


**CITY OF LOS ANGELES**  
**INTER-DEPARTMENTAL MEMORANDUM**

Date: February 14, 2019

To: Honorable City Council  
c/o City Clerk, Room 395  
Attention: Honorable Mike Bonin, Chair, Transportation Committee

From: Seleta J. Reynolds, General Manager   
Department of Transportation

Subject: **CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) APPEAL OF NOTICE OF EXEMPTION FOR VENICE BOULEVARD GREAT STREET PROJECT - FINALIZED PROJECT AND ADDITIONAL IMPROVEMENTS (PROJECT) (COUNCIL FILE (CF) 19-0092)**

**SUMMARY**

This report responds to CF19-0092 notice of appeal filed on January 25, 2019 by the Westside Los Angeles Neighbors Network, Inc. The Los Angeles Department of Transportation (LADOT) reviewed the appellant's justifications for appeal and recommends that the City Council uphold the LADOT determination that the project is exempt from CEQA pursuant to sections 15301 and 15304 of the CEQA Guidelines, and that none of the exception criteria in Section 15300.2 of the CEQA Guidelines apply.

**RECOMMENDATION**

- 1) DENY the CEQA Section 21151 (c) appeal;
- 2) DETERMINE that the Venice Boulevard Great Street Project - Finalized Project and Additional Improvements (Project) is categorically exempt under CEQA after considering the Notice of Exemption on file and the response included in this report;
- 3) ADOPT AND CONCUR with the Project as approved by the Los Angeles Department of Transportation; and
- 4) DIRECT Department staff to file a Notice of Exemption with the Los Angeles City Clerk and the Los Angeles County Clerk.

**BACKGROUND**

As part of the Venice Boulevard Great Street Project, previously approved on November 28, 2016 (Prior Project), LADOT tested a pilot demonstration on 0.80 miles of Venice Boulevard (Pilot Project) and implemented 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, and right-turn lanes at intersections along Venice Boulevard. LADOT installed other permanent improvements that are separately exempt from the Pilot Project, such as high-visibility crosswalks and upgrades, leading-pedestrian intervals, left-turn signal phasing, dual left-turn lanes on Venice Boulevard at Centinela Avenue, and four new signals and pedestrian crossings. The Pilot Project was necessary to assess whether design improvements supported and strengthened the corridor, provided safety for all modes of travel, continued the growth of local businesses, and improved placemaking for Mar Vista.

With one year of collected data, 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 determined that the Pilot Project was safe, efficient, good for business, and supported by residents. These findings are supported by data that demonstrated reduced bicyclist collisions, increased multi-modal activity, negligible change in vehicle volumes and travel times, increased business revenue, and positive public survey results. On December 20, 2018, LADOT recommended that the following Pilot Project features become permanent - protected and buffered bicycle lanes on Venice Boulevard between Beethoven Street and Inglewood Boulevard, including green-painted sections; right-turn lanes at intersections along Venice Boulevard; and bus benches, bike racks, trash receptacles, and landscaping installed along the corridor.

In direct response to the report findings, LADOT implemented the following additional improvements since December 20, 2018 - left-turn signal phasing on Venice Boulevard at Wade Street; peak-hour parking restrictions on Centinela Avenue between McCune Avenue and Venice Boulevard; and all-way stop signs on Victoria Avenue and Charnock Road. Subject to further public outreach, evaluation, and feasibility, LADOT may implement other traffic improvements including bus boarding island(s) on Venice Boulevard along the Project segment, planters that replace existing traffic bollards, and additional traffic calming measures such as speed humps and turning restrictions on neighborhood streets within the project area.<sup>1</sup>

On December 21, 2018, LADOT filed a Notice of Exemption (NOE) for the Project (Attachment 1), which was approved through a LADOT General Manager's Determination on December 20, 2018.

On January 25, 2019, Westside Los Angeles Neighbors Network, Inc. (Channel Law Group, LLP, Representative) filed an appeal of LADOT's determination that the Project is exempt under CEQA with the City Council (CEQA, Public Resources Code, Section 21151(c)). The CEQA appeal challenges the application of the exemption, alleging that the Project failed to qualify for an exemption under the categories described in Sections 15301 and 15304 of the CEQA Guidelines. Pursuant to state law and the City's Municipal Code, the LADOT General Manager's Determination itself is not before the City Council - only the CEQA environmental determination.

## DISCUSSION

Upon receipt of the appeal, the Department reviewed the appellant's arguments and determined that LADOT appropriately analyzed the Project under CEQA. The following provides detailed responses to each of the appellant's Justifications for Appeal.

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<sup>1</sup> 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.

**Appeal Comment 1:**

The City (of Los Angeles) 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.

**City Response 1:**

LADOT determined that the Project qualifies as minor alteration of an existing street due to negligible or no expansion of an existing use under the State CEQA Guidelines sections 15301(c). The Project qualifies as a minor alteration of the existing highway because it repurposes space in the existing paved roadway through placement of striping, landscaping, and bollards that are all considered exempt activity under CEQA, and does not expand the physical area which could contribute to a physical impact to environmentally sensitive resources (i.e., biology, geology, cultural, historic, etc.), nor does it substantially alter the existing use of the street.

The findings of the *Venice Great Streets One-Year Evaluation Report* do not support the conclusion that the Pilot Project resulted in adverse traffic or environmental impacts. While the Project did reduce travel lane carrying capacity, LADOT determined that the Project is able to carry existing travel demand, noted through Average Daily Traffic (ADT) traffic volumes that closely match volumes collected prior to the installation of the Project (see *Venice Boulevard Great Streets One-Year Evaluation Report*).<sup>2</sup> Traffic volumes were measured on Venice Boulevard before the Pilot Project was constructed (September 2015), and measured again at the one-month, three-month, six-month, 12-month, and 15-month periods after the project was completed. Traffic volumes at the 15-month period (46,662 ADT) show only a 1.7% decrease when compared to 2015 levels (47,471 ADT). These findings conclude that the roadway modification is able to accommodate existing demand. Additional data shows that current travel times exceeding a 30 second increase over travel times observed prior to the Project exist for less than 10% of the day. The average speed of vehicles traveling midday are also within 1 MPH of speeds found prior to the Pilot Project.

Traffic delay in itself is no longer considered a contributing factor to an impact under CEQA. The narrative provided in Attachment 1 of the Categorical Exemption filed with the Los Angeles County Clerk on December 21, 2018, makes clear that the Project may result in additional travel delay, though such travel delay no longer qualifies as an exception under 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) to replace delay and capacity-based metrics such as level of service (LOS) when lead agencies are evaluating transportation impacts under CEQA.

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<sup>2</sup> Los Angeles Department of Transportation. Venice Boulevard Great Streets One-Year Evaluation Report. 2018.  
[https://static1.squarespace.com/static/595fd8fa5016e119d794e4b1/t/5c1c0c3fcd836656561d106f/1545342048197/VeniceBlvd\\_1-Year\\_Report\\_FINAL\\_.pdf](https://static1.squarespace.com/static/595fd8fa5016e119d794e4b1/t/5c1c0c3fcd836656561d106f/1545342048197/VeniceBlvd_1-Year_Report_FINAL_.pdf)

Under new CEQA Guidelines section 15064.3 (adopted January 1, 2019), “a project’s effect on automobile delay shall not constitute a significant impact.”, and the State has officially adopted the changes to CEQA Guidelines that direct lead agencies to evaluate transportation projects based on vehicle miles traveled (VMT), partially based on aligning the impact metric with the statutory goal to increase multimodal transportation networks. The project does increase multimodal transportation networks by adding additional protected bicycle lane elements along a street that is designated as a Tier 1 Protected Bicycle Lanes street, referred to as the Bicycle Enhanced Network in the City’s Mobility Plan 2035.

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.

The appellant notes that Venice Boulevard is an existing tsunami evacuation and disaster route. Only the segment of Venice Boulevard from the western City limits to Abbot Kinney Boulevard is within the Tsunami Inundation Area as established by the State.<sup>3</sup> In the event of a tsunami, residents that live on or adjacent to Venice Boulevard west of Abbot Kinney Boulevard should use Venice Boulevard to travel east of Lincoln Boulevard. Those east of Lincoln Boulevard, including those on or adjacent to the Project boundary, would have no need to evacuate in the instance of a tsunami.

The appellant also alleges that LADOT did not disclose public safety impacts that should be subject to a CEQA review. The public safety impact under CEQA normally results if the Project requires the addition of a new fire station, or the expansion, consolidation, or relocation of an existing facility to maintain service, and that new facility would result in environmental impacts (see LA CEQA Thresholds Guide, Section K.2<sup>4</sup>). LADOT worked with LAFD to ensure that emergency response times are not impacted as a result of the Project. LADOT provided transponders to LAFD that preempt traffic signals to the ‘green’ phase, which allows LAFD emergency vehicles to travel through the corridor more efficiently. The Project does not require either new or expansion of public safety facilities that would result in any environmental impacts that would disqualify the application of a Class 1 or Class 4 Exemption pursuant to Section 15300.2 (c) of the CEQA Guidelines.

**Appeal Comment 2:**

The Project does not conform to the guidelines set forth in the *Road Diet Informational Guide - Safety* on the Federal Highway Administration website. Venice Boulevard was an arterial highway with seven lanes and an 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 concepts should have been subject to CEQA review.

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<sup>3</sup> State of California. 2009. Tsunami Inundation Map for Emergency Planning.  
[https://www.conservation.ca.gov/cgs/Documents/Tsunami/Maps/Tsunami\\_Inundation\\_Venice\\_Quad\\_LosAngeles.pdf](https://www.conservation.ca.gov/cgs/Documents/Tsunami/Maps/Tsunami_Inundation_Venice_Quad_LosAngeles.pdf)

<sup>4</sup> LA CEQA Thresholds Guide. 2006. <http://planning.lacity.org/Documents/MajorProjects/CEQAThresholdsGuide.pdf>



**City Response 2:**

The *Road Diet Informational Guide - Safety*<sup>5</sup>, referred to by the appellant, is an Informational Guide Book only and does not govern the decision making processes of any agency. In addition, the informational guide does not state that roadways outside of the FHWA-studied ADT ranges could pose adverse impacts to the environment and should be subject to federal or state environmental review. The FHWA guide does not include any recommendations against, or otherwise prohibits, the use of road diets on streets that exceed a certain ADT threshold. Instead, the FHWA recommends that agencies perform additional analysis to consider the feasibility of a road diet conversion on roadways with higher ADT's, including the consideration of peak hour volumes by direction, signal spacing, turning volumes at intersections, and other access points. LADOT analyzed many datasets to inform the project's design, including peak hour volumes, turning volumes, and the overall collision data across the corridor.

**Appeal Comment 3:**

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.

**City Response 3:**

The appellant claims that the Project is improperly piecemealed for environmental review purposes because the Palms - Mar Vista - Del Rey Community Plan is currently being updated. The City initiated the process for updating the Westside Community Plans, which includes the Palms - Mar Vista - Del Rey Community Plan. However, the Project implements the Bicycle Enhanced Network of the Mobility Plan 2035, which was adopted by City Council on September 7, 2016 (Council File No. 15-0719-S15) and is independent of the Community Plan update process. The City's initiation of the community plan process does not prevent the City from taking actions, such as issuing permits, or making decisions on street operations that may affect the plan area.

Furthermore, the Community Plan update may include policies that affect the designation of transportation facilities in Mar Vista, and LADOT will consider how those policies may direct future changes in the project area when the Community Plan is adopted by the City Council. However, these are separate actions, and the Project does not constitute improper segmenting as the appellant alleges.

**Appeal Comment 4:**

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.

**City Response 4:**

As part of the Prior Project completed in May 2017, seven trees were removed to install new high-visibility crosswalks on Venice Boulevard that better connect the north and south sides of

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<sup>5</sup> Federal Highway Administration. Road Diet Informational Guide. 2014. [https://safety.fhwa.dot.gov/road\\_diets/guidance/info\\_guide/rdig.pdf](https://safety.fhwa.dot.gov/road_diets/guidance/info_guide/rdig.pdf)

the street. An LADOT contractor removed seven trees of various species - two Windmill Palm, one Tipuana, one Eucalyptus, one Bottlebrush, two African Fern Pines, all located between 12102 and 12756 Venice Boulevard. This tree removal was not extensive, and contributed little in habitat value due to its location along a high-volume median that was at minimum 1.5 miles from the State-owned Ballona Wetlands Ecological Reserve. In compliance with the City's tree replacement standards, the LADOT contractor was required to replant a total of 14 trees. Eight Australian Willow trees were planted at 12011, 12114, 12226, 12310, 12316, 12318, 12446, 12814 Venice Boulevard. Six Pink Trumpet trees were planted in the center median islands on Venice Boulevard between Centinela Avenue and Beethoven Street.

For the Prior Project, ENV-2016-4488-CE, filed November 28, 2016, the tree removal was part of the action that was classified as operation, repair, maintenance or minor alteration of existing street, sidewalk, and gutter, involving negligible or no expansion beyond previously existing use. In addition, staff found that the removed trees were not located in a manner to be considered a stand of trees that constitute an aesthetic resource. This action is exempt under Article III, Section 1, Class 1, Category 3 of the City of Los Angeles Environmental Quality Act Guidelines (2002); and none of the exceptions to the use of a categorical exemption as set forth in Section 15300.2 of the State CEQA Guidelines apply. The tree removal has been approved and completed without appeal or challenge.

The appellant makes similar claims around neighborhood traffic volumes and disruption to wildlife as the result of noise in both Comment 4 and Comment 7. LADOT has provided a response to alleged neighborhood disruption as the result of the Project, see City Response 7.

**Appeal Comment 5:**

The Project involves the reduction in 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 seven lane arterial to five 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.

**City Response 5:**

Similar to City Response 1, LADOT determined that the Venice Boulevard Great Street Project qualifies as minor alteration of an existing street due to negligible or no expansion of an existing use under the State CEQA Guidelines sections 15301(c). The Project qualifies as a minor alteration of the existing highway because it repurposes space in the existing paved roadway, and does not expand the existing use of the street.

LADOT cannot confirm which Federal Highway Administration criteria the appellant is referring to. If appellant is referring to the Federal Highway Administration *Road Diet Informational Guide - Safety* document, this is an informational guide only and does not act as a governing document that requires compliance by any agency. More importantly, deviation from this guiding document does not constitute an environmental impact that would disqualify the application of a Class 1 or Class 4 Exemption pursuant to Section 15300.2 of the CEQA Guidelines.

**Appeal Comment 6:**

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 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.

**City Response 6:**

The appellant alleges that the LADOT erred in applying the exemption, as the Project modifies an existing bicycle lane as opposed to creating new bicycle lanes. Staff finds that modifying an existing bicycle lane is an exempt activity under Section 15301(c) of the CEQA Guidelines because it is a minor alteration of a roadway that does not result in environmental impacts. LADOT also found that the Project included activities that are exempt under Section 15304 of the CEQA Guidelines where the Project scope includes creating bicycle lanes and installing landscaping. Installing bicycle lanes with higher protection from motor traffic achieves statewide goals of providing more attractive multimodal transportation options and reducing transportation-related greenhouse gas emissions as outlined in SB 743. Staff finds that the class 1 and 4 of exemptions in Sections 15301(c) and 15304 were correctly applied to the Project.

City CEQA Guidelines section 4(13) conforms verbatim to State CEQA Guidelines section 15304(h). Furthermore, State CEQA Guidelines section 15304’s list of exempt activities is not exclusive (provides “[e]xamples [that] include but are not limited to”), and the “modification” of a bicycle lane on an existing right-of-way would be a lesser included activity to the “creation” of a bicycle lane that is expressly categorically exempt. New CEQA Guidelines section 15031(c) (adopted January 1, 2019) makes clear that “alterations” of existing rights-of-way, including bicycle lanes, are categorically exempt from CEQA.

**Appeal Comment 7:**

The Project is 2-4 miles from Ballona Wetlands and has created noise and disruption on previous quiet, residential, tree-lined streets. The potential effect of this on local migratory birds could be significant.

**City Response 7:**

The appellant alleges that the project resulted in increased noise that could potentially affect local migratory birds, but does not provide evidence that there is either substantial increase in noise due to additional traffic on residential streets, or that such an increase is substantial enough to adversely impact migratory birds.

The Mobility Plan 2035 EIR considered the noise impacts of roadway capacity reducing projects along the Bicycle Enhanced Network, which the Project partly implements. The EIR concluded that while projects that reduce roadway capacity could increase traffic diverted onto lower volume residential streets that are parallel to major arterials, the increase in noise would not be substantial enough to result in a significant impact.

Based on the Los Angeles CEQA Thresholds Guide, a proposed project has a significant impact on noise levels from operations, including mobile noise, if:

Ambient noise level measured at the property line of affected uses increases by 3 dBA CNEL to or within the “normally unacceptable” or “clearly unacceptable” range designed for specific land use categories, or any 5 dBA or more increase in noise level.

The neighborhood surrounding the project area that includes affected local streets is comprised of both single family and multi-family residential land uses. The LA CEQA Threshold Guide defines 70 dBA CNEL as the minimum threshold for normally unacceptable range for these land uses. LADOT collected vehicle counts for four parallel streets neighboring Venice Boulevard that include two local streets of Pacific Avenue and Victoria Avenue, and two collector streets of Charnock Road and Palms Boulevard. Vehicle volumes collected approximately 15 months after the Project was completed show volume increases along local streets of Pacific Avenue and Victoria Avenue average approximately 13 to 35 additional vehicles per hour for the 24-hour period (See Venice Boulevard Great Streets One-Year Evaluation Report<sup>6</sup>). Collected traffic volumes on the lower volume local and collector streets (Charnock Road, Pacific Avenue, Victoria Avenue) indicate demands of approximately 4,000 ADT or less that are relatively consistent with, if slightly higher than previous volumes collected before the lane reconfiguration was installed. However, this traffic volume is still well below the reference 10,000 ADT for streets shown to produce a noise level of 69 dBA CNEL, as provided the Mobility Plan 2035 EIR<sup>7</sup>.

Charnock Road and Palms Boulevard are both classified as ‘Collector’ streets that provide linkages between local streets and arterials, and Palms Boulevard was already accommodating high vehicle volumes before the Pilot Project. According the California Department of Transportation *Technical Noise Supplement*, an automobile generates a noise level of 59 dBA at 25 miles per hour and 66 dBA at 35 miles per hour.<sup>8</sup> Any trips diverted from the Project to local streets would likely travel at slower speeds than they would along Venice Boulevard, due to the high frequency of stop controlled intersections. As part of the Project, LADOT installed several strategies to reduce the very small volume of neighborhood cut through, including (2) new stop signs on Victoria Avenue, (2) new stop signs on Charnock Avenue, and peak hour parking restrictions on Centinela Avenue to improve flow. Therefore, diverted traffic is unlikely to result in higher overall noise impacts to sensitive uses.

Additionally, the project is in an urban built-out area, where the nearest portion of the Project is over 1.5 miles away from the Ballona Wetlands. The appellant presents no evidence that higher increase in traffic on local streets exceeds an acceptable threshold that would impact migratory bird species. Such a conclusion based on the appellant’s statements, as well as the evidence in the record, is remote and speculative.

The City of Los Angeles Environmental Impact Report to the Mobility Plan 2035 provides necessary mitigation measures for the Ballona Wetlands habitat (B2) for projects that physically extend into the wetland habitat. In this instance, the nearest portion of the Project is over 1.5 miles away from the Ballona Wetlands, and does not extend into the Ballona Wetlands, so the

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<sup>6</sup> Los Angeles Department of Transportation. Venice Boulevard Great Streets One-Year Evaluation Report. 2018. [https://static1.squarespace.com/static/595fd8fa5016e119d794e4b1/t/5c1c0c3fcd836656561d106f/1545342048197/VeniceBlvd\\_1-Year\\_Report\\_FINAL\\_.pdf](https://static1.squarespace.com/static/595fd8fa5016e119d794e4b1/t/5c1c0c3fcd836656561d106f/1545342048197/VeniceBlvd_1-Year_Report_FINAL_.pdf)

<sup>7</sup> City of Los Angeles Mobility Plan 2035 Recirculated Draft EIR. February 2015. Page 4.5-6

<sup>8</sup> California Department of Transportation (Caltrans), Technical Noise Supplement, November 2009.

Project does not require measures to mitigate impacts to the Ballona Wetlands.

**Appeal Comment 8:**

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 Corridors along the route of the Expo Line, which is 2-3 miles from Venice Boulevard. Like Great Streets Venice Boulevard, 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 4,400 and 6,000 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.

**City Response 8:**

The appellant verifies that the Project is similar to other projects considered in relation to the City's Mobility Plan 2035, and then discusses the intent of the Expo Corridor Plan to increase housing density along the route of the Expo Line. The appellant then alleges that LADOT failed to consider the cumulative impacts from the Expo Corridor Plan (additional driving from new housing) that may contribute to delay as a result of the reduction in capacity of Venice Boulevard. As stated in City Response 1, additional driving delay or congestion is no longer, on its own, considered an environmental impact under CEQA; therefore, additional delay as a result of the Project and other related projects is also not considered a cumulative impact under CEQA.

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, or contribute to a cumulative impact that would disqualify the application of a Class 1 or Class 4 Exemption pursuant to Section 15300.2 (b) of the CEQA Guidelines.

**Appeal Comment 9:**

The Project a) fails to consider the potential increase in cars produced by the Expo Corridor Plan and similar projects through the Westside and b) fails to consider that the EIR on MP 2025 is currently under legal challenge. It also fails to address the glaring omission in the Great Streets Venice Boulevard evaluation of the effects that the capacity reduction on Venice Boulevard will have on its nearest neighboring collateral: Washington Boulevard. In 2015, as part of the West LA Transportation Improvement 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 links in the Westside mobility network. That link was Washington Boulevard. The results showed that deleting capacity on Washington Boulevard increased volume on nearby collateral streets. The collateral street exhibiting the greatest volume increases was Venice Boulevard. Based on this model it is reasonable that doing the reserve (as Great Streets Venice Boulevard has done) would produce analogous volume increases on Washington Boulevard.

**Appeal Response 9:**

See City Response 8 for the related transportation impacts of the Exposition Transit Neighborhood Plan and similar projects on the Westside. Staff confirms that a lawsuit was filed on the Mobility Plan 2035 EIR, but there have been no court actions limiting or otherwise affecting the Mobility Plan 2035 which is currently in effect.

The Dynamic Validation Test found in the Model Development Report<sup>9</sup> of the Coastal Transportation Corridor Specific Plan and West Los Angeles Transportation Improvement and Mitigation Specific Plan (CTCSP/WLA TIMP) tests a reduction in traffic volumes during a 3-hour peak period on certain arterial roadways to analyze the impacts on other parallel arterial roadways. The results indicate that reducing the traffic volumes on Washington Boulevard would subsequently increase volumes on Venice Boulevard. The appellant alludes that this test performed in reverse (reducing volumes on Venice Boulevard) would result in subsequent volume increases on Washington Boulevard.

However, the findings of the Venice Boulevard Great Street One-Year Evaluation Report conclude that there are negligible changes in traffic volumes along Venice Boulevard as a result of the lane reduction, as further elaborated in City Response 1. Thus, there is no supportive data that demonstrates significantly increased traffic volumes on Washington Boulevard.

**Appeal Comment 10:**

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.

**City Response 10:**

For the reasons described in City Response 9, LADOT has no evidence to suggest that traffic volumes on neighboring arterial streets such as Washington Boulevard have or will increase.

As to impacts related to air quality, the Mobility Plan 2035 EIR evaluated the potential impacts of installing the network of bicycle facilities, including the Project, and found that these changes would not result in significant impacts to air quality. This topic was addressed in the attached narrative to the Notice of Exemption filed on December 21, 2018, where staff concluded that the exception to the exemptions based on environmental impacts did not apply.

**FINANCIAL IMPACT**

There is no General Fund impact.

SJR:DM:ds/jg

Attachments

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<sup>9</sup> Los Angeles Department of Transportation. Westside Mobility Plan Model Development Report. 2015. <https://planning.lacity.org/eir/CoastalTrans/deir/pdfs/appendixF.pdf>

COUNTY CLERK'S USE

ORIGINAL FILED

CITY OF LOS ANGELES

OFFICE OF THE CITY CLERK

200 NORTH SPRING STREET, ROOM 360

LOS ANGELES, CALIFORNIA 90012

CALIFORNIA ENVIRONMENTAL QUALITY ACT

LOS ANGELES, COUNTY CLERK

## NOTICE OF EXEMPTION

(California Environmental Quality Act Section 15062)

DOCUMENT FILED  
City Clerk's Office  
NE-18-260-TR

CITY CLERK'S USE

No:

Certified by 

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 (d), 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 Chamock Rd. and Ocean View Ave.; Chamock 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

928-9606

TELEPHONE NUMBER

EXT. (213)

EXEMPT STATUS: (Check One)

## STATE CEQA GUIDELINES

## CITY CEQA GUIDELINES

☐

MI MINISTERIAL

Sec. 15268

Art. II, Sec. 2b

☐

DECLARED EMERGENCY

Sec. 15269

Art. II, Sec. 2a (1)

☐

EMERGENCY PROJECT

Sec. 15269 (b) &amp; (c)

Art. II, Sec. 2a (2) &amp; (3)

☐

GENERAL EXEMPTION

Sec. 15060.

n/a

☒

CATEGORICAL EXEMPTION

Sec. 15300 et seq.

Art. III, Sec. 1

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

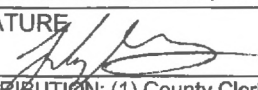
OTHER (See California Code of Regulations Sec. 15269)

## 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



TITLE

Transportation Planning Associate

DATE

12-20-18

DISTRIBUTION: (1) County Clerk, (2) City Clerk, (3) Agency Record



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\* 2 0 1 8 1 2 2 1 1 2 3 0 0 3 1 \*

Friday, December 21, 2018 1:05 PM

Item(s)

Fee	Qty	Total
NoE - County Posting Fee 2018317995	1	\$75.00

<b>Total</b>		<b>\$75.00</b>
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Total Documents: 1

Customer payment(s):

Cash	\$75.00
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## 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 area<sup>1</sup>, 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."<sup>2</sup> 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.<sup>3</sup>

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.<sup>4</sup>

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, Boise Avenue, Ocean View Avenue, and Mountain View Avenue; high-visibility crosswalk upgrades at all intersections within project; signal re-phasing for

<sup>1</sup> 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.

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

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

<sup>4</sup> City of Los Angeles, *Vision Zero Action Plan*, Jan. 2017, <https://view.joomag.com/vision-zero-action-plan-2017/0893807001485436685>.

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 I: 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.<sup>5</sup> 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 an 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 elements 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

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<sup>5</sup>. Keith Knapp et al., *Road Diet Informational Guide*, Nov. 2014, U.S. Department of Transportation Federal Highway Administration: Safety, [https://safety.fhwa.dot.gov/road\\_diets/guidance/info\\_guide/rdig.pdf](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 EIR<sup>6</sup>, 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 as a

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<sup>6</sup> 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.<sup>7</sup> 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.<sup>8</sup> 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

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<sup>7</sup> Mobility Plan 2035 Recirculated Draft EIR, Page 4.3-13

<sup>8</sup> CARB, EMAC2014.

comparable or higher as compared to Venice Blvd.<sup>9</sup> 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.<sup>10</sup>

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 development of a multimodal transportation system, and providing clean, efficient access to 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,<sup>11</sup> 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

<sup>9</sup> Severin Martinez. 2016. Who Wins When Streets Lose Lanes? An Analysis of Safety on Road Diet Corridors in Los Angeles. Graduate paper for UCLA Lewis Center for Regional Policy Studies

<sup>10</sup> Department of City Planning. Recommendation Report to City Planning Commission on the Mobility 2035, May 28, 2015

<sup>11</sup> OPR. 2016. Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA. Page III:27, and Discussion Draft of the 'Technical Advisory on Evaluating Vehicle Miles Traveled in CEQA', page 13.



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/corteselist/>) does not reflect sites of concern in the immediate area in which the 2018 Project will take place.<sup>12</sup> 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.<sup>13</sup> 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.

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

<sup>13</sup> City of Los Angeles Office of Historic Resources, "Historic-Cultural Monument (HCM) List," last updated April 3, 2018, <http://preservation.lacity.org/commission/designated-historic-cultural-monuments>.

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.

### 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	Wentworth 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)	0.05	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	0.13	6/26/2017	2 lanes in each direction with center turn lane and on-street parking. 3rd peak hour lane in eastbound 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	0.96	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 the street.
Manchester Avenue	Haas Avenue	Saint Andrews	0.33	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	6/29/2017	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 Boulevard	Vermont Avenue	Royal Street	0.54	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

6th Street	Fairfax Avenue	Curson Avenue	0.36	1/15/2018	2 lanes in each direction with curbside parking	1 lane eastbound, 2 lanes westbound with center turn lane and curbside parking
Monterey Road	Via Marisol	Pullman	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 center turn lane, on-street parking and buffered bike lanes
La Tuna Canyon Road	4910' W/O South La Tuna Canyon Road	7600' W/O South La Tuna Canyon Road	0.51	6/8/2018	2 lanes in each direction	1 lane in each direction
La Tuna Canyon Road	Honolulu Avenue	4190' w/o Honolulu Avenue	0.79	6/8/2018	2 lanes in each direction	1 lane in each direction
La Tuna Canyon Road	W/B Foothill Fwy Off-Ramp	4190' w/o Honolulu Avenue	0.23	6/8/2018	2 lanes eastbound, 1 lane westbound	1 lane in each direction
La Tuna Canyon Road	W/B Foothill Fwy Off-Ramp	South La Tuna Canyon Road	0.19	6/8/2018	2 lanes in each direction	1 lane in each direction with turn pockets
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
Alhambra Avenue	Brawley Street	Druid Street	0.09	6/28/2018	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
Alhambra Avenue	Druid Street	Lowell Avenue	1.1	6/28/2018	2 lanes in each direction with curbside parking	1 lane in each direction with center turn lane, curbside parking, and bike lanes
Alhambra Avenue	Lowell Avenue	Alhambra City Boundary	0.1	6/28/2018	2 lanes in each direction	1 lane eastbound, 2 lanes westbound with center buffer and eastbound buffered bike lane
Figueroa Street	Exposition Boulevard	30th Street	0.5	7/1/2018	3 lanes northbound with 4th peakhour 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
Figueroa 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
Figueroa 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 lane southbound, center turn lane
Figueroa Street	Venice Boulevard	11th Street	0.48	7/1/2018	3 lanes northbound with 4th peakhour 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

Figueroa Street	11th Street	Olympic Boulevard	0.08	7/1/2018	3 lanes northbound with 4th peakhour 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
Figueroa Street	Olympic Boulevard	9th Street	0.08	7/1/2018	3 lanes northbound with 4th peakhour bus lane, curbside parking	2 lanes northbound with 1 full-time bus lane and curbside parking in northbound direction
Figueroa Street	9th Street	8th Street	0.12	7/1/2018	3 lanes northbound with 4th peakhour bus lane, curbside parking	3 lanes northbound with 1 full-time bus lane and curbside parking
11th 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	Figueroa 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
Spring Street	3rd Street	9th Street	0.73	9/30/2018	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
Chatsworth Street	Arleta Avenue	Chatsworth 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

**CITY OF LOS ANGELES**  
CALIFORNIA

**Seleta Reynolds**  
GENERAL MANAGER



**ERIC GARCETTI**  
MAYOR

**DEPARTMENT OF TRANSPORTATION**

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(213) 972-8470  
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**Date:** December 20, 2018

**Council No.:** 11 - Bonin  
**Plan Area:** 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:

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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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 [Signature]  
CITY CLERK'S OFFICE

### **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)<sup>1</sup>, 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:

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<sup>1</sup> 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](mailto:jamie.hall@channellawgroup.com) if you have any questions, comments or concerns.

Sincerely,



Jamie T. Hall