NOTICE OF EXEMPTION

TO:	FROM: (Public Agency)	
☒ Office of Planning and Research P. O. Box 3044, Room 113 Sacramento, CA 95812-3044	Name:	San Diego Metropolitan Transit System (lead agency) Contact: Mark Olson, Director of Marketing and Communications
	Address:	1255 Imperial Avenue Suite 1000 San Diego, CA 92101
	Telephone:	619-557-4588
☒ Clerk of the Board of Supervisors or County Clerk (San Diego County) Address: 1600 Pacific Hwy, #260, San Diego, CA 92101		

1. Project Title:	Copley Park Division Digital Information Board Project
2. Project Applicant:	**San Diego Metropolitan Transit System** Contact: Mark Olson, Director of Marketing and Communications 1255 Imperial Avenue Suite 1000 San Diego, CA 92101 Telephone: 619-557-4588 **Clear Channel Outdoor, LLC** Contact: John Phillips Real Estate Development Rep 7257 Ronson Rd, Ste E San Diego, CA 92111 Telephone: 858-302-5142
3. Project Location – Identify street address and cross streets or attach a map showing	7490 Copley Park Place, San Diego, CA 92111 Located near State Route 52. See attached map.

project site (preferably a USGS 15' or 7 1/2' topographical map identified by quadrangle name):	
4. (a) Project Location – City: City of San Diego	(b) Project Location – County: San Diego
5. Description of nature, purpose, and beneficiaries of Project:	On September 17, 2026, San Diego Metropolitan Transit System ("MTS") Board of Directors authorized the Chief Executive Officer to execute a License Agreement with Clear Channel Outdoor, LLC ("CCO") to design, construct, operate, and maintain a double-sided digital information board on MTS owned property at the Copley Park Division facility adjacent to State Route 52 ("Project"). The agreement provides for an initial term of 20 years, with two additional five-year renewal options that could extend the total term to 30 years. The digital display is anticipated to include approximately 672 square feet of advertising area on each display face, with an overall structure height of approximately 60 to 70 feet. The final location, size, and design of the structure will be subject to MTS review and approval during the design process. The total area occupied by the project will not exceed 5,000 square feet of MTS property. Under the agreement, CCO will be responsible for all costs associated with project development, including design, permitting, construction, operation, maintenance, utilities, insurance, technology upgrades, and eventual removal of the structure. CCO will also be required to periodically modernize the digital display technology to ensure the facility remains consistent with generally accepted industry standards. At the end of the agreement term, or upon earlier termination, CCO will be responsible for removing the structure and restoring the property. The agreement reserves dedicated display time for MTS communication needs. MTS will receive one dedicated eight-second advertising slot during each rotation cycle on one display face, together with additional display time on the second face on an as-available basis. This display time may be used for:

	• Transit promotional messages • Service alerts • Wayfinding messages • Ridership promotions • MTS partner and stakeholder messages • Special event information • Emergency notifications • Public safety agency information • Amber alerts • Other transit-related communications. Because of the project's proximity to State Route 52, the display will operate in accordance with applicable Caltrans requirements. Advertising content will be limited to static digital images, and full-motion advertising will not be permitted. The display will utilize LED technology equipped with automatic dimming controls that adjust brightness levels based on ambient lighting conditions. All advertising content displayed on the structure must comply with MTS Board Policy 21 governing revenue-generating advertising. The agreement is structured to provide MTS with both guaranteed and performance-based revenue while allowing the agency to leverage privately funded infrastructure to expand customer information, emergency communications, and transit-related messaging. The project will create a prominent regional communications platform while generating a new source of non-fare revenue to support the agency's long-term financial sustainability.
6. Name of Public Agency approving project:	**San Diego Metropolitan Transit System** Contact: Mark Olson, Director of Marketing and Communications 1255 Imperial Avenue Suite 1000 San Diego, CA 92101 Telephone: 619-557-4588

7. Name of Person or Agency undertaking the project, including any person undertaking an activity that receives financial assistance from the Public Agency as part of the activity or the person receiving a lease, permit, license, certificate, or other entitlement of use from the Public Agency as part of the activity:	**San Diego Metropolitan Transit System** Contact: Mark Olson, Director of Marketing and Communications 1255 Imperial Avenue Suite 1000 San Diego, CA 92101 Telephone: 619-557-4588 **Clear Channel Outdoor, LLC** Contact: John Phillips Real Estate Development Rep 7257 Ronson Rd, Ste E San Diego, CA 92111 Telephone:858-302-5142
8. Exempt status: (check one)	
(a) ☐ Ministerial project.	
(b) ☐ Not a project.	
(c) ☐ Emergency Project.	
(d) ☒ Categorical Exemption. State type and section number:	Class 3, 14 Cal. Code Regs., § 15303 (new construction or conversion of small structures) Class 11, 14 Cal. Code Regs., § 15311 (accessory structures) Class 32, 14 Cal. Code Regs., § 15332 (in-fill development projects)
(e) ☐ Declared Emergency.	
(f) ☒ Statutory Exemption. State Code section number:	Pub. Resources Code, § 21080.25 (b)(2), (8), (9) (transportation project exemptions and criteria) Pub Resources Code, § 21080(b)(10), (11); 14 Cal. Code Regs., § 15275(a) (specified mass transit projects)
(g) ☐ Other. Explanation:	
9. Reason why project was exempt:	The Project described above is statutorily and categorically exempt from environmental review under the California Environmental Quality Act ("CEQA"), Public Resources Code section 21000 *et seq.*, and Title 14 of the California Code of Regulations, section 15000 *et seq.* ("State CEQA Guidelines"), as follows: The Project is statutorily exempt under Public Resources Code section 21080.25, subdivision

	(b), which includes projects that would improve customer information and wayfinding for transit riders (subdivision (b)(2)) and the maintenance, repair, relocation replacement, or removal of any utility infrastructure associated with these types of projects (subdivision (b)(8)). The Project is a state-of-the-art digital display at MTS's Copley Park Division that will provide wayfinding information, promote transit services, and generate additional revenue to support public transit operations within MTS's service area. Therefore, it is within the scope of projects subject to Public Resources Code section 21080.25(b)(2), (8), and (9). In compliance with the statutory exemption criteria in Public Resources Code section 21080.25, subdivision (c), the Project will be carried out by MTS as the lead agency under CEQA by execution of a License Agreement for the construction and operation of the Project subject to all terms and conditions therein, including payment of a license fee and dedication of a minimum of share of advertising display time which may be used for wayfinding and informational messaging such as transit schedules and special MTS promotions or emergency messaging, as needed, and which may not be sold to third parties. Therefore, MTS is carrying out the Project by executing a License Agreement for construction and operation. Although "wayfinding" is not specifically defined in State law, the San Diego Municipal Code uses the term to mean signage displayed near the public right-of-way "that directs pedestrians and cyclists to nearby attractions and transit connections." (See SDMC § 143.1020(b)(7)(I).) Here, the Project will improve customer information and wayfinding for transit riders by dedicating a percentage of display time (plus additional unsold display time) solely for wayfinding and informational messaging such as train schedules and special transit-ridership promotions, and will therefore meet the legislative purpose of improving mobility and connectivity by enhancing access to transit. This percentage is consistent with other digital

	wayfinding projects that use private advertising dollars to finance the wayfinding installation, maintenance and liability related to such devices instead of scarce public transit fare dollars. The private advertising dollar method of enhancing transit wayfinding is just a different means of financing the same wayfinding function as a device paid for entirely by public transit dollars. Additionally, the project's revenue sharing will also provide reliable revenue to MTS to continue improving its transit system in accordance with its governing laws. The Project will also be located at MTS's Copley Park Division in the City of San Diego, which is adjacent to State Route 52, and will support transit uses within the existing public-right-of-way. Public Resources Code section 21071(a)(1) defines an "Urbanized area" as an incorporated city that has a population of at least 100,000 persons. The City of San Diego is an incorporated city that has a population of 1,389,526. Therefore, the Project is located in an urbanized area. The Project will not add physical infrastructure that increases new automobile capacity on existing rights-of-way. The Project consists of construction and operation of an outdoor advertising structure and supporting structures, fixture connections, electrical supply and related equipment and accessories and will not increase new automobile capacity on existing rights-of-way. The Project does not require demolition of any affordable housing units. In compliance with the statutory exemption criteria in Public Resources Code section 21080.25, subdivision (f), the Project will be constructed by a skilled and trained workforce or, alternatively, under a project labor agreement. The construction contract for the Project will include an enforceable commitment to MTS that the contractor and its subcontractors at every tier will use a skilled and trained workforce to perform all work on the project or a contract that falls within an apprenticeship occupation in the building and construction trades in accordance with Chapter 2.9 (commencing with Section 2600) of Part 1

	of Division 2 of the Public Contract Code. The MTS Board action includes certification that the Project will be completed by a skilled and trained workforce consistent with the criteria in Public Resources Code section 21080.25. The Project is also statutorily exempt under Public Resources Code section 21080(b)(10), (11) and State CEQA Guidelines section 15275, subdivision (a) as a project for the institution or increase of passenger or commuter service on high-occupancy vehicle lanes already in use, including the modernization of existing stations and parking facilities. Due to its improvement of MTS's Copley Park Division and addition of passenger wayfinding improvements to the existing MTS transit use, the Project falls within this statutory exemption. Additionally, the Project is categorically exempt under State CEQA Guidelines section 15303 (Class 3) because it consists of the construction and location of limited numbers of new, small facilities or structures. The Project consists of construction and operation of an outdoor wayfinding structure and supporting structures, fixture connections, electrical supply and related equipment and accessories, to be located within an urbanized area on premises not to exceed a total of 5,000 square feet. Within urbanized areas, the Class 3 categorical exemption applies by its terms to commercial structures of up to 10,000 square feet in floor area and accessory or appurtenant structures. Based on its size and location, the Project therefore falls within the Class 3 categorical exemption. State CEQA Guidelines section 15311 (Class 11) also specifically exempts construction, or replacement of minor structures accessory to (appurtenant to) existing commercial, industrial, or institutional facilities. The Project also falls within this exemption as the Project is accessory to MTS's existing transit use. Finally, State CEQA Guidelines section 15332 (Class 32) applies to projects characterized as in-fill development that is consistent with the applicable general plan designation and policies and zoning designation and regulations; occurs within city limits on a project site of no more

	than five acres substantially surrounded by urban uses; is on a site with no value as habitat for endangered, rare or threatened species; would not result in any significant effects relating to traffic, noise, air quality or water quality; and is on a site that can be adequately served by all required utilities and public services. Here, the Project meets the criteria for infill development. None of the exceptions to the categorical exemptions in State CEQA Guidelines section 15300.2 applies. The Project is not located in a particularly sensitive environment as the Project is located entirely within developed and disturbed areas adjacent to State Route 52. The cumulative impact of successive projects of the same type in the same place, over time is not significant, as no similar wayfinding and advertising structures of this scale are proposed at MTS's Copley Park Division. The Project will not result in any damage to scenic resources within a highway officially designated as a state scenic highway as it is not located within a designated state scenic highway. The Project site is not included on any list complied pursuant to Section 65962.5 of the Government Code. The Project will not cause a substantial adverse change in the significance of a historical resource.

10. Lead Agency Contact Person: Telephone:	Mark Olson, Director of Marketing and Communications 619-557-4588
11. If filed by applicant: Attach Preliminary Exemption Assessment (Form "A") before filing. Not Applicable	
12. Has a Notice of Exemption been filed by the public agency approving the project? Yes ☐ No ☐ Not Applicable	
13. Was a public hearing held by the Lead Agency to consider the exemption? Yes ☒ No ☐ If yes, the date of the public hearing was: September 17, 2026	

Signature

Date: September 17, 2026

Mark Olson
Name

Title: Director of Marketing and Communications

☒ Signed by Lead Agency

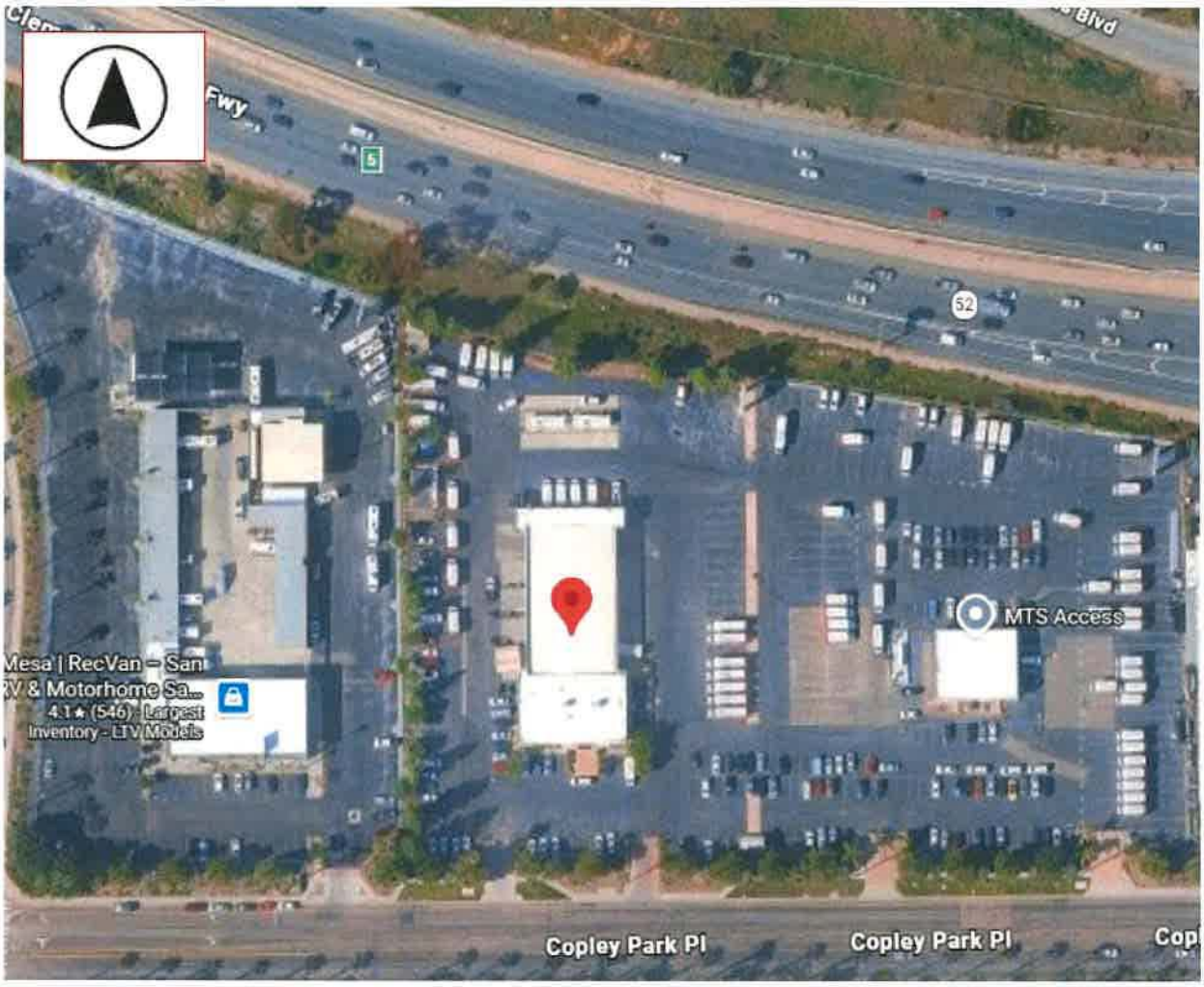
☐ Signed by Applicant

Date Received for Filing: Click to enter date

(Clerk Stamp Here)

Authority cited: Sections 21083 and 21110, Public Resources Code.
Reference: Sections 21108, 21152, and 21152.1, Public Resources Code.

Location Map:


Fwy
5
52
MTS Access
Mesa | RecVan – San
V & Motorhome Sa...
4.1 ★ (546) · Largest
Inventory - LTV Models
Copley Park Pl
Copley Park Pl