (within the existing intersection right-of-way) to 2.55 fc. Spill light from the primary ID sign is measured at 0.62 fc adjacent to Sizzler and 0.0 fc at the nearest adjacent land use boundary. Spill light from the parking entrance along Kareem Court would result in 0.33 fc measured at the west side of the wall at the adjacent residential use. No other on-site lighting would cause spillover onto residential properties. This would not result in a significant impact.

Further, with existing perimeter street lighting the project would not contribute 2.0 fc at any residential property line. The maximum light intensity at a residential property line would be 1.56 at the west side of the wall surrounding the Carlton Square development. The street lighting is the main source of light at this location. Because the street lights are oriented toward the street right-of-way, the existing wall blocks the majority of the light spillover. Therefore, the Forum Design and associated installation of new signage would not result in a significant effect on the environmental or any sensitive surrounding land uses.

(d) Scenic Highways. A categorical exemption shall not be used for a project which may result in damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as a state scenic

⁵ City of Inglewood, *Initial Study for The Forum Design*, prepared by The Planning Center|DC&E, April 2012.



highway. This does not apply to improvements which are required as mitigation by an adopted negative declaration or certified EIR.

The proposed project would not damage scenic resources, including trees, rock outcroppings, and historic buildings within a state scenic highway. There are no state scenic highways in the vicinity. The nearest designated State Scenic Highway to the project site is State Route 2 (SR-2, or the Angeles Crest Highway) 19 miles northeast of the project site. The nearest eligible State Scenic Highway to the site is SR-1, or Lincoln Boulevard, six miles west of the site (Caltrans 2012). SR-110, the Pasadena Freeway or Arroyo Parkway, 9.5 miles northeast of the site, is a designated National Scenic Byway (USDOT 2012). Project implementation would not damage scenic resources in any of the three designated or eligible scenic highways mentioned.

(e) Hazardous Waste Sites. A categorical exemption shall not be used for a project located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code.

This exception does not apply to the proposed project. California Government Code Section 65962.5 requires various state agencies to compile lists of hazardous waste disposal facilities, unauthorized release from underground storage tanks, contaminated drinking water wells, and solid waste facilities from which there is known migration of hazardous waste and submit such information to the Secretary for Environmental Protection on at least an annual basis. This issue would apply only if the project site is included on any of the above referred to lists and therefore would pose an environmental hazard to surrounding sensitive uses. In meeting the provisions in Government Code Section 65962.5, commonly referred to as the "Cortese List," database resources that provide information regarding identified facilities or sites include EnviroStor, GeoTracker, and other lists compiled by the California Environmental Protection Agency. According to EnviroStor, there are no federal Superfund, state response, voluntary cleanup, tiered permit, corrective action, hazardous waste permit, or monitoring wells on the project site.⁶ As a result, this exception is not applicable to the project.

(f) Historical Resources. A categorical exemption shall not be used for a project which may cause a substantial adverse change in the significance of a historical resource.

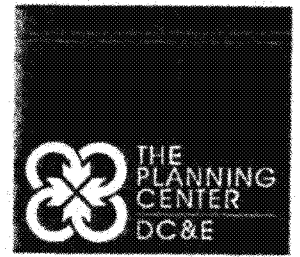
This exception does not apply to the proposed project. According to the Historic Resources included within the previously approved Categorical Exemption dated January 30, 2012, the proposed project and the proposed new signage is consistent with the Secretary of the Interior's Standards for Rehabilitation. Standard 9 states that:

New additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property. The new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment.

The proposed new signage will be designed to be compatible and reversible new additions.⁷ In general, the proposed project retains significant character-defining features of the exterior and interior. As such, no known historical resources would be adversely damaged by implementation of the project. The project approvals of

⁶ State of California Department of Toxic Substance Control, EnviroStor, website: <http://www.envirostor.dtsc.ca.gov/public/>, accessed April 3, 2012.

⁷ HRG, The Forum Historic Resources Analysis, February 27, 2012, pg.32.



January 30, 2012, including the Owner Participation Agreement, required that all rehabilitation work be in compliance with the Secretary of the Interior's Standards for Rehabilitation. The City has determined that the proposed rehabilitation activities are consistent with the Secretary of the Interior's Standards for Rehabilitation. In general, the proposed project retains significant character-defining features of the exterior and interior.