
CATEGORICAL EXEMPTION ANALYSIS

PROJECT DESCRIPTION

The Los Angeles County Metropolitan Transportation Authority (Metro) is proposing to implement a Countywide Bike Share system. Phase II of the proposed system would expand the bike share network outside of downtown Los Angeles and add approximately 60 new stations in Los Angeles (Port of Los Angeles and Venice) and Pasadena. Metro would own and manage the system's equipment and would contribute up to 50 percent of the system's capital costs.

The project includes the following actions: site plan approval by the City of Los Angeles Department of Transportation; site plan approval by the City of Pasadena Department of Transportation; approval by the Port of Los Angeles Engineering Division, approval of a Coastal Development Permit for the Port of Los Angeles and Venice locations; environmental compliance 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 up to 60 locations in the Port of Los Angeles, the community of Venice, and the City of Pasadena. While the locations listed below in Tables 1, 2, and 3 represent the general locations of each bike share station, in each city, final locations would be determined during the construction phase. Specific kiosk locations, such as intersection corners, nearby intersections, or midblock locations, would be determined based on factors like visibility and safety.

Although different bike share equipment and technologies are 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 Phase II Project Station Locations in Port of Los Angeles

Station Intersection/Point of Interest	Station Intersection/Point of Interest
Fanfare Fountain Cruise Terminal: Swinford & N. Front Street	Catalina Express site
USS Iowa	Downtown Harbor: 6th Street & Sampson
Crafted & E. 22nd Street	Ports O'Call & Nagoya Way
Doubletree Hotel: Via Cabrillo-Marina & Doubletree driveway	Cabrillo Beach
Wilmington Waterfront Park (West): Harry Bridges Blvd./John S. Gibson Blvd.	Wilmington Waterfront Park (East)
Banning Landing: S Avalon Blvd. & Water Street	

Source: Metro 2017

Table 2
Potential Phase II Project Station Locations in Venice

Station Intersection	Station Intersection
N. Venice Blvd. & Abbot Kinney Blvd.	Abbot Kinney Blvd. & Cadiz Street
N. Venice Blvd. & Pisani Place	Washington Blvd. & Pacific Avenue
Abbot Kinney Blvd. & California Avenue	Washington Blvd. & Dell Avenue
Abbot Kinney Blvd. & Westminster Avenue	S. Venice Blvd. & Walgrove Avenue
Washington Blvd. & Strongs Avenue	California Avenue & Lincoln Blvd.
Washington Blvd. & Abbot Kinney Blvd.	Rose Avenue & Rennie Avenue
N. Venice Blvd. & Lincoln Blvd.	Ocean Front Walk & N. Venice Blvd.
Rose Avenue & 7th Avenue	Windward Avenue & Windward Circle
Rose Avenue & Main Street	7th Avenue & San Juan Avenue
17th Street/SMC Expo Station	Downtown/4th Street Expo Station
N. Venice Avenue & Pacific Avenue	Ocean Front Walk & N. Venice Blvd.
Main Street & Windward Circle	Windward Avenue & Windward Circle
Ocean Front Walk & Navy Street	

Source: Metro 2017

Table 3
Potential Phase II Project Station Locations in Pasadena

Station Intersection	Station Intersection
Huntington Hospital	Marengo Avenue & Green Street (southeast side along Marengo Avenue)
Colorado Blvd. & Garfield Avenue (Paseo Colorado) (south side of E. Colorado Blvd, opposite Garfield Avenue)	Garfield Avenue & Holly Street (northwest corner along Holly Street)
Pasadena Library & E. Walnut (Walnut north side)	Euclid Avenue & Villa Street (north side along Villa Street)
Orange Grove Blvd. & Walnut Street (south side along Walnut Street)	Fair Oaks Avenue & Peoria Street (northeast corner along Peoria Street)
E. Union Street & N. Lake Avenue (north side of E. Union Avenue, just east of Lake Avenue)	S. Lake Avenue & E. Del Mar Blvd. (southwest corner along Del Mar Blvd.)

Station Intersection	Station Intersection
S. Lake Avenue & E California Blvd. (west side of S. Lake Avenue, south of E California Blvd.)	S. Chester Avenue & Cordova Avenue (south side along Cordova Avenue)
E. Colorado Avenue & Bonnie Avenue (south side of E. Colorado Blvd., west of Bonnie Avenue)	S. Raymond Avenue & Fillmore Street (northeast side)
MTA Right-of-Way – City Maintenance (Holly Street)	N. Lake Avenue & E. Maple Avenue (southbound Foothill Transit 690 stop – west side of N. Lake Avenue, south of E. Maple Street)
Allen Avenue & Corson Street (west side of Allen Avenue, north of Corson Street)	S. Raymond Avenue & E. Del Mar Blvd. (west side of S. Raymond Avenue, opposite Del Mar Metro Station)
E. Green Street & S. Hill Avenue (north side of E. Green, west of S. Hill Avenue)	S. Pasadena Avenue & W. Dayton Street (east side of S Pasadena Avenue, north of W. Dayton Street)
S. Oakland Avenue & E. Union Street (southwest corner)	N. Lake Avenue & Merrett Drive (east side of N. Lake Avenue, opposite Merrett Drive)
N. Madison Avenue & E. Green Street (Playhouse lot)	S. Wilson Avenue & San Pasqual Street (northeast corner along Wilson Avenue)
S. Oak Knoll Avenue & E. Colorado Blvd. (northeast corner on Oak Knoll Avenue)	Wilson Avenue & Colorado Blvd. (north side)
MTA Right-of-Way – City Maintenance (Colorado Blvd.)	Fair Oaks Avenue & Mountain Street (Jackie Robinson Community Center)
S. Lake Avenue & Cordova Street (south side on Cordova Street)	Mercantile Alley (south side next to the parking structure)
E. Bellevue Drive at S. Arroyo Pkwy. (northeast corner)	Cordova & S. Los Robles (northwest corner)
Rose Bowl (near bus stop)	Caltech East (north side of street)

Source: Metro 2017

CITY OF LOS ANGELES (VENICE AND PORT OF LOS ANGELES)

ENVIRONMENTAL SETTING

The City of Los Angeles General Plan land use designation where the docking stations would be located is Open Space/Commercial/Industrial/Multifamily Residential in both the Port of Los Angeles and the community of Venice. Project sites are located in urban areas adjacent to surface parking lots and paved rights-of-way. The project sites are typically surrounded by commercial sites, with high foot traffic and served by public transit. The majority of docking sites would be located on paved rights-of-way such as sidewalks and parking lots, in areas that do not contain native vegetation and are characterized by an urban type visual character. One docking site in the Port of Los Angeles is located on what is currently turf, and would require a concrete pad to be poured. The project sites both in the Port of Los Angeles and the community of Venice are located within the Coastal Zones, which is subject to the provisions of the Coastal Act of 1976.

Per Figure CR 4 in the City of Los Angeles General Plan Draft Environmental Impact Report (EIR), the project area in the Port of Los Angeles contains historic cultural monuments, while the project area in Venice does not contain historic cultural monuments (Los Angeles 1995). Docking stations would be located near historic cultural monuments, but the stations would be on sidewalks and be congruent with the existing urban fabric. 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 (Los Angeles 1995).

Project components are described in Table 4.

Table 4
LA Metro Bike Share Project Components

Component	Description
Construction of Docking Station	Docking stations would be dropped into place. Docking stations would be held down with a weighted base, avoiding the need for bolting. One station would require the pouring of a concrete base.
Construction Equipment	Lift gate, pallet jack, trucks.
Construction Duration	Installation of docking station would take approximately four hours.
Project Operation	Docking stations would be operated by users with a pass card or a single-use permit. Bikes would be used and exchanged between stations. Solar stations would power all docking and payment stations in Venice and Port of Los Angeles.

Source: Metro 2015

A. EXEMPT STATUS

The LA Metro Countywide Bike Share system project qualifies for a CEQA Categorical Exemption under CEQA Guidelines Section 15303, New Construction or Conversion of Small Structures (Class 3).

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 analyzes why this project meets the conditions for a Class 3 – New Construction or Conversion of Small Structures exemption and includes 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 up to 26 bike share stations in the city of Los Angeles (up to 15 in Venice and up to 11 in or near the Port of Los Angeles), as shown in Tables 1 and 2. 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. Most 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, such as parking lots, or in existing rights-of-way, such as sidewalks. One docking station in Port of Los Angeles

would require that a concrete pad be poured over existing turf. Nonetheless, this disturbance would be minimal and as analyzed below would not impact environmental resources.

Conclusion

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

C. EXCEPTIONS TO CATEGORICAL EXEMPTION ANALYSIS

The analysis is based on the City of Los Angeles General Plan Draft EIR, 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 (Los Angeles 1995). The project would require a small patch of turf removal to install one docking station on the Port of Los Angeles, but no important farmland, wetlands, wild and scenic rivers, floodplains, or critical habitat would be impacted. Ground disturbance would be minimal and would not impact sensitive resources. The project sites are located in the Coastal Zones for both the Port of Los Angeles and the community of Venice. Nonetheless, the project would comply with policies included in the Venice Local Coastal Program (2001) and the Port of Los Angeles Master Plan (2014). For example, the project would comply with policies aimed at protecting scenic qualities (Section 30251) and enhancing public access to the coast (Section 30252) in the City of Venice Local Coastal Program. As such, the project would not impact resources in the Coastal Zones and exception (a) would not apply to the proposed project.

Docking stations would be located near historic structures, but the stations would be congruent with the existing urban fabric and as such would not impact historic resources.

The project would involve only minimal ground disturbance, in areas previously disturbed for turf installation and maintenance. As such, the project would not impact any archaeological or paleontological sites.

The project would not be located on sites identified as containing hazardous materials (DTSC 2017a, 2017b).

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 (Los Angeles 1995). Project installation would require a small amount of ground disturbance for the installation of one concrete pad for one docking station. No natural habitat or

endangered species would be impacted. No other docking stations would require any ground disturbance. The project area has no native wild vegetation, and existing vegetation is ornamental. As such, the project would not impact sensitive environments and this exception would not apply to the proposed project.

Historic Resources

Los Angeles contains numerous historic buildings and historic districts as shown in Figure CR 4 in the City of Los Angeles General Plan Draft EIR (Los Angeles 1995). Docking stations would be located in the vicinity of historic places and structures such as the Los Angeles Maritime Museum. Nonetheless, the stations would be visually congruent with the historic structures' existing urban setting and would not damage the quality of historic structures. 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, in existing parking spaces, or in 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 their size, the docking stations would not impact the historic resources' 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 that is included on any list compiled pursuant to Section 65962.5 of the Government Code. 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 require a small amount of ground disturbance to remove a small patch of turf to pour in a pad of concrete for the installation of one docking station in the Port of Los Angeles. No other docking station would require any ground disturbance activities or vegetation removal. Because ground disturbance would be minimal, the project would not result in any significant impacts and therefore would not contribute to any cumulative biological or cultural resources impacts. 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 the installation of new small structures. The project would be compatible with the areas' land use and would

not change their 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. As such, the project would not impact any scenic resources within an officially designated 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 Los Angeles (DTSC 2017a, 2017b; SWRCB 2017).

(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 involve a small amount of ground-disturbing activities to remove a patch of turf and pour in a concrete pad for one docking station. All other docking stations would be placed on previously disturbed paved areas via lift gate or pallet jack, and they would be held down by a weighted base. Because ground disturbance would be minimal the project would not impact any archaeological or paleontological resources. As discussed above, historical buildings are located throughout 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 structures' integrity or eligibility. Therefore, there would be no impact on cultural resources and this exception would not apply.

CITY OF PASADENA**ENVIRONMENTAL SETTING**

The City of Pasadena General Plan land use plan designations where the docking stations 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 commercial sites, with high foot traffic and served by public transit. The docking sites would be located on paved rights-of-way such as sidewalks and parking lots, areas that do not contain native vegetation and with a low degree of visual character. Per Figure 5.4-1 of the Pasadena General Plan Draft EIR, the project area contains several historic resources. Docking stations would be located near historic cultural monuments, but they would be on sidewalks and would be congruent with the existing urban fabric. Cultural and historic resources sites are protected under federal, state, and local regulations, depending on their listing status.

The City of Pasadena Draft EIR identifies the project area as largely devoid of any natural habitat that could contain any protected or endangered species (Pasadena 2015).

Project components are described in Table 5.

Table 5
LA Metro Bike Share Project Components

Component	Description
Construction of Docking Station	Docking stations would be dropped into place. Docking stations would be held down with a weighted base, avoiding the need for bolting. Minimal ground disturbance would take place at two stations.
Construction Equipment	Lift gate, pallet jack, trucks.
Construction Duration	Installation of docking station would take approximately four hours.
Project Operation	Docking stations would be operated by users with a pass card or a single-use permit. Bikes would be used and exchanged between stations. Solar stations would power most docking and payment stations. Up to 2 docking stations will be hardwired with electricity that is not solar in origin in Pasadena.
<i>Source: Metro 2015</i>	

A. EXEMPT STATUS

The LA Metro Countywide Bike Share system project qualifies for a CEQA Categorical Exemption under CEQA Guidelines Section 15303, New Construction or Conversion of Small Structures (Class 3).

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 analyzes why this project meets the conditions for a Class 3 – New Construction or Conversion of Small Structures exemption and includes 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 34 bike share stations in Pasadena, as shown in Table 3 above. 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 require a small amount of digging and pouring of concrete for up to two docking stations that will be located on what is existing turf. Other docking stations will not require digging or pavement disturbance, as the stations would have a weighted base. They would be placed on existing paved surfaces, such as parking lots, or in existing rights-of-way, such as sidewalks.

Conclusion

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

C. EXCEPTIONS TO CATEGORICAL EXEMPTION ANALYSIS

The analysis is based on the City of Pasadena's General Plan EIR, published on January 14, 2015.

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 (Pasadena 2015). The project would involve minor ground disturbance for a small amount of turf removal at up to two docking stations. As such, vegetation removal and ground disturbance would be minimal.

Docking stations would be located near historic structures, but the stations would be congruent with the existing urban fabric and as such would not impact historic resources. Because ground disturbance would be minimal and the station would be congruent with surrounding areas, the project would not impact any archaeological or paleontological sites. The project sites are not identified as containing hazardous materials (DTSC 2017a, 2017b).

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 (Pasadena 2015). Project installation would require a small amount of ground disturbance for the installation of concrete pads for up to two docking stations. Because the two stations are located on existing turf in previously disturbed areas natural habitat or endangered species would not be impacted. No other docking stations will require any ground disturbance. The project area has no native wild vegetation, and existing vegetation is ornamental. As such, the project would not impact sensitive environments and this exception would not apply to the proposed project.

Historic Resources

Pasadena contains numerous historic buildings and historic districts as shown in Figure 5.4-1 of the Pasadena General Plan Draft EIR (Pasadena 2015). Docking stations would be located in the vicinity of historic places and structures like the Rose Bowl. Nonetheless, the stations would be visually congruent with the historic structures' existing urban setting and would not damage the quality of historic structures. 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, in existing parking spaces, or in 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 their size, the docking stations would not impact the historic resources' 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 that is included on any list compiled pursuant to Section 65962.5 of the Government Code. 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 require a small amount of ground disturbance and turf removal for up to 2 docking stations. The project would not result in any significant impacts and therefore would not contribute to any cumulative biological or cultural resources impacts. 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 Pasadena regulations as they relate to the installation of new small structures. The project would be compatible 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. Although Highway 110 has a small segment in Pasadena that is an eligible state scenic highway, no bike stations are proposed on this stretch of highway. As such, the project would not impact scenic resources within an officially designated 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 that is included on any list compiled pursuant to Section 65962.5 of the Government Code in (DTSC 2017a, 2017b; SWRCB 2017).

(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 involve a small amount of ground-disturbing activities to remove turf and pour in a concrete pad for up to two docking stations. All other docking stations would be placed on previously disturbed paved areas via lift gate or pallet jack, and they would be held down by a weighted base. Because ground disturbance would be minimal, the project would not impact any archaeological or paleontological resources. As discussed above, historical buildings are located throughout 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 structures' integrity or eligibility. Therefore, there would be no impact on cultural resources and this exception would not apply.

REFERENCES

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