

Channel Law Group, LLP

8200 Wilshire Blvd.
Suite 300
Beverly Hills, CA 90211

Phone: (310) 347-0050
Fax: (323) 723-3960
www.channellawgroup.com

JULIAN K. QUATTLEBAUM, III *
JAMIE T. HALL **
CHARLES J. McLURKIN

Writer's Direct Line: (310) 982-1760
jamie.hall@channellawgroup.com

*ALSO Admitted in Colorado
**ALSO Admitted in Texas

January 25, 2019

VIA PERSONAL DELIVERY

Holly Wolcott
City of Los Angeles
Office of the City Clerk
3rd Floor, Room 395
Los Angeles, CA

2019 JAN 25 PM 2:20
CITY CLERK
BY
DELIVERY

Re: CEQA Appeal for Venice Boulevard Great Street Project – Finalized Project and Additional Improvements

Dear City Clerk:

This firm represents Westside Los Angeles Neighbors Network, Inc. On or about December 20, 2018 the City of Los Angeles Department of Transportation (“Department” or “City”) determined that the project entitled “Venice Boulevard Great Street Project – Finalized Project and Additional Improvements” (“Project”) was exempt from the California Environmental Quality Act (“CEQA”). The Department filed a Notice of Exemption with the County Recorder on or about December 21, 2018. See attached NOE attached as Exhibit A. Pursuant to Public Resources Code Section 21151(c)¹, Westside Los Angeles Neighbors Network, Inc. (“WLANN” or “Appellant”) hereby appeals the determination that the Project is exempt from CEQA to the City Council.

The Department incorrectly determined that the Project was exempt from CEQA. Appellant provides the following justifications for appeal:

¹ PRA section 21151(c) states as follows: “If a nonelected decisionmaking body of a local lead agency certifies an environmental impact report, approves a negative declaration or mitigated negative declaration, or determines that a project is not subject to this division, that certification, approval, or determination may be appealed to the agency’s elected decisionmaking body, if any.”

Justifications for Appeal

- The City of did not conduct any environmental review of the Great Streets Venice Boulevard road diet, despite there being substantial evidence during the one-year pilot project to support a fair argument that the road diet had significant impacts upon the environment. This project is a MAJOR alteration of an existing highway, reducing the carrying capacity on an arterial highway designated as a tsunami evacuation route and a LA County disaster route by 33%. In addition, with 43 driveways and 10 unsignalized intersections, the protected bike lane created foreseeable adverse traffic and public safety impacts, which should be subjected to a CEQA review.
- The Project does not conform to the guidelines set forth in the *Road Diet Informational Guide - Safety* on the Federal Highway Administration website. Venice Blvd was an arterial highway with 7 lanes and annual average daily traffic (AADT) between 46,500 to 52,000 cars in 2016 per CalTrans. Such a non-standard implementation of the road diet concept should have been subject to CEQA review.
- Presently, the Palms - Mar Vista - Del Rey Community Plan is being updated. As part of the Community Plan update, the Mobility Element in the Community Plan will be subject to CEQA and formal public review. The Great Streets Venice Boulevard road diet constitutes an improper segmenting of a project without any CEQA review.
- Additionally, the impact that extensive tree removal will have on the over 200 species of migratory birds or monarch butterflies that travel through the area, or the visiting birds from the State-owned Ballona Wetlands Ecological Reserve approximately 3 miles away is unknown. Also, the increase in vehicles into neighborhoods disturbs plants, trees and wildlife nesting, roosting, living and growing there.
- The Project involves the reduction of capacity on a major arterial and, as such, does not constitute a minor alteration of an existing street. Moreover, the project, consisting of the reduction of a 7 lane arterial to 5 lanes, has no applicable standards or guidelines. It also fails to comply with criteria posted by the Federal Highway Administration for implementation of similar projects.
- The Project does not create a bicycle lane on an existing right of way. Such a Facility already existed at the time the project was instituted. It MODIFIES an existing bicycle lane on a major arterial resulting in significant environmental impacts. Moreover, the City cites Los Angeles City CEQA guidelines for Class 4 (13) exemptions, which exempts “street restriping to modify existing bicycle lanes on an existing right of way.” To modify existing bicycle lanes is not the same as to create bicycle lanes, and we would argue that City’s CEQA guidelines do not conform with State CEQA guidelines. The Project has, by its own admission increased the number of vehicles on collateral residential streets by 1-3 additional vehicles per minute.
- The Project is 2-4 miles from the Ballona Wetlands and has created noise and has created noise and disruption on previous quiet, residential, tree-lined streets. The potential effect of these on local migratory birds could be significant.

- The City has stated that the project is similar to other projects that have been implemented as part of Mobility Plan 2035. Mobility Plan 2035 aligns with other plans including the Expo Corridor Plan, implemented in 2017.
- This plan promotes increased density around the High-Quality Transit Corridor along the route of the Expo Line, which is 2-3 miles from Venice Blvd. Like Great Streets Venice Blvd the Expo Corridor Plan seeks to reduce greenhouse gases by promoting alternate forms of transportation. It seeks to accomplish this by virtue of creating housing near a High-Quality Transit Corridor (the Expo Line). Because of its reliance on granting density bonuses based on the tenets of the City's recently enacted Measure JJJ. It is expected to generate between 4400 and 6000 new units by 2035. However, because the minimum affordable requirements of measure JJJ average 10%, 90% of these new units will be market rate units. There are no existing studies to indicate that the future occupants of these market rate units will eschew car ownership. Hence there is a potential cumulative impact on the environment based on the concomitant addition of cars related to market rate dwelling units resulting from the Expo Corridor Plan and the reduction of lane capacity on a major arterial resulting from Great Streets Venice Blvd.
- The Project a) fails to consider the potential increase in cars produced by the EXPO Corridor Plan and similar projects throughout the Westside and b) fails to consider that the EIR on MP 2035 is currently under legal challenge. It also fails to address the glaring omission in the Great Streets Venice Blvd Evaluation of the effects that the capacity reduction on Venice Blvd will have on its nearest neighboring collateral arterial: Washington Blvd. In 2015, as part of the West La Transportation Improvement Mitigation Plan (another plan that the current project is aligned with), a Modeling Report was done that included a Dynamic Validation Test which test the deletion of link in the Westside Mobility network. That link was Washington Blvd. The results showed that deleting capacity on Washington Blvd increased volume on nearby collateral streets. The collateral street exhibiting the greatest volume increases was Venice Blvd. Based on this model it is reasonable to conclude that doing the reverse (as Great Street Venice Blvd has done) would produce analogous volume increased on Washington Blvd.
- The environmental effects of these volume increases have not been addressed by the current project and could pose a significant environmental impact, including Air Quality.

WLANN respectfully request that the City Council grant the appeal and reverse the Department's environmental determination (as well as the actions analyzed in the Notice of Exemption). Please note that Appellant reserve the right to supplement the justifications for appeal presented.

I may be contacted at 310-982-1760 or at jamie.hall@channellawgroup.com if you have any questions, comments or concerns.

Sincerely,



Jamie T. Hall

Exhibit A

2018 317995

FILED
Dec 27 2018

City of Los Angeles Department of Transportation
 Department of Transportation

CITY OF LOS ANGELES
OFFICE OF THE CITY CLERK
 200 NORTH SPRING STREET, ROOM 380
 LOS ANGELES, CALIFORNIA 90012
CALIFORNIA ENVIRONMENTAL QUALITY ACT
NOTICE OF EXEMPTION
 (California Environmental Quality Act Section 15062)

DOCUMENT FILED City Clerk's Office #6-18-2460-TR	CITY CLERK'S USE	
	Certified by [Signature]	Date: 12-20-18

Filing of this form is optional. If filed, the form shall be filed with the County Clerk, 12400 E. Imperial Highway, Norwalk, CA 90650, pursuant to Public Resources Code Section 21152 (b). Pursuant to Public Resources Code Section 21167 (c), the filing of this notice starts a 35-day statute of limitations on court challenges to the approval of the project. Failure to file this notice with the County Clerk results in the statute of limitations being extended to 180 days.

LEAD CITY AGENCY City of Los Angeles Department of Transportation		COUNCIL DISTRICT 11
PROJECT TITLE Venice Boulevard Great Street Project - Finalized Project and Additional Improvements		COUNCIL FILE NO: N/A
PROJECT LOCATION Venice Boulevard between Beethoven St. and Inglewood Blvd., Centinela Ave. between McCune Avenue and Venice Blvd.; intersections of Charnock Rd. and Ocean View Ave.; Charnock Rd. and Mountain View Ave.; Victoria Ave. and Colonial Ave.; and Victoria Ave. and Boise Ave. Related traffic calming may also include residential streets in the project area that is bounded by and include Beethoven St. (west), Inglewood Blvd. (east), Pacific Ave. (south), and Palms Blvd. (north)		
DESCRIPTION OF NATURE, PURPOSE, AND BENEFICIARIES OF PROJECT: The proposed project consists of 1) making a set of pedestrian, bicycle, and vehicular improvements along the Venice Boulevard corridor in Council District 11 permanent after they were piloted and evaluated successfully and 2) adding additional vehicular traffic improvements on Venice Boulevard and on nearby streets. This project intends to further improve traffic safety and access for all roadway users and address transportation conflicts related to pedestrian, bicycle, and vehicle movements. See Attachment A for more project information.		
NAME OF PERSON OR AGENCY CARRYING OUT PROJECT, IF OTHER THAN LEAD CITY AGENCY: N/A		
CONTACT PERSON Jaclyn Garcia	AREA CODE 928-0606	TELEPHONE NUMBER EXT. (213)

EXEMPT STATUS: (Check One)

- ☐ MI MINISTERIAL
☐ DECLARED EMERGENCY
☐ EMERGENCY PROJECT
☐ GENERAL EXEMPTION
☒ CATEGORICAL EXEMPTION

STATE CEQA GUIDELINES

Sec. 15268

Sec. 15269

Sec. 15269 (b) & (c)

Sec. 15060

Sec. 15300 et seq.

CITY CEQA GUID

Art. II, Sec. 2b

Art. II, Sec. 2a

Art. II, Sec. 2a

n/a

Art. III, Sec. 1

Class 1 Category 1(3), 1(15), 1(20), 4(3), 4(13) (City CEQA Guidelines)

- ☐ OTHER (See California Code of Regulations Sec. 15269)

REGISTRAR - RECORDS/COUNTY CLERK

DATE
January 21 2019DATE
October 21 2018

THIS NOTICE WAS POSTED

JUSTIFICATION FOR PROJECT EXEMPTION:

The project is exempt under City CEQA Guidelines and State CEQA Guidelines. City CEQA Guidelines Class 1(3) states a project is exempt if it involves the operation, repair, maintenance or minor alteration of existing highways and streets, sidewalks, and gutters involving negligible or no expansion of use beyond that previously existing; and does not involve the removal of a scenic resource. Further, City CEQA Guidelines Class 1(15) exempts the installation of traffic signs, signals, and pavement markings, including traffic channelization using paint and raised pavement markers. City CEQA Guidelines Class 1(20) exempts the modernization of an existing highway or street by construction of improvements and adding auxiliary lanes for localized purposes such as turning, involving negligible or no expansion of use beyond that previously existing, except where extensive tree removal will be involved. Moreover, City CEQA Guidelines Class 4(3) exempts new gardening, tree planting, or landscaping, but not including tree removal except dead, damaged or diseased trees or limbs. Finally, City CEQA Guidelines Class 4(13) exempts the creation of bicycle lanes on existing rights-of-way. None of the limitations set forth in State CEQA Guidelines 15300.2 apply. See attached narrative (Attachment A) for further discussion.

IF FILED BY APPLICANT, ATTACH CERTIFIED DOCUMENT OF EXEMPTION FINDING

SIGNATURE [Signature]	TITLE Transportation Planning Associate	DATE 12-20-18
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DISTRIBUTION: (1) County Clerk, (2) City Clerk, (3) Agency Record



Attachment A

Project: Venice Boulevard Great Street Project - Finalized Project and Additional Improvements ("2018 Project")

I. Project Description

The 2018 Project consists of 1) making a set of pedestrian, bicycle, and vehicular improvements along the Venice Boulevard corridor in Council District 11 permanent after they were piloted and evaluated successfully and 2) adding additional vehicular traffic improvements on Venice Boulevard and on nearby streets. The 2018 Project intends to further improve traffic safety and access for all roadway users and address transportation conflicts related to pedestrian, bicycle, and/or vehicle movements.

After being piloted as described below, in *Section II: Project History*, the following improvements will be made permanent: protected and buffered bicycle lanes on Venice Boulevard between Beethoven Street and Inglewood Boulevard, including green-painted sections; dual-left turn lanes on Venice Boulevard and Centinela Avenue, right-turn lanes at intersections along Venice Boulevard; and bus benches, bike racks, trash receptacles, and landscaping installed along the corridor.

The following additional vehicular traffic improvements will be implemented: left-turn signal phasing on Venice Boulevard at Wade Street, and left-turn phasing on Northbound Centinela Avenue at Venice Boulevard. Other traffic improvements may be implemented subject to further evaluation: peak-hour parking restrictions on Centinela Avenue between McCune Avenue and Venice Boulevard, bus boarding island(s) on Venice Boulevard along the pilot project segment, replacing existing traffic bollards with planters; and on neighborhood streets in the project area¹, all-way stop signs, speed humps, and turning restrictions.

II. Project History

This project that was previously approved on November 28, 2016 ("Prior Project") was initiated as part of the City's Great Streets Program, which aims to "serve, support, and strengthen the vibrant corridors that are the backbone of Los Angeles."² Venice Boulevard was selected as the Great Street for Council District 11, with the desire for a project that would support local business, improve safety for all travelers, and foster the "small town downtown" corridor that was desired during the community input process.³

The Prior Project and 2018 Project also lie on the City's High Injury Network, a series of streets in Los Angeles where approximately 65% of traffic deaths and severe injuries of people walking occurred, according to collision records. Prior to the Prior Project, from 2003-2016, 360 collisions involving injury occurred on Venice Blvd. Over half of the serious injuries involved people walking and biking. The City later identified this stretch of Venice Boulevard as a Priority Corridor in the City's first ever Vision Zero Action Plan.⁴

This 2018 Project builds upon the Venice Boulevard Great Street Pilot Demonstration Project (ENV-2016-4488-CE, filed November 28, 2016), completed in May 2017 (Prior Project). The Prior Project resulted from community feedback that culminated from more than two-years of outreach (2015-2016) and over 15 events. The Prior Project included two components that addressed community needs and desires.

One part consisted of a set of permanent installations, including new traffic signals and pedestrian crossings at Venice Boulevard at Meier Street, Bolse Avenue, Ocean View Avenue, and Mountain View Avenue; high-visibility crosswalk upgrades at all intersections within project; signal re-phasing for

¹ For the purpose of installing traffic calming measures along neighborhood streets, the project area is bounded by and includes Beethoven Street to the west, Inglewood Boulevard to the east, Pacific Avenue to the south, and Palms Boulevard to the north.

² Great Streets Studio, L.A. Great Streets, <http://lagreatstreets.org>

³ Great Streets Studio, "Venice Boulevard," L.A. Great Streets, <http://lagreatstreets.org>

⁴ City of Los Angeles, Vision Zero Action Plan, Jan. 2017, <https://www.journag.com/vision-zero-action-plan-2017/3893897001485436685>.

exclusive left-turns at Venice Boulevard and Grand View Boulevard; upgraded sidewalks, community art installations. Those elements are exempt from CEQA, and have already been constructed and completed. The 2018 Project will not substantively modify or reverse them.

In addition, the Prior Project included the following features as a pilot project: protected bicycle lanes on Venice Boulevard between Beethoven Street and Inglewood Boulevard, including green-painted sections; bus benches, bike racks, trash receptacles, and landscaping installed along the corridor; and new right-turn lanes at various intersections along Venice Boulevard (added in October 2017), and dual left-turn lane on Venice Boulevard at Centinela Avenue (added in December 2017) (Pilot Project). Following installation, City staff collected, processed, and analyzed data at various stages after Pilot Project completion. Staff presented the findings to the public and continued to accept public input thereon at regular open houses and project update sessions.

After careful consideration to the data analysis and public feedback, the City plans to make the Pilot Project permanent features, which have demonstrated success in increasing multi-modal activity, reducing severe injuries within the project area, accommodating existing vehicle volumes, and also providing a neighborhood that people enjoy. The 2018 Project also includes additional vehicular traffic improvements outlined in *Section 1: Project Description*.

III. Environmental Review Basis for Categorical Exemption

The 2018 Project comprises elements that are categorically exempt from the California Environmental Quality Act (CEQA). The following discussion provides the exemption criteria that applies to the 2018 Project.

A project qualifies for a Class 1, Category 3 exemption under City CEQA Guidelines and a Class 1(c) exemption under State CEQA Guidelines (CCR Sec. 15301 (c)) if it consists of operation, repair, maintenance, or minor alteration of existing streets, sidewalks, and gutters involving negligible or no expansion of use beyond that previously existing; and does not involve the removal of a scenic resource. Further, a project qualifies for a Class 1, Category 15 exemption if it consists of the installation of traffic signs, signals and pavement markings, including traffic channelization using paint and raised pavement markers. A project qualifies for a Class 1, Category 20 exemption if it consists of the modernization of an existing highway or street by construction of improvements and adding auxiliary lanes for localized purposes such as turning, involving negligible or no expansion of use beyond that previously existing, except where extensive tree removal will be involved. Moreover, a project qualifies for a Class 4, Category 3 exemption under City CEQA Guidelines and a Class 4(b) exemption under State CEQA Guidelines (CCR Sec. 15304 (b)) if it consists of new gardening, tree planting, or landscaping, but not including tree removal except dead, damaged or diseased trees or limbs. Finally, a project qualifies for a Class 4, Category 13 exemption under City CEQA Guidelines and a Class 4(h) exemption under State CEQA Guidelines (CCR Sec. 15304 (h)) if it consists of the creation of bicycle lanes on existing rights-of-way.

The 2018 Project, in its entirety is found to be Categorically Exempt from CEQA. Those project features that were found to be categorically exempt are listed as the following (with associated category in the City's CEQA Guidelines):

- Street restriping to include right turn lanes (Class 1(15)).
- left-turn signal phasing (Class 1(15)).
- right-turn parking restrictions (Class 1(15)).
- peak-hour parking restriction signs and pavement markings (Class 1(15)).
- green conflict zone paint markings (Class 1(15)).
- peak-hour parking restriction (Class 1(20)).
- street planters for lane buffer demarcation (Class 1(20)).
- speed humps (Class 1(20)).



- bus boarding islands (Class 1(20)),
- bus benches, bike racks, trash receptacles (Class 1(20)),
- new landscaping (Class 4(3)), and
- street restriping to modify existing bicycle lanes on an existing right-of-way (Class 4 (13))

Consideration of Potential Exceptions to Use of a Categorical Exemption

The State CEQA Guidelines (CCR Sec 15300.2) limit the use of categorical exemptions in the circumstances that follow. The narrative below substantiates through facts why these exceptions do not apply.

1. Exceptions to the Exemption Based on Project Location. Exemption 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 be significant in a particular sensitive environment. 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.

Those project features covered under the Class 1 categories, such as right-turn pockets, stop signs, and speed humps, are not subject to the location exception.

Those project features that include making permanent the protected bicycle lanes and landscaping on Venice Boulevard are eligible for a Class 4 exemption and therefore are potentially subject to the location exception. However, Class 4 exemptions are qualified by the consideration of whether the project is located in a sensitive environment where it would impact an environmental resource of hazardous or critical concern. Specifically, if upgrading the bicycle lanes were to occur in a sensitive environment that would impact a resource of hazardous and critical concern, then the bicycle lanes would not be eligible to be exempt from CEQA. However, nationwide research has demonstrated effectiveness of channelization, lane reductions, and bicycle lanes in calming traffic.⁵ In contrast to impacting a resource of hazardous and critical concern, the project features are expected to reduce severe roadway collisions of all roadway users, including people in vehicles, people who travel by foot, and people on bicycles.

The 2018 Project is not located in a environmentally sensitive area that has been precisely mapped, or an area of a particular concern. The 2018 Project includes changes in an existing public right-of-way in an urban environment, and does not expand the right-of-way or result in road widening. Given that the bicycle lanes are striped, and landscape and streetscape furniture is installed or maintained within the existing public right-of-way, these element of the 2018 Project would not cause impact on an environmental resource. Additionally, as described in the "Traffic/Transportation" element of Subsection 3: Significant Impact below, the 2018 Project's effects on traffic, transportation networks, and mobility also will not impact a resource of hazardous and critical concern in a sensitive environment.

2. Exceptions to the Exemption Based on Cumulative Impact. This exemption applies when, although a particular project may not have a significant impact, the cumulative impact of successive projects of the same type in the same place, over time is significant.

While other similar projects are occurring elsewhere in the City, they have been determined to be happening in different neighborhoods, locations, and times. Of a list of similar projects completed in 2017 and 2018 to date (Attachment A 1), the closest project, on Washington Boulevard extending from La Brea Avenue to Wellington Road, is five miles from the 2018 Project. This distance exceeds the known factors that can be demonstrated to contribute to impacts (such as noise, air quality, and transportation, etc.) within the project area. Given the nature of the project, this 2018 Project is not anticipated to result in a

⁵ Keith Knapp et al., *Road Diet International Guide*, Nov. 2014, U.S. Department of Transportation Federal Highway Administration, Safety, https://safety.fhwa.dot.gov/road_diets/guidance/info_guide/rdig.pdf and U.S. Department of Transportation Federal Highway Administration, *Crash Modification Factors Clearinghouse*, <http://www.cmfclearinghouse.org/>

cumulative impact when included with successive projects in the same place and over time.

3. Exceptions to the Exemption Based on Significant Impact on the Environment due to Unusual Circumstances. This exception applies when, although the project may otherwise be exempt, there is a reasonable possibility that the project will have a significant effect due to unusual circumstances.

A. No Unusual Circumstances

LADOT found there to be no unusual circumstances that would apply to the 2018 Project that would be considered to contribute to an environmental impact based evaluation and evidence in the record of the Pilot Project. The 2018 Project is similar to other projects the City has contemplated in the Mobility Plan 2035, and others that LADOT has both installed and reviewed pursuant to CEQA. The impact sections below address how unusual circumstances are not present for each impact area of concern.

B. No Significant Impacts

Aesthetics

As stated in Section I: Project Description, the 2018 Project consists of protected bicycle lanes on existing street right-of-way, right-turn pockets, street furniture, left-turn signal phasing, peak-hour parking restrictions, all-way stop signs, and speed humps, none of which constitute a removal of a scenic resource. As such, this exception does not apply.

The Prior Project (substantially completed in May 2017; ENV-2016-4488-CE) involved, within the median of Venice Boulevard, limited tree removal of four Tipuana Tipu trees to accommodate median access ramps at the crosswalks (not located in a manner to be considered a stand of trees that would constitute an aesthetic resource) and their replacement with eight Tipuana Tipu trees by the Urban Forestry Division (UFD). The 2018 Project, however, would not remove or replace any trees nor modify or remove any of the urban forestry work done in the Prior Project.

Air Quality

Air quality impacts from roadway relocation projects were discussed in the Mobility Plan 2035 EIR⁶, which evaluated the environmental impact that would result in completing the entire bicycle lane network throughout the City. The following narrative summarizes that discussion, and concludes that the 2018 Project would not contribute to a significant air quality impact.

Where roadway capacity is reduced, there could be an incremental reduction in vehicle speeds along the affected street segments and there could be a localized incremental increase in carbon monoxide (CO) emissions. Increased localized carbon monoxide concentrations could occur where large amounts of traffic operate under heavily congested conditions and if vehicles would be idling for a substantial period of time. However, recent gains in engine technology has reduced carbon monoxide concentrations as seen in past decades. Existing ambient CO levels are much lower within the South Coast Air Basin, as CO concentrations in the basin have not exceeded State standards since 1992 due to stringent State and federal mandates for lowering vehicle emissions. This is accurate even when considering the most congested City intersections with the highest traffic volumes and largest percentage of vehicle idle time.

The one-hour concentration throughout the City is typically 3 ppm and the 8-hour concentration is typically 2 ppm according to monitoring data. The State and federal 1-hour standards are 20 and 35 ppm, respectively. The State and federal 1-hour standards are both 9.0 ppm. No CO standard has been exceeded in the Basin since 2002. The Basin is designated

⁶ Mobility Plan 2035 Recirculated Draft EIR, Section 4.3



maintenance area for CO which means both State and federal air quality standards are satisfied.

The project location in West Angeles would not be considered an unusual circumstance since the monitored CO concentrations are lower than other part of the region. The 8-hour CO concentration for West Los Angeles was 3.6 parts per million (ppm) in 2000, and is projected to sustain an 8-hour CO concentration of 2.8 ppm through to 2020. This is just over 30 percent of the California Ambient Air Quality Standard (CAAQS) used to determine an impact under CEQA, and is 60 percent of the projected 8-hour CO concentration of Central Los Angeles.

The maximum 8-hour concentration monitored at the West Los Angeles Station, at the VA Hospital in West Los Angeles was 1.15 ppm in 2012, well below the 9.0 8-hr standard.⁷ The Los Angeles CEQA Thresholds Guide refers to the SCAQMD CEQA Air Quality Handbook for appropriate thresholds. The CEQA Thresholds Guide also identifies the following thresholds: the incremental increase due to the 2018 Project is equal to or greater than 1.0 ppm for the California 1-hour CO standard, or 0.45 ppm for the 8-hour CO standard.

To trigger an impact, CO emissions along any roadway segment affected by the similar changes explore in the Mobility Plan 2035, would have to increase by almost 7 times in the peak hour or by four times in over an 8-hour period. Because of the low ambient CO condition, even where speed on an average street segments could be reduced to almost zero, the resulting CO emissions would only increase by a factor of two.⁸ Given that CO hotspot concentrations are relatively lower in West Los Angeles, and the project changes are similar to those explored in the Mobility Plan 2035 that were not found to result in significant impact to air quality. As such, this exception does not apply.

Noise

The work shall be performed in accordance with Ordinance No. 144,331, "Noise Regulation" in Chapter XI of the Los Angeles Municipal Code of March 1982. The City will restrict demolition, construction, and striping on Venice Boulevard in locations near sensitive uses (such as residences) to daytime hours in accordance with the city's noise regulations. The installation process would not be expected to exceed ambient noise by more than 5 dBA for more than 10 continual days, thus there will be no noise impact on the neighborhood immediately surrounding the project area. As such, this exception does not apply.

Biological Resources

The 2018 Project does not involve the loss or alteration to any biological resources. As such, this exception does not apply.

As mentioned in the "Aesthetics" element above, the Prior Project involved the removal and replacement of trees, but the 2018 Project does not involve any further tree removals or replacements.

Traffic/Transportation

The 2018 Project consists of making permanent existing lane striping that reduced the number of through travel lanes to create a dedicated bikeway. Such changes can result in increased travel delay, especially during peak periods, however, the project-related delay are not unusual as would occur with similar roadway reconfiguration projects explored elsewhere in the City. Between 2010 and 2016, the City has implemented 64.5 miles of similar roadway reconfiguration that have resulted in reduction of the travel lane capacity along arterials, many with volumes that are

⁷ Mobility Plan 2035 Recirculated Draft EIR, Page 4-3-13

⁸ CARB, EMAC2014



comparable or higher as compared to Venice Blvd.⁹ The My Figueroa Project is a similar roadway reconfiguration project where the traffic study predicted a potential for up to eight minute delay at one intersection. The City's Mobility Plan EIR disclosed the potential delays of installing an entire network of bicycle lanes along similarly constrained roadway networks, and found that the installation of such facilities could result in substantial travel times at an area-wide level of analysis. The City Council were aware of such adverse effects, and found that the benefits of roadway safety, and greater transportation options, in addition to advances in citywide sustainability, and environmental objectives outweighed the adverse effects of increased travel delay when they certified the EIR and Statement of Overriding Considerations, and adopted the Mobility Plan in 2015, as fully documented in the public record.¹⁰

In addition, substantial travel delay no longer qualifies as an exception under the Section 15300.2 (c) of the CEQA Guidelines that could disqualify a lane striping project covered under a Class 1 or Class 4 exemption due to the adoption and rulemaking procedures of Senate Bill (SB) 743. Upon adopting SB 743 into law, the legislature and Governor directed the Office of Planning and Research (OPR) replace delay and capacity-based metrics such as level of service (LOS) when lead agencies are evaluating transportation impacts under CEQA. The legislature further found that new transportation analysis under CEQA was needed to promote the state's goals of reducing greenhouse gas (GHG) emissions and traffic-related air pollution, promote the development of a multimodal transportation system (including bicycle lanes), and provide clean, efficient access to destinations.

In its document, 'Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA', the OPR recommended that a vehicle miles traveled (VMT) per capita metric replace delay-based metric throughout the State when identifying transportation impacts under CEQA. OPR finds that a VMT per capita metric is in direct correlation with the state's goals of reducing GHG emissions and traffic-related air pollution, promoting the destinations. OPR further finds that delay-based metric of LOS, in congruence with the legislative direction and intent, to be in conflict with achieving improved environmental outcomes, and is ill suited in defining environmental outcomes under CEQA, regardless of location.

In its 'Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA', OPR has further indicated that both active transportation projects (which include bicycle lanes), and transportation projects that reduce number of lanes should generally not lead to substantial increase in VMT,¹¹ and further not be considered to contribute to a significant impact under CEQA. In the presumption of less than significant impacts for active transportation projects, OPR finds that streamlining active transportation projects align with three of the statutory goals of SB 743, which include reducing greenhouse gas emissions, increasing multimodal transportation networks, and facilitating mixed-use development.

In summary, the actions of the California Legislature in adopting SB 743, as well as the record of evidence and preliminary guidance as provided by OPR, Caltrans, and the Natural Resource Agency support the conclusion that travel delay is not considered an exception of hazardous and critical concern that would disqualify the application of a Class 1 or Class 4 Exemption pursuant to Section 15300.2 (c) of the CEQA Guidelines.

With respect to construction-related to the 2018 Project, the work shall be performed in accordance with work area traffic control handbook (WATCH). City construction crews will

⁹ Severin Martinez. 2016. Who Wins When Streets Lose Lanes? An Analysis of Safety on Road Die Angeles. Graduate paper for USC A Lewis Center for Regional Policy Studies.

¹⁰ Department of City Planning. Recommendation Report to City Planning Commission on the Mobility

¹¹ OPR. 2016. Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts, and Discussion Draft of the Technical Advisory on Evaluating Vehicle Miles Traveled in CEQA.



coordinate with schools and Department of Transportation according to WATCH and provide flaggers when required. When the activity site encroaches upon a sidewalk, walkway or crosswalk area, pedestrians shall be provided advance warning if they are detoured away from the activity site. Advance notification of sidewalk closures shall be provided according to WATCH. At least one lane of traffic in each direction will be maintained at all times. Standard conditions and construction practices are anticipated for the 2018 Project. No unusual construction noise or traffic effects are anticipated. No reasonable possibility has been identified that the project will have a significant effect due to unusual circumstances. As such, this exception does not apply.

4. 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 highway.

Venice Boulevard is a City-designated scenic highway between Abbot Kinney Boulevard and Longwood Avenue—including the project corridor—as a wide street with a landscaped median. However, the 2018 Project does not include the removal of existing trees or median and would not impact or result in the degradation of any aesthetic, biological, or historic resources, and therefore this exception does not apply.

5. Hazardous Waste Sites. This exception applies when a project is located on a site listed as a hazardous waste site under Government Code Section 65962.5.

As of December, 2018, the California Environmental Protection Agency (CalEPA) Cortese List resource (<https://calepa.ca.gov/sitecleanup/cortese/list/>) does not reflect sites of concern in the immediate area in which the 2018 Project will take place.¹² All project work will be limited to transportation improvements within existing rights-of-way. Therefore, this exception has no application here.

6. Historical Resources. This exception applies when a project may cause a substantial adverse change in the significance of a historical resource. None of the City's Declared Monuments on the Historic-Cultural Monument (HCM) List are located in the immediate project area.¹³ Moreover, the 2018 Project comprises work within the public right-of-way that would not lead to adverse change in the significance of any known historical resource.

The 2018 Project would occur on existing streets and sidewalks, with no more than two feet in depth of excavation. The depth of demolition and excavation is not anticipated to exceed the depth of previously disturbed soil.

In case of any historical artifacts being encountered, City Engineer Standard Specifications, Section 6-3.2, (Greenbook, 2012) states: "If discovery is made of items of archaeological or paleontological interest, the Contractor shall immediately cease excavation in the area of discovery and shall not continue until ordered by the Engineer." Therefore, during activities in which there will be ground disturbances (i.e., digging, drilling, etc.) if any evidence of archaeological, cultural, or paleontological resources are found, all work within the vicinity of the find shall stop until a qualified archaeologist can assess the finds and make recommendations. No excavation of any finds should be attempted by project personnel unless directed by a qualified archaeologist. Construction activities may continue in other areas. If the discovery proves significant under CEQA (Section 15064.5f; Public Resources Code or PRC 21082), additional work such as testing or data recovery may be warranted.

¹² California Environmental Protection Agency. Cortese List Data Resources, last accessed December 12, 2018, <https://calepa.ca.gov/sitecleanup/cortese/list/>.

¹³ City of Los Angeles Office of Historic Resources. "Historic-Cultural Monument (HCM) List" last updated April 3 <http://preservation.lacity.org/commission/designated-historic-cultural-monuments>

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The discovery of human remains is always a possibility during ground disturbances; State of California Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the Los Angeles County Coroner has made a determination of origin and disposition pursuant to PRC Section 5097.98. The Los Angeles County Coroner must be notified of the find immediately. If the human remains are determined to be prehistoric, the Coroner will notify the Native American Heritage Commission, which will determine and notify a Most Likely Descendent (MLD). The MLD shall complete the inspection of the site within 48 hours of notification and may recommend scientific removal and nondestructive analysis of human remains and items associated with Native American burials.

In case of unforeseen discovery of cultural resources, measures are in place to manage unanticipated cultural resource finds or discovery of human remains. Therefore, no substantial adverse impact to cultural resources is anticipated.

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Attachment A.1 - Project List of Completed Roadway Reconfigurations (2017 - 2018 to date)

Street	Extent 1	Extent 2	Distance (mi)	Implemented Date	Old Configuration	New Configuration
Foothill Boulevard	Westworth Avenue	Sunland Avenue	0.67	3/9/2017	2 lanes in each direction with center turn lane	1 lane in each direction with center turn lane
Glendale Boulevard	Reservoir Street	Lake Shore Avenue (Southbound)	0.08	4/5/2017	2 lanes southbound, 3 lanes northbound with median and curbside parking on west side of street	2 lanes in each direction with median and curbside parking on west side of street
North Broadway	Avenue 18	Avenue 21	0.22	6/26/2017	2 lanes in each direction with center turn lane and on-street parking, 3rd lane in peak direction during rush hour	2 lanes in each direction with center turn lane and full-time on-street parking on south side of street, 3rd peak hour lane in westbound direction
North Broadway	Avenue 21	Thomas Street	0.77	6/26/2017	2 lanes in each direction with center turn lane and on-street parking, 3rd lane in peak direction during rush hour	2 lanes in each direction with center turn lane and full-time on-street parking in both directions
North Broadway	Thomas Street	Lincoln Park Avenue	0.15	6/26/2017	2 lanes in each direction with center turn lane and on-street parking, 3rd peak hour lane in westbound direction	2 lanes in each direction with center turn lane and full-time on-street parking in both directions
Washington Boulevard	La Brea Avenue	Wellington Road	0.75	6/26/2017	2 lanes in each direction with center turn lane and curbside parking, 3rd lane during peak hours	2 lanes in each direction with center turn lane and curbside parking, 3rd lane in westbound direction only during peak hours
Washington Boulevard	6th Avenue	Western Avenue	0.8	6/26/2017	2 lanes in each direction with center turn lane and curbside parking, 3rd lane in westbound direction during peak hours	2 lanes in each direction with center turn lane and full-time curbside parking on both sides of street
Washington Boulevard	Western Avenue	Vermont Avenue	0.95	6/26/2017	2 lanes in each direction with center turn lane and curbside parking, 3rd lane in each direction during peak hours	2 lanes in each direction with center turn lane and full-time curbside parking on both sides of street
Manchester Avenue	Haas Avenue	Saint Andrews	0.35	6/29/2017	2 lanes in each direction with curbside parking and center turn lane, 3rd eastbound lane during peak hours	2 lanes in each direction with center turn lane and full-time curbside parking
Manchester Avenue	Saint Andrews	Western Avenue	0.1	6/27/2017	2 lanes in each direction with center turn lane and curbside parking, 3rd lane in both directions during peak hours	2 lanes in each direction with center turn lane and full-time curbside parking
Jefferson		Arnold Street	0.64	7/20/2017	2 lanes westbound, 2 lanes eastbound with 3rd peak hour lane, center turn lane	2 lanes in each direction with center turn lane

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6th Street	Fairfax Avenue	Cannon Avenue	0.36	7/15/2018	2 lanes in each direction with curbside parking	1 lane eastbound, 2 lanes westbound with center turn lane and curbside parking
Monterey Road	Via Marconi	Pulman	0.31	2/13/2018	2 lanes northbound, 1 lane southbound with center turn lane, on-street parking and bike lanes	1 lane in each direction with turn lane, on-street parking and buffered bike lanes
La Tuna Canyon Road	4810' W/O South La Tuna Canyon Road	7850' W/O South La Tuna Canyon Road	0.51	8/8/2018	2 lanes in each direction	1 lane in each direction
La Tuna Canyon Road	Honolulu Avenue	4180' w/o Honolulu Avenue	0.49	6/8/2018	2 lanes in each direction	1 lane in each direction
La Tuna Canyon Road	WB Foothill Ferry On-Ramp	4180' w/o Honolulu Avenue	0.42	6/8/2018	2 lanes eastbound, 1 lane westbound	1 lane in each direction
La Tuna Canyon Road	WB Foothill Ferry On-Ramp	South La Tuna Canyon Road	0.19	6/8/2018	2 lanes in each direction	1 lane in each direction with turn pocket
La Tuna Canyon Road	South La Tuna Canyon Road	3040' W/O South La Tuna Canyon Road	0.57	6/8/2018	2 lanes in each direction	1 lane in each direction
Alambrera Avenue	Brakeley Street	Druid Street	0.57	6/8/2018	2 lanes in each direction with center turn lane and curbside parking	1 lane eastbound, 2 lanes westbound with center turn lane, curbside parking and bike lanes
Alambrera Avenue	Druid Street	Lowell Avenue	0.11	6/8/2018	2 lanes in each direction with curbside parking	1 lane in each direction with center turn lane, curbside parking, and bike lanes
Alambrera Avenue	Lowell Avenue	Alambrera City Boundary	0.07	6/28/2018	2 lanes in each direction	1 lane eastbound, 2 lanes westbound with center turn lane and eastbound buffered bike lane
Figueras Street	Emerson Boulevard	30th Street	0.50	7/1/2018	3 lanes northbound with 4th peak-hour lane, 2 lanes southbound with 3rd peak-hour lane, center turn lane, and curbside parking	2 lanes in each direction with center turn lane, curbside parking
Figueras Street	30th Street	23rd Street	0.48	7/1/2018	3 lanes northbound with 4th peak hour lane, 2 lanes southbound, center turn lane and curbside parking	2 lanes in each direction with center turn lane, curbside parking
Figueras Street	23rd Street	Venice Boulevard	0.5	7/1/2018	3 lanes northbound with 4th bus only lane, 2 lanes southbound, center turn lane and curbside parking	2 lanes northbound with 1 full-time bus lane, 2 lanes southbound, center turn lane, curbside parking in northbound direction
Figueras Street	Venice Boulevard	11th Street	0.46	7/1/2018	3 lanes northbound with 4th peak-hour bus lane, 2 lanes southbound, center turn lane, curbside parking in northbound direction	2 lanes northbound with 1 full-time bus lane, 2 lanes southbound, center turn lane, curbside parking in northbound direction

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Figueras Street	4th Street	Olympic Boulevard	0.08	7/1/2018	3 lanes northbound with 4th peak hour bus lane, 2 lanes southbound center turn lane curbside parking in northbound direction	2 lanes northbound with 1 full-time bus lane center turn lane, and 1 lane southbound
Figueras Street	Olympic Boulevard	9th Street	0.08	7/1/2018	3 lanes northbound with 4th peak hour bus lane, curbside parking	2 lanes northbound with 1 full-time bus lane and curbside parking in northbound direction
Figueras Street	9th Street	8th Street	0.12	7/1/2018	3 lanes northbound with 4th peak hour bus lane, curbside parking	3 lanes northbound with 1 full-time bus lane and curbside parking
4th Street	Broadway	Flower Street	0.35	7/1/2018	2 lanes westbound, with curbside parking	1 lane westbound, with curbside parking
11th Street	Flower Street	Figueras Street	0.07	7/1/2018	2 lanes westbound, 1 westbound right turn lane, center turn lane, and 1 lane eastbound	1 lane in each direction with center turn lane
Song Street	3rd Street	9th Street	0.21	8/30/2018	2 lanes southbound with 3rd peak hour lane on east side of street, curbside parking on both sides	2 lanes southbound with full-time curbside parking on both sides
Chickworth Street	Artista Avenue	Chickworth Drive	0.67	10/31/2018	2 lanes in each direction with center turn lane and curbside parking	1 lane in each direction with center turn lane and curbside parking

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CITY OF LOS ANGELES
CALIFORNIA

Seleta Reynolds
GENERAL MANAGER



ERIC GARCETTI
MAYOR

DEPARTMENT OF TRANSPORTATION
100 South Main Street, 10th Floor
Los Angeles, California 90012
(213) 972-8470
FAX (213) 972-8410

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Dec 21 2018

John C. Legar, Register - Transportation Desk

Registration number: 11001015600

Date: December 20, 2018

Council No.:
Plan Area:

11 - Bonin
Palms - Mar Vista -
Del Rey

Subject: Notice of General Manager's Determination - Venice Great Street - Finalized Project and Additional Improvements ("2018 Project")

To Interested parties:

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The City of Los Angeles adopted the Mobility Plan 2035, the Transportation Element of the City's General Plan on January 20, 2016. The Mobility Plan 2035 provides the policy foundation for achieving a transportation system that balances the needs of all road users. The City of Los Angeles Department of Transportation (LADOT) is an implementing agency of the Mobility Plan 2035, and serves as the Lead City Agency pursuant to review required by the Division 13 of the Public Resources Code (PRC) for the 2018 Project.

As part of the Venice Great Street, previously approved November 28, 2016 (Prior Project), LADOT tested a pilot demonstration on 0.80 miles of Venice Boulevard (Pilot Project) and made permanent improvements within the existing rights-of-way from Beethoven Street to Inglewood Boulevard. The Prior Project reflected the results of a two-year public outreach process lead by the Great Streets Initiative, Council District 11, and LADOT. The Pilot Project used paint and temporary materials to install new buffered and protected bicycle lanes supplemented with green paint, a lane reconfiguration from three to two lanes in each direction, dual-left turn lanes on Venice Boulevard at Centinela Avenue, and right-turn lanes at intersections along Venice Boulevard. LADOT made other permanent improvements that were separately exempt from the Pilot Project, such as high-visibility crosswalk installations and upgrades, leading-pedestrian intervals, left-turn signal phasing, and four new signals and pedestrian crossings. The Pilot Project was necessary to test the success at improving public safety, facilitating multi-modal activity, and activating the Mar Vista downtown corridor on Venice Boulevard.

LADOT evaluated the success of the Pilot Project across several goals - mobility, economy, safety, and neighborhood character. After careful consideration of the evaluation results and public feedback, LADOT finds that the Pilot Project demonstrates success at increasing multi-modal activity and reducing

severe injuries, and the Pilot Project also accommodates existing vehicular volumes while providing a street that residents feel is safe and enjoyable.

LADOT will also make Additional Improvements to further improve safety and circulation on and around Venice Boulevard. These improvements are noted in the below Approval and attached Notice of Exemption and Narrative on file.

DETERMINATION

Pursuant to the Los Angeles Municipal Code (LAMC) Sections 80.08.2 and Section 89.01, I hereby:

Determine based on the Notice of Exemption and Narrative on file with LADOT that the Finalized Project consisting of 0.80 miles of new buffered and protected bicycle lanes, lane reconfigurations, dual left-turn lanes, right-turn channelization, and left-turn signal phasing on Venice Boulevard within the existing rights-of-way from Beethoven Street to Inglewood Boulevard are exempt from the California Environmental Quality Act (CEQA) pursuant to City CEQA Guidelines Class 1(3), Class 1(15), Class 1(20), Class 4(3), and Class 4(13).

Determine based on the Notice of Exemption and Narrative on file with LADOT that the Additional Improvements consisting of left-turn phasing on Venice Boulevard at Wade Street, left-turn phasing on Northbound Centinela Avenue at Venice Boulevard, peak-hour parking restrictions on Centinela Avenue between McCune Avenue and Venice Boulevard, bus boarding island(s) on Venice Boulevard within the existing rights-of-way from Beethoven Street to Inglewood Boulevard, and replacing existing traffic bollards with planters; and on neighborhood streets in the project area, installing all-way stop signs, speed humps, and turning restrictions are exempt from the California Environmental Quality Act (CEQA) pursuant to City CEQA Guidelines Class 1(3), Class 1(15), Class 1(20), Class 4(3), and Class 4(13).

Approve the Finalized Project to make permanent the Pilot Project on Venice Boulevard within the existing rights-of-way from Beethoven Street to Inglewood Boulevard that includes 0.80 miles of new buffered and protected bicycle lanes, lane reconfigurations, dual left-turn lanes, and right-turn channelization, and left-turn signal phasing. This is based on the results of a comprehensive one-year pilot study that demonstrated the Pilot Project's success at increasing multi-modal activity, reducing severe injuries, accommodating vehicular demand, and receiving support from the community.

Approve Additional Improvements, which include left-turn phasing on Venice Boulevard at Wade Street, left-turn phasing on Northbound Centinela Avenue at Venice Boulevard, and other improvements deemed necessary as a result of further evaluation and described in the attached Notice of Exemption.



Seleta Reynolds
General Manager



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LADOT - Los Angeles Department of Transportation
LADOT is a part of the City of Los Angeles