

# Attachment A

**Project:** West Adams Corridor and Neighborhood Safety Improvement Project

## I. Project Description

The proposed project consists of street safety improvements along an approximately two-mile length of West Adams Boulevard between Fairfax Avenue and Crenshaw Boulevard in Council District 10, including a roadway reallocation from two lanes in each direction with a two-way, center left-turn lane to one lane in each direction with a two-way center left-turn lane and buffered bicycle lanes in each direction. Proposed improvements will achieve calmer traffic on neighborhood streets, reduced speeds, and increased safety for all modes, including for people walking and bicycling.

## II. Project History

The project is located on West Adams Boulevard between Fairfax Avenue and Crenshaw Boulevard. This segment is located on the City's High Injury Network, the streets in Los Angeles where approximately 65% of traffic deaths and severe injuries of people walking occur, assessed from collision records. After a rigorous analysis of crash history, roadway geometry, and community outreach, City staff categorized the project as a Vision Zero Priority Corridor and recommended it for the improvements described above. Outreach materials used to notify and engage the community about the project are provided in **Attachment B**.

## III. Environmental Review

### A. Basis for Categorical Exemption

A project qualifies for a Class 1, Category 3 categorical exemption under City CEQA Guidelines and a Class 1(c) categorical 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 categorical exemption if it consists of the installation of traffic signs, signals and pavement markings, including traffic channelization using paint and raised pavement markers. Moreover, a project qualifies for a Class 1, Category 20 categorical 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. Finally, a project qualifies for a Class 4, Category 13 categorical exemption under City CEQA Guidelines and a Class 4(h) categorical exemption under State CEQA Guidelines (CCR Sec. 15304 (h)) if it consists of the creation of bicycle lanes on existing rights-of-way.

### 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. 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 in 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 the center left-turn lane, are not subject to the location exception.

Those project features that include roadway restriping to feature bicycle lanes 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.

Given that the bicycle lanes are striped on existing street right-of-way, this element of the project would not cause impact on an environmental resource by roadway widening. Additionally, as described in the "Traffic/Transportation" element of Subsection 3: Significant Impact below, the project's effects on traffic, transportation networks, and mobility also will not impact a resource of hazardous and critical concern in a sensitive environment. In addition, nationwide research has demonstrated effectiveness of channelization, lane reductions, and bicycle lanes in calming traffic.<sup>1</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.

**2. 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. In addition, the project does not contribute incrementally to an environmental impact. Given the nature of the project, this project is not anticipated to result in a cumulative impact when included with successive projects in the same place and over time.

**3. Significant Effect.** 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.

#### **Aesthetics**

This exception applies when a project may cause a substantial adverse change in the significance of a visual resource. As stated in Section I: Project Description, the project only consists of reconfiguring lanes to add a center left-turn lane and buffered bicycle lanes; it would not impact any aesthetic resources. 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 West Adams 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 proposed project does not involve the loss of, an alteration to, nor an impact to any biological resources. It does not include the removal of existing trees. As such, this exception does not apply.

#### **Traffic/Transportation**

The project reallocates travel lanes by removing one travel lane in each direction on West Adams Boulevard from Fairfax Avenue and Crenshaw Boulevard to install buffered bicycle lanes. Such a change could increase travel delay in the peak periods along West Adams Boulevard. However, substantial travel delay no longer qualifies as an exception under the Section 15300.2 (c) of the CEQA

---

<sup>1</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/>.

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 'Technical Advisory on Evaluating Transportation Impacts in CEQA'<sup>2</sup>, 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, 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 the restriping of West Adams Boulevard, the work shall be performed in accordance with work area traffic control handbook (WATCH). City construction crews will coordinate with schools and the 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.

#### **Water Supply**

The proposed project does not involve any unusual circumstances that would impact water supply. As such, this exception does not apply.

Standard conditions and construction practices are anticipated for this 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

---

<sup>2</sup> The Governor's Office of Planning and Research. December 2018. 'Technical Advisory on Evaluating Transportation Impacts in CEQA' [https://opr.ca.gov/docs/20190122-743\\_Technical\\_Advisory.pdf](https://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf)

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.

The project would not adversely impact any scenic features on the project corridor, nor crossing the project corridor. In the vicinity of the project but not directly crossing or along it lie two scenic highways: Crenshaw Boulevard is a City-designated scenic highway between I-10 and Slauson Avenue, and West Adams Boulevard is a City-designated scenic highway between Crenshaw Boulevard and Figueroa Street. However, the project does not include the removal of existing trees or median and would not impact 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 10, 2018, the Department of Toxic Substances Control (DTSC) data management system (<http://www.envirostor.dtsc.ca.gov>) reflects two evaluation sites along the street on which the project will take place: Best 1 Hour Laundry (5149-5151 West Adams Boulevard) and LA City TSI - Adams Blvd. / LaBrea Ave. ("Commercial district along Adams Blvd.[,] west of the Adams Blvd./ LaBrea Avenue Intersection[:] project consists of multiple parcels and an alleyway").<sup>3</sup> However, all project work will be limited to striping changes and other surface-level improvements within existing rights-of-way on West Adams Boulevard. The project will not involve work on the sites identified above nor work that affects those sites. 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. A search of the City's Declared Monuments resulted in the following site in the immediate project area that are on the Historic-Cultural Monument (HCM) List:<sup>4</sup>

- Historic Cultural Monument 512: Church of The Advent

The project includes striping changes, lane reassignment, and bicycle improvements along the street segments that shares property frontage of the designated historic monument. However, the project comprises work within the public right-of-way that would not lead to adverse change in the significance of this historical resource nor any other known historical resource.

The proposed 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.

---

<sup>3</sup>. California Department of Toxic Substance Control, *EnviroStor* Hazardous Waste and Substance Site List, last accessed December 10, 2018, <http://www.envirostor.dtsc.ca.gov/public/>.

<sup>4</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.