

Attachment A

Project: Forest Lawn Drive Active Transportation & Traffic Safety Project

I. Project Description

The proposed project consists of the implementation of protected bike lanes along an approximately one mile segment of Forest Lawn Drive between Memorial Drive and Zoo Drive. This segment of Forest Lawn Drive borders Griffith Park and along it are major civic destinations including Forest Lawn Memorial Park, Mount Sinai Memorial Park, and the future Los Angeles River (LA River) Greenway and Headworks Restoration Park.¹

Specifically, the project includes the following elements:

- Reducing the number of vehicle travel lanes from two to one in each direction
- Introducing a continuous center-turn lane² where feasible based on City design standards³
- Upgrading the existing unprotected (Class II) bike lanes to protected (Class IV) bike lanes, which will include vertical separation elements such as flexible posts or rubber curbs

The project is entirely within existing City right-of-way and involves no roadway widening or tree removals. It will reallocate roadway space to prioritize safety and access for people biking and turning, particularly those accessing recreational destinations such as Griffith Park and future improvements to the LA River Greenway. LADOT's project page (including linked documents) provides more detailed information regarding the project.⁴

II. Project History

The Council District 4 (CD4) office identified this corridor as a priority for safety and network connectivity when it was identified as a priority for street resurfacing by StreetsLA. City of Los Angeles Department of Transportation (LADOT) collaborated with CD4 on public outreach and stakeholder engagement beginning in Spring 2023,⁵ and the proposed final design was informed directly by corridor-specific needs and community feedback through surveys, meetings, and community events.

The Mobility Plan 2035 identifies Forest Lawn Drive as part of the Bicycle Lane Network.⁶ Street segments designated as part of the Bicycle Lane Network require at a minimum Class II bikeways according to the *HLA Standard Elements Table - A Supplemental Document to the*

¹ See Attachment B, p 3, Project Map

² See Attachment B, p 4, Center Turn Lane Location Map

³ City of Los Angeles Department of Transportation Manual of Policies and Procedures, Application and Design for Striping, Channelization and Special Signing. See pages 7-8 for 2-Way Turn Lane Standard widths https://ladot.lacity.gov/sites/default/files/2023-02/mpp_531_02212023.pdf (All references are on file with the Department)

⁴ Forest Lawn Active Transportation & Traffic Safety Project Website: <https://ladotlivablestreets.org/projects/forest-lawn>

⁵ See Attachment B, p 6, Engagement Collateral

⁶ Mobility Plan 2035: Bicycle Lane Network, Map D2 on page 145 (PDF page 162)

https://planning.lacity.gov/odocument/523f2a95-9d72-41d7-aba5-1972f84c1d36/Mobility_Plan_2035.pdf

Complete Streets Design Guide.⁷ However, a protected bicycle lane (Class IV) is considered a safer and more appropriate treatment for Forest Lawn due to the posted speed limit of 45 MPH⁸ and high prevailing speeds.⁹ Forest Lawn Drive should serve as a critical connector for the city's growing Bike Lane Network, linking to major future projects such as the LA River Greenway, Headworks Restoration Park, and Zoo Drive Bike Lanes,¹⁰ which provide direct access to Griffith Park. However, the current high vehicle speeds and lack of physical protection of the existing bicycle facility discourage use by all but the most confident cyclists. A Class IV facility would provide the comfort and safety necessary to support broad ridership.

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 (14 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 (the City CEQA Guidelines further explain that a scenic resource is defined as “including but not limited to a stand of trees, a rock outcropping or an historic building.”) The project qualifies for these categorical exemptions because it consists of the operation and minor alteration of an existing street, Forest Lawn Drive; does not involve an expansion of use beyond those previous existing, as the project upgrades existing bike lanes and would accommodate any projected growth already analyzed and approved from the Bicycle Lane Network in Mobility Plan 2035 and the capacity from the existing four-lane roadway would be accommodated by a two-lane roadway and center-turn lanes;¹¹ and does not involve the removal of a scenic resource, including no removal of trees, rock outcroppings, or historic buildings (see below on Consideration of Potential Exceptions to use of a Categorical Exemption, Aesthetics and Scenic Highway sections).

Further, a project more specifically qualifies for a Class 1, Category 15 categorical exemption under the City CEQA Guidelines if it consists of the installation of traffic signs, signals and pavement markings, including traffic channelization using paint and raised pavement markers; and 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, except where extensive tree removal will be involved (with both Class 1, Category 15 and Class 1, Category 20 including the same limitations as the above Class 1 categorical exemptions of negligible or no expansion of use and not involving the removal of a scenic resource). The project qualifies for these categorical exemptions because it consists of the installation of pavement markings for the conversion of the Class II bike lanes to Class IV bike lanes and the four-lane roadway to a two-lane roadway with center-turn lanes; and the modernization of Forest Lawn Drive, an

⁷ HLA Standard Elements Table - A Supplemental Document to the Complete Streets Design Guide (page 6)

https://planning.lacity.gov/odocument/6fc05193-c065-4d18-834d-ead8a8fe1f53/HLA_Standard_Elements_Table.pdf

⁸ See Figure 5-A on page 23. Given a posted speed limit of 45 MPH, Caltrans recommends a protected bike lane <https://dot.ca.gov/-/media/dot-media/programs/design/documents/dib-94-010224-a11y.pdf>

⁹ See Attachment B, p 40, Speed Survey

¹⁰ See Attachment B, p 5, Map of Future Connecting Projects

¹¹ Forest Lawn Drive Safety and Mobility Project FAQ, <https://ladotlivablestreets-cms.org/uploads/6949dd2811d54a288ac768c27cd152e5.pdf>

existing street, by the construction of improvements such as the Class IV bike lane and center-turn lanes for the project's two-lane roadway with no tree removals.

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, which do not involve removal of healthy, mature, scenic trees except for forestry and agricultural purposes. The project qualifies for this exemption because it is creating a Class IV bike lane to replace the existing Class II bike lane, and does not involve the removal of any trees.

Consideration of Potential Exceptions to use of a Categorical Exemption

The State CEQA Guidelines (14 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 to all instances, except where the project may impact on an environmental resource of hazardous or critical concern where designated, precisely mapped, and officially adopted pursuant to law by federal, state, or local agencies. This exception is known as the “location exception.”

Those project features covered under the Class 1 categories 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. A review and analysis of relevant City and other databases (including ZIMAS and NavigateLA) show that there are no precisely mapped, officially adopted areas of environmental resources of hazardous or critical concern at the project site.¹²

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^{13,14}. Given the limited nature of the project which involves only work on an existing roadway (Forest Lawn Drive) for a short length (one mile) and no excavation, 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.

¹² LADOT Technical Memo #1, 2026.

¹³ LADOT Liveable Streets, *Our Projects*, last accessed March 24, 2026, <https://ladotlivablestreets.org/projects>

¹⁴ See Attachment B, p 83 for Similar Projects Summary Table

A. No Unusual Circumstances

There are no unusual circumstances for this project compared to other road improvement projects that typically qualify for categorical exemptions for existing facilities or minor alterations to land. This work is a typical minor alteration and improvement project for a street, sidewalk, gutter, and bicycle and pedestrian way, that falls under the Class 1 exemption. The City has successfully implemented over 300 lane reconfiguration projects, many on similar streets with comparable bicycle and automobile configurations.¹⁵

The proposed project reallocates vehicle travel lanes and reduces through travel lanes to create space for protected bike lanes on Forest Lawn Drive between Memorial Drive and Zoo Drive. Such a change could increase travel delay in the peak periods, however, the project-related delays are not unusual as would occur with similar roadway reconfiguration projects explored elsewhere in the City.¹⁶ 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 comparable or higher as compared to the project corridor.¹⁷

B. No Significant Impacts

The project would not result in any significant impacts as set forth below.

i. Aesthetics

As stated in Section I: Project Description, the project only consists of reconfiguring lanes to upgrade the existing bicycle lanes to protected bike lanes; it would not impact any aesthetic resources. Furthermore, the Hollywood Community Plan¹⁸ does not identify any scenic quality plans applicable to Forest Lawn Drive, and as set forth below while Forest Lawn Drive is a City-designated scenic highway in Mobility Plan 2035, it is not due to any scenic quality features and the project would not be inconsistent with such City designation.

ii. 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 Forest Lawn Drive in locations near sensitive uses (such as residences) to daytime hours and 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 less than significant noise impacts on the neighborhood immediately surrounding the project area. Furthermore, extensive noise analyses from similar streetscape improvement projects, such as the My Figueroa Project, have consistently determined that construction and operation

¹⁵ LADOT Lane Reconfiguration Guidelines, April 2023, <https://ladot.lacity.gov/sites/default/files/2024-09/lane-reconfiguration-guidelines-update-april-2023.pdf>

¹⁶ See Attachment B, p 44, Traffic Delay Analysis

¹⁷ Severin Martinez, "Who Wins When Streets Lose Lanes?: An Analysis of Safety on Road Diet Corridors in Los Angeles," applied planning research project, UCLA Luskin School of Public Affairs, June 2016.

¹⁸ Hollywood Community Plan <https://planning.lacity.gov/odocument/006954e9-57e1-4f1f-ac48-d819e6450249/Hollywood%20Community%20Plan.pdf>

impacts related to noise and vibration would be less than significant, requiring no mitigation measures.¹⁹

iii. 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, and the roadway work consists of minimally-impactful striping and installation of flexible posts or rubber curbs.

iv. Traffic/Transportation

The proposed project reallocates vehicle travel lanes and reduces through travel lanes to create space for protected bike lanes on Forest Lawn Drive between Memorial Drive and Zoo Drive. Such a change could increase travel delay in the peak periods, however, the project-related delays are not unusual as would occur with similar roadway reconfiguration projects explored elsewhere in the City.²⁰ 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 comparable or higher as compared to the project corridor.²¹

The proposed project will not result in significant impacts to traffic, circulation, or emergency access. A comprehensive travel delay analysis was conducted using industry-standard Synchro 11 and Highway Capacity Manual (HCM) methodologies to ensure operational stability. Analysis of the 1-mile corridor demonstrates that the lane reconfiguration will have a minimal impact on travel times even during the busiest periods of the day. During weekday peak periods, travel times may increase by a maximum of only 15 seconds, while weekend peak periods show a maximum travel delay increase of 1 minute and 36 seconds in the eastbound direction. These results fall well below the LADOT Lane Reconfiguration Guidelines,²² which define additional delays of less than 2 minutes per mile as "low" and acceptable for project implementation.

Regarding emergency access, the project has been designed and reviewed in direct coordination with the Los Angeles Fire Department (LAFD) to ensure response capabilities are maintained or enhanced.²³ The project meets all safety and access requirements agreed upon between LADOT and LAFD, ensuring that emergency response remains unimpeded.

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) to replace delay and capacity-based metrics such as level of service (LOS) when

¹⁹ City of Los Angeles 2010 Bicycle Plan, *4.4 Noise and Vibration*
<https://planning.lacity.gov/eir/BicyclePlan/DEIR/4.4%20Noise.pdf>

²⁰ See Attachment B, p 44, Traffic Delay Analysis

²¹ Severin Martinez, "Who Wins When Streets Lose Lanes?: An Analysis of Safety on Road Diet Corridors in Los Angeles," applied planning research project, UCLA Luskin School of Public Affairs, June 2016.

²² LADOT Lane Reconfiguration Guidelines, Page 6

<https://ladot.lacity.gov/sites/default/files/2024-09/lane-reconfiguration-guidelines-update-april-2023.pdf>

²³ LADOT Technical Memo #2, 2026.

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. The California Natural Resources Agency certified and adopted the CEQA Guidelines in December of 2018, and are now in effect.²⁴

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, 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 transportation impacts, the restriping of the work of restriping of the project corridor shall be performed in accordance with work area traffic control handbook (WATCH)²⁵. 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

²⁴ State of California, Natural Resources Agency, Final Adopted Text, December 2018.

<http://resources.ca.gov/ceqa/>

²⁵ WATCHBOOK: Work Area Traffic Control Handbook 2024 Edition. Inspection available upon request.

https://www.bnibooks.com/collections/temporary-traffic-controls/products/work-area-traffic-control-handbook-2024-edition?utm_source=watchbook.org&utm_medium=website&utm_campaign=watchbook.org&utm_term=558A

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.

v. Land Use Impacts

The project is consistent with the City of Los Angeles General Plan, including the Mobility Plan 2035, and complies with the requirements and intent of Measure HLA.²⁶ The Project advances the Mobility Plan's goals by providing a safe, convenient, and comfortable bicycle facility along a key arterial corridor that connects to multiple regional destinations. It applies guidance from the Complete Streets Design Guide and aligns with the interpretive flexibility afforded by the Mobility Plan's Implementation Procedures. Furthermore, it complies with Measure HLA by implementing a street enhancement that exceeds baseline standards while remaining consistent with the Mobility Plan's intent and furthering the Plan's goals.

vi. Hazardous Waste and Historic Resources

The project would not have a significant impact on hazardous waste and historic resources, as set forth below in the other 15300.2 exception areas.

vii. Non-implicated impact Areas

The proposed project does not involve any activities that would impact agriculture, air, energy, geology and soils, greenhouse gas emissions, water quality and supply, mineral resources, population and housing, public services, recreation, and public utilities (related to the need for new facilities), and wildfire, as it only involves non-excavation work on an existing roadway.

C. Conclusion

Standard conditions and construction practices are anticipated for this project.²⁷ As set forth above, no unusual circumstances are present, and no reasonable possibility has been identified that the project will have a significant effect. 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.

While Forest Lawn Drive is a City-designated scenic parkway in Mobility Plan 2035, it is not designated as a state scenic highway. Forest Lawn Drive was so designated by the City since it is a road that passes through the Hollywood Hills and is a gateway to Griffith Park,²⁸ and the project would not impact any of these features.

There are no State-designated scenic highways at any of the project sites, on the project corridor, nor crossing the project corridor. In any case, the project does not include the removal of existing trees or median and would not impact any aesthetic, biological, or historic resources, as set forth previously. Therefore, this exception does not apply.

²⁶ LADOT Technical Memo #3, 2026.

²⁷ See LADOT Technical Reference Library, at <https://ladot.lacity.gov/businesses/technical-reference-library>

²⁸ Hollywood Plan Update, Draft EIR, 4.1 Aesthetics, https://planning.lacity.gov/eir/Hollywood_CPU/DEIR/files/4.1%20Aesthetics.pdf

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 March 7, 2025, the Department of Toxic Substances Control (DTSC) data management system (<http://www.envirostor.dtsc.ca.gov>) does not reflect any evaluation sites along the street on which the project will take place, including any sites listed under Government Code Section 65962.5, and the project site does not otherwise appear on any other lists under 65962.5.²⁹ 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 showed the project is near two designated Historic-Cultural Monuments (HCM)- Griffith Park and Travel Town in Griffith Park.³⁰ However the project consists of restriping a street to include protected bike lanes on an existing right of way with similar pavement markings and traffic safety and control elements. As such the project will not adversely change the significance of the nearby historical resources.

²⁹ California Department of Toxic Substance Control, *EnviroStor* Hazardous Waste and Substance Site List, last accessed March 7, 2025, CalEPA Cortese List Data Resources, <http://www.envirostor.dtsc.ca.gov/public/>; <https://calepa.ca.gov/sitecleanup/corteselist/>

³⁰ City of Los Angeles City Planning, "Historic-Cultural Monument (HCM) List," last accessed July 3, 2025, <https://planning.lacity.gov/preservation-design/historic-landmark-programs>.