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**CATEGORICAL EXEMPTION ANALYSIS**

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**PROJECT DESCRIPTION**

Los Angeles County Metropolitan Transportation Authority (Metro) is proposing to implement a Countywide Bike Share system. The proposed system would begin with 80 stations and approximately 1,000 bikes in the Phase 1 Pilot area of Downtown Los Angeles, which is the proposed project. Metro would own and manage the system's equipment and would contribute up to 50 percent of the system's capital costs. Metro would also manage a master contract to provide operations and maintenance for the entire regional system and provide up to 35 percent of the net operations and maintenance cost of each city's network of stations (Metro 2015).

The project includes the approval of station locations by the City of Los Angeles Department of Transportation, environmental clearance under the California Environmental Quality Act (CEQA) and placement of bike sharing stations. Metro serves as the CEQA Lead Agency and would have final approval of all plans and environmental documents. The project includes 80 locations in the City of Los Angeles (Appendix A). While the locations listed below in Table 1 represent the general location of each bike share station, final location would be determined during the construction phase. Specific kiosk locations, like intersection corners, nearby intersections, or mid-block locations, would be determined based on factors like visibility and safety.

Although there are different bike share equipment and technologies available, the project would include Third Generation type equipment, with the option to upgrade equipment and technology as needed. For a Third Generation configuration, docks are wired together via plates or a top bar, and a cell/satellite connection is placed at each station kiosk. The bikes would be locked at each dock and solar power would be located at the kiosk to enable bike share operations. There are different types of configurations and the exact configuration of each docking station would be selected during construction to best accommodate space and accessibility needs. Considerations, as outlined in the Regional Bike Share Implementation Plan, include space, safety, access, visibility, property ownership, solar access, route planning, bike share network and street design and guidelines. Docking stations would be installed in accordance with local regulations regarding fire hydrants, crosswalks, driveways, standpipes, doorways, sidewalk widths, and effective widths.

**Table 1  
Potential Project Station Locations**

N Figueroa St & Diamond St	S Grand Ave & W 11th St
Union Station West Portal	S Olive St & W 12th St
N Los Angeles St & N Alameda Street	S Figueroa St & W 8th St
E Temple St & N Alameda St	S Figueroa St & W 9th St
N Main St & W Temple St	S Figueroa St & W 12th St
S Spring St & W 1st St	E 7th St & S Main St
S Grand Ave & W 1st St	S Grand Ave & W 14th St
W Temple St & N Hill St	S Figueroa St & W 18th St
Hill St at Metro Station/Grand Park	Willow St & Mateo St
S Olive St & W 6th St	Mateo St & E 7th St
S Hill St & W 5th St	E 5th St & Wall St
W 5th St & S Grand Ave	Wall St & E 7th St
W 7th St & S Flower St	S San Pedro Street & E 7th St
S Flower and W 7th St	E 11th St & Santee St
W 7th St & S Flower St	E Pico Blvd & Santee St
S Grand Ave & W 9th St	Kohler St & E 6th St
S Figueroa St & W 11th St	E 7th St & S Alameda St
W Pico Blvd & S Figueroa St	E 2nd St & S San Pedro St
W 12th St & S Hill St	Boyd St & S San Pedro St
S Grand Ave & W Washington Blvd	Crocker St & E 6th St
S San Pedro St & E Washington Blvd	S Main St & E 5th St
S Hope St & W Pico Blvd	Ord St & New High St
E 5th St & S Hewitt St	New High St & Ord St
E 3rd St & Rose St	N Spring St & W College St
E 3rd St & S Santa Fe Ave	N Alameda St & Alpine St
S San Pedro St & E 1st St	Union Station East Portal
S Grand Ave & W 7th St	S Grand Avenue & W 3rd St
W 2nd St & S Figueroa St	S Broadway & W 3rd St
W 2nd St & S Hill St	S Hope St & W Olympic Blvd
S Figueroa St & W Cesar Chavez Ave	S Broadway & W 9th St
S Spring St & W 3rd St	S Broadway & W 11th St
S Main St & E 4th St	N Broadway & W Cesar Chavez Ave
S Main St & E 1st St	S San Pedro St & E 8th St
S Spring St & W 5th St	S Maple St & E 9th St
S Main St & E 6th St	Wilshire Boulevard & Witmer Street
W 7th St & S Spring St	S Wall Street & E 11th Street
S Hill St & W 7th St	W College Street & N Hill Street
S Hope St & W 6th St	E Temple Street & N Vignes Street
W 7th St & S Bixel St	E Pico Street & S San Pedro Street
E 9th St & S Main St	E Olympic Boulevard & S Central Avenue
S Main St & E 9th St	E Washington Boulevard & S Central Avenue
S Olive St & W 8th St	S Central Avenue & E 15th Street

## ENVIRONMENTAL SETTING

The City of Los Angeles General Land Use Plan Designations where the docking station would be located is Open Space/Commercial/Industrial/Multifamily Residential. All project sites are located in urban areas adjacent to surface parking lots and paved rights-of-way. The project sites are typically surrounded by office towers and commercial sites, with high foot traffic and served by public transit. The docking sites would be located on paved rights-of-way like sidewalks and parking lots, areas that do not contain native vegetation and with a low degree of visual character. Per the City of Los Angeles General Plan EIR

Figure CR 4 the project area contains several Historic Cultural Monuments (LA 1995). Cultural and historic resources sites are protected under federal, state and local regulations depending on their listing status. The City of Los Angeles General Plan identifies the project area as largely devoid of any natural habitat that could contain any protected or endangered species (LA 1995).

Project components and descriptions of the same are outlined in Table 2, below.

**Table 2**  
**LA METRO Bike Share Project Components**

<b>Component</b>	<b>Description</b>
<b>Construction of docking station</b>	Docking stations would be dropped into place. Docking stations would be held down with a weighted base avoiding the need for bolting and digging.
<b>Construction Equipment</b>	Lift gate, pallet jack, trucks.
<b>Construction Duration</b>	Installation of docking station would take anywhere from four hours to two days.
<b>Project Operation</b>	Docking stations would be operated by users with a pass card or single use permit. Bikes would be used and exchanged between stations. Solar stations would power docking and payment stations.

*Source: Metro 2015*

## **A. EXEMPT STATUS**

The LA METRO Bike Share Project qualifies for a CEQA Categorical Exemption under the *Section 15303 (Class 3) New Construction or Conversion of Small Structures* exemption.

## **B. REASON WHY THE PROJECT IS EXEMPT**

Article 19 (Categorical Exemptions) of the CEQA Guidelines lists classes of projects that are exempt from the requirements of CEQA. This section provides an analysis of why this project meets the conditions for a *Class 3 – New Construction or Conversion of Small Structures* exemption along with the reasons why none of the possible exceptions to Categorical Exemptions, found in *Section 15300.2 Exceptions*, apply to this project. The statutory language of each condition and possible exception is printed in bold italics below, followed by the project related analysis for each condition and exception.

### **Categorical Exemption Analysis**

#### ***15303 New Construction or Conversion of Small Structures***

***Class 3 consists of construction and location or limited numbers of new, small facilities or structures, installation of small new equipment and facilities in small structures (...).***

**The proposed project meets this condition.** The proposed project is categorically exempt from environmental review under CEQA because the project involves the installation of a limited number of new, small structures. The project would install 80 bike share stations in the City of Los Angeles. The new structures would contain Third Generation bike docking stations, as stated above in the Project Description, and each docking station would be sized based on ridership expectations as outlined in the

Regional Bike Share Implementation Plan. Docking station installation would not require digging or pavement disturbance as the stations would have a weighted base. They would be placed on existing paved surfaces like parking lots or existing rights-of-way like sidewalks.

### **Conclusion**

As outlined above, the proposed project qualifies for *Section 15303, Class 3 – New Construction or Conversion of Small Structures* exemption category under CEQA.

## **C. EXCEPTIONS TO CATEGORICAL EXEMPTION ANALYSIS**

The analysis is based on the City of Los Angeles. The City of Los Angeles General Plan Draft EIR was published on January 19, 1995.

### **15300.2 Exceptions**

*(a) Location. 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 in a particularly sensitive environment be significant. 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.*

**This exception does not apply to the proposed project.** The project area contains no important farmland, wetlands, wild and scenic rivers, floodplains, or critical habitat (LA 1995). Further, the project would not involve any grading or vegetation removal. Docking stations would be located near historic structures, but they would be congruent with the existing urban fabric and as such would not impact historic resources. The project would not involve any ground disturbance and would not impact any archeological or paleontological sites. The project sites are not located on sites identified as containing hazardous materials (DTSC 2015).

#### Natural Habitat and Endangered Species

The proposed project area is located in a developed urban area that does not contain substantial areas of natural habitat for plants and animals (LA 1995). Project installation would not include any ground disturbance. The project area is located in a developed urban environment with no native wild vegetation, and any vegetation present is ornamental. The project may include tree trimming as necessary, but all trimmings would take place in accordance with the City of Los Angeles regulations and permit requirements. As such, the project would not impact any sensitive environments and this exception would not apply to the proposed project.

#### Historic Resources

The City of Los Angeles contains numerous historic buildings and historic districts as shown in Figure CR 4 (LA 1995). Docking stations would be located in the vicinity of historic places and structures like Olvera Street and Union Station. Nonetheless, the stations would be visually congruent with the existing urban setting that the historic structures are in and would not damage the quality of historic structure. The

docking stations would not create new visual barriers that would change the historic character of an area or break up the continuity of a historic district. They would be placed on existing sidewalks, existing parking spaces or parking lots and would not constitute a substantial visual change in the character of an area or contribute to a decline in a resource's importance. Further, due to their location in pre-established urban areas and size the docking stations would not impact the historic resource's integrity. As such, the project would not impact historic resources.

#### Hazardous Site

See item (e) below.

#### Conclusion

The project site is not located on a hazardous site which is included on any list compiled pursuant to Section 65962.5 of the Government Code and there are no wetlands, endangered species, wildlife habitats and cultural, historical and archaeological resources on the site; therefore, this exception is not applicable.

*(b) Cumulative Impact. All exemptions for these classes are inapplicable when the cumulative impact of successive projects of the same type in the same place, over time is significant.*

**This exception does not apply to the proposed project.** The project would construct new small structures. The project would not require any ground disturbance activities or vegetation removal. The project would not result in any significant impacts and therefore would not contribute to any cumulative biological or cultural resources impacts. Although subsequent projects would increase the number of stations to approximately 254 stations they would be dispersed in different communities and would be congruent with the existing urban fabric. Therefore, this exception would not apply to the proposed project.

*(c) Significant Effect. A categorical exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.*

**This exception does not apply to the proposed project.** There are no unusual circumstances at the project sites or planned project operations that would create a reasonable possibility of significant effects to the environment. The project would not have a significant effect on any biological or cultural resources. In addition, project implementation would follow all City of Los Angeles regulations as they relate to installation of new small structures. The project is congruent with the current usage of the project areas and would not change current project site functions. Therefore, there would be no potential for significant effects and this exception does not apply to the proposed project.

*(d) 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. This does not apply to improvements which are required as mitigation by an adopted negative declaration or certified EIR.*

**This exception does not apply to the proposed project.** There are no designated scenic highways in the project area and as such the project would not impact any scenic resources within a highway officially designated as a state scenic highway.

*(e) Hazardous Waste Sites. A categorical exemption shall not be used for a project located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code.*

**This exception does not apply to the proposed project.** A search of the Geotracker and Envirostor environmental databases was conducted. The records review showed that the project would not be located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code in the City of Los Angeles (DTSC 2015a & 2015b).

*(f) Historical Resources. A categorical exemption shall not be used for a project which may cause a substantial adverse change in the significance of a historical resource.*

**This exception does not apply to the proposed project.** The project would not involve ground disturbing activities like digging or grading. Docking stations would be placed via lift gate or pallet jack and they would be held down by a weighted base. As such, the project would not impact any archeological and paleontological resources. Further, all project sites are located in previously disturbed paved areas. As discussed above, the historical buildings are located through out the project area and some docking stations would be located on adjacent corner streets. Nonetheless, the docking stations would not modify the historical resources nor would they modify the structure's integrity or eligibility. Therefore, there would be no impact on cultural resources and this exception would not apply.

## REFERENCES

California Department of Transportation (Caltrans). *Officially Designated State Scenic Highways*. <http://www.dot.ca.gov/hq/LandArch/scenic/schwy.htm>. Accessed August 5, 2015.

City of Los Angeles (LA). 1995. *Draft Environmental Impact Report City of Los Angeles General Plan*.

DTSC (California Department of Toxic Substances Control). 2015a. *Cortese List*. [http://www.dtsc.ca.gov/SiteCleanup/Cortese\\_List.cfm](http://www.dtsc.ca.gov/SiteCleanup/Cortese_List.cfm), accessed August 5, 2015

———. 2015b. *EnviroStor*. <http://www.envirostor.dtsc.ca.gov/>. Accessed August 5, 2015.

Los Angeles County Metropolitan Transportation Authority (Metro). April 22, 2015. *Regional Bike Share Implementation Plan for Los Angeles County* (Attachment B).