

CALIFORNIA ENVIRONMENTAL QUALITY ACT NOTICE OF EXEMPTION

City of Los Angeles

DEPARTMENT OF TRANSPORTATION
100 SOUTH MAIN STREET, 9TH FLOOR
LOS ANGELES, CALIFORNIA 90012

Submission of this form is optional. The form shall be filed with the County Clerk, 12400 E. Imperial Highway, Norwalk, California, 90650 and with the State Clearinghouse in the Governor's Office of Land Use and Climate Innovation, if filed with the County Clerk, 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.

The City of Los Angeles Department of Transportation General Manager determined that the project was categorically exempt from CEQA and approved the project on:

Lead City Agency:

Council District:

Project Title:

Council File Number:

Project Location:

Description of Nature, Purpose, and Beneficiaries of Project:

Name of Person or Agency Carrying Out Project, If Other Than Lead City Agency:

Contact Person:

Telephone Number:

Exempt Status (check one):

- ☐ Ministerial (State CEQA Guidelines Sec. 15268)
- ☐ Declared Emergency (State CEQA Guidelines Sec. 15269)
- ☐ Emergency Project (State CEQA Guidelines Sec. 15269 (b) & (c))
- ☐ General Exemption (State CEQA Guidelines Sec. 15060)
- ☐ Categorical Exemption (Sec. 15300 *et seq.*)
 - ☐ Class:
- ☐ Other (Statutory Exemption: Public Resources Code Sec. 21080.20.5)

Justification for Project Exemption:

If Filed by Applicant, Certified Document of Exemption Finding:

SIGNATURE:

TITLE:

DATE:

FEE:

Receipt Number:

Recorded By:

Date:

Attachment A

Project: Pico Boulevard Safety and Mobility Plan Project

I. Project Description

The proposed project consists of street safety improvements along an approximately 3.5 mile length of Pico Boulevard, between Crenshaw Boulevard and Figueroa Street, in Council Districts 1, 9, and 10. The following proposed modifications along Pico Boulevard are expected to improve traffic safety and mobility issues for all modes, including for people walking and bicycling:

- Class IV protected bicycle lanes on Pico Boulevard between Crenshaw Boulevard and Figueroa Street with street reconfiguration from two lanes in each direction to one lane in each direction accompanied by center left turn lanes.
- Some on-street parking removal, primarily along the westbound direction of Pico Boulevard
- Toucan signals at Manhattan Place and New Hampshire Avenue
- Sidewalk repairs, curb ramp upgrades, and other minor ancillary roadway repairs and upgrades within the project limits

LADOT's project page (including linked documents) provides more detailed information regarding the project.¹

II. Project History

The project is located on Pico Boulevard between Crenshaw Boulevard and Figueroa Street. This street 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 an 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. Pico Boulevard is also designated on the Mobility Plan 2035 Bicycle Lane Network and per Measure HLA, the Department is required to install bike lanes when implementing qualifying street improvements such as street resurfacing.

The project would enhance safety, accessibility, and multimodal connectivity along the corridor, which serves as a key commercial, cultural, and transportation route for the community. It would close a critical gap in the active transportation network by connecting existing bike lanes on Figueroa Street to existing bike lanes on Venice Boulevard via existing bike lanes on 4th Avenue, resulting in a continuous bikeway from the ocean in Venice to downtown Los Angeles and facilitating connections to local and regional transit.

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

¹ LADOT Liveable Streets, *Pico Boulevard Safety and Mobility Plan Project*, last accessed May 5, 2026, <https://ladotliveablestreets.org/projects/pico>.

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 alteration of an existing street, Pico Boulevard; does not involve an expansion of use beyond those previously existing, as the project installs 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; 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 Class IV bike lanes and the conversion of the four-lane roadway to a two-lane roadway with center-turn lanes; and the modernization of Pico Boulevard, an 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 and does not involve the removal of any trees.

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 following circumstances:

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.

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.

Similar projects are anticipated to take place at different locations and at different times. Notably, the City will install bicycle lanes on Pico Boulevard between Figueroa Street and Grand Avenue as part of a separate project led by the City's Department of Public Works. Although the two projects compliment each other, they are being implemented on different timelines and independently led by separate departments for different purposes. Also, active transportation projects and transportation projects that reduce the number of vehicle lanes should generally not lead to substantial increase in VMT, and therefore they should not be considered to contribute to a significant cumulative impact. The combination of these two projects are expected to decrease VMT rather than result in any potential cumulative negative 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.

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.²

The proposed project reallocates vehicle travel lanes and reduces through travel lanes to create space for protected bike lanes on Pico Boulevard between Crenshaw Boulevard and Figueroa Street. 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. Between 2010 and 2016, the City has implemented approximately 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.³

B. No Significant Impacts

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

i. 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,

² LADOT Lane Reconfiguration Guidelines, April 2023, <https://ladot.lacity.gov/sites/default/files/2024-09/lane-reconfiguration-guidelines-update-april-2023.pdf>

³ 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.

the project consists of reconfiguring lanes to add a center left-turn lane and protected bicycle lanes, as well as removing on-street parking to add protected bicycle lanes in a built-up, urbanized area with existing similar street markings and features; it would not impact any aesthetic resources. Furthermore, the project would not impact any zoning and other regulations governing scenic quality in the Zoning Code, Downtown, Westlake, Wilshire, West Adams - Baldwin Hills - Leimert, or South LA Community Plans, or other applicable plans.

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 Pico Boulevard 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 an 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 impacts related to noise and vibration would be less than significant, requiring no mitigation measures.⁴

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 modular curbs.

iv. Traffic/Transportation

The project includes restriping of Pico Boulevard to reallocate travel lanes by removing one travel lane in each direction as well as some on-street parking removal between Crenshaw Boulevard to Figueroa Street to install protected bicycle lanes. Such a change could increase travel delay in the peak periods along Pico Boulevard.

However, 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 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.⁵

In its document, 'Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA', the OPR recommended that a

⁴ City of Los Angeles 2010 Bicycle Plan, 4.4 Noise and Vibration [Los Angeles 2010 Bicycle Plan](#)

⁵ State of California, Natural Resources Agency, Final Adopted Text, December 2018.
<http://resources.ca.gov/ceqa/>

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.

Further, work shall be performed in accordance with work area traffic control handbook (WATCH).⁶ 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.

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. 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. 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.

⁶ WATCHBOOK: Work Area Traffic Control Handbook 2024 Edition. Inspection available upon request. <https://watchbook.org>.

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.⁷ 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.

There are no historical and scenic features or a scenic highway in the immediate vicinity of the project locations. 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.

Staff reviewed the Cortese List data resources. As of April 29, 2026, the Department of Toxic Substances Control (DTSC) data management system (<http://www.envirostor.dtsc.ca.gov>) identified one Voluntary Cleanup site along the project corridor at 2652 West Pico Boulevard associated with a recent infill development at this location.⁸ The purpose of the Voluntary Cleanup Program is to provide an expedited way for parties to clean up contaminated properties that are not a high priority for the state. By funding and managing their own cleanup, proponents can move at their own pace, and DTSC provides regulatory oversight through an agreement rather than a mandatory order. The program's objective is to restore properties to productive use faster while still protecting public health and the environment and while the site is still technically active, the voluntary cleanup has already occurred with no further action required according to a letter from DTSC dated September 22, 2025. Additionally, a review of Leaking Underground Storage Tank Sites from the State Water Board's database on May 5, 2026⁹ indicates there is an open case associated with 2554 Pico Boulevard that is undergoing verification monitoring as of December 2025. No cleanup activities or potential hazardous contaminants of concern are linked to the project elements associated with this NOE. Therefore, this exception does not apply 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 historic resources identified three historic cultural monument buildings (Monuments # 120, 432, and 1314) along Pico Boulevard within the project limits. According to the City's Cultural Heritage Ordinance, a historical or cultural monument is any site, building, or structure of particular historical or cultural significance to the City of Los Angeles.

⁷ See LADOT Technical Reference Library, at <https://ladot.lacity.gov/businesses/technical-reference-library>

⁸ California Department of Toxic Substance Control, *EnviroStor* Hazardous Waste and Substance Site List, last accessed April 29, 2026, <http://www.envirostor.dtsc.ca.gov/public/>.

⁹Cortese List Data Resources, last accessed May 5, 2026 <https://geotracker.waterboards.ca.gov/search>

After consulting HistoricPlacesLA¹⁰, the project corridor also overlaps with the following Historic Districts: Country Club Park, Harvard Heights, Angelus Vista, Alvarado Terrace, and Pico Union. Further, the corridor includes a Historic Streetlight District between Hoover Street and Western Avenue and Historic Streetcar Commercial corridor between Arlington Avenue and 6th Avenue.

The corridor also overlaps with the following designated and eligible Historic Resources:

- Bekins Moving and Storage Company 1306 S Crenshaw Boulevard
- Jewel's Catch One - 4061 W Pico Boulevard
- Forum Theatre - 4058 W Pico Boulevard
- 4027 W Pico Boulevard
- The Westchester Apartments 3501 W Pico Boulevard
- Pico Car Wash - 3131 W Pico Boulevard
- 3073 W Pico Boulevard
- Papa Cristo's - 2771 W Pico Boulevard
- Saint Sophia Cathedral
- 2750 W Pico Boulevard
- 2709 W Pico Boulevard
- Victoria Theatre - 2570 W Pico Boulevard
- 2551 W Pico Boulevard
- 2534 W Pico Boulevard
- 2114 W Pico Boulevard
- Doria Apartments
- Rose Building - 1513 W Pico Boulevard

The addition of the project will not affect any known local historical resources because the proposed project would occur on existing streets and 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. Additionally, the addition of bike lanes, signal modifications and upgrades, and left turn calming will not affect any known local historical resources as the project is occurring in an existing public right-of-way in an urbanized area with existing traffic and safety features similar to those proposed as part of this project. In the case of Historic Resources that are part of the public right-of-way, such as the Historic Streetlight District and historic sidewalk patterns in the Harvard Heights Historic District, these elements will remain. For example, if sidewalk repair is needed in Harvard Heights, the historic sidewalk pattern will be reconstructed in the historic scoring pattern.

¹⁰ HistoricPlacesLA, last accessed May 5, 2026 <https://hpla.lacity.org/search>