

CATEGORICAL EXEMPTION NARRATIVE

I. PROJECT DESCRIPTION (Continued)

To ensure that the treatment of the subject vacation area is sympathetic both to the needs of the surrounding ROW, and to the adjacent historical resource, the City recommends that the following conditions be considered: 1.) Any fencing installed within the vacation area not exceed five feet in height, and be placed a minimum of 18 inches from the sidewalk edge, to allow for buffering plantings. 2.) The installation of fencing, or any other permanent fixtures within the vacation area shall be approved by the Office of Historic Resources, consistent with the City's Cultural Heritage Ordinance. See attachment for further details.

The project proposes removal of tree wells and planting new street trees. No tree removals are anticipated in the public ROW. Tree removals and replacements or new street tree planting would be done in accordance with applicable City policy. Parkway and landscape areas would be designed in accordance with the City's Urban Forestry Division and Complete Streets Design Guide.

II. ENVIRONMENTAL REVIEW

A. Basis for Categorical Exemption

This project is exempt from CEQA pursuant to State CEQA Guidelines Article 19, Section 15305, Class 5, Minor Alterations in Land Use Limitations, Category (c). Class 5 consists of minor alterations in land use limitations in areas with an average slope of less than 20%, which do not result in any changes in land use or density, including (c) Reversion to acreage in accordance with the Subdivision Map Act. Additionally, the project is exempt pursuant to *Los Angeles CEQA Guidelines* Article III, Section 1, Class 5, Alterations in Land Use Limitations, Class (3) Minor street, alley and utility easement vacations where the vacated property does not constitute a buildable site that would allow a commercial or industrial development of more than 10,000 square feet or a residential development of more than 25 units. The project would widen the sidewalk on the western side of the street from six to 12 feet on the east edge of La Fayette Park. The project would improve the vacated area with new street trees and street lights in the public ROW, new landscaping, and pedestrian-oriented elements on private property. No changes in land use or density are proposed. As detailed in this document and the attachment, given the proposed use of the site, the zoning and uses of the adjacent properties, and the historic designation of the adjacent site, the project does not create a buildable site that would allow a commercial or industrial development of more than 10,000 square feet or a residential development of more than 25 units. Thus, the project qualifies for Class 5 categorical exemption.

B. 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 particularly sensitive environment. 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 project is exempt from CEQA pursuant to State CEQA Guidelines Article 19, Section 15305, Class 5 (c). The Project Site is located within the urbanized and developed City of Los Angeles and is currently a paved ROW. A review of available information related to biological habitat, historic and cultural resources, and hazardous materials databases did not reveal the presence of any known environmental resources of

hazardous or critical concern or otherwise sensitive environmental considerations. The project site and surrounding area are not within proximity of a known archaeological site¹. The Granada Buildings which were built in 1927 are identified as a Los Angeles Historic-Cultural Monument (LA Historic-Cultural Monument No. 238) and the buildings occupy the seven parcels on La Fayette Park Place and 7th Street that are adjacent to the southern portion of the proposed vacation area. The property owners for the Granada Buildings are the applicants for the proposed vacation. No physical changes are proposed to the façade or structure of the Granada Buildings. As further explained in the discussion for Exception (6), below, the project would not adversely change or impact the Granada Buildings and thus would not have a significant effect on cultural resources.

For the reasons stated above, this exception does not apply.

2. Cumulative Impact. This exception 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.

The project consists of the vacation of approximately 19,036 square feet of public ROW and would widen the sidewalk on the western side of the street from six to 12 feet on the east edge of La Fayette Park. The project would improve the vacated area with new street trees and street lights in the public ROW, new landscaping, and pedestrian-oriented elements on private property. No other projects of the same type are anticipated in the area and no other projects in the vicinity are known to overlap during construction. The minor improvements proposed for this project are not anticipated to have significant effects as further described below (3) and are also not anticipated to result in a cumulative impact. Therefore, this exception has no application to this project.

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.

As indicated above, La Fayette Park Place is designated as a Standard Local Street in the *2035 Mobility Plan* with a corresponding designated ROW width of 60 feet, consisting of a 36-foot roadway with 12-foot sidewalks on either side. Currently, La Fayette Park Place has a ROW with a width of 120 feet. The proposed vacation intends to widen the sidewalk on the western side of the street from six to 12 feet on the east edge of La Fayette Park. The project would improve the vacated area with new street trees and street lights in the public ROW, new landscaping, and pedestrian-oriented elements on private property. Parkway and landscape areas would be designed in accordance with the City's Urban Forestry Division and Complete Streets Design Guide.

Per a tree report prepared for the Project by Psomas², 19 trees are located within the proposed vacation area; these trees consist of jacaranda trees, Canary Island date palms, Indian laurel fig, Carolina laurel cherry trees, sweet bay trees, Mexican fan palm, and London plane trees. Any tree removal and replacement would be in accordance with City policy and per applicable tree removal permit(s).

Based on the scope and nature of the project, the proposed will not result in a reduction or loss of public open space, usability, or public views. Street vacations are known to occur in various locations throughout the City and are not uncommon or unusual. This project has not identified unusual circumstances or significant effects. No reasonable possibility that the project will have a significant effect due to unusual circumstances has been identified. Therefore, this exception has no application to this project.

¹ City of Los Angeles, *Citywide General Plan Framework Final Environmental Impact Report*, certified August 2001, Figure CR-1 – Prehistoric and Historic Archaeological Sites and Survey Areas in the City of Los Angeles.

² Psomas, Tree Evaluation Report for the La Fayette Park Place Partial Street Vacation Project Site, City of Los Angeles, California, June 29, 2021.

4. Scenic Highway. 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.

The project location was referenced against the database of scenic highways at <https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways> and no scenic highway is located within the vicinity of the project or within the project site.

Since the proposed project is not within a state designated scenic highway or within sight of any state designated scenic highway, this exception has no application.

5. Hazardous Waste Site. 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 October 20, 2021, the State Department of Toxic Substances Control (DTSC) (Envirostor database at <https://www.envirostor.dtsc.ca.gov/public/>) and the California Regional Water Quality Control Board (RWQCB) (Geotracker database at <https://geotracker.waterboards.ca.gov/>) have not listed the project site, as such, this exception does not apply.

6. Historical Resources. This exception applies when a project may cause a substantial adverse change in the significance of a historical resource.

No historical resource is involved in the proposed project. As indicated in the Attachment, a significant adverse effect would occur if a project were to adversely affect a historical resource. A substantial adverse change in the significance of a historic resource means demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired. As discussed above, the project consists of the vacation of a portion of the ROW and subsequent improvement the vacated area with new street trees and street lights in the public ROW, new landscaping, and pedestrian-oriented elements on private property.

The project does not include any development on the 420-foot ROW segment. Adjacent to the project Site are the Granada Buildings at 666 S. La Fayette Park Place. The Granada Buildings are a designated Los Angeles Historic-Cultural Monument (LA Historic-Cultural Monument No. 238) and were built in 1927 as indicated above. The Granada Buildings and surface parking lot occupy the seven parcels zoned C-2 at the corner of La Fayette Park Place and 7th Street, and they directly abut the southern portion of the proposed vacation area. The property owners for the Granada Buildings are the applicants for the proposed vacation, but there are no physical changes proposed to the façade or structure of the Granada Buildings. While the Granada Buildings represent the presence of historical resources in the project area, the project consists of vacation of a ROW and associated improvements to the vacated area, and the project does not include any alterations to the existing buildings. The installation of fencing, or any other permanent fixtures within the vacation area shall be approved by the Office of Historic Resources, consistent with the City's Cultural Heritage Ordinance, thus no substantial adverse change in the significance of the Historic Monument is anticipated. Thus, this exception has no application to this project. Refer to the Attachment for additional information.

III. REFERENCES

California Code of Regulations, Title 14, Division 6, Chapter 3 (State CEQA Guidelines), available from <https://leginfo.legislature.ca.gov/>

California Regional Water Quality Control Board. *Geotracker*. Retrieved October 20, 2021, from [https:// geotracker.waterboards.ca.gov](https://geotracker.waterboards.ca.gov).

California Department of Transportation (Caltrans). *California State Scenic Highway System Map*. Retrieved September 8, 2021, from

La Fayette Park PI (Por of) (SELY SIDE) Between Hoover St and Wilshire BI - VAC E1401363

<https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aaca>

City of Los Angeles Department of City Planning Parcel Profile Report. Retrieved on October 20, 2021, from *NavigateLA* <http://boemaps.eng.ci.la.ca.us/navigate/>

City of Los Angeles Department of Public Works Bureau of Engineering. Retrieved on October 20, 2021, *NavigateLA*. <http://boemaps.eng.ci.la.ca.us/navigate/>

City of Los Angeles Environmental Quality Act Guidelines

City of Los Angeles Municipal Code

Psomas, Tree Evaluation Report for the La Fayette Park Place Partial Street Vacation Project Site, City of Los Angeles, California, June 29, 2021

Public Resources Code, Div. 13, Sections 21000-21189 (CEQA), available from Public Resources Code Section 5097.98

State Department of Toxic Substances Control. *Envirostor*. Retrieved October 20, 2021, from www.envirostor.dtsc.ca.gov

ATTACHMENT

Findings Supporting a Categorical Exemption, July 2021, by EcoTierra Consulting, Inc.

Findings Supporting a Categorical Exemption

Case Number: VAC-E1401363

Project Location: La Fayette Park Place between Wilshire Boulevard and Hoover Street

Community Plan Area: Westlake

Council District: 1 – Cedillo

Project Description: The Project includes vacation of an approximately 42-foot strip of La Fayette Park Place between Wilshire Boulevard and Hoover Street. The Project would consist of vacation of the strip of La Fayette Park Place and improvement of a new 12-foot wide sidewalk on the east side of the 36-foot wide roadway. The vacated portion of La Fayette Park Place would remain as landscaped open space. There is no development proposed as part of the Project.

PREPARED FOR:

City of Los Angeles
Bureau of Engineering, Department of Public Works

PREPARED BY:

EcoTierra Consulting, Inc.

APPLICANT:

672 La Fayette Park Place, LLC

July 2021

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I. INTRODUCTION

1. INTRODUCTION

The subject of this document is the proposed vacation of an approximately 42-foot strip of La Fayette Park Place (the “Project”), between Wilshire Boulevard and Hoover Street (the “Project Site”) in the Westlake community of the City of Los Angeles (the “City”). The Project is discussed in further detail in Section II, Project Description. The Project Site is located within the Westlake Community Plan Area of the City of Los Angeles. The City of Los Angeles Bureau of Engineering is the Lead Agency under the California Environmental Quality Act (CEQA).

2. PROJECT INFORMATION

Project Title: La Fayette Park Place

Project Applicant: 672 La Fayette Park Place, LLC

Project Location: La Fayette Park Place between Wilshire Boulevard and Hoover Street, Los Angeles, CA 90057

Lead Agency: Bureau of Engineering | Department of Public Works
1149 S. Broadway, Suite 600
Los Angeles, CA 90015

3. ORGANIZATION OF THIS DOCUMENT

This document is organized as follows:

Introduction: This section provides introductory information such as the Project title, the Project Applicant, and the designated Lead Agency for the proposed Project.

Project Description: This section provides a detailed description of the proposed Project including the environmental setting, Project characteristics, and environmental clearance requirements.

Categorical Exemption Analysis: This section contains a consistency analysis of the Project with the appropriate Categorical Exemption class and demonstrates that exclusions to a Categorical Exemption are not applicable to this Project.

II. PROJECT DESCRIPTION

1. PROJECT SUMMARY

The Project proposes the vacation of an approximately 42-foot wide strip of La Fayette Park Place between Wilshire Boulevard and Hoover Street. The Project would consist of vacation of the strip of La Fayette Park Place along the southeast edge of the right-of-way and improvement of a new 12-foot wide sidewalk on the east side of the 36-foot wide roadway. The vacated portion of La Fayette Park Place would remain as landscaped open space. There is no development proposed as part of the Project.

2. ENVIRONMENTAL SETTING

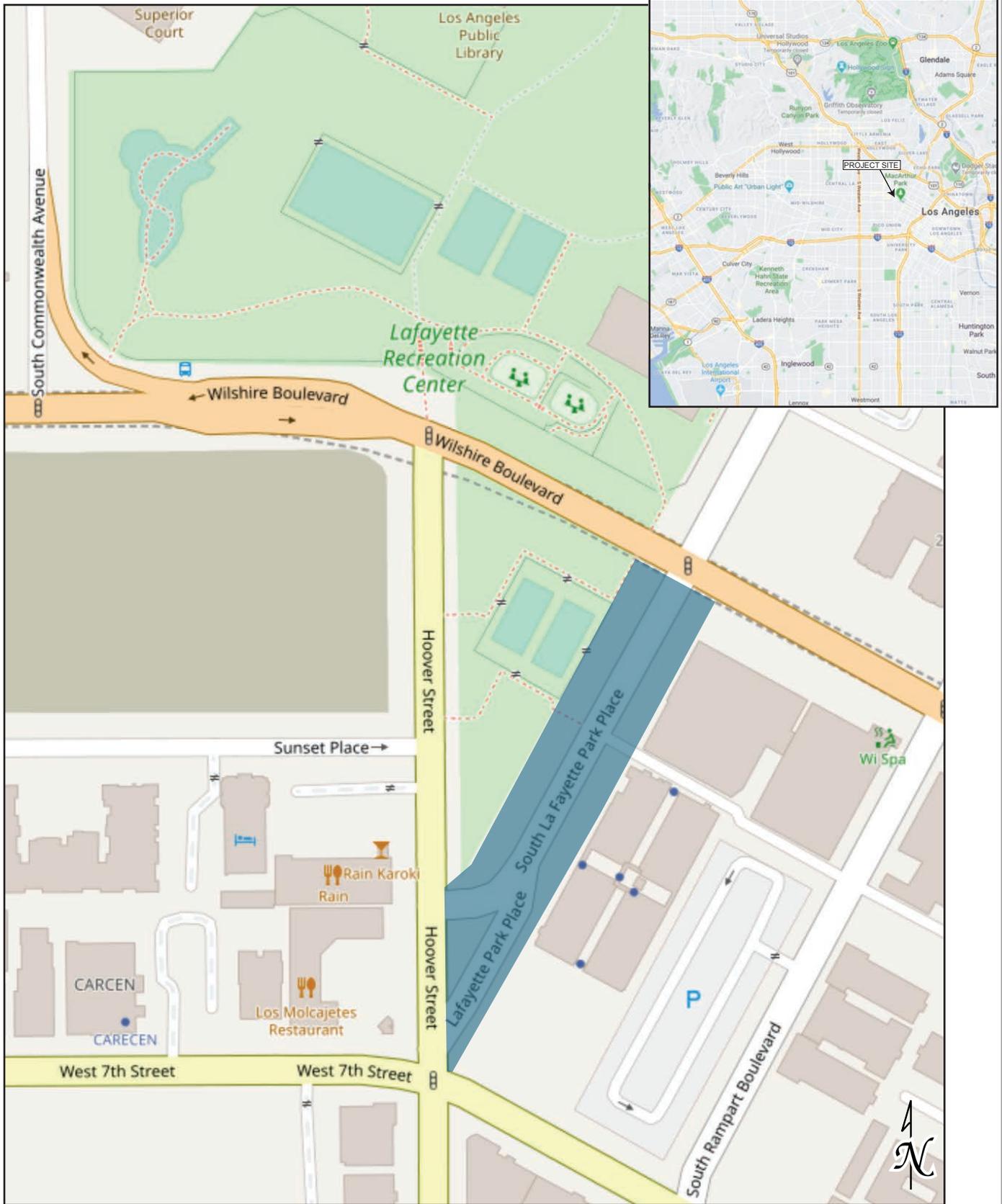
a) Project Location

The proposed vacation consists of an approximate 420-foot segment on the southeast side of La Fayette Park Place, between Hoover Street and Wilshire Boulevard (see Figure II-1, **Regional Vicinity and Project Location Map**). The area to be vacated is located on the southeast edge of La Fayette Park Place and is approximately 42-feet wide (see Figure II-2, **Aerial Photograph of the Project Site**); upon completion, the vacated area would total $\pm 19,036$ square feet.

Regional access to the Project Site is provided by the Hollywood Freeway (“US 101”) approximately one (1) mile to the north-northeast and the Harbor Freeway (“SR 110”). Local access to the Project Site is provided by Wilshire Boulevard, Beverly Boulevard, Hoover Street, and 7th Street.

a) Existing Conditions

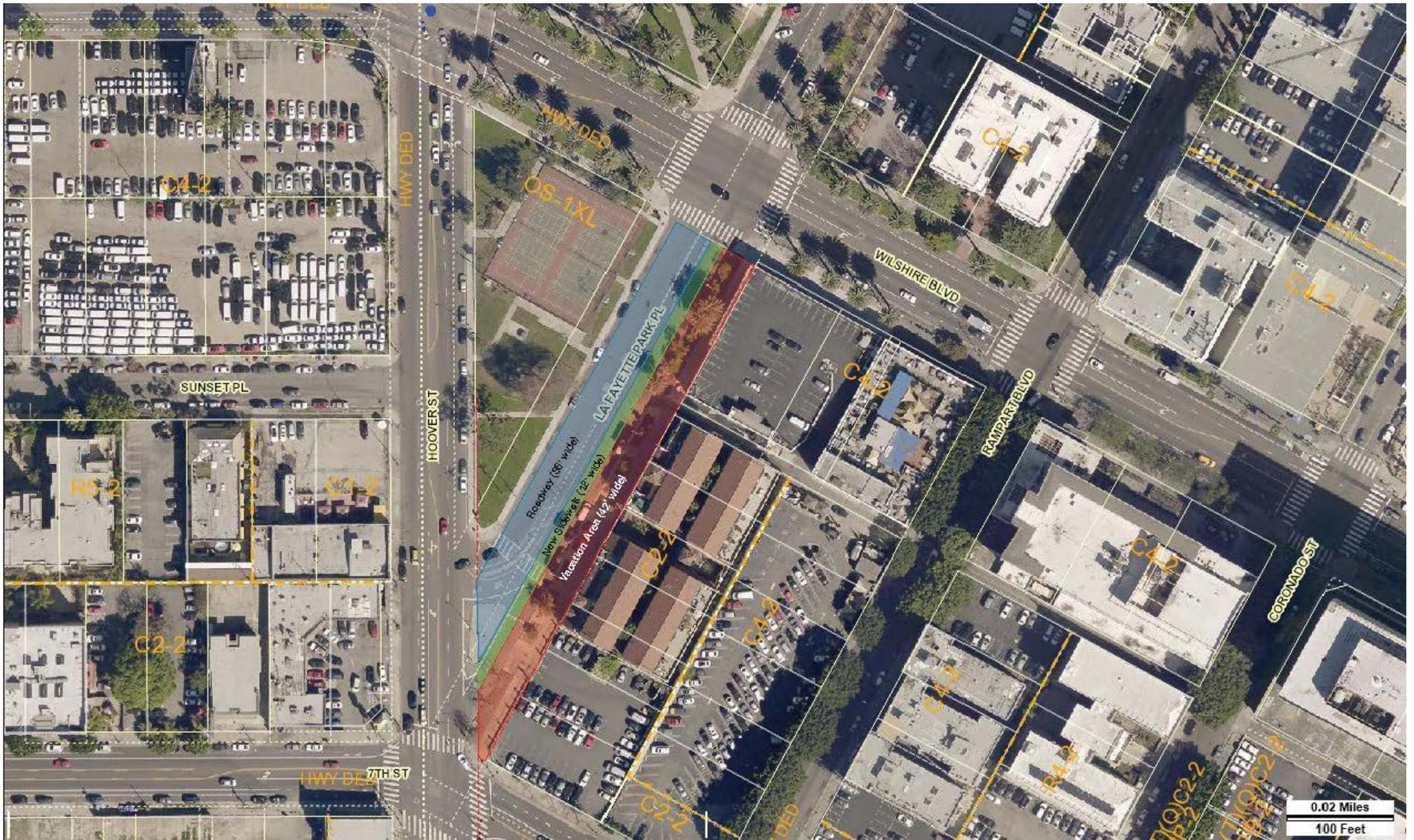
The area of La Fayette Park Place to be vacated is currently over-dedicated as a ROW with a width of 120-feet (see Figure II-3, **Existing and Proposed ROW Conditions**). The private properties directly east of the ROW area to be vacated are zoned C4-2 (two parcels) and C2-2 (seven parcels).



■ Project Site

Source: OpenStreetMap and GoogleEarth, November 2020.

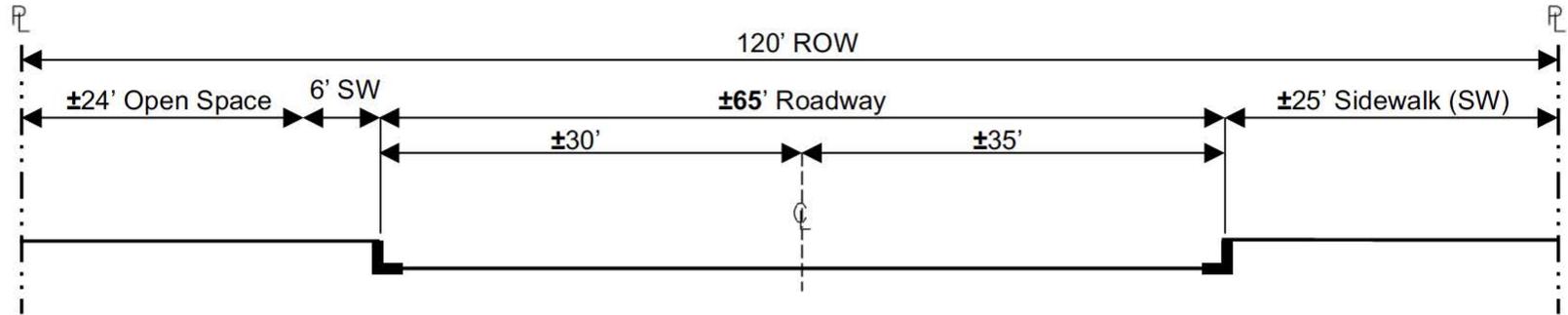
Figure II-1
Regional Vicinity and Project Location Map



Source: City of Los Angeles, Department of Planning, ZIMAS, March 2019.

Figure II-2
Aerial Photograph of Project Site

APPROXIMATE EXISTING CONDITION: 120' ROW*
(looking North)



APPROXIMATE PROPOSED CONDITION: 78' ROW
Local Street – Standard
(looking North)

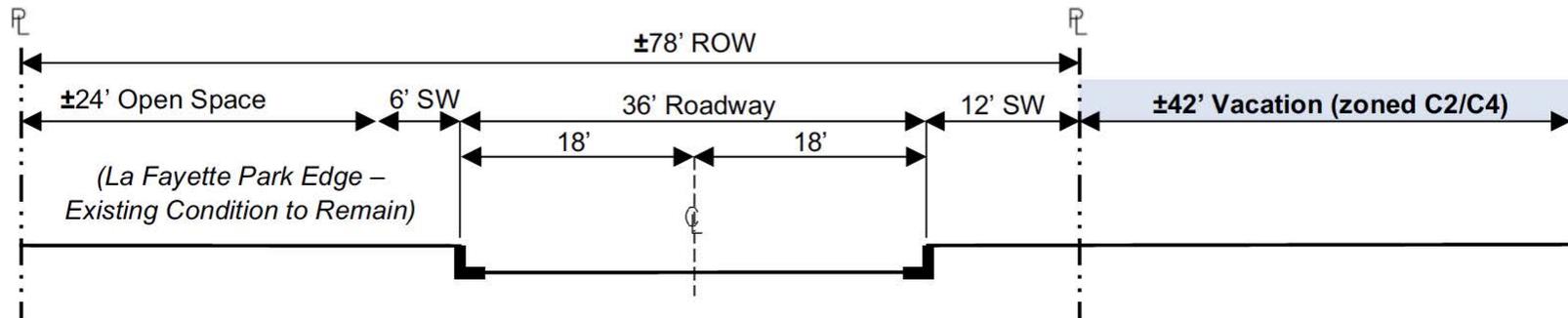


Figure II-3
Existing and Proposed ROW Conditions

b) Surrounding Land Uses

The area to be vacated abuts the following addresses and parcels:

- 656 S. La Fayette Park Place (APN 5141-011-016, zoned C4-2)
- 666 S. La Fayette Park Place (APN 5141-011-015, zoned C2-2)
- 684 S. La Fayette Park Place, 2715-2723 W 7th Street (APNs 5141-011-014 and -018, zoned C2-2)

These parcels are designated as land uses Community Commercial (corresponding zoning: C1, C2, C4, CR, RAS3, RAS4, P) and Regional Center (corresponding zoning: C2, C4, RAS3, RAS4, P, PB). One C4-2 parcel is currently used for retail and commercial office uses, and the seven C2-2 parcels are currently used for a variety of commercial tenants, known as The Granada Buildings. Abutting the west edge of the ROW is La Fayette Park and a temporary homeless shelter (“La Fayette Triangle Bridge Housing”).

The Granada Buildings (LA Historic-Cultural Monument No. 238), built as two-story live-work spaces in 1927, occupy the seven parcels zoned C-2 at the corner of La Fayette Park Place and 7th Street, and the buildings and their surface parking lots directly abut the southern portion of the proposed vacation area.

Based on the City’s ZIMAS database and aerial photos, landscaping consistent with the landscaping at the southeasterly edge of La Fayette Park extends beyond the property line to the sidewalk, but appears to still function as open space. The existing alley that leads to La Fayette Park Place from the east is not proposed to be modified and will remain accessible.

Along Hoover Street south of where La Fayette Park Place intersects are commercial uses including retail, restaurant, and office.

3. PROJECT CHARACTERISTICS

The Project proposes vacation of an approximate 420-foot segment on the southeast side of La Fayette Park Place, between Hoover Street and Wilshire Boulevard. The area to be vacated is located on the southeast edge of La Fayette Park Place and is approximately 42-feet wide; upon completion, the vacated area would total approximately 19,036 square feet. This portion of La Fayette Park Place is an over-dedicated ROW with a width of 120 feet. It is designated in the 2035 Mobility Plan to be a Standard Local Street with a corresponding designated ROW width of 60 feet, consisting of a 36-foot roadway with 12-foot sidewalks on either side (as shown in Figure II-2, **Existing and Proposed ROW**

Conditions). The proposed vacation intends to widen the sidewalk on the eastern side of the street to 12 feet. The Project would improve the vacated area with new street trees and street lights in the relocated public ROW, new landscaping, a widened public sidewalk on the east side of the street, and walkways on private property (see Figure II-4, **Site Plan**).

The existing alley that leads to La Fayette Park Place from the east is not proposed to be modified and will remain accessible.

The proposed vacation will require partial or full closures of La Fayette Park Place to both vehicular and pedestrian traffic during construction. The project will require the removal, replacement and construction of new sidewalks, utilities, landscaping and any existing parkways or tree wells. Because the vacation would only be applicable to the existing, over-designated ROW, there are no current structures that would be removed.

Pending approval, the vacation will result in real property reverting to the owner(s) of the adjacent parcels.

c) Construction

The Project would be constructed within 24 months of Project approval. Construction activities would include the removal, replacement and construction of new sidewalks, utilities, landscaping and any existing parkways or tree wells. The Project is estimated to require an export of approximately 400 cubic yards of street material and an import of approximately 300 cubic yards of soil. Exported materials would likely be disposed at the Azusa Land Reclamation Landfill in Azusa.

4. REQUESTED PERMITS AND APPROVALS

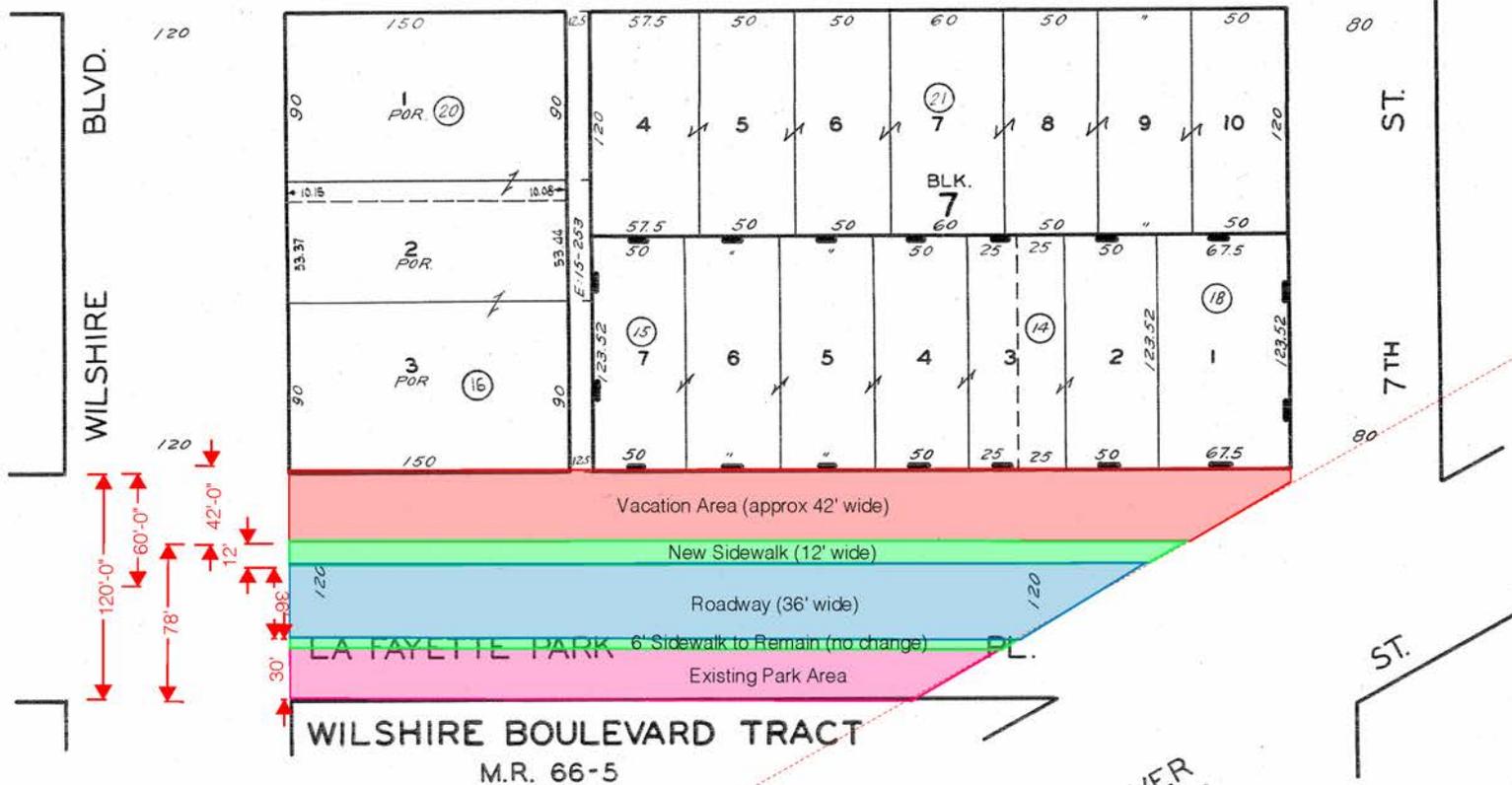
The list below includes the anticipated requests for approval of the Project. The discretionary and ministerial entitlements, reviews, permits, and approvals required to implement the Project include, but are not necessarily limited to, the following:

- (1) Approval of the proposed vacation;
- (2) Permits as required by BOE, LADOT, and Department of City Planning for any temporary or permanent road closures as a result of the vacation; and
- (3) Other discretionary and ministerial permits and approvals that may be deemed necessary, including, but not limited to, tree removal, street lighting, and changes to utilities in order to execute and implement the Project.

5141 II
SCALE 1" = 60'

3-26-66 REVISED
680306 3-13-57
12-18-57
4-15-59
920318/0011002-23
991213
2006032105001002-28

2006



WILSHIRE BOULEVARD TRACT
M.R. 66-5

LETTS RESUBDIVISION
OF LOTS 11, 12, 13, 14, 15, 16 AND 17, BLK. 7
OF THE WILSHIRE BOULEVARD
TRACT

M.B. 1-61

CODE
12706

FOR PREV. ASSMT. SEE: 1682-11

HOOVER

*Existing 6' sidewalk and park edge
to be maintained.

ASSESSOR'S MAP
COUNTY OF LOS ANGELES, CALIF.

Figure II-4
Site Plan

5. ENVIRONMENTAL REVIEW

As demonstrated in the following Section III, Categorical Exemption Analysis, this Project has been determined to qualify as a Class 5 “Minor Alterations in Land Use Limitations” project, which is a categorical exemption under CEQA. The Project meets the City’s LA CEQA Guidelines definition of a “Minor Alterations in Land Use Limitations” project as further discussed below.

III. CATEGORICAL EXEMPTION ANALYSIS

1. EXEMPTION

The Project qualifies for a Class 5 –Minor Alterations in Land Use Limitations Project Categorical Exemption under the California Environmental Quality Act (CEQA) (Public Resources Code, Sections 21000-21189.57) as set forth in Section 15332 of the *State CEQA Guidelines* (California Code of Regulations, Title 14, Chapter 3, Sections 15000-15387). The Project meets the 2002 *City of Los Angeles Environmental Quality Act Guidelines* definition of a “Minor Alterations in Land Use Limitations” project for a Class 5 Categorical Exemption.

2. EXEMPTION RATIONALE

Article 19, Categorical Exemptions, of the *State CEQA Guidelines* (Sections 15300 – 15333) lists classes of projects which have been determined not to have a significant effect on the environment and which are exempt from the provisions of CEQA as required by Section 21084 of the Public Resources Code. This section provides an analysis demonstrating that the Project meets the conditions for a Class 5 Categorical Exemption and that none of the possible exceptions to a Categorical Exemption listed in Section 15300.2 of the *State CEQA Guidelines* is applicable to this Project. The specific language of the conditions of the Class 5 Categorical Exemption and each possible exception is shown in italics below under their respective headings, which are followed by the Project analysis for each condition and exception.

a) Conditions of the Class 5 Categorical Exemption

[State CEQA Guidelines Section] 15305. Minor Alterations in Land Use Limitations

Class 5 consists of minor alterations in land use limitations in areas with an average slope of less than 20%, which do not result in any changes in land use or density, including but not limited to:

- (a) Minor lot line adjustments, side yard, and set back variances not resulting in the creation of any new parcel;*
- (b) Issuance of minor encroachment permits;*
- (c) Reversion to acreage in accordance with the Subdivision Map Act.*

The 2002 *City of Los Angeles Environmental Quality Act Guidelines* includes a list of 40 specific types of projects that fall under the Class 5 “Minor Alterations in Land Use

Limitations” project type. Of the 40 types of projects listed, the Project meets the project type defined as:

- 3) *Minor street, alley and utility easement vacations where the vacated property does not constitute a buildable site that would allow a commercial or industrial development of more than 10,000 square feet or a residential development of more than 25 units.*

(1) Project Analysis

The Project Site, an approximate 420-foot segment on the southeast side of La Fayette Park Place, between Hoover Street and Wilshire Boulevard, is flat and does not contain any slopes of 20 percent or more.

The Project does not include any changes in land use or density. The Project does not include any development on the 420-foot ROW segment.

Consistent with the conditions above, the Project would not result in the creation of any new parcel. The Project does not include a request for reversion to acreage.

Additionally, the Project includes a street vacation that would not constitute a buildable site; the vacated area would be improved with street trees, lighting, and landscaping. There is no development proposed for the vacated area and thus a commercial or industrial development of more than 10,000 square feet or a residential development of more than 25 units would not occur.

Thus, the Project meets the conditions enumerated for a Class 5 Categorical Exemption under CEQA and the 2002 City of Los Angeles Environmental Quality Act Guidelines.

b) Exceptions to a Categorical Exemption

[State CEQA Guidelines Section] 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.*
- (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.*

- (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.
- (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.
- (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.
- (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.

(1) Project Analysis

Exception (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.

The Project Site is located within the urbanized and developed City of Los Angeles and is currently a paved ROW.

A review of available information related to biological habitat, historic and cultural resources, and hazardous materials databases did not reveal the presence of any known environmental resources of hazardous or critical concern or otherwise sensitive environmental considerations. Specifically, no riparian or other sensitive natural communities exists on the Project Site or in the surrounding area.¹ The Project Site and surroundings are not located in or adjacent to a Biological Resource Area or Significant Ecological Area as defined by the City of Los Angeles or the County of Los Angeles.^{2,3} In addition, there are no other sensitive natural communities identified by the CDFW or

¹ US EPA, NEPAassist, website: <https://nepassisttool.epa.gov/nepassist/nepamap.aspx>, accessed: November 2020.

² US EPA, NEPAassist, website: <https://nepassisttool.epa.gov/nepassist/nepamap.aspx>, accessed: November 2020.

³ Los Angeles County, Los Angeles County General Plan, Figure 9.3 Significant Ecological Areas and Coastal Resource Areas Policy Map, October 6, 2015.

USFWS.^{4,5} A tree report prepared for the Project by Psomas determined that there are 19 trees within in the proposed vacation area; these trees consist of jacaranda trees, Canary Island date palms, Indian laurel fig, Carolina laurel cherry trees, sweet bay trees, Mexican fan palm, and London plane trees. As determined by the tree report, none of the 19 trees are considered “protected trees”, as defined in the City’s Municipal Code.⁶

The Project Site and surrounding area are not within proximity of a known archaeological site.⁷ The Granada Buildings are identified as a Los Angeles Historic-Cultural Monument (LA Historic-Cultural Monument No. 238); built as two-story live-work spaces in 1927, the buildings occupy the seven parcels zoned C-2 at the corner of La Fayette Park Place and 7th Street, and they directly abut the southern portion of the proposed vacation area. The property owners for the Granada Buildings are the applicants for the proposed vacation, but there are no physical changes proposed to the façade or structure of the Granada Buildings. As further explained in the discussion for Exception [e]), below, the Project would not adversely change or impact the Granada Buildings and thus would not have a significant effect on cultural resources.

Review of the GeoTracker and EnviroStor environmental databases found that there are no documented hazardous sites or cleanup sites within or adjacent to the Project Site.⁸

The Project Site does not contain any particularly sensitive environment; specifically, the Project Site does not contain any habitat capable of sustaining any species identified as endangered, rare, or threatened. Furthermore, the Project would not impact an environmental resource of hazardous or critical concern (see also the discussion for Exception [e]), below). Therefore, the exception is not applicable to the Project.

Exception (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.

Cumulative impacts are two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts (State CEQA Guidelines Section 15355). The Project consists of the vacation of a portion of the ROW and subsequent improvement the vacated area with new street trees and street

⁴ California Department of Fish and Wildlife, CDFQ Lands, website: <https://apps.wildlife.ca.gov/lands/>, accessed: November 2020.

⁵ United States Fish and Wildlife Service, National Wetlands Inventory, website: <https://www.fws.gov/wetlands/data/Mapper.html>, accessed: November 2020.

⁶ Psomas, Tree Evaluation Report for the La Fayette Park Place Partial Street Vacation Project Site, City of Los Angeles, California, June 29, 2021.

⁷ City of Los Angeles, Citywide General Plan Framework Final Environmental Impact Report, certified August 2001, Figure CR-1 – Prehistoric and Historic Archaeological Sites and Survey Areas in the City of Los Angeles.

⁸ California Department of Toxic Substances Control, EnviroStor, website: <http://www.envirostor.dtsc.ca.gov/public/>, accessed: November 2020.

lights in the public ROW, new landscaping, and pedestrian-oriented elements on private property. The Project does not include any development on the 420-foot ROW segment.

Other than the possibility of construction of the proposed vacation overlapping with construction of other projects in the immediate vicinity, there is no potential for successive projects to result from the Project's proposed ROW vacation. During construction of the Project, minor and temporary impacts may occur such as lane closures, street tree planting, restriping, and sidewalk restoration. Such activities would be temporary, singular, and minor such that the cumulative nature of impacts would not be significant. This exception is not applicable to the Project.

Exception (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.

There are no unusual circumstances with the Project Site or the Project that would create a reasonable possibility of significant effects to the environment. The Project Site is located within a highly urbanized setting, and the Project would vacate a portion of the existing ROW. Moreover, the Lead Agency has not determined an unusual circumstance is applicable to the Project. The Project does not conflict with the underlying zoning or governing documents, and in fact, the proposed vacation would result in the ROW being more consistent with the 2035 Mobility Element, which designates the ROW as a Standard Local Street, which is to have a designated ROW width of 60 feet. Currently the ROW is 120 feet, and after vacation the ROW would be 36 feet wide. Pending approval, the vacation will result in real property reverting to the owner(s) of the adjacent parcels.

The Project would result in widened public sidewalks of 12 feet on the eastern side, able to accommodate parkway and landscape areas in accordance with the City's Urban Forestry Division and Complete Streets Design Guide. The Project would also create new opportunities for private frontage features and ADA-compliant pedestrian-oriented elements that activate historic Granada Building's primary frontage along La Fayette Park Place. The vacation will also allow for the consolidation of the intersection of La Fayette Park Place and Hoover Street, eliminating the existing forked-intersection and concrete island.

The proposed vacation intends to retain the existing curb and sidewalk on the east edge of La Fayette Park. The proposed vacation will not result in a reduction or loss of public open space, usability, or public views.

Therefore, as there are no unusual circumstances regarding the Project or Project Site, the exception is not applicable to the Project.

Exception (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.

There are no State-designated scenic highways or highways eligible for scenic designation in the Project Site vicinity. There are also no locally-designated scenic highways in the Project Site vicinity.⁹ Furthermore, the Project does not propose any changes or alterations to a designated state scenic highway. Therefore, as the Project Site is not located along a State- or City-designated scenic highway, the exception is not applicable to the Project.

Exception (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.

California Government Code Section 65962.5 requires various State agencies to compile lists of hazardous waste disposal facilities, unauthorized releases from underground storage tanks, contaminated drinking water wells, and solid waste facilities where there is known migration of hazardous waste, and submit such information to the Secretary for Environmental Protection on at least an annual basis. A significant impact may occur if a project site is included on any of the above lists and poses an environmental hazard to surrounding sensitive uses.

There are no known hazardous sites associated with the Project Site as according to California Department of Toxic Substances Control's ("DTSC") EnviroStor database.¹⁰ Therefore, the Project would not pose an environmental hazard to surrounding sensitive uses or the environment in regards to siting the Project on a known hazardous waste site or any other type of site appearing on a list compiled pursuant to Section 65962.5 of the Government Code, and a less than significant impact would occur. Therefore, as the Project Site is not located on a hazardous waste site and no hazardous materials occur at the Project Site, no potentially significant hazardous impacts would result. This exception is not applicable to the Project.

⁹ City of Los Angeles Department of City Planning, *Mobility Plan 2035, Citywide General Plan Circulation System, Map A4 – Central, Midcity Subarea, and Map A5 – Central, East and Cornfield Arroyo Secco Plan (CASP) Subarea*, September 2016.

¹⁰ California Department of Toxic Substances Control, *EnviroStor*, website: <http://www.envirostor.dtsc.ca.gov/public/>, accessed: November 2020.

Exception (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.

Section 15064.5 of the *State CEQA Guidelines* defines a historical resource as:

1. a resource listed in or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources;
2. a resource listed in a local register of historical resources or identified as significant in an historical resource survey meeting certain state guidelines; or
3. an object, building, structure, site, area, place, record or manuscript which a lead agency determines to be significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California, provided that the lead agency's determination is supported by substantial evidence in light of the whole record.

A significant adverse effect would occur if a project were to adversely affect a historical resource meeting one of the above definitions. A substantial adverse change in the significance of a historic resource means demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired.

As discussed above, the Project consists of the vacation of a portion of the ROW and subsequent improvement the vacated area with new street trees and street lights in the public ROW, new landscaping, and pedestrian-oriented elements on private property. The Project does not include any development on the 420-foot ROW segment.

Adjacent to the Project Site are the Granada Buildings at 666 S. La Fayette Park Place. The Granada Buildings are a designated Los Angeles Historic-Cultural Monument (LA Historic-Cultural Monument No. 238).¹¹ Built as two-story live-work spaces in 1927, the Granada Buildings and surface parking lot occupy the seven parcels zoned C-2 at the corner of La Fayette Park Place and 7th Street, and they directly abut the southern portion of the proposed vacation area. The property owners for the Granada Buildings are the applicants for the proposed vacation, but there are no physical changes proposed to the façade or structure of the Granada Buildings.

While the Granada Buildings represent the presence of historical resources in the Project area, the Project consists of vacation of a ROW and associated improvements to the vacated area, and the Project does not include any alterations to the existing buildings.

¹¹ *Historic Places LA, Los Angeles Historic Resources Inventory, Resource Report, Granada Buildings, website: <http://www.historicplacesla.org/reports/81dea527-5c19-4b57-b84b-48bc94f64096>, accessed November 2020.*

Furthermore, the area to be vacated is not considered to be a contributing feature to the Granada Building's historical status. Thus, the Project would not alter the historic significance of the Granada Buildings.

Furthermore, the Project Site is not within a Historical Preservation Overlay Zone.¹² The Project Site itself is not identified as an eligible resource by Survey LA, the City's office historic resources survey;¹³ or as a City Historic-Cultural Monument.¹⁴ Moreover, the Project Site itself is not listed as an historical resource in national or State registries.¹⁵

Therefore, implementation of the proposed Project would not result in a substantial adverse change to a historic resource. This exception is not applicable to the Project.

(2) Conclusion

None of the six exceptions to a Categorical Exemption is applicable to this Project. As the Project meets the conditions enumerated for a Class 5 Categorical Exemption under CEQA and no exceptions are applicable, the Project therefore qualifies for a Categorical Exemption under CEQA and the 2002 City of Los Angeles Environmental Quality Act Guidelines. No further analysis is required.

¹² *City of Los Angeles Department of City Planning, Zone Information & Map Access System.*

¹³ *City of Los Angeles Department of City Planning, Office of Historic Resources, Historic Places LA online map.*

¹⁴ *City of Los Angeles Department of City Planning, Historic-Cultural Monument (HCM) List, August 22, 2019.*

¹⁵ *City of Los Angeles Department of City Planning, Office of Historic Resources, Historic Places LA online map.*