

II. Project Description

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1. Introduction

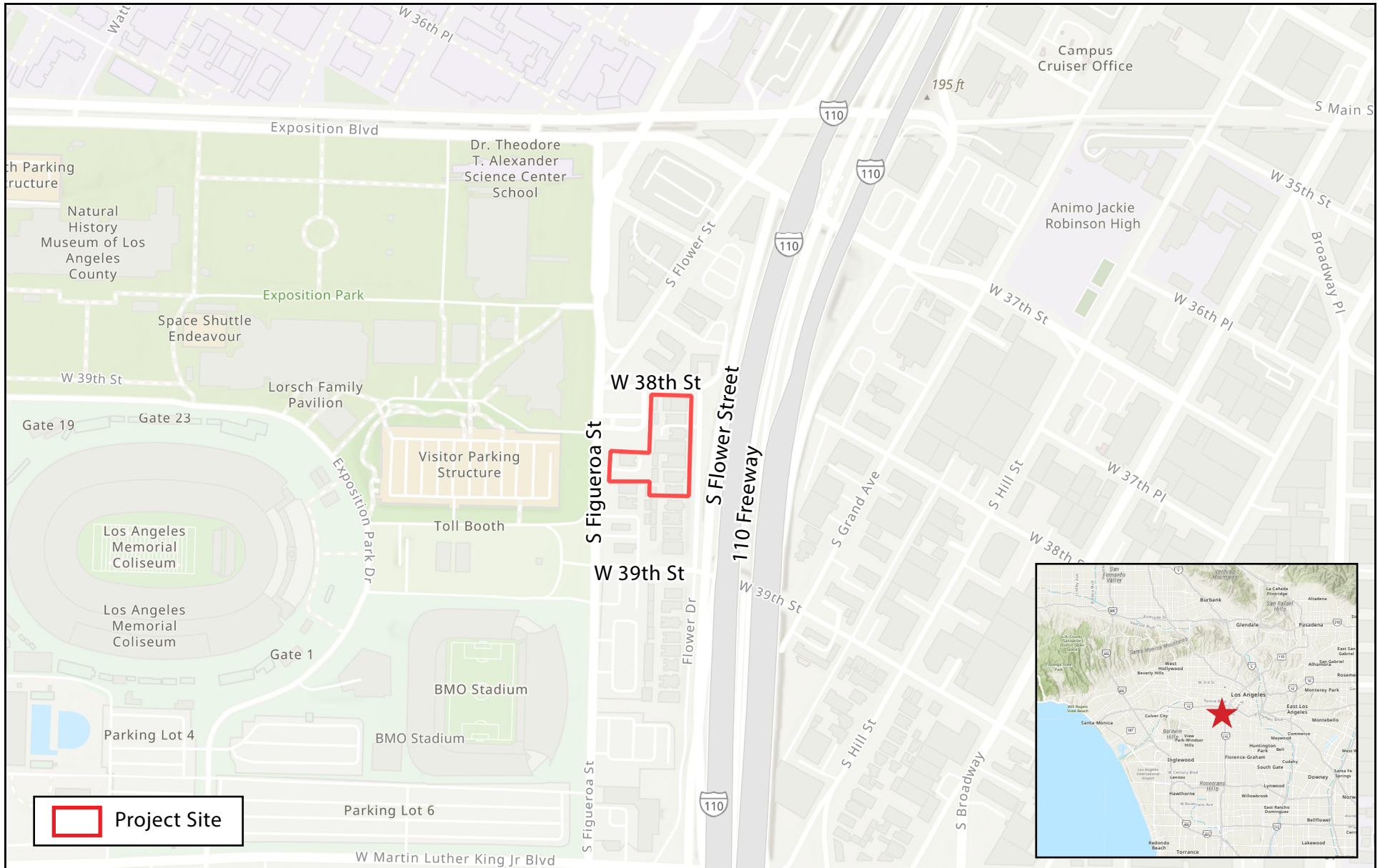
The Project proposes a new seven-story, mixed-use building comprised of 209 dwelling units (including 16 units for Low-Income households, 22 units for Very Low-Income households, and four units for Extremely Low-Income households); and 2,705 square feet of ground level retail and restaurant uses. The Project would have a maximum building height of 86 feet, and a total floor area of 252,148 square feet on a 62,988 square-foot (1.4-acre) site. The Project involves the demolition of eight multi-family residential buildings (seven of which are within the Flower Drive Historic District), and the removal of surface parking areas.

2. Environmental Setting

a. Project Location

The Project Site is located at 3822- 3828 South Figueroa Street, 3801- 3833 ½ South Flower Drive, and 468 -470 West 39th Street (APN 5037-031-001 to -007, -015, -016) directly east of Exposition Park within an urbanized area approximately two miles southwest of Downtown Los Angeles, as shown in **Figure II-1: Regional Map**, on page **II-2**. The Project Site is generally bounded by South Figueroa Street to the west, West 38th Street to the north, South Flower Drive and Interstate 110 (I-110) freeway to the east, and existing residential uses and an auto servicing center to the south.

Local access to the Project Site is provided by South Figueroa Street, and primary regional access is provided by the I-110 freeway located directly east of South Flower Drive and Interstate 10 (I-10) located 1.6 miles north of the Project Site. Public transportation in the vicinity of the project Site includes the Los Angeles County Metropolitan Transportation Authority (Metro) E rail line located 0.3 miles north of the Project Site on Exposition Boulevard, and multiple local and express bus lines including Metro lines 2, 81, and 550 which travel north/west along South Figueroa Street. The Los Angeles Department of Transportation (LADOT) also serves the Project Site with the DASH Southeast – Clockwise and Counterclockwise service routes.



SOURCE: ESRI, 2025



FIGURE II-1: Regional Map

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b. Existing Conditions

(1) Existing Project Site Conditions

Figure II-2: Aerial of the Project Site, on page II-5 provides an aerial photograph of the Project Site and its surrounding properties. As shown in **Figure II-2**, the Project Site is currently developed with seven, two-story multi-family residential buildings that are part of the Flower Drive Historic District along Flower Drive, and a two-story multi-family residential building and surface parking along Figueroa Street. Existing development on the site totals 51 residential units and 49,722 square feet of floor area.

The Project Site is relatively flat with limited ornamental landscaping. Existing landscaping within the Project Site includes a total of 14 on-site trees and nine street trees located within the public right-of-way surrounding the Project Site. Existing on-site trees include eight species such as Mexican Fan Palm, Spinless Yucca, and Queen Palm. None of the on-site trees or street trees are protected by the City of Los Angeles Protected Tree and Shrubs Ordinance No. 186,873.¹

(2) Land Use and Zoning

The Project Site has a General Plan Land Use designation of Community Commercial corresponding to the C2, C4, RAS3, R3, RAS4, and R4 zones, and the Project Site is zoned as C2-1L (Commercial Zone, Height District 1L) along South Figueroa Street and RD1.5-1 (Restricted Density Multiple Dwelling Zone, Height District 1) along South Flower Drive.

The C2 Zone permits various retail, restaurant, and residential uses. Height District 1L in conjunction with the C2 Zone restricts development to a maximum FAR of 1.5:1, and a maximum height of 75 feet and six stories for commercial developments (residential developments are limited in height only). The C2 Zone does not impose any setback requirements for commercial developments, although it imposes a side yard setback requirement of at least five feet, with an additional foot per story above the second story for buildings more than two stories in height (with a set maximum of 16 feet), and a rear yard setback requirement of at least 15 feet, with an additional foot per story above the third story (with a set maximum of 20 feet), for residential uses at the lowest residential story. The RD1.5 Zone permits single- and multi-family and various accessory uses. Height District 1 in conjunction with the RD1.5 Zone limits development to a maximum FAR of 3:1 and a maximum height of 45 feet. The RD1.5 Zone imposes a 15-foot front yard setback requirement, a side yard setback requirement of at least five feet with an additional foot for every story above the second story for buildings more than two stories in height (with a set maximum of 16 feet), and a 15-foot rear yard requirement.

The Project Site is located within a Transit Priority Area (TPA) pursuant to Senate Bill (SB) 743. SB 743 established new rules for evaluating aesthetic and parking impacts under CEQA for certain types of projects. Specifically, Public Resources Code (PRC) Section 21099(d) states:

¹ Pursuant to Ordinance No. 186,873 and as defined in LAMC Section 17.02, a protected tree or shrub includes any of the following Southern California indigenous tree species, which measure four inches or more in cumulative diameter, 4.5 feet above the ground level at the base of the tree, or any of the following Southern California indigenous shrub species, which measure four inches or more in cumulative diameter, 4.5 feet above the ground level at the base of the shrub: Oak tree; Southern California Black Walnut tree; Western Sycamore tree; California Bay tree; Mexican Elderberry shrub; and Toyon shrub. This definition does not include any tree or shrub grown or held for sale by a licensed nursery, or trees planted or grown as part of a tree planting program.

“Aesthetic and parking impacts of a residential, mixed-use residential, or employment center on an infill site within a transit priority area (TPA) shall not be considered significant impacts on the environment.” TPAs are defined as areas within 0.5 miles of a major transit stop that are existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in an adopted Transportation Improvement Program (TIP) (PRC, Section 21099.)² The Project qualifies as a mixed-use residential Project on an infill site located within a TPA, as the Project Site is located within 0.5 miles of a several major transit stops, as defined by PRC Section 21064.3. The Project Site is approximately 0.4 miles from the Expo Park and USC Metro rail stations which serve the Metro E Line and provides service to Santa Monica and Downtown Los Angeles. Metro also operates multiple local and express bus lines and stops within a 0.5-mile radius that serve the Project Site, including the 2, 81, and 550 Lines. The Los Angeles Department of Transportation (LADOT) also serves the Project Site with the DASH Southeast and DASH King-East service routes, with a stop located approximately 400 feet south of the Project Site along South Figueroa Street. Thus, in accordance with SB 743 and the City’s Zoning Information file (ZI) No. 2452, the Project’s aesthetic and parking impacts are not considered significant as a matter of law.

Additionally, Assembly Bill (AB) 2097 established California Government Code Section 65863.2, which prohibits a public agency from imposing or enforcing any minimum automobile parking requirement on any residential, commercial, or other development project that is within 0.5 mile of a Major Transit Stop, with a few exceptions for certain event venues and hotel uses. As described above, the Project Site is located within 0.5 miles of several Major Transit Stops and consists only of residential and commercial retail and restaurant uses, and as such, is not required to provide parking for such uses.

The Project Site is also located within the boundaries of the Los Angeles State Enterprise Zone pursuant to the City’s ZI No. 2374, the greater Downtown Housing Incentive Area pursuant to the City’s ZI No. 2385, the Exposition/University Park Redevelopment Project Area pursuant to the City’s ZI No. 2488, and the South Los Angeles Alcohol Sales Specific Plan pursuant to the City’s ZI No. 1231. The Project is also within the Neighborhood Stabilization Ordinance: North University Park- Exposition Park-West Adams (NSO) pursuant to the City’s ZI No. 2397. However, the NSO overlay is not applicable to projects with frontage on South Figueroa Street.

² California Assembly Bill 2553, which went into effect on January 1, 2025, amends Section 21064.3 of the Public Resources Code to revise the definition of “major transit stop.” The new definition increases the service interval frequency to 20 minutes, whereas the previous definition required a frequency of 15 minutes or less during peak commute periods.

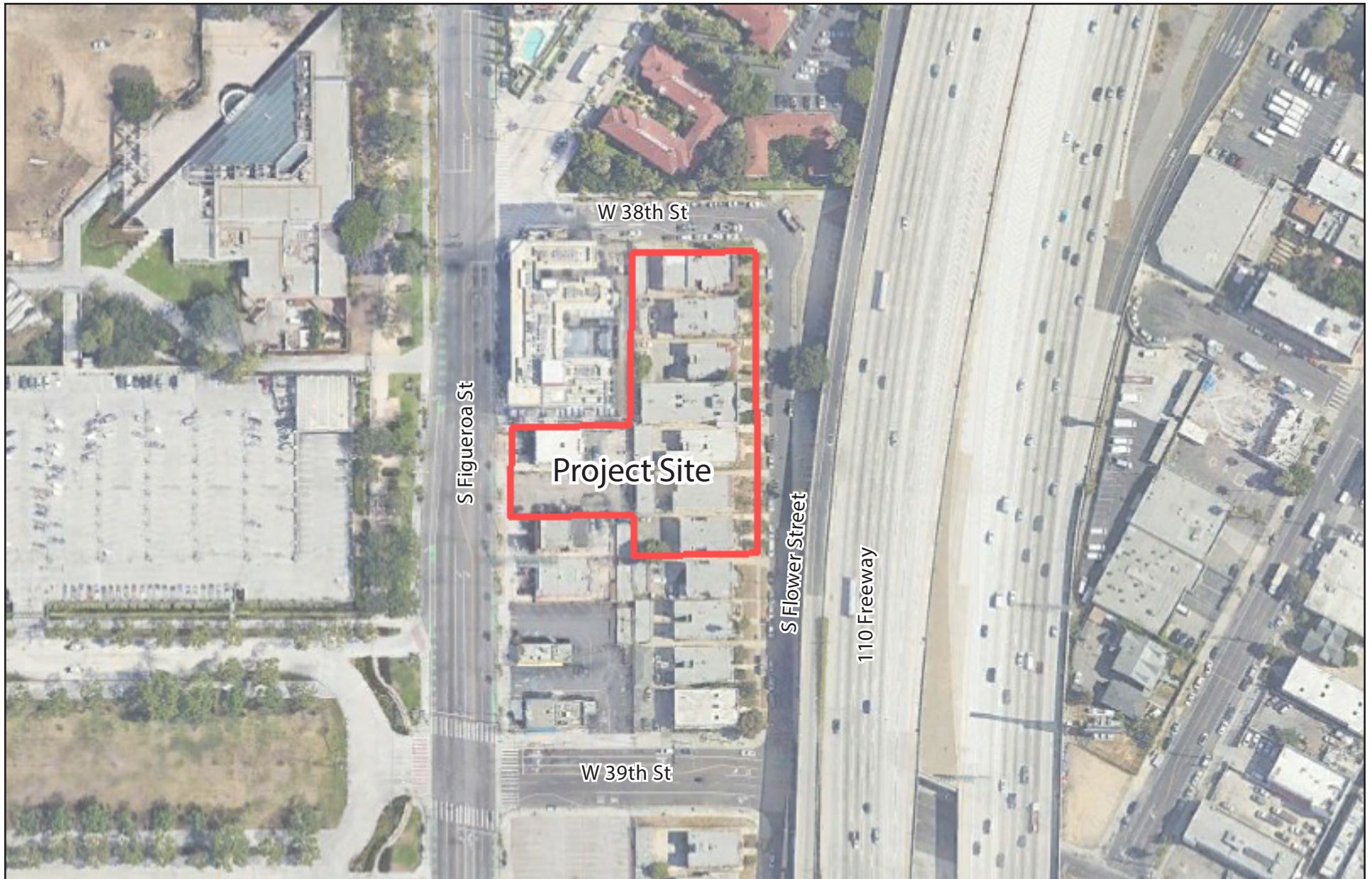


FIGURE II-2: Aerial of the Project Site

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(3) On-Site Historic Resources

The eastern portion of the Project Site is occupied by the Flower Drive Historic District, which is a designated historic resource per the California Register of Historic Resources (CRHR). As shown in **Figure II-3: Contributing and Non-contributing Resources Within the Flower Drive Historic District** on page II-8, the Flower Drive Historic District Boundary encompasses seven of the eight buildings proposed for demolition for the Project. **Table II-1: Parcels on Project Site** lists the parcels on the Project Site and associated addresses, build years, and descriptions. Six of the existing buildings on the Project Site, Parcel Nos. 3, 5, 6, 7, 8 and 9, along South Flower Street, are designated contributing resources to the Flower Drive Historic District.

Table II-1: Parcels on Project Site

#	Address	APN	Year Built	Description
1	3822 South Figueroa St.	5037-031-015	1922	Two-story fourplex
2	3828 South Figueroa St.	5037-031-016	N/A	Vacant, parking lot
3	3801 South Flower Dr. and 468 West 38th St.	5037-031-001	1923	Two-story apartment house
4	3809 South Flower Dr.	5037-031-002	1921	Two-story fourplex
5	3813 South Flower Dr.	5037-031-003	1922	Two-story fourplex
6	3819 South Flower Dr.	5037-031-004	1924	Two-story apartment house
7	3821 South Flower Dr	5037-031-005	1924	Two-story fourplex
8	3825 South Flower Dr	5037-031-006	1927	Two-story apartment house
9	3831 South Flower Dr	5037-031-007	1920	Two-story fourplex

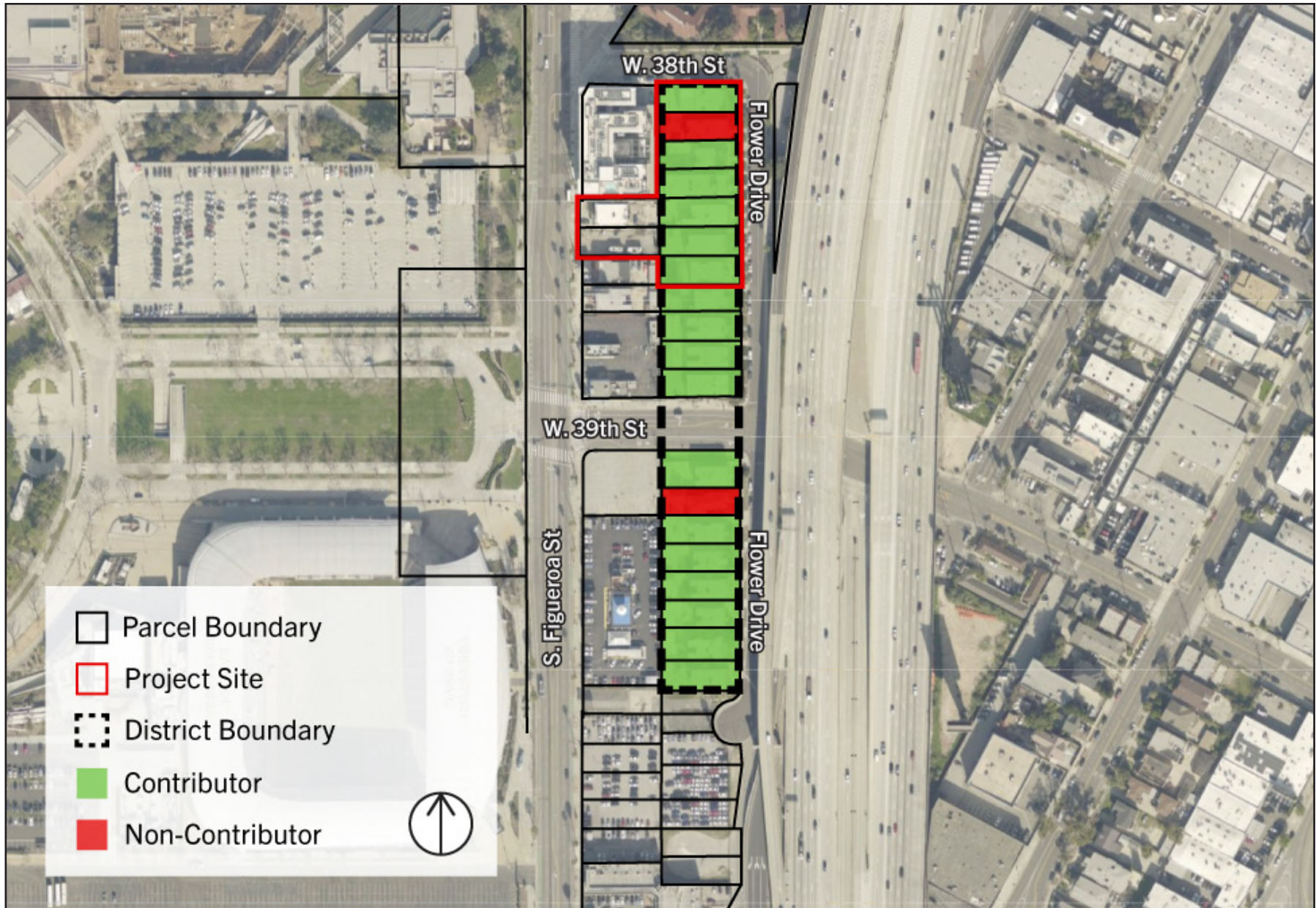
Source: GPA Consulting, 2025.

The Flower Drive Historic District was determined eligible for listing in the California Register by the State Historical Resources Commission (SHRC) in 2008 and is designated historic under California Register Criterion 1 for its association with the development of multi-family housing during the 1920s and Criterion 3 for its embodiment of the distinctive characteristics of two-story Mediterranean Revival influence multi-family dwellings in Los Angeles during the 1920s.

c. Surrounding Land Uses

The area surrounding the Project Site is urbanized and includes a mix of low- to mid-rise buildings containing a variety of commercial, residential and public facilities uses. The surrounding properties are generally zoned C2-1L, RD1.5-1, and PF-1, which are generally consistent with the zoning on the Project Site. Bordering the Project Site to the south are two two-story multi-family units, surface parking, and commercial uses (currently an auto servicing center) which are zoned C2-1L and RD1.5-1. An existing surface parking lot and residential uses are located further south across West 39th Street, where the 3900 South Figueroa Street mixed-use project is currently under construction. The western portion of the Project Site fronting South Figueroa Street is bordered to the north by the seven-story “Hub Los Angeles Coliseum,” a private student housing development that includes ground floor retail, multi-family units, and various residential amenities, and to the south by two-story multi-family units, surface parking, and commercial uses.

Exposition Park is located west of the Project Site across South Figueroa Street. Exposition Park includes the Los Angeles Memorial Coliseum, the BMO Stadium, the California Science Center, the Dr. Theodore T. Alexander Jr. Science Center School, the California African American Museum, the Los Angeles County Natural History Museum, the Exposition Park Rose Garden, the Wallis Annenberg Building, the Expo Center, and the Lucas Museum of Narrative Art which is currently under construction. To the north of the Project Site across West 38th Street are commercial and residential developments including the University of Southern California's (USC) University Park Campus and Garrett Gardens apartment complex. To the east of the Project Site is the I-110 freeway.



SOURCE: GPA Consulting, 2024



FIGURE II-3: Contributing and Non-contributing Resources Within the Flower Drive Historic District

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3. Project Objectives

Section 15124(b) of the California Environmental Quality Act (CEQA) Guidelines states that the project description shall contain “a statement of the objectives sought by the proposed project.” Section 15124(b) of the CEQA Guidelines further states that “the statement of objectives should include the underlying purpose of the project.” The underlying purpose of the Project is to revitalize the Project Site by developing a mixed-use building that provides new student housing and multi-family housing opportunities and neighborhood-serving commercial uses that serve the community and promote walkability.

As set forth in the CEQA guidelines, the Project’s specific objectives are provided below:

- Develop an infill mixed-use project that maximizes the available residential density on the site with a mix of market-rate and affordable multi-family residential units near existing public transit facilities and institutional facilities;
- Develop dense, multi-family housing to support the goals of the City’s Housing Element and the City’s Regional Housing Assessment by providing new market rate and affordable housing in a variety of sizes for different household types and income levels;
- Promote local and regional economic growth by developing new commercial uses that provide short- and long-term employment opportunities and sales tax revenue in the City;
- Create a development with high quality design that supports environmental sustainability through energy efficiency, water conservation, and the reduction of greenhouse gas emissions;
- Complement the visual character of the area and improve the pedestrian environment through a high level of architectural design, new trees and landscaping, and active ground floor commercial uses; and
- Promote local, regional, and State land use and mobility objectives by intensifying development on an infill site located near jobs, retail, and entertainment and in proximity to transit and transportation infrastructure in order to reduce vehicle miles traveled (VMT) and encourage pedestrian and other non-vehicular modes of travel.

4. Description of Project

a. Project Overview

As discussed above and summarized in **Table II-2: Summary of Existing and Proposed Floor Area** on page II-10, the Project proposes to develop a new seven-story mixed-use building comprised of 209 dwelling units (including 16 units for Low-Income households, 22 units for Very Low-Income households, and four units for Extremely Low-Income households) and 2,705 square feet of ground level retail and restaurant uses. The Project would have a maximum building height of 86 feet and a total floor area of 252,148 square feet on a 62,988 square-foot (1.4-acre) Project Site, for a FAR of 4.5:1. The Project would include 23,127 square feet of open space consisting of private patios, courtyard areas, roof decks, and indoor amenities for residents, as well as 34 residential parking spaces and six commercial parking spaces at the ground level.

The Project involves the demolition of eight multi-family residential buildings (seven of which are within the Flower Drive Historic District), and the removal of existing surface parking areas.

Table II-2: Summary of Existing and Proposed Floor Area

Use	Existing (sf)	Demolition (sf) ^b	Proposed New Construction (sf)
Residential ^a	49,722	49,722	249,443
Retail and restaurant	0	0	2,705
Total	49,722	49,722	252,148

sf = square feet
^a Inclusive of affordable housing units. Four units would be reserved for Extremely Low Income Households, 22 units would be reserved for Very Low-Income households, and 16 units would be reserved for Low-Income households.
^b Demolition of all existing structures would total 49,722 square feet. Hardscape, such as parking areas, would total an additional 33,942 square feet. Total demolition including structures, driveways and pavement would be 83,664 square feet.
Source: KTGy, 2025.

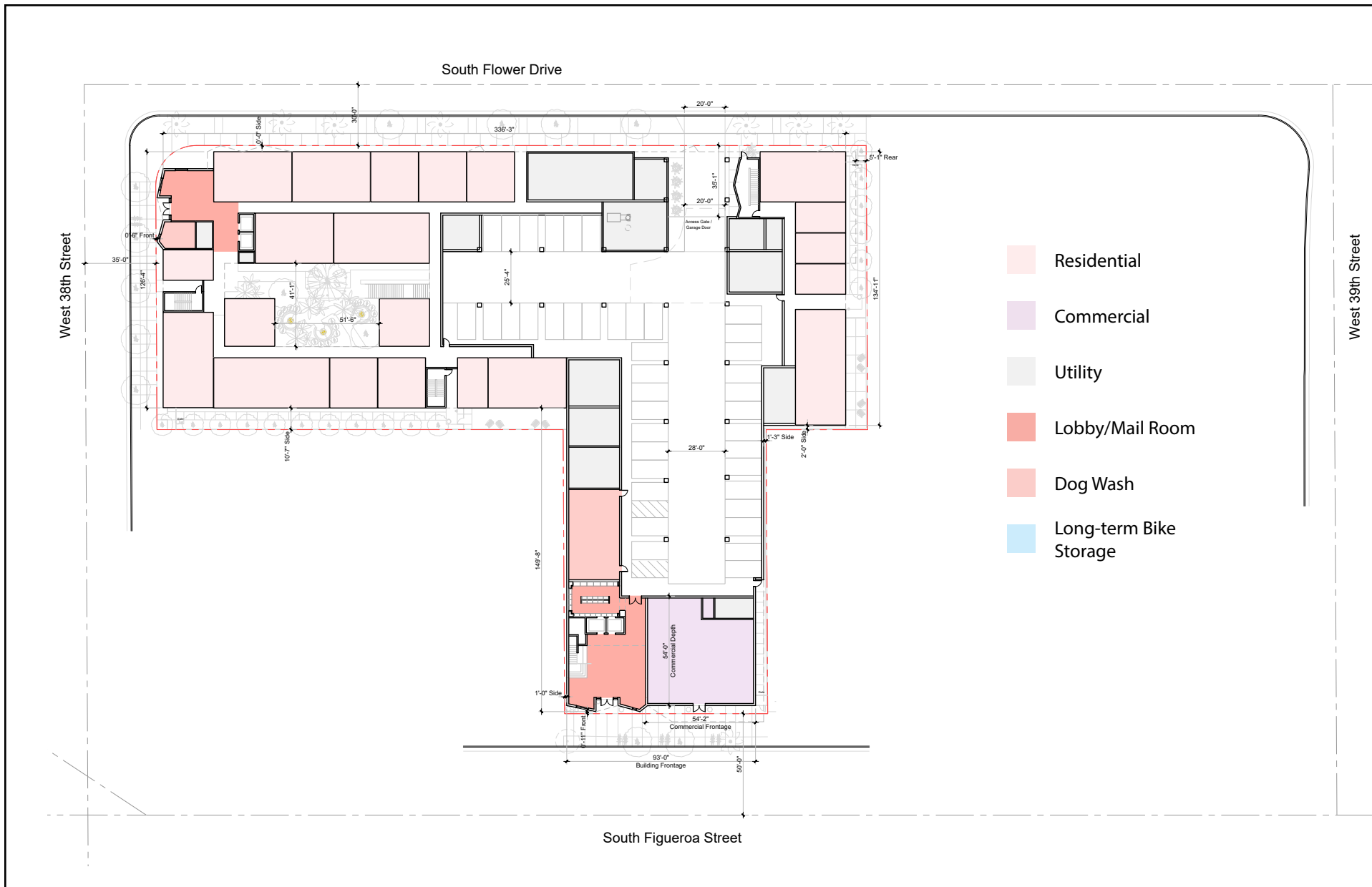
As shown in **Table II-3: Project Development Program** and **Figure II-4: Conceptual Site Plan** and on pages II-11 and II-12, the 209 residential units would consist of 34 studios, 43 one-bedroom units, 45 two-bedroom units, 34 three-bedroom units, and 53 four-unit bedroom units.

The ground floor of the Project would include a main entry lobby for the residential uses and 2,705 square feet of retail and restaurant uses along South Figueroa Street. A secondary residential lobby would be located along West 38th Street adjacent to a small dog washroom available for residents. A large internal courtyard, residential units, as well as an at-grade, wrapped parking garage with long-term bicycle parking inclusive of a small 100-square-foot workspace for bicycle repairs and maintenance and various mechanical rooms would also be located on the ground floor.

The second floor would contain residential units and three internal open space courtyards with lounging and seating areas and a pool, as well as a fitness room, a club and game room, and a co-working space. The third floor through sixth floor would include a study room in addition to residential units. The seventh floor includes residential units as well as residential amenities including a roof deck area which would include outdoor furniture, barbecue areas, and a game lawn.

Table II-3: Project Development Program

Project Component	Proposed
Residential ^a	
Studio	34 units
One-Bedroom	43 units
Two-Bedroom	45 units
Three-Bedroom	34 units
Four-Bedroom	53 units
Total	209 units (249,443 sf)
Affordable Units	
Extremely Low Income	4 units
Very Low Income	22 units
Low Income	16 units
Total	42 Affordable
Retail and Restaurant	
Total	2,705 sf
Open Space	
Private Open Space	300 sf
Common Open Space	22,827 sf
Total	23,127 sf
Vehicular Parking ^b	
Residential	34 spaces
Commercial	6 spaces
Total	40 spaces
Bicycle Parking	
Long-Term	130 spaces
Short-Term	16 spaces
Total	142 spaces
FAR	4.5:1
Height	86 feet (7 stories)
Total Floor Area	252,148 sf
<i>sf = square feet</i> ^a Inclusive of affordable housing units provided in table. ^b Per AB 2097, the Project has no minimum parking requirement. Source: KTG, 2025.	



SOURCE: KGTY, 2026



FIGURE II-4: Conceptual Site Plan

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b. Design and Architecture

As shown in **Figure II-5: Building Sections, West and South Elevations**, **Figure II-6: Building Sections, East and North Elevations**, **Figure II-7, Conceptual Rendering - View of Main Entry on South Figueroa Street Facing East**, **Figure II-8: Conceptual Rendering - Roof Deck View Facing North**, and **Figure II-9: Conceptual Rendering - Freeway View of South Flower Drive Elevation Facing West** on pages II-14 through II-18, the Project has been designed to be compatible with existing and proposed development in the surrounding area. The Project's contemporary architectural design complements recent and under-construction projects within the surrounding area such as the BMO Stadium, the HUB Los Angeles apartment complex, and the Lucas Museum of Narrative Art. The massing on the Project's façade steps back from the existing student housing building to the north to both reduce massing along South Figueroa Street and provide for privacy between buildings. The ground floor level along South Figueroa Street would activate the street level with the inclusion of ground floor retail and restaurant uses. Floor-to-ceiling windows at the ground level along South Figueroa Street would further activate the street and provide visual transparency into the Project Site.

The Project's external façades along South Flower Drive (facing the I-110 freeway) and West 38th Street and all internal façades feature a cohesive design theme with varied materiality and color and angled bay windows to add building articulation and create visual interest. The Project's seventh floor roof decks provide views of Downtown Los Angeles and the surrounding neighborhood, including the USC campus. Exterior building materials would include white and grey stucco with metal accents and perforated metal panels.



FIGURE II-6: Building Sections, East and North Elevations

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SOURCE: KGTU, 2025

FIGURE II-7: Conceptual Rendering - View Of Main Entry On South Figueroa Street Facing East

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MAGILIGHT

SOURCE: KGTU, 2025

FIGURE II-8: Conceptual Rendering - Roof Deck View Facing North

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SOURCE: KGTU, 2025

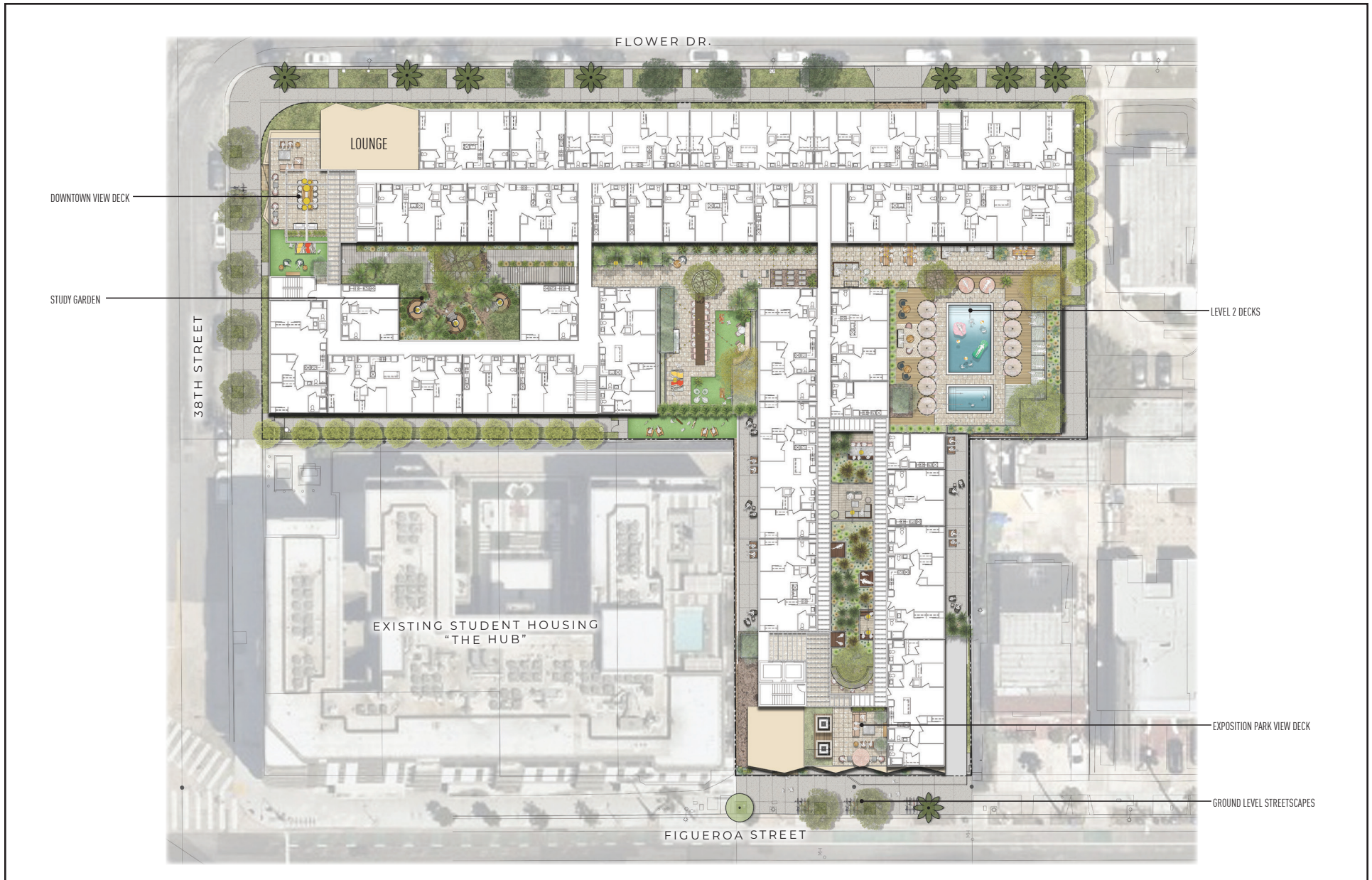
FIGURE II-9: Conceptual Rendering - Freeway View of South Flower Drive Elevation Facing West

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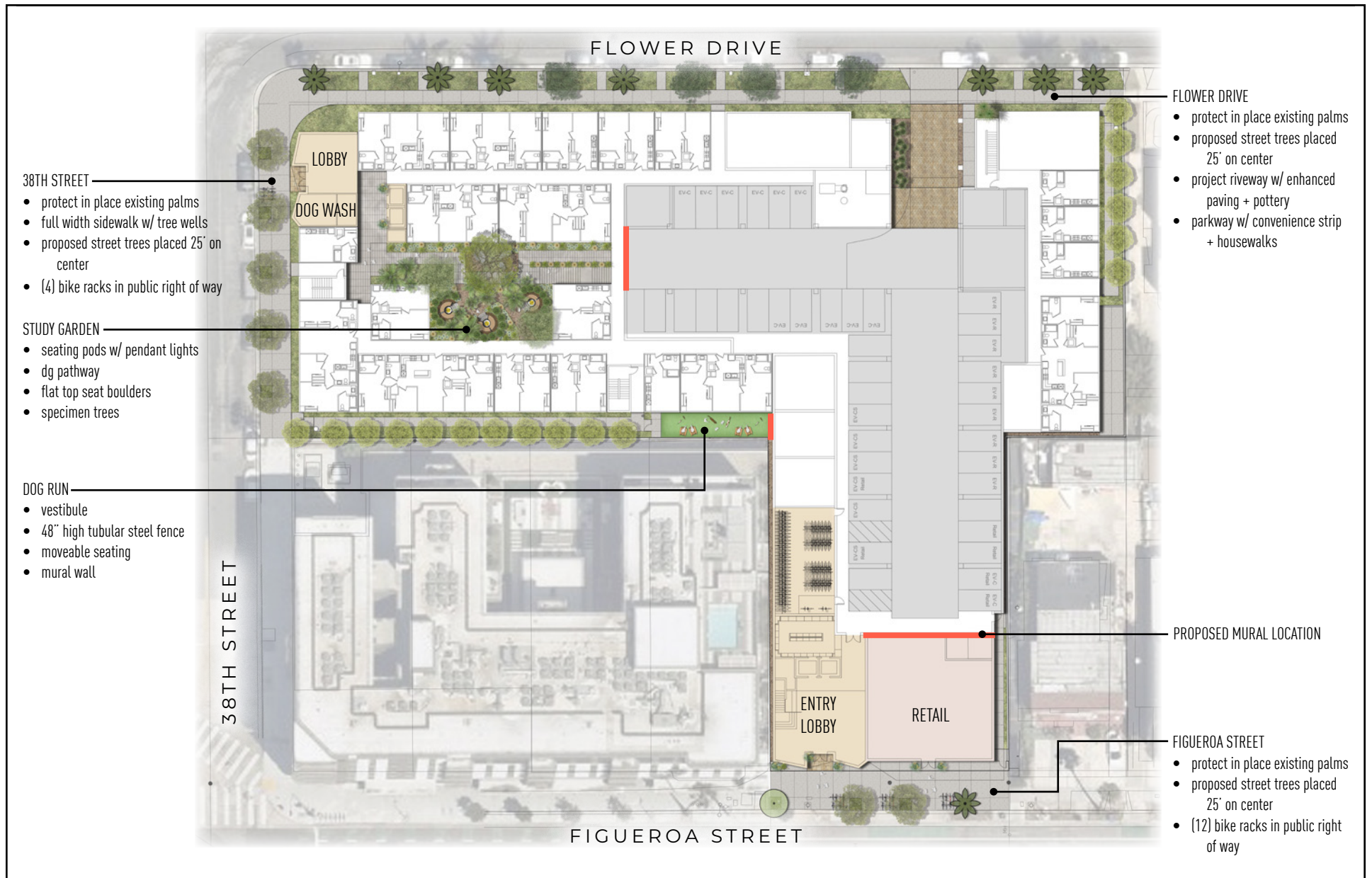
c. Open Space and Landscaping

As shown in **Figure II-10, Conceptual Landscape Plan, Figure II-11, Level 1 Landscape Plan, Figure II-12, Level 2 Landscape Plan and Figure II-13, Level 7 View Deck Plan** on pages II-20 through II-23, open space and landscaping would be provided in accordance with the City of Los Angeles Municipal Code (LAMC) Section 12.21 G, inclusive of reduction permissible pursuant to State Density Bonus law. The Project would incorporate accessible indoor and outdoor common open space on the ground floor, second floor, and seventh floor, as well as private open space throughout the building on all levels. The Project would provide 23,127 square feet of open space that would contain amenities such as courtyards, a pool, roof decks, recreation rooms, and private patios. Open space areas would be accessible from South Figueroa Street, West 38th Street, and from the interior of the Project Site. The landscape design would emphasize native and drought-tolerant shrubs and grasses and ornamental trees. The Project would provide 54 new trees on the Project Site (one tree provided for every four units, per LAMC Section 12.21 G).

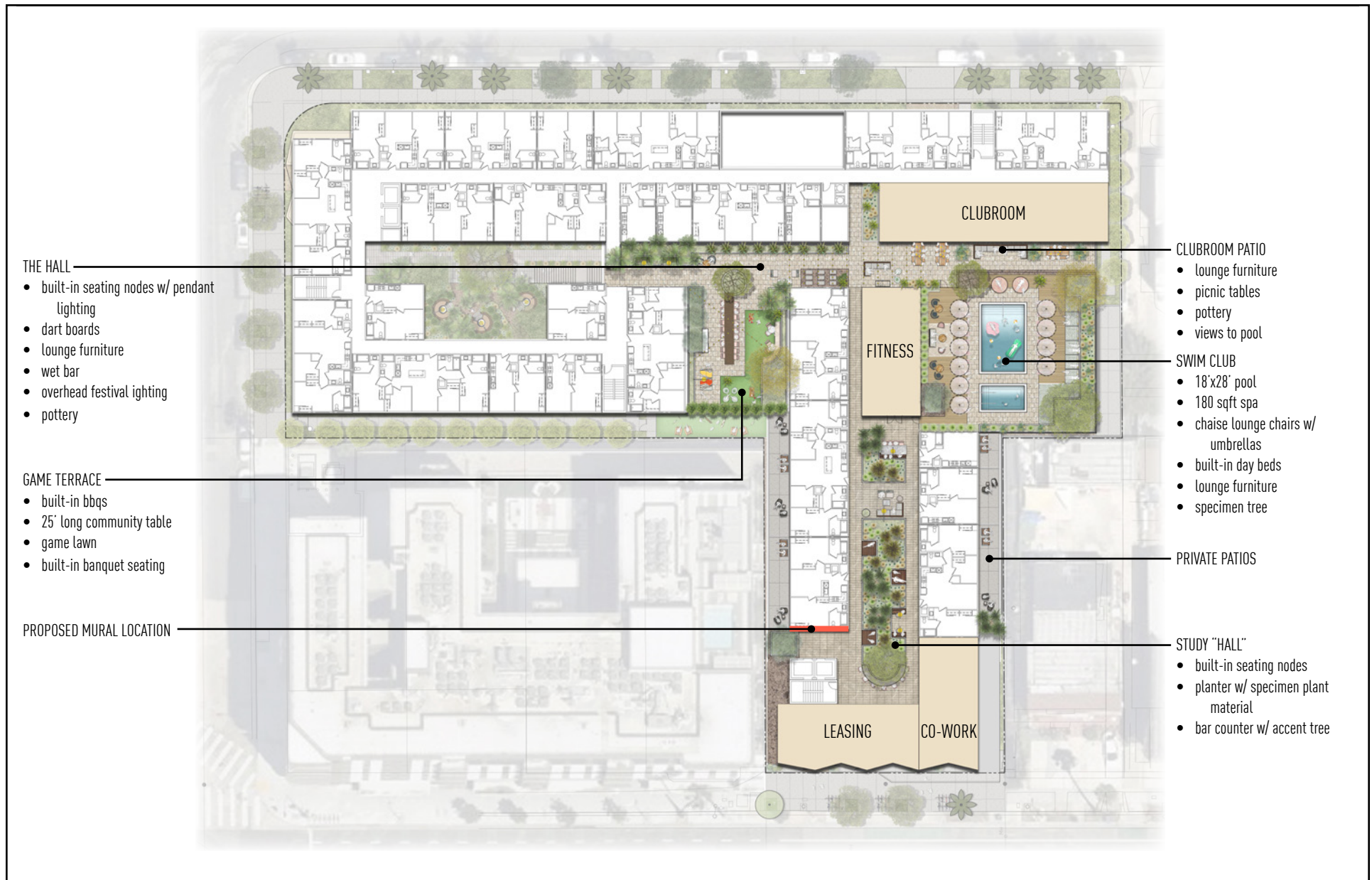
There are a total of 23 trees on the Project Site, including nine street trees. All of the street trees are proposed to be retained, while the remaining 14 on-site trees would be removed. If any street trees ultimately require removal per the direction of the Los Angeles Urban Forestry Division, they will be replaced at a 2:1 ratio per current City policy. Pursuant to LAMC Section 12.21 G which requires one tree per four units, the Project would provide 54 trees, including 34 trees on the ground floor (23 on the Project Site and 11 new street trees in addition to the existing street trees to remain), 17 trees on the second floor, and three trees on the seventh floor.



SOURCE: KGTY, 2025



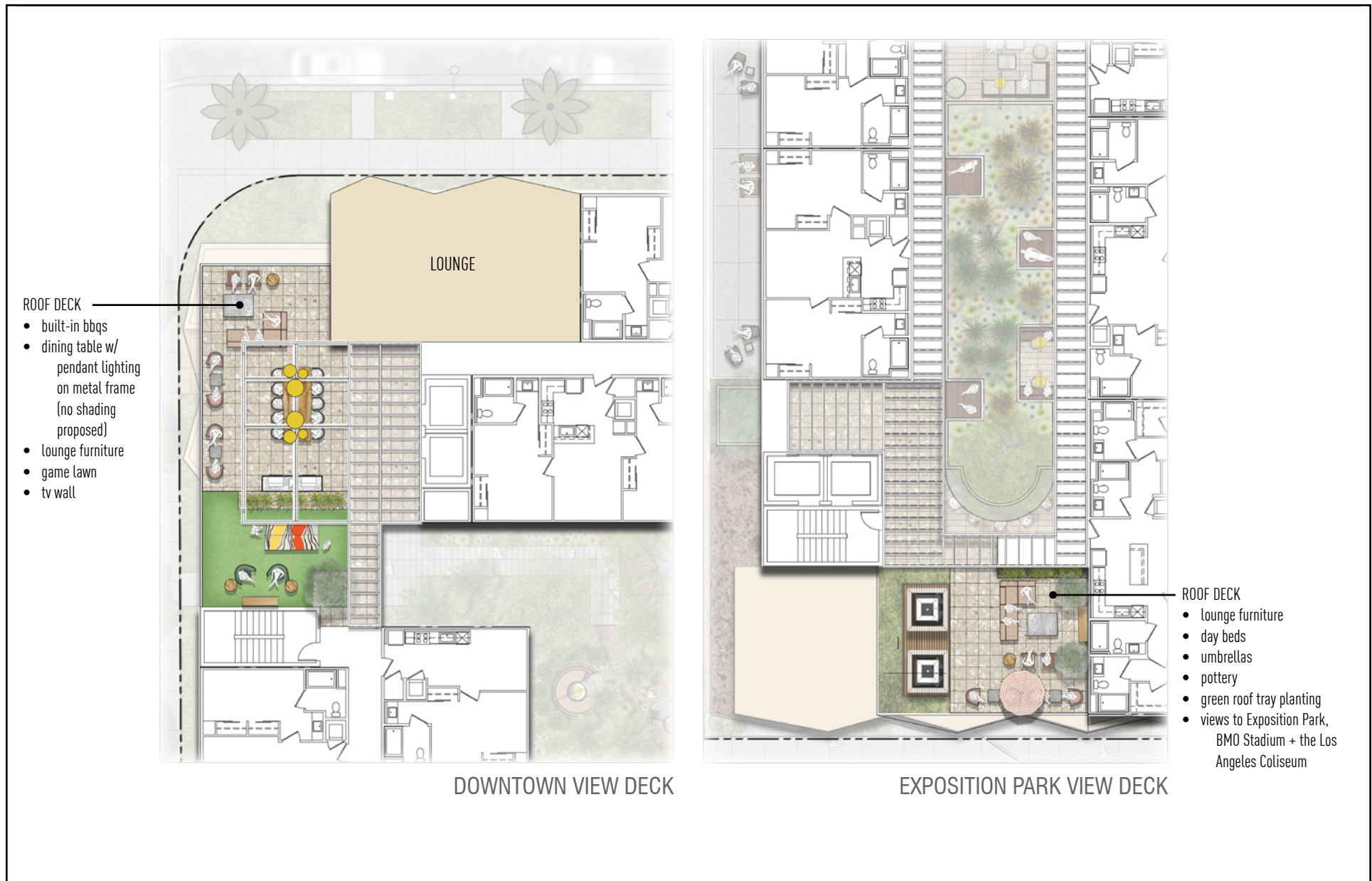
SOURCE: KGTy, 2025



SOURCE: KGTy, 2025

FIGURE II-12: Level 2 Landscape Plan

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SOURCE: KGTy, 2025

FIGURE II-13: Level 7 View Deck Plan

d. Access, Circulation, and Parking

The Project would include a new driveway with access along South Flower Drive that would provide ingress and egress into the wrapped at-grade parking garage. As previously discussed, AB 2097 prohibits a public agency from imposing or enforcing any minimum automobile parking requirement on any residential, commercial, or other development project that is located within one-half mile of a major transit stop. Per AB 2097, the Project is not required to provide a minimum number of parking spaces as it is a mixed-use residential project located 0.3 miles from a major transit stop served by an existing rail transit station and two or more bus lines within a 20-minute service interval during the morning and afternoon commute periods, as described above. Nonetheless, the Project would voluntarily include 40 vehicle spaces, consisting of 34 parking spaces for residents and six parking spaces for visitors. The Project would provide 36 EV Ready spaces (all 34 of the residential parking spaces and 25 percent, or two, of the commercial parking spaces would be EV Ready) and would further be subject to the most updated version of the California Green Building Code at time of Project filing.

The Project would provide short- and long-term bicycle spaces for both residential and commercial uses. A total of 16 short-term bicycle spaces would be located on South Figueroa Street and West 38th Street in bike racks proposed to be located in the public right-of-way. In addition, 130 long-term bicycle spaces would be located on the ground floor of the Project Site within the at-grade parking garage with access from the main entrance lobby and parking garage.

Residential access would be provided from the ground floor to the main lobby along South Figueroa Street and a secondary lobby along West 38th Street. Retail and restaurant access for pedestrians would be provided from the ground floor along South Figueroa Street. Access for loading and trash staging and pickup would be located along South Flower Drive, within the driveway entry.

e. Lighting and Signage

Lighting for the Project is intended to minimize light trespass and glare from the Project Site onto adjacent properties and to provide safety and nighttime visibility through shielded, focused, and directed illumination. Proposed signage along South Figueroa Street includes mounted and backlit signage over the main lobby entry doors and at the top of the building facing both south and north. Commercial signage would be mounted to the canopy awning above the commercial glass front and would be illuminated from the interior. Additional lighting includes planter uplighting and trellis-mounted down light for each roof deck, building-mounted emergency lighting along South Flower Drive and at the points for ingress and egress around the building perimeter, and interior courtyard lighting. All signage would comply with the requirements of the LAMC.

f. Site Security

During construction of the Project, the Project Site would be fenced, gated, and monitored via surveillance cameras, on-site security, and/or security drive-by patrols. During operation of the Project, access to the parking structure would be controlled through gated entries, and the entry areas would be well illuminated. All resident building entries would only be accessible through key fob access, either from a door into the building or a gate into a side yard. All side

yards would be fenced and secured from public access. A vehicular gate would be set back from the parking entryway along South Flower Drive and would be closed after commercial business hours.

g. Sustainability Features

The Project would support environmental sustainability by incorporating sustainable building features and construction protocols required by the Los Angeles Green Building Code (LAMC Chapter IX, Article 9), the California Green Building Standards Code (California Code of Regulations, Title 24, Part 11; referred to as the CALGreen Code), and the California Building Energy Efficiency Standards (California Code of Regulations, Title 24, Part 6; California Energy Code). The Project would emphasize energy and water conservation, which would be achieved through the use of energy-efficient heating, ventilation, and air conditioning (HVAC), lighting systems, a gray water system for irrigation, ENERGY STAR® appliances, and low-flow plumbing fixtures. The Project would reserve 15 percent of roof area for solar use.

The Project would provide 36 EV Ready spaces (all 34 of the residential parking spaces and 25 percent, or two, of the commercial parking spaces would be EV Ready) and would further be subject to the most updated version of the California Green Building Code at time of Project filing.

5. Project Design Features

Project Design Features (PDFs) are separately identified elements and/or components that contribute to the physical design, construction, or operational plans of a project, that have been identified to reduce its potential environmental impacts. Examples of PDFs include components such as certain types of roofing materials and windows, but can also include programmatic elements such as integrating secure routes between parking areas and requiring the use of certain types of construction equipment during project construction. Because PDFs are elements and/or components of the project incorporated into its design or operations without any assessment of feasibility and irrespective of the project's environmental effects, they are analyzed as part of the project and considered in any document assessing the project's potential environmental effects. By contrast, mitigation measures are feasible measures imposed on a project that are specifically tailored to reduce the potentially significant impacts of a project as disclosed by the environmental analysis. Mitigation measures are designed to avoid project impacts or, at minimum, to reduce them to a less than significant level. Although PDFs can reduce or avoid particular project effects on the environment, they cannot be used to avoid fully analyzing a project's potential impacts; that is, they cannot be used to "[preclude] or [obfuscate] required disclosure of the project's environmental impacts and analysis of potential mitigation measures."³ Regardless of the type of PDF, PDFs can be shown on a project's approved plan set and/or establish a restriction with which a project must comply, and are listed in the project's Mitigation Monitoring Plan along with the adopted mitigation measures to ensure compliance is mandated through enforceable conditions.

³ Mission Bay Alliance v. Office of Community Investment & Infrastructure (2016) 6 Cal.App.5th 160, 185.

The Project Design Features are summarized below and are discussed in detail in their respective Draft EIR sections.

Project Design Feature AQ-PDF-1 Off-Road Diesel-Powered Construction Equipment. All off-road diesel-powered construction equipment greater than 90 horsepower would meet California Air Resources Board Tier 4 Final off-road emissions standards. Requirements for Tier 4 Final equipment will be included in applicable bid documents and successful contractor(s) must demonstrate the ability to supply such equipment. A copy of each unit's Best Available Control Technology (BACT) documentation (certified tier specification or model year specification), and CARB or SCAQMD operating permit (if applicable) will be provided to the City upon request.

Project Design Feature CUL-PDF-1: Prior to initiating ground-disturbing activities, the Project applicant shall retain a qualified professional archaeologist meeting Secretary of the Interior professional qualifications (Project Archaeologist). Archaeological Resources Training shall be provided to all construction managers and construction personnel engaged in relevant job activities prior to commencing any ground disturbance work within the Project Site. The training shall be prepared and conducted by a qualified professional archaeologist meeting Secretary of the Interior professional qualifications. The training content shall include, but not be limited to, information about archaeological resources in the vicinity, types of common archaeological resources in southern California, and the procedures to be followed to protect any such resources in the case of inadvertent discovery. The training may be discontinued when ground disturbance activities for the Project are completed. Construction personnel shall not be permitted to operate equipment within the construction area during the relevant construction period unless they have attended the training. A copy of the training transcript and/or training video, as well as a list of the names of all personnel who attended the training shall be maintained by the Project.

Project Design Feature CUL-PDF-2: The Project Archaeologist shall monitor, or supervise archaeological monitors (Monitors), for as needed and intermittent archaeological monitoring during ground disturbing activities. Archaeological monitoring will begin once excavation reaches the bottom of the artificial fill layer, which is approximately four feet below ground surface. After initiation, intermittent archaeological monitoring shall occur for a minimum of 20 hours per week. The Project Archaeologist shall have the ability to recommend monitoring be decreased or eliminated after the first two weeks of spot monitoring during ground-disturbing activities below four feet are complete. The recommendation shall be based on the absence of cultural resources and/or indication of subsurface soils possessing a low likelihood for significant intact resources. In the event that archaeological resources are inadvertently unearthed or encountered during excavation and grading activities, the Project Archaeologist/Monitors may request that construction halt within 50 feet of the find and the Project Archaeologist shall record and assess the resource. Actions recommended by the Project

Archaeologist to manage the discovery, such as avoidance or excavation of the find, shall be adhered to and documented within the resource record.

Project Design Feature NOI-PDF-1: Operation of permanently wired amplified sound systems at the rooftop pool deck and ground floor parklets shall be limited to between the hours of 7:00 a.m. and 10:00 p.m. and shall not exceed a volume of 80 dBA measured at 3 feet from any speaker. In addition, all speakers shall be designed and installed to direct sound toward the center of the Project terraces.

Project Design Feature POL-PDF-1: During construction, the Project shall implement temporary security measures, including security fencing, lighting, and locked entry. The Project Site would be monitored via surveillance cameras, security on-site, or security drive-by patrols depending on the stage of construction to monitor the Project Site during nighttime hours.

Project Design Feature POL-PDF-2: The Project shall provide sufficient lighting of building entries and walkways to provide for pedestrian orientation and clearly identify a secure route between parking areas and points of entry into buildings.

Project Design Feature POL-PDF-3: Prior to the issuance of a building permit, the Project Applicant shall consult with LAPD's Crime Prevention Unit regarding the incorporation of features that are appropriate for the design of the Project, including applicable features in LAPD's "Design Out Crime" Guidelines.

Project Design Feature POL-PDF-4: Upon completion of construction of the Project and prior to the issuance of a certificate of occupancy, the Applicant will submit a diagram of the Project Site to the LAPD's Southwest Community Police Station's Commanding Officer that includes access routes and any additional information that might facilitate police response.

Project Design Feature TRAF-PDF-1: Construction Traffic Management Plan. The contractor would develop a detailed Construction Traffic Management Plan as part of the Project, including provision of construction worker parking in designated areas, temporary traffic controls during all construction activities adjacent to public right-of-ways, street closure information, detour plans, haul routes, and staging plans among other provisions. The contractor would submit the Construction Traffic Management Plan to the City of Los Angeles for approval. The Construction Management Plan would include the following:

- Scheduling workdays to begin and end prior to the morning and afternoon peak hours, respectively, to the extent feasible so as to avoid worker trips during those peak hours.
- Coordination with various City departments and offices to ensure adequate access to the Project Site and land uses in proximity of the Project Site is maintained.
- Scheduling pick-ups, deliveries, and exports of construction materials so as to occur during off-peak hours. Hauling shall be from 9:00 A.M. to 3:00 P.M.

weekdays, and 8:00 A.M. to 4:00 P.M. on Saturdays. No hauling shall be performed on Sundays and holidays.

- Reduce the potential of trucks waiting for extended periods to load or unload.
- Provision of worker parking on-site or in designated off-site private parking areas and prohibition of construction-related vehicle parking on surrounding streets, other than the streets adjacent to the Project Site.
- Temporary traffic controls during all construction activities adjacent to public ROWs to improve traffic flow on public roadways (e.g. flag personnel) and to maintain access for land uses in the vicinity of the Project Site. Determine the number and location of flag personnel required during traffic rerouting and deliveries.
- Contractor to post advance bilingual notification to adjacent property owners and occupants of upcoming construction activities, including durations and daily hours of operation, at several locations on the Project Site.
- Establish requirements for storage of materials and loading/unloading on the Project Site.
- Worksite traffic control plans approved by the City would be implemented to route vehicles, bicyclist and pedestrians around the area during any parking, travel lane or sidewalk closures and provide for protective measures for the public.
- Maintenance of a log, available on the job site, documenting the dates of hauling and the number of trips (i.e., trucks) per day.
- Identification of a construction manager and provision of a telephone number for any inquiries or complaints from residents regarding construction activities. The telephone number shall be posted at the site readily visible to any interested party during site preparation, grading, and construction.

6. Anticipated Construction Schedule

Construction of the Project is anticipated to begin in 2027 and end in 2029. Opening year of the Project would be 2030. Demolition of existing uses is estimated to include 83,664 square feet of existing residential uses and hardscaped areas such as parking lots and driveways. It is estimated that 8,310 cubic yards (CY) of soil export would be hauled from the Project Site. Construction hours would occur in accordance with LAMC requirements which prohibit construction between the hours of 9:00 p.m. and 7:00 a.m. Monday through Friday, after 6:00 p.m. and before 8:00 a.m. on Saturday, and at any time on Sunday or holidays. Parking for the construction workers would be provided on the Project Site or would be leased from nearby off-site parking areas.

7. Requested Permits And Approvals

The anticipated requests for approval of the Project are listed below. The Environmental Impact Report will analyze impacts associated with the Project and will provide environmental review sufficient for all necessary entitlements and public agency actions associated with the Project. The discretionary entitlements, reviews, permits and approvals required to implement the Project include, but are not necessarily limited to, the following:

1. Pursuant to **LAMC Section 12.22 A.25** and **California Government Code Section 65915**, a **Density Bonus Compliance Review** for a 32 percent increase in density for a Housing Development Project setting aside four units for Extremely Low Income households, 22 units for Very Low Income households, and 16 units for Low Income Households for a period of 55 years, including four Incentives and four Waivers of Development Standards, as follows:
 - a. An **On-Menu Incentive** to allow averaging of floor area ratio, density, and open space over the Project Site, and permit vehicular access from a less restrictive zone to a more restrictive zone.
 - b. An **On-Menu Incentive** to allow a 19 percent decrease in the total amount of required open space, from 28,550 square feet to 23,127 square feet.
 - c. An **Off-Menu Incentive** to allow a FAR of 4.5:1 across the Project Site in lieu of the otherwise maximum permitted FAR of 3:1 in the RD1.5 Zone and 1.5:1 in the C2 Zone.
 - d. An **Off-Menu Incentive** to allow a height increase across the Project Site to 86 feet and seven stories, in lieu of the maximum permitted 75 feet and six stories in the C2-1L Zone, and 45 feet in RD1.5-1 Zone.
 - e. A **Waiver of Development Standard** to reduce the front yard setback along West 38th Street from 15 feet to six inches.
 - f. A **Waiver of Development Standard** to reduce the side yard setback along South Flower Drive from 10 feet to zero feet.

- g. A **Waiver of Development Standard** to reduce the side yard setback along the western interior property line from 10 feet to two feet.
 - h. A **Waiver of Development Standard** to reduce the rear yard setback along the southern interior property line from 15 feet to five feet, one inch.
- 2. Pursuant to **LAMC Section 16.05**, a **Project Review** for a project resulting in an increase of 50 or more dwelling units; and
 - 3. Pursuant to **LAMC Section 17.15**, a **Vesting Tentative Tract Map (VTTM No. 84555-CN)** for the merger and re-subdivision of nine lots into one ground lot for residential and commercial condominium purposes; and a haul route for 8,310 cubic yards of exported soil.
 - 4. Other discretionary and ministerial permits that may be deemed necessary, including, but not limited to, temporary street closure permits, grading permits, excavation permits, foundation permits, building permits, and sign permits.

8. Responsible and Trustee Public Agencies

A Responsible Agency under CEQA is a public agency that proposes to carry out or approve a project, for which a lead agency is preparing or has prepared an EIR or negative declaration (State CEQA Guidelines Section 15381). No responsible agencies have been identified for the Project. A Trustee Agency under CEQA is a state agency having jurisdiction by law over natural resources affected by a project which are held in trust for the people of the State of California (State CEQA Guidelines Section 15386). No trustee agencies have been identified for this Project.