

IV. Environmental Impact Analysis

G. Transportation

1. Introduction

This section analyzes the Project's potential impacts on Transportation. The analysis is primarily based on the *3822 South Figueroa Street Student Housing Project Transportation Assessment*¹ (Transportation Assessment) included in its entirety in Appendix I of this Draft EIR.

The analysis of Vehicle Miles Traveled (VMT) is based on the Transportation Assessment. The Transportation Assessment was prepared pursuant to Los Angeles Department of Transportation's (LADOT's) Transportation Assessment Guidelines (TAG), which was developed in July 2019 and updated in July 2020 and August 2022 to establish the guidelines and methodology for assessing transportation impacts for development projects based on the updated California Environmental Quality Act (CEQA) Guidelines from the State of California that require transportation impacts be evaluated based on VMT rather than level of service (LOS) or any other measure of a project's effect on automobile delay. The Transportation Assessment was approved by LADOT on April 4, 2025. A copy of LADOT's Assessment Letter for the Transportation Assessment is included in Appendix I of this Draft EIR.

2. Environmental Setting

a. Regulatory Framework

There are several plans, regulations, and programs that include policies, requirements, and guidelines regarding transportation at the federal, State, regional, and City of Los Angeles (City) levels that apply to the Project. As described below, these plans, guidelines, and laws include:

- Federal Americans with Disabilities Act of 1990 (ADA)
- California Complete Streets Act
- California Assembly Bill (AB) 32 and Senate Bill (SB) 375
- California Vehicle Code
- California Senate Bill 743
- CEQA Guidelines Section 15064.3
- Southern California Association of Governments (SCAG) 2024-2050 Regional Transportation Plan/Sustainable Communities Strategy (2024-2050 RTP/SCS)

¹ Kimley-Horn and Associates, Inc., Transportation Assessment Report (Transportation Assessment) for the 3822 South Figueroa Street Student Housing Project, March 2025.

- City of Los Angeles Mobility Plan 2035
- South Los Angeles Community Plan
- City of Los Angeles Exposition/University Park Redevelopment Plan
- Los Angeles Municipal Code (LAMC)
- LADOT Transportation Assessment Guidelines (TAG)
- LADOT Manual of Policies and Procedures Section 321
- LADOT Vision Zero
- Citywide Design Guidelines
- Plan for a Healthy Los Angeles

(1) Federal

(a) Americans with Disabilities Act of 1990

Titles I, II, III, and V of the Americans with Disabilities Act (ADA) have been codified in Title 42 of the United States Code (USC), beginning at Section 12101. Title III prohibits discrimination based on disability in “places of public accommodation” (businesses and non-profit agencies that serve the public) and “commercial facilities” (other businesses). The regulation includes Appendix A through Part 36 (Standards for Accessible Design), establishing minimum standards for ensuring accessibility when designing and constructing a new facility or altering an existing facility. Examples of key guidelines include detectable warnings for pedestrians entering traffic where there is no curb, a clear zone of 48 inches for the pedestrian travel way, and a vibration-free zone for pedestrians.

(2) State

(a) Complete Streets Act

Assembly Bill (AB) 1358, the Complete Streets Act (Government Code Sections 65040.2 and 65302), was signed into law by Governor Arnold Schwarzenegger in September 2008. As of January 1, 2011, the law requires cities and counties, when updating the part of a local general plan that addresses roadways and traffic flows, to ensure that those plans account for the needs of all roadway users. Specifically, the legislation requires cities and counties to ensure that local roads and streets adequately accommodate the needs of bicyclists, pedestrians and transit riders, as well as motorists.

At the same time, the California Department of Transportation (Caltrans), which administers transportation programming for the State, unveiled a revised version of Deputy Directive 64 (DD-64-R1 October 2008), an internal policy document that now explicitly embraces Complete Streets as the policy covering all phases of State highway projects, from planning to construction to maintenance and repair.

(b) Assembly Bill 32 and Senate Bill 375

With the passage of AB 32, the Global Warming Solutions Act of 2006, the State of California committed itself to reducing Statewide greenhouse gas (GHG) emissions to 1990 levels by 2020. The California Air Resources Board (CARB) is coordinating the response to comply with AB 32.

On December 11, 2008, CARB adopted its Scoping Plan for AB 32. This scoping plan included the approval of Senate Bill (SB) 375 as the means for achieving regional transportation-related GHG targets. SB 375 provides guidance on how curbing emissions from cars and light trucks can help the State comply with AB 32.

There are five major components to SB 375. First, regional GHG emissions targets: CARB's Regional Targets Advisory Committee guides the adoption of targets to be met by 2020 and 2035 for each Metropolitan Planning Organization (MPO) in the State. These targets, which MPOs may propose themselves, are updated every eight years in conjunction with the revision schedule of housing and transportation elements.

Second, MPOs are required to prepare a Sustainable Communities Strategy (SCS) that provides a plan for meeting regional targets. The SCS and the Regional Transportation Plan (RTP) must be consistent with each other, including action items and financing decisions. If the SCS does not meet the regional target, the MPO must produce an Alternative Planning Strategy that details an alternative plan to meet the target.

Third, SB 375 requires that regional housing elements and transportation plans be synchronized on eight-year schedules. In addition, Regional Housing Needs Assessment (RHNA) allocation numbers must conform to the SCS. If local jurisdictions are required to rezone land as a result of changes in the housing element, rezoning must take place within three years.

Fourth, SB 375 provides CEQA streamlining incentives for preferred development types. Certain residential or mixed-use projects qualify if they conform to the SCS. Transit-oriented developments (TODs) also qualify if they (1) are at least 50 percent residential, (2) meet specified density requirements, and (3) are within 0.5 miles of a transit stop. The degree of CEQA streamlining is based on the degree of compliance with these development preferences.

Finally, MPOs must use transportation and air emissions modeling techniques consistent with guidelines prepared by the California Transportation Commission (CTC). Regional Transportation Planning Agencies, cities, and counties are encouraged, but not required, to use travel demand models consistent with the CTC guidelines.

(c) California Vehicle Code

The California Vehicle Code (CVC) provides requirements for ensuring emergency vehicle access regardless of traffic conditions. CVC Sections 21806(a)(1), 21806(a)(2), and 21806(c) define how motorists and pedestrians are required to yield the right-of-way to emergency vehicles.

(d) Senate Bill 743

On September 27, 2013, Governor Jerry Brown signed SB 743, which went into effect in January 2014. SB 743 directed the Governor's Office of Planning and Research (OPR)² to develop revisions to the CEQA Guidelines by July 1, 2014, to establish new criteria for determining the significance of transportation impacts and define alternative metrics to traffic LOS. This started a process that changed transportation impact analysis under CEQA. These changes include elimination of auto delay, LOS, and other similar measures of vehicular capacity or traffic congestion as a basis for determining significant impacts under CEQA for land use projects and plans in California. Additionally, as discussed further below, as part of SB 743, parking impacts for particular types of development projects in areas well served by transit are not considered significant impacts on the environment. According to the legislative intent contained in SB 743, these changes to current practice were necessary to "more appropriately balance the needs of congestion management with statewide goals related to infill development, promotion of public health through active transportation, and reduction of greenhouse gas emissions."

On January 20, 2016, OPR released the *Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA*, which was an update to *Updating Transportation Impacts Analysis in the CEQA Guidelines, Preliminary Discussion Draft of Updates to the CEQA Guidelines Implementing Senate Bill 743*, which was released on August 6, 2014. Of particular relevance was the updated text of the proposed new CEQA Guidelines Section 15064.3 that relates to the determination of the significance of transportation impacts, alternatives, and mitigation measures. Specifically, CEQA Guidelines Section 15064.3, which is discussed further below, establishes VMT as the most appropriate measure of transportation impacts. In November 2018, the California Natural Resources Agency (CNRA) finalized the updates to the CEQA Guidelines, and the updated guidelines became effective on December 28, 2018.

Based on these changes, on July 30, 2019, the City of Los Angeles City Council adopted the CEQA Transportation Analysis Update, which sets forth the revised thresholds of significance for evaluating transportation impacts, as well as screening and evaluation criteria for determining impacts. The CEQA Transportation Analysis Update establishes VMT as the City's formal method of evaluating a project's CEQA transportation impacts. In conjunction with this update, LADOT adopted its TAG, which defines the methodology for analyzing a project's transportation impacts under CEQA in accordance with SB 743, in July 2019 with updates in July 2020 and August 2022.

(e) CEQA Guidelines Section 15064.3

As discussed above, recent changes to the CEQA Guidelines include the adoption of Section 15064.3, *Determining the Significance of Transportation Impacts*. CEQA Guidelines Section 15064.3 establishes VMT as the most appropriate measure of transportation impacts. Generally, land use projects within 0.5 miles of either an existing major transit stop³ or a stop

² The Governor's Office of Planning and Research was renamed to the Office of Land Use and Climate Innovation (LUCI) in July 2024.

³ "Major transit stop" is defined in Public Resources Code (PRC) Section 21064.3 as a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 20 minutes or less during the morning and afternoon peak commute periods. California Assembly Bill 2553

along an existing high quality transit corridor⁴ should be presumed to cause a less than significant transportation impact. Projects that decrease VMT in the project area compared to existing conditions should be presumed to have a less than significant transportation impact. A lead agency has discretion to choose the most appropriate methodology to evaluate VMT, including whether to express the change in absolute terms, per capita, per household or in any other measure. A lead agency may also use models to estimate VMT and may revise those estimates to reflect professional judgment based on substantial evidence. As discussed further below, LADOT developed City of Los Angeles VMT Calculator Version 1.4 (June 2023) (VMT Calculator) to estimate project-specific daily household VMT per capita and daily work VMT per employee for developments within City limits. The methodology for determining VMT based on the VMT Calculator is consistent with CEQA Guidelines Section 15064.3 and the current version of the TAG.

(3) Regional

(a) Southern California Association of Governments 2024-2050 Regional Transportation Plan / Sustainable Communities Strategy

In compliance with SB 375, On April 4, 2024, the Southern California Association of Governments (SCAG) adopted the 2024-2050 Regional Transportation Plan/Sustainable Communities Strategy (2024-2050 RTP/SCS), also referred to as Connect SoCal 2024, a long-range visioning plan that incorporates land use and transportation strategies to increase mobility options and achieve a more sustainable growth pattern while meeting GHG reduction targets set by CARB. The 2024-2050 RTP/SCS contains baseline socioeconomic projections that are used as the basis for SCAG's transportation planning, as well as the provision of services by the six-county region of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura counties. SCAG policies are directed toward the development of regional land use patterns that contribute to reductions in vehicle miles and improvements to the transportation system.

The 2024-2050 RTP/SCS builds on the long-range vision of SCAG's prior 2020-2045 RTP/SCS to balance future mobility and housing needs with economic, environmental and public health goals. A substantial concentration and share of growth is directed to Priority Development Areas (PDAs), which include Neighborhood Mobility Areas (NMAs), Transit Priority Areas (TPAs), Livable Corridors, and in unincorporated areas, Spheres of Influence. These areas account for approximately 8.2 percent of SCAG's total land area, 66 percent of forecasted household growth, and 54 percent of forecasted employment growth between 2019 and 2050. TPAs are PDAs that are within 0.5 miles of a major transit stop that is existing or planned. NMAs include four elements: intersection density; low-speed streets; land use diversity; and accessibility to amenities within one mile using street network distances. Livable Corridors are areas where local jurisdictions can plan and zone for increased density at nodes along key corridors and redevelop single-story underperforming retail with well-designed, higher-density housing and employment centers.

was approved on September 19, 2024, to amend Section 21064.3 of the Public Resources Code and revise the definition of "major transit stop" to increase the frequency of service interval to 20 minutes. Previously the definition included a frequency of 15 minutes or less during peak commute periods.

⁴ "High-quality transit corridors" are defined in PRC Section 21155 as a corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours.

Growth at strategic nodes along key corridors, many of which are within High Quality Transit Corridors (HQTCs), will make transit a more convenient and viable option. Spheres of Influence (SOIs) are existing or planned service areas within the planning boundary outside of an agency's legal boundary. The intent of an SOI is to promote the efficient, effective and equitable delivery of local and regional services for existing and future residents and to encourage a collaborative process between agencies.

The goals of the 2024–2050 RTP/SCS fall into four core categories: mobility, communities, environment and economy. The 2024-2050 RTP/SCS invests \$751.7 billion in the transportation system, primarily in operations and maintenance, to ensure the continued performance of the current network. The 2024-2050 RTP/SCS includes investments and strategies to better manage these and past investments, including an Intelligent Transportation System and policies for Transportation Demand Management (TDM). With implementation of the objectives, the 2024-2050 RTP/SCS intends to create a region with:

- Transit as a backbone of the transportation system;
- More Complete Streets where people and safety are prioritized;
- Policies that encourage emerging technologies and mobility innovations that support rather than hamper regional goals;
- More housing, jobs and mobility options closer together in Priority Development Areas to preserve natural lands and open spaces;
- More housing to address the “existing housing need” as defined by the Regional Housing Needs Assessment; and
- Safe and fluid movement of goods, with a commitment to the broad deployment of zero- and near-zero emission technologies.

Specific to the core category of mobility, the 2024-2050 RTP/SCS includes the following categories of mobility policies and strategies:

- System Preservation and Resilience;
- Complete Streets;
- Transit and Multimodal Integration;
- Transportation System Management;
- Transportation Demand Management;
- Technology Integration;
- Safety; and
- Funding the System/User Fees.

When compared with the 2019 baseline condition, upon full implementation of the 2024-2050 RTP/SCS in 2050, the 2024-2050 RTP/SCS would result in a 11.6-percent reduction in daily

VMT per capita, a 31.8 percent reduction in daily minutes of traffic delay, and a 7.9 percent increase in work-related transit trips.

(4) Local

(a) *City of Los Angeles Mobility Plan 2035*

In August 2015, the City Council adopted Mobility Plan 2035 (Mobility Plan), which serves as the City's General Plan circulation element. The City Council has adopted several amendments to the Mobility Plan since its initial adoption, including the most recent amendment on September 7, 2016.⁵ The Mobility Plan incorporates "complete streets" principles and lays the policy foundation for how the City's residents interact with their streets. The Mobility Plan includes five main goals that define the City's high-level mobility priorities:

- (1) Safety First;
- (2) World Class Infrastructure;
- (3) Access for All Angelenos;
- (4) Collaboration, Communication, and Informed Choices; and
- (5) Clean Environments and Healthy Communities.

Each of the goals contains objectives and policies to support the achievement of those goals.

Street classifications are designated in the Mobility Plan, may be amended by a Community Plan, and are intended to create a balance between traffic flow and other important street functions, including transit routes and stops, pedestrian environments, bicycle routes, building design and site access, etc. The Complete Streets Design Guide, which was adopted by the City Council alongside the Mobility Plan, defines the street classifications as follows:

- **Arterial Streets:** Major streets that serve through traffic and provide access to major commercial activity centers. Arterials are divided into two categories:
 - **Boulevards** represent the widest streets that typically provide regional access to major destinations and include two further categories, Boulevard I and Boulevard II.
 - **Avenues** pass through both residential and commercial areas and include three further categories, Avenue I, Avenue II, and Avenue III.
- **Collector Streets:** Generally located in residential neighborhoods and provide access to and from arterial streets for local traffic and are not intended for cut-through traffic.
- **Local Streets:** Intended to accommodate lower volumes of vehicle traffic and provide parking on both sides of the street.

⁵ Los Angeles Department of City Planning, Mobility Plan 2035: An Element of the General Plan, approved by City Planning Commission on June 23, 2016, and adopted by City Council on September 7, 2016.

- Continuous local streets connect to other streets at both ends.
- Non-Continuous local streets lead to a dead-end.

The Mobility Plan also identifies enhanced networks of major and neighborhood streets that facilitate multi-modal mobility within the citywide transportation system. This layered approach to complete streets selects a subset of the City's streets to prioritize travel for specific transportation modes. In all, there are four enhanced networks: the Bicycle Enhanced Network (BEN), Transit Enhanced Network (TEN), Vehicle Enhanced Network (VEN), and Neighborhood Enhanced Network (NEN). In addition to these networks, many areas that could benefit from additional pedestrian features are identified as Pedestrian Enhanced Districts (PED). These networks and PED are defined as follows:

- The NEN is a selection of streets that provide comfortable and safe routes for localized travel of slower-moving modes, such as walking, bicycling, or other slow speed motorized means of travel.
- The TEN is the network of arterial streets prioritized to improve existing and future bus service for transit riders.
- The BEN is a network of streets to receive treatments that prioritize bicyclists. Tier 1 Protected Bicycle Lanes are bicycle facilities that are separated from vehicular traffic. Tier 2 and Tier 3 Bicycle Lanes are facilities on roadways with striped separation. Tier 2 Bicycle Lanes are those more likely to be built by 2035.
- The VEN identifies streets that prioritize vehicular movement and offer safe, consistent travel speeds and reliable travel times.
- The PEDs identify where pedestrian improvements on arterial streets could be prioritized to provide better walking connections to and from the major destinations within communities.

(b) South Los Angeles Community Plan

The Land Use Element of the City's General Plan includes 34 community plans. Community plans are intended to provide an official guide for future development and propose approximate locations and dimensions for land use. The community plans establish standards and criteria for the development of housing, commercial uses, and industrial uses, as well as circulation and service systems. The community plans implement the City's General Plan Framework Element (Framework Element) at the local level and consist of both text and an accompanying generalized land use map. The community plans' texts express goals, objectives, policies, and programs to address growth in the community, including those that relate to the transportation system required to support such growth. The community plans' maps depict the desired arrangement of land uses, as well as street classifications and the locations and characteristics of public service facilities.

The Project Site is located within the South Los Angeles Community Plan (Community Plan). The Community Plan was adopted in November 2017 and is designed to accommodate

development to the year 2035. The Community Plan includes the following transportation and circulation goals, objectives, and policies that are applicable to the Project:

- **Goal M1:** A street system that is diverse and balances the needs of pedestrians, bicyclists, transit users, mobility-challenged persons and vehicles, while providing sufficient mobility and abundant access options for the existing and future users of the street system.
 - **Policy M1.3: Adequate Traffic Mitigation.** Developments that increase density or intensity by zone change, variance, conditional use, parcel map, subdivision or other discretionary action should provide adequate traffic mitigation and ensure that mobility needs are met.
 - **Policy M1.4: Private Investment for Off-site Facilities/ Amenities.** Encourage new developments to include bicycle and pedestrian amenities, off-site transit, and road improvements, creating a circulation system that optimizes travel by all modes.
- **Goal M3:** Throughout the community, a street environment that is pleasant, universally accessible, safe, and convenient for pedestrians.
 - **Policy M3.1: Pedestrian Access.** Encourage walking by orienting building entrances to face the streets and sidewalks when designing access to new developments and buildings.
 - **Policy M3.3: Pedestrian Amenities.** Maintain sidewalks, streets and rights-of-way in good condition, free of obstructions, and with adequate lighting, trees and parkways. Streets should accommodate pedestrians comfortably through adequate sidewalks, parkway landscaping that provides shade, and street lighting that provides for safety during the night.
 - **Policy M3.4: Minimize Pedestrian Conflicts.** Minimize conflicts between buses, cars, and pedestrians by designing and constructing sidewalks and crosswalks that make pedestrians feel safe, as well as by creating well-marked crossings at intersections and select mid-block locations, preferably within Transit-Oriented Areas and Districts.
- **Goal M4:** A safe, comprehensive, and integrated bikeway network that is accessible to all, and encourages bicycling for recreation and transportation.
 - **Policy M4.3: Bicycle Amenities.** Incorporate bicycle amenities (such as parking, lockers, changing rooms and showers) in public facilities, parks, commercial and multi-family residential developments, employment and transit centers, as well as park-and-ride facilities.
- **Goal M5:** An integrated land use and transit strategy that directs growth to areas accessible by transit facilities and services.
 - **Policy M5.2: Development at Transit Nodes.** Facilitate development and public improvements at multi-modal transit nodes or intersections that Metro identifies as

major transfer nodes to promote convenient access between new development and the transit system.

- **Policy M5.5: Land Uses Adjacent to Stations.** Encourage a coordinated integration of development around transit stations to improve services, access, and the economic vitality of the community.
- **Goal M7:** A network of streets, highways, and freeways that supports existing and planned land uses, and provides improved motorized vehicle mobility throughout the South Los Angeles Community Plan Area, particularly on congested corridors.
- **Goal M9:** Improved air quality and health of residents as a result of decreased single-occupant automobile demand and reduced vehicle miles traveled.
 - **Policy M9.4: TDM Plans.** Encourage major developments to submit a Transportation Demand Management (TDM) Plan to the City and provide employee incentives for utilizing alternatives to the automobile (i.e., carpools, vanpools, buses, flex-time, telecommuting, bicycling, walking, etc.).
- **Goal M10:** A parking supply that is sufficient, serves economic development and facilitates all modes of transportation.
 - **Policy M10.3: Parking Structures.** Support the development of City-owned or other parking structures, where appropriate, and discourage surface parking lots.
- **Goal M11:** Parking policies and requirements that capture the true cost of private vehicle use and support livable neighborhoods, environmental sustainability, energy conservation, and the use of alternative modes of transportation.
- **Policy M11.4: Connections for Electric Vehicles.** Encourage new construction to include vehicle access to properly wired outdoor receptacles to accommodate zero emission vehicles (ZEVs) and plug-in electric hybrids (PHEV).

(c) Exposition/University Park Redevelopment Plan

The former Community Redevelopment Agency of Los Angeles's (CRA/LA) Hoover Expansion Redevelopment Plan was adopted in January 1966 and amended multiple times thereafter. In 2005, the name of the plan was changed to the Exposition/University Park Redevelopment Plan (Redevelopment Plan). The Redevelopment Plan encompasses approximately 574 acres of land located just southwest of downtown Los Angeles and is divided into four areas: the original Hoover Redevelopment Project Area, which comprises portions of the northern and western areas of USC Campus core, and three expansion areas. The Project Site is located within Expansion Area 3.⁶

The Redevelopment Plan includes goals aimed at encouraging the retention and development of affordable housing, improvement of neglected community facilities, and the promotion of economic development opportunities, and includes specific objectives that focus on

⁶ City of Los Angeles. Exposition/University Park Redevelopment Plan. <https://planning.lacity.gov/odocument/7969ac9e-4078-4c9f-b987-4045661aab7f/Hoover-Map-in-PDF.pdf>, accessed February 22, 2026.

preserving and protecting historic structures, encouraging commercial development, and to make provisions for well planned community uses, facilities, pedestrian and vehicular circulation, and adequate parking, particularly as these relate to Exposition Park.

The Redevelopment Plan designates the entirety of the Project Site for commercial uses; however, pursuant to Section 1307 of the Redevelopment Plan, the CRA/LA is authorized to permit new residential uses within a commercially designated area.

On December 29, 2011, the California Supreme Court issued its decision in the *California Redevelopment Association v. Matosantos* case, which involved challenging the constitutionality of ABX1 26, the bill that dissolved all redevelopment agencies in California. The decision upheld ABX1 26, which, therefore, led to the dissolution of the Community Redevelopment Agency of the City of Los Angeles (CRA/LA). The dissolution of the agencies became effective in February 2012. ABX1 26, however, did not dissolve adopted redevelopment plans. Therefore, the Exposition/ University Park Redevelopment Plan and its requirements for development within the Redevelopment Project Area are still in effect.

As the City initially elected not to become the successor agency to the CRA/LA, a Designated Local Authority (DLA) was formed, and the Governor of California appointed its three-member board to wind down the operations of the former CRA/LA. From 2012 to 2019, the DLA implemented and enforced the requirements of the Redevelopment Plan. On November 11, 2019, Ordinance No. 186,325 became effective, which transferred the DLA's land use authority under the redevelopment plans to the City's Department of City Planning and established a process by which the Department of City Planning would review projects for consistency with applicable redevelopment plan regulations.

(d) Los Angeles Municipal Code

With regard to construction traffic, Los Angeles Municipal Code (LAMC) Section 41.40 limits construction activities to the hours from 7:00 a.m. to 9:00 p.m. on weekdays and from 8:00 a.m. to 6:00 p.m. on Saturdays and national holidays. No construction is permitted on Sundays.

LAMC Section 12.37 sets forth requirements for street dedications and improvements for new development projects. Specifically, LAMC Section 12.37 states that no building or structure shall be erected or enlarged on any property, and no building permit shall be issued therefore, on any R3 or less restrictive zone, or in any lot in the RD1.5, RD2, or R3 Zones, if the lot abuts a major or secondary highway or collector street unless one-half of the street adjacent to the subject property has been dedicated and improved to the full width to meet the standards for a highway or collector street as provided in the LAMC. While LAMC Section 12.37 generally applies to projects meeting the above criteria, the authority to require right-of-way dedications and improvements for discretionary projects that involve zone changes or divisions of land falls under LAMC Sections 12.32 G.1 and 17.05.

With regard to on-site bicycle parking, LAMC Section 12.21 A.16 sets forth requirements for long-term and short-term bicycle parking for residential and commercial buildings. Where there is a combination of uses on a lot, the number of bicycle parking spaces required shall be the sum

of the requirements of the various uses. LAMC Section 12.21 A.16 also includes facility requirements, design standards and siting requirements for bicycle parking.

LAMC Section 12.26 J provides for Transportation Demand Management (TDM) and Trip Reduction Measures that are applicable to the construction of new non-residential gross floor area. Different TDM requirements are provided for developments in excess of 25,000 square feet of gross floor area, 50,000 square feet of gross floor area, and 100,000 square feet of gross floor area. The TDM requirements set forth therein vary depending upon the maximum non-residential gross floor area described above, and include measures, such as the provision of a bulletin board, display case, or kiosk with transit information and carpool/vanpool parking spaces.

(e) LADOT Transportation Assessment Guidelines

As discussed above, pursuant to CEQA Guidelines Section 15064.3 that implement SB 743, the City established the TAG that includes both CEQA thresholds (and screening criteria) and non-CEQA thresholds (and screening criteria). LADOT updated the TAG in August 2022. The CEQA thresholds provide the methodology for analyzing the Appendix G transportation thresholds, including providing the City's adopted VMT thresholds. The non-CEQA thresholds provide a method to analyze projects for purposes of entitlement review and making necessary findings to ensure the project is consistent with adopted plans and policies, including the Mobility Plan. Specifically, the TAG is intended to effectuate a review process that advances the City's vision of developing a safe, accessible, well-maintained, and well-connected multimodal transportation network. The TAG has been developed to identify land use development and transportation projects that may impact the transportation system, to ensure proposed land use development projects achieve site access design requirements and on-site circulation best practices, to define whether off-site improvements are needed, and to provide step-by-step guidance for assessing impacts and preparing Transportation Assessment Studies.⁷

(f) LADOT Manual of Policies and Procedures Section 321

LADOT Manual of Policies and Procedures (MPP) Section 321 provides the basic criteria for the review of driveway design. As discussed in MPP Section 321, the basic principle of driveway location planning is to minimize potential conflicts between users of the parking facility and users of the abutting street system, including the safety of pedestrians.

(g) LADOT Vision Zero

The Vision Zero program, implemented by LADOT, represents a citywide effort to eliminate traffic deaths in the City by 2025. Vision Zero has two goals: a 20-percent reduction in traffic deaths by 2017 and zero traffic deaths by 2025. In order to achieve these goals, LADOT has identified a network of streets, called the High Injury Network (HIN), which has a higher incidence of severe and fatal collisions. The HIN, which was last updated in 2018, represents six percent of the City's street miles but accounts for approximately two-thirds (64 percent) of all fatalities and serious injury collisions involving people walking and biking.

⁷ Los Angeles Department of Transportation (LADOT), Transportation Assessment Guidelines, 2022.

(h) Citywide Design Guidelines

The Citywide Design Guidelines serve to implement the urban design principles set forth in the City of Los Angeles General Plan Framework Element (Framework Element) and are intended to be used by City of Los Angeles Department of City Planning staff, developers, architects, engineers, and community members in evaluating project applications, along with relevant policies from the Framework Element and Community Plans. The Citywide Design Guidelines were updated in October 2019 and include guidelines pertaining to pedestrian-first design which serves to reduce VMT.

(i) Plan for a Healthy Los Angeles

Plan for a Healthy Los Angeles: A Health and Wellness Element of the General Plan (Plan for a Healthy Los Angeles) provides guidelines to enhance the City's position as a regional leader in health and equity, encourage healthy design and equitable access, and increase awareness of equity and environmental issues.⁸ Plan for a Healthy Los Angeles addresses GHG emission reductions and social connectedness, which are affected by the land use pattern and transportation opportunities.

b. Existing Conditions

The Project's transportation study area (Study Area) was defined in accordance with the latest version of LADOT's TAG (August 2022) and agreed upon with LADOT staff. The Study Area includes an area covering an approximately 0.25-mile radius around the Project Site. As shown in **Figure IV.G-1, Transportation Analysis Study Area**, the Study Area for the traffic analysis includes the Project intersections in listed below, as well as the streets that front or are near the Project Site which include South Figueroa Street, West 38th Street, West 39th Street, and South Flower Drive.

The following intersections were included in the Study Area for the Project Transportation Assessment:

1. South Figueroa Street and West 38th Street
2. South Figueroa Street and West 39th Street
3. South Figueroa Street and Martin Luther King Boulevard
4. South Figueroa Street and West 37th Street
5. South Flower Drive and West 39th Street

⁸ City of Los Angeles Department of City Planning. Plan for a Healthy Los Angeles: A Health and Wellness Element of the General Plan, 2015.

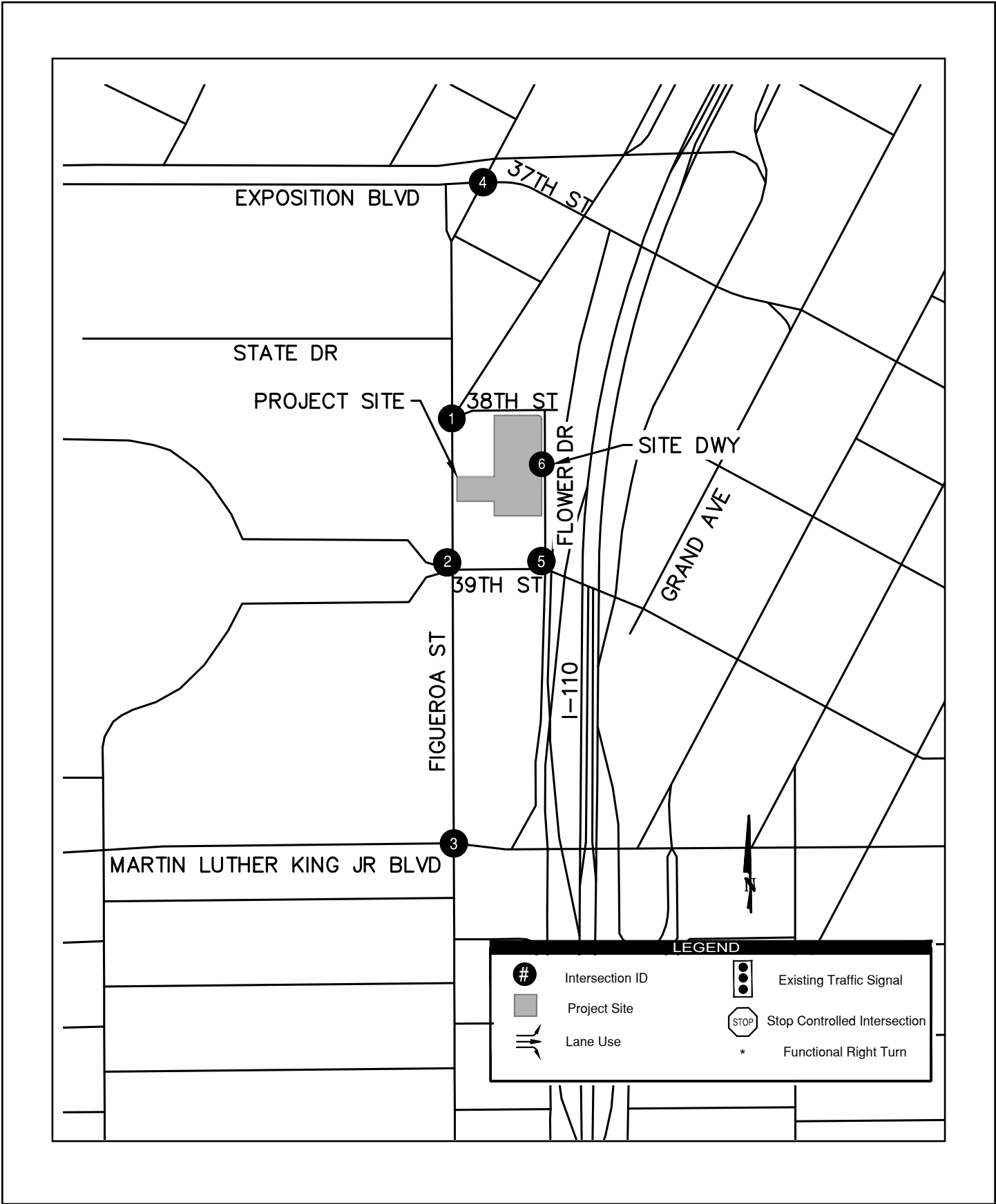


FIGURE IV.G-1: Transportation Analysis Study Area



(1) Existing Street System

(a) Freeways

As described in the Transportation Assessment, primary regional access to the Project Site is provided by the Harbor Freeway (I-110), which is accessible from the Project Site via interchanges at West Martin Luther King Jr. Boulevard, West 37th Street, and West Exposition Boulevard. I-110 generally runs in the north-south direction and is located directly east of the Project Site. In the vicinity of the Project Site, I-110 provides six travel lanes in each direction.

(b) Roadways

The roadways adjacent to the Project Site are part of the existing urban roadway network and do not contain hazardous geometric design features, such as sharp curves or dangerous intersections. The key roadways in the vicinity of the Project Site are:

- **South Figueroa Street**– South Figueroa Street is classified as an Arterial Street (Avenue I) in the Mobility Plan. Oriented in the north-south direction, it is located west of the Project Site. It has four travel lanes in the Study Area, two lanes in each direction. No on-street parking is allowed on either side of the street within the Study Area. South Figueroa Street is also included as a TEN, PED, and BEN in the Mobility Plan.
- **West 38th Street**– West 38th Street is classified as a Local Street in the Mobility Plan. Oriented in the east-west direction, it is located north of the Project Site. It has two travel lanes in the Study Area, one lane in each direction. Unmetered on-street parking is generally provided on the north and south sides of the street within the Study Area.
- **South Flower Drive**– South Flower Drive is classified as a Local Street in the Mobility Plan. Oriented in the north-south direction, it is located east of the Project Site. It has two travel lanes in the Study Area, one lane in each direction. Unmetered parking is generally provided on the west side of the street and no on-street parking is allowed on the east side of the street within the Study Area. South Flower Drive is also included in as a PED in the Mobility Plan.
- **West 39th Street**– West 39th Street is classified as an Arterial Street (Avenue I and Avenue II) in the Mobility Plan. Oriented in the east-west direction, it is located south of the Project Site. It has four travel lanes in the Study Area, two lanes in each direction. No on-street parking is allowed on either side of the street within the Study Area. West 39th Street is also included in the as part of the NEN and as a PED in the Mobility Plan.

(2) Existing Transit Service

The Study Area is well-served by several public transit options operated by the Los Angeles County Metropolitan Transportation Authority (Metro) and LADOT Downtown Area Shuttle (DASH), including local and regional bus lines and the Metro rail system. The Project Site is located 0.3 miles from the Expo Park and University of Southern California (USC) Metro Station which serves the E Line of the Metro Rail System. The following provides a brief description of the public transit services in the vicinity of the Project Site.

- **Metro Local 2** – Route 2 is a local line that travels east-west and north-south through the City from Downtown Los Angeles to Westwood, with average headways of 15 to 20 minutes during weekday peak hours.
- **Metro Local 81** – Route 81 is a local line that travels east-west and north-south through the City from South Los Angeles to Eagle Rock, with average headways of 15 minutes during weekday peak hours.
- **Metro Local 550** – Route 550 is a local line that travels east-west and north-south between Harbor Gateway and Exposition Park, with average headways of 30 minutes during weekday peak hours.
- **LADOT DASH Southeast** – DASH Southeast is a local LADOT transit line that travels east-west and north-south within South Los Angeles, with average headways of 30 minutes during weekday peak hours.
- **LADOT DASH King-East**– DASH King-East is a local LADOT transit line that travels east-west and north-south within South Los Angeles, with average headways of 30 minutes during weekday peak hours.

(3) Existing Bicycle and Pedestrian Facilities

There are currently no Class I or III bicycle facilities located within 0.25 miles of the Project Site. A Class I bicycle facility is a fully separated bicycle facility, exclusively for the use of bicycles and pedestrians. A Class III bicycle facility designates a preferred route for bicyclists that is not served by dedicated bikeways that are separated from vehicular traffic to provide continuity to the bikeway network. There are existing Class II and IV bicycle routes along South Figueroa Street within the Study Area. A Class II bicycle facility is a striped lane for one-way bicycle travel on a street or highway. A Class IV bicycle facility (separated bikeway) is a bikeway for the exclusive use of bicycles and includes a separation required between the separated bikeway and the through vehicular traffic.⁹

The streets surrounding the Project Site provide a network of 12- to 15-foot wide sidewalks providing easy access for pedestrians to the Project Site, nearby land uses, and nearby transit facilities.

South Figueroa Street, South Flower Drive, Martin Luther King Jr. Boulevard, Exposition Boulevard/West 37th Street, and West 39th Street within the Study Area are identified as part of the PED. South Figueroa Street and Martin Luther King Jr. Boulevard within the Study Area are identified as part of the BEN.

(4) High-Injury Network

As indicated previously, Vision Zero has identified the HIN, a network of streets included based on collision data from the last five years, where strategic investments by LADOT will have the biggest impact in reducing death and severe injury. As indicated in the Transportation

⁹ Caltrans Classification Brochure, 207. https://lbikecoalition.org/wp-content/uploads/2017/12/caltrans-d4-bike-plan_bikeway-classification-brochure_072517.pdf, accessed February 22, 2026.

Assessment, South Figueroa Street to the west of the Project study has been identified by the City as part of the HIN.

(5) Existing Project Site Conditions

As described in Section II, Project Description, of this Draft EIR, existing uses on the Project Site include seven two-story apartments along South Flower Drive and a two-story apartment and surface parking lot along South Figueroa Street. Vehicular access to the Project Site is provided by South Figueroa Street, West 38th Street, and South Flower Drive, and pedestrian access is currently provided by sidewalks along South Figueroa Street, West 38th Street, and South Flower Drive.

c. Future Cumulative Transportation Conditions

In accordance with the TAG and MOU, the future scenario analysis contained within the Transportation Assessment, provided in Appendix I of this Draft EIR, incorporates a list of Related Projects (approved or pending projects expected to be built by the year 2030 in the vicinity of the Proposed Project) compiled based on information obtained from the Department of City Planning and LADOT as well as ambient growth factors. The MOU, which outlined all the traffic study assumptions, growth rate, and Project trip generation and distribution, was submitted and approved as part of the Transportation Assessment.

Traffic volumes from a total of seven Related Projects were added to the study intersections to simulate future traffic conditions with expected new development in the area. The list of Related Projects was provided by LADOT on July 16th, 2024. Table III-1 within Section III, Environmental Setting, lists the seven Related Projects and the trips generated by each related project per information provided by LADOT.

Trip distribution and assignment for the Related Projects were obtained from approved traffic studies, where available, and were developed utilizing the same methodology utilized to assess trip generation for the Project if approved traffic studies were not available. Cumulative projects' trip distribution and assignment were developed based on proximity to regional and local roadways and existing travel patterns. Traffic volumes for the Related Projects were added to the Opening Year 2030 traffic volumes for both the With- and Without-Project scenarios to generate the Opening Year 2030 Cumulative traffic volumes. In addition to traffic volumes from Related Projects, ambient growth was estimated as an annual percentage increase over the existing traffic volumes. A growth rate of 0.75 percent per year was utilized and approved by the LADOT as part of the MOU. The ambient growth rate of 0.75 percent was applied to the peak hour traffic volumes to represent Opening Year (2030) without Project volumes.

3. Project Impacts

a. Thresholds of Significance

In accordance with the State CEQA Guidelines Appendix G, the Project would have a significant impact related to land use if it would:

Threshold (a): Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities;

Threshold (b): Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b);

Threshold (c): Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment); or

Threshold (d): Result in inadequate emergency access.

b. Methodology

(1) Requirements for Transportation Assessments

In November 2018, the CNRA finalized the updates to the State CEQA Guidelines, which became effective on December 28, 2018, and were subsequently adopted by the City on February 28, 2019. Based on these changes, on July 30, 2019, the City adopted the CEQA Transportation Analysis Guidelines Update, which sets forth the revised thresholds of significance for evaluating transportation impacts, as well as screening and evaluation criteria for determining impacts. The CEQA Transportation Analysis Guidelines Update establishes VMT as the City's formal method of evaluating a project's transportation impacts. In conjunction with this update, LADOT adopted its TAG in 2019 and updated it in 2020 and again in 2022. The analysis in this section and the Transportation Assessment included as Appendix I of this Draft EIR relies on the latest version of the TAG updated by LADOT in August 2022.

(2) Consistency with Plans, Programs, Ordinances, or Policies

CEQA Guidelines Transportation Threshold (a) requires an analysis of the Project's potential to conflict with plans, programs, ordinances, or policies that address the circulation system including transit, roadway, bicycle and pedestrian facilities. Per the LADOT TAG, the City aims to achieve an accessible and sustainable transportation system that meets the needs of all users of the transportation system, including pedestrians, bicyclists, motorists, public transit riders, disabled persons, senior citizens, and movers of commercial goods. As such, all proposed development projects are required to be analyzed to identify potential conflicts with adopted City transportation plans and policies.

As discussed in the Transportation Assessment, a project would not result in an impact based on whether it would not implement an adopted plan, program, ordinance or policy. Rather, the threshold test is intended to assess whether the proposed development does not conflict with or preclude the City from implementing adopted plans, programs, ordinances, or policies. CEQA generally requires analysis of inconsistencies with applicable policies, not an affirmative analysis of comprehensive consistency. A project that generally conforms with and does not obstruct key City development policies and standards would generally be considered to not conflict with such plans and standards. Furthermore, under CEQA, a project is considered to not conflict with an applicable plan if it would not conflict with the overall intent of the plan or preclude the attainment

of its primary goals. A project does not need to be in perfect conformity with each and every policy. Finally, any inconsistency with an applicable policy, plan, or regulation is only a significant impact under CEQA if the policy, plan, or regulation was adopted for the purpose of avoiding or mitigating an environmental effect and if the inconsistency itself would result in a direct physical impact on the environment.

(3) Vehicle Miles Traveled

(a) VMT Impact Thresholds

The following describes the methodology by which vehicle trips and VMT are calculated in the City of Los Angeles VMT Calculator Version 1.4 (VMT Calculator).¹⁰ LADOT developed the VMT calculator to estimate project-specific household VMT per capita and daily work VMT per employee for developments within City limits, which are based on the following types of one-way trips:

- **Home-Based Work Production:** trips to a workplace destination originating from a residential use.
- **Home-Based Other Occupation:** trips to a non-workplace destination (e.g., retail, restaurant, etc.) originating from a residential use.
- **Home-Based Work Attraction:** trips to a workplace destination originating from a residential use.

As detailed in the City of Los Angeles VMT Calculator Documentation, the household VMT per capital threshold applies to Home-Based Work Production and Home-Based Other Production trips, while the work VMT per employee threshold applies to Home-Based Work Attraction trips, as the location and characteristics of residences and workplaces are often the main drivers of VMT as discussed in Appendix 1 of OPR's *Technical Advisory on Evaluating Transportation Impacts in CEQA*.

Other types of trips generated in the VMT Calculator include Non-Home-Based Other Production (trips to a non-residential destination originating from a non-residential use), Home-Based Other Attraction (trips to a non-workplace destination originating from a residential use), and Non-Home Based Other Attraction (trips to a non-residential destination originating from a non-residential use). These trips are not factored into the VMT per capita and VMT per employee thresholds as those trips are typically localized and are assumed to have a negligible effect on the VMT impacts assessment. However, those trips are factored into the calculation of the total project VMT for screening purposes when determining if VMT analysis would be required.

The City's VMT impact criteria for development projects is specified in Threshold T-2.1 (Causing Substantial Vehicle Miles Traveled) of the TAG. Per the criteria, a development project would have a potential significant impact if the project meets one or more of the following:

¹⁰ Los Angeles Department of Transportation, City of Los Angeles VMT Calculator, Version 1.4, June 2023.

- For residential projects, the project would generate household VMT per capita exceeding 15 percent below the existing average household VMT per capita for the Area Planning Commission (APC) area in which the project is located.
- For office projects, the project would generate work VMT per employee exceeding 15 percent below the existing average work VMT per employee for the APC in which the project is located.
- For regional serving projects including retail projects, entertainment projects, and/or event centers, the project would result in a net increase in VMT. Retail projects that fall under 50,000 square feet are considered local serving and are assumed to have a negligible effect on VMT and are, therefore, not considered for the purposes of identifying significant VMT impacts. New retail uses that are above 50,000 square feet may also be considered locally serving if an applicant provides documentation that most of the vehicle trips will be originating from the project area.
- For other land use types where the threshold is not further specified measure VMT impacts for the work trip element using the criteria for office projects above.

The VMT calculator, as described in the LADOT Transportation Assessment Guidelines, was used to determine the Project's VMT for its residential uses. The VMT estimation tool generates VMT estimates in a manner that is consistent with the Governor's Office of Planning and Research's (OPR) guidelines. Table 2.2-1 of the TAG identifies the daily household VMT per capita and daily work VMT per employee impact criteria (15 percent below the APC average) for the APCs. Based on LADOT's VMT impact criteria, because the Project is located within the South Los Angeles APC and proposes residential uses, the applicable VMT impact criteria is 6.0 daily household VMT per capita.

(4) Hazardous Geometric Design Features

(a) Geometric Design Feature and Incompatible Use Analysis

LADOT's TAG require projects to be evaluated for potential geometric design features that create road hazard impacts and potential increases in road hazards related to the design of the Project's access points to the property from the public right-of-way (ROW) or modifications along the public ROW (i.e., street dedications). The City considers the following factors when evaluating a project's access plans to determine whether it would substantially increase hazards due to geometric design features:

- The relative amount of pedestrian activity at project access points.
- Design features/physical configurations that the project introduces that affect the visibility of pedestrians and bicyclists to drivers entering and exiting the site, and the visibility of cars to pedestrians and bicyclists.
- The type of bicycle facilities the project driveway(s) crosses and the relative level of utilization.

- The physical conditions of the site and surrounding area, such as curves, slopes, walks, landscaping or other barriers, that could result in vehicle/pedestrian, vehicle/bicycle, or vehicle/vehicle impacts.
- The project location, or project-related changes to the public ROW, relative to proximity to the High Injury Network or a Safe Routes to School program area.
- Any other conditions, including the approximate location of incompatible uses that would substantially increase a transportation hazard.

In accordance with LADOT's TAG, impacts regarding the potential increase of hazards due to a geometric design feature generally relate to the design of the access points to and from a project site, and may include safety, operational, or capacity impacts. Impacts can be related to vehicle/vehicle, vehicle/bicycle, or vehicle/pedestrian conflicts, as well as to operational delays caused by vehicles slowing and/or queuing to access a project site. These conflicts may be created by the driveway configuration or through the placement of project driveway(s) in areas of inadequate visibility, adjacent to bicycle or pedestrian facilities, or too close to busy or congested intersections. Evaluation of access impacts require details relative to project land use, size, design, location of access points, etc. These impacts are typically evaluated for permanent conditions after project completion but can also be evaluated for temporary conditions during project construction. Project access can be analyzed in qualitative and/or quantitative terms and in conjunction with the review of internal site circulation and access to parking areas. All proposed site access points should be evaluated.

(b) Freeway Safety Analysis

A Caltrans Freeway Ramp Impact Analysis is required when a Project would add more than 25 trips to any freeway off-ramp in either the A.M. or P.M. peak hour. A project would result in adverse safety conditions at such a ramp if each of the following three criteria were met:

1. Under a scenario analyzing future conditions upon project buildout, with project traffic included, the off-ramp queue would extend to the mainline freeway lanes.
2. A project would contribute at least two vehicle lengths (50 feet, assuming 25 feet per vehicle) to the queue.
3. The average speed of mainline freeway traffic adjacent to the off-ramp during the analyzed peak hour(s) is greater than 30 miles per hour (mph).

If a potential adverse safety condition is identified, corrective measure to be implemented to offset this potential condition could include TDM strategies to reduce a project's trip generation, investments in active transportation or transit system infrastructure to reduce a project's trip generation, changes to the traffic signal timing or lane assignments at the ramp intersection, or physical changes to the off-ramp. Any physical change to the ramp would have to improve safety, not induce greater VMT, and not result in secondary environmental issues.

(5) Emergency Access

The analysis of the Project's potential access impacts includes an analysis of the proposed vehicle access points and internal circulation. Construction activities and their impact on emergency access are also reviewed. A determination was made pursuant to the threshold of significance regarding the Project's potential to impede emergency access on adjacent City streets and/or result in potential safety impacts.

c. Project Design Features

The Project would implement the following Project Design Feature (PDF) associated with transportation:

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.

d. Analysis of Project Impacts

Threshold (a): Would the Project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?

A discussion of consistency with the following plans: SCAG 2024 RTP/SCS, Mobility Plan; Plan for a Healthy Los Angeles, South Los Angeles Community Plan; Exposition/University Park Redevelopment Plan; LAMC; LADOT Vision Zero; and Citywide Design Guidelines are discussed below.

As described in Section II, Project Description, of this Draft EIR, vehicular access to the Project Site would be provided by one 20 foot driveway located on South Flower Drive.

(1) Impact Analysis

(a) SCAG 2024–2050 RTP/SCS

As discussed in detail in Section IV.D, Land Use and Planning, of this Draft EIR, the Project would not conflict with 2024-2050 SCAG RTP/SCS goals, objectives, and policies related to encouraging pedestrian activity and reducing VMT. As detailed in Table 1 in Appendix I, Land Use Tables, of this Draft EIR, the Project would improve mobility and accessibility, encourage transit use, and reduce VMT and GHG emissions. These would be achieved by providing new housing and commercial uses in close proximity to existing residential, retail, entertainment, educational, and restaurant uses, thereby encouraging the use of alternative modes of transportation available in the vicinity of the Project Site. Additionally, the Project would provide pedestrian and bicycle improvements such as 16 new short-term and 130 new long-term bicycle parking spaces, landscaping and sidewalk improvements, and street-facing commercial storefronts with floor-to-ceiling windows which would activate the pedestrian realm and support

healthy and equitable communities. Further, 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 incorporate sustainability features per the CALGreen Code and the California Building Energy Efficiency Standards, which would support resource efficiency by conserving water and energy.

(b) Mobility Plan 2035

The Mobility Plan 2035 serves as the City’s General Plan circulation element, incorporates “complete streets” principles, and lays the policy foundation for the City’s transportation planning efforts. The following five goals define the City’s mobility priorities:

1. Safety First: Design and operate streets in a way that enables safe access for all users, regardless of age, ability, or transportation mode of choice.
2. World Class Infrastructure: A well-maintained and connected network of streets paths, bikeways, trails, and more provides Angelenos with the optimum variety of mode choices.
3. Access for All Angelenos: A fair and equitable system must be accessible to all and must pay particularly close attention to the most vulnerable users.
4. Collaboration, Communication, and Informed Choices: The impact of new technologies on out day-to-day mobility standards will continue to become increasingly important to the future. The amount of information made available by new technologies must be managed responsibly in the future.
5. Clean Environments and Healthy Communities: Active transportation modes such as bicycling and walking can significantly improve personal fitness and create new opportunities for social interaction, while lessening impacts on the environment.

The Mobility Plan 2035 also identifies corridors proposed to enhance transit modes (bicycle, pedestrian, transit, and vehicle). These corridors are categorized as:

- Neighborhood Enhanced Network (NEN) is a selection of streets that provide comfortable and safe routes for localized travel of slower-moving modes such as walking, bicycling, or other slow speed motorized means of travel. West 39th Street and West 37th Street within the Study Area is identified as part of the NEN as Tier 2.
- Transit Enhanced Network (TEN) is the network of arterial streets enhanced to improve transit service performances and/or the overall experience of people who walk and take transit. South Figueroa Street in the Study Area is identified as a comprehensive transit enhanced network.
- Bicycle Enhanced Network (BEN) is a network of streets planned for protected bicycle lanes and bicycle paths to provide bikeways to a variety of users. South Figueroa Street and Martin Luther King Jr Boulevard within the Study Area is identified as Tier 1 bicycle lanes. Tier 1 bicycle lanes are protected bicycle lanes along streets with physical separation.

- Vehicle Enhanced Network (VEN) is a selection of streets that prioritize vehicular movement and that offer safe and consistent travel speeds and reliable travel times. None of the streets in the Study Area are identified as part of the VEN.
- Pedestrian Enhanced District (PED) is a selection of streets that enhance the environment to promote more walking, reduce reliance on other modes of transportation for shorter trips, promote health, and increase the vitality of streets. South Figueroa Street, South Flower Drive, Martin Luther King Jr Boulevard, Exposition Boulevard/West 37th Street and West 39th Street within the Study Area are identified as part of the PED.

The Project does not involve substantial changes to the public right-of-way along South Figueroa Street, West 39th Street, and South Flower Drive that would preclude the City from completing complete streets infrastructure as identified in the Mobility Plan in the future. The Project would be consistent with, and would not impede, the City's implementation of the Mobility Plan. A consistency analysis with the applicable goals of the Mobility Plan is included in Table IV.G-1 below.

Table IV.G-1: Project Consistency with Applicable Goals of Mobility Plan 2035

Objective, Policy, Program or Plan	Analysis of Project Consistency
Chapter 1: Safety First	
<p><u>Policy 1.1 Roadway User Vulnerability</u> Design, plan, and operate streets to prioritize the safety of the most vulnerable roadway user.</p>	<p>No Conflict. While this policy applies to the City and not development projects, the Project may be required to make roadway modifications (widening of approximately 1.5 feet) along South Figueroa Street. The Project would include streetscape improvements such as landscaping to encourage walkability. The Project's future driveway would be designed consistent with LADOT standards and ADA requirements. The Project would also include on-site bicycle parking including 16 short-term bicycle spaces and 130 long-term bicycle spaces.</p> <p>Furthermore, the Project does not propose modifying, removing, or otherwise affecting existing bicycle infrastructure. Overall, the physical changes in the public right-of-way would not degrade, but prioritize the safety and experience of the most vulnerable roadway users. Therefore, the Project would not conflict with this policy.</p>
<p><u>Policy 1.2 Complete Streets</u> Implement a balanced transportation system on all streets, tunnels, and bridges using complete streets principles to ensure the safety and mobility of all users.</p>	<p>No Conflict While this policy applies to the City and not development projects, the Project would conform to all design element requirements, including those related to proper driveway alignment, sidewalk widths, sight lines, and other design considerations that would ensure adequate sight distance, mobility, and accessibility to reduce, if not totally avoid, any adverse effects on the safety and mobility of all users on-site and on the public rights-of-way. In addition, the Project would provide bicycle parking (16 short-term spaces</p>

Objective, Policy, Program or Plan	Analysis of Project Consistency
	and 130 long-term spaces), and would include the development of a mix of residential and commercial uses in close proximity to a number of public transportation options, thereby promoting the use of alternative transportation modes. The Project would support the mobility goals of the City and help facilitate pedestrian and bicycle accessibility by improving the safety and mobility of all users in the vicinity of the Project Site. Therefore, the Project would not conflict with this policy.
<p><u>Policy 1.3 Safe Routes to Schools</u> Prioritize the safety of school children on all streets regardless of highway classifications.</p>	<p>No Conflict While this policy applies to the City and not development projects, the Project would not result in roadway modifications in a manner that would introduce safety hazards on and around the Project Site. Therefore, the Project would not conflict with this policy.</p>
<p><u>Policy 1.6 Multi-Modal Detour Facilities</u> Design detour facilities to provide safe passage for all modes of travel.</p>	<p>No Conflict Construction activities would be maintained on-site to the extent feasible. Any impediments to the public right-of-way would be addressed with implementation of the Construction Traffic Management Plan (pursuant to Project Design Feature TRAF-PDF-1 above) which would include detour routes for all applicable travel modes, including pedestrian, transit, and bicycle users. Therefore, the Project would not conflict with this policy.</p>
<p>Chapter 2: World Class Infrastructure</p>	
<p><u>Policy 2.1 Adaptive Reuse of Streets</u> Design, plan, and operate streets to serve multiple purposes and provide flexibility in design to adapt to future demands.</p>	<p>No Conflict. While this policy applies to the City and not development projects, the Project would not alter adjacent streets or the right-of-way in a manner that would preclude or conflict with future changes by various City Departments. The Project would conform to all design element requirements, including those related to proper driveway alignment, sidewalk widths, and design that would not hinder sight distance, mobility, or accessibility to reduce, if not totally avoid, any effects on the public rights-of-way. Therefore, the Project would not conflict with this policy.</p>

Objective, Policy, Program or Plan	Analysis of Project Consistency
<p><u>Policy 2.3 Pedestrian Infrastructure</u> Recognize walking as a component of every trip and ensure high-quality pedestrian access in all site planning and public right-of-way modifications to provide a safe and comfortable walking environment.</p>	<p>No Conflict. The Project would enhance pedestrian access within and around the Project Site. The Project provides ample space and access for pedestrians along its frontages. No driveways are proposed along South Figueroa Street and West 38th Street, eliminating any vehicle-pedestrian conflict points as compared to the present condition where a driveway currently exists. Vehicular access to the Project Site is exclusively via South Flower Drive, ensuring the pedestrian experience and safety are maintained along South Figueroa and West 38th Streets. Full width sidewalks with tree wells are proposed along South Figueroa Street and West 38th Street. Additionally, the Project would remove one existing driveway along West 38th Street and consolidate four driveways into a single driveway along South Flower Drive, further enhancing pedestrian safety. Therefore, the Project would not conflict with this policy.</p>
<p><u>Policy 2.4 Neighborhood Enhanced Network</u> Provide a slow speed of locally serving streets.</p>	<p>No Conflict. West 39th Street and West 37th Street within the Study Area are identified as part of the NEN as Tier 2. While this policy applies to the City and not development projects, the Project would not alter West 39th Street and West 37th Street in a manner that would preclude or conflict with the City's plans to provide comfortable and safe routes for localized travel of slower-moving modes along these streets. Therefore, the Project would not conflict with this policy.</p>
<p><u>Policy 2.5 Transit Network</u> Improve the performance and reliability of existing and future bus service.</p>	<p>No Conflict. South Figueroa Street in the Study Area is identified as a comprehensive transit enhanced network and Martin Luther King Jr Boulevard as a moderate plus transit enhanced street. The Project would not alter South Figueroa Street or Martin Luther King Jr Boulevard in a manner that would preclude or conflict with the City's plans to improve the performance and reliability of existing and future transit service. In addition, the Project would encourage more transit use by developing residential and commercial uses in close proximity to convenient access to transit services, including the Metro E Line USC/Expo station, Metro bus lines 2, 81, and 550, and the DASH Southeast and DASH King-East service routes. Therefore, the Project would not conflict with this policy.</p>
<p><u>Policy 2.6 Bicycle Networks</u> Provide safe, convenient, and comfortable local and regional bicycle facilities for people of all</p>	<p>No Conflict. South Figueroa Street and Martin Luther King Jr. Boulevard within the Project Study Area are identified as Tier 1 bicycle lanes, which are protected</p>

Objective, Policy, Program or Plan	Analysis of Project Consistency
types and abilities. (includes scooters, skateboards, rollerblades, etc.)	bicycle lanes physically separated from vehicular traffic. While this policy applies to the City and not development projects, the Project would not alter the bicycle infrastructure near the proposed Project or preclude the City's ability to implement the protected bicycle lanes. In fact, the Project will remove one existing driveway along West 38th Street and consolidate four driveways into a single driveway along South Flower Drive, further enhancing bicyclist safety. Therefore, the Project would not conflict with this policy.
<p><u>Policy 2.7 Vehicle Network</u></p> <p>Provide vehicle access to the regional freeway system.</p>	<p>No Conflict. Regional access to the existing freeway system, specifically I-110, is provided by several roadways within the Project Study Area, including West Martin Luther King Jr. Boulevard, West 37th Street, and West Exposition Boulevard. The Project would not alter any of the surrounding streets, including streets identified as roadways providing regional access to and from the freeway system. Therefore, the Project would not conflict with this policy.</p>
<p><u>Policy 2.9 Multiple Networks</u></p> <p>Consider the role of each mode enhanced network when designing a street that included multiple modes.</p>	<p>No Conflict. As discussed above, South Figueroa Street, South Flower Street, Martin Luther King Jr Boulevard, Exposition Boulevard/West 37th Street, and West 39th Street all surround the Project Site and are all part of multiple networks designated by the Mobility Plan. While this policy generally applies to the City and not specific development projects, the Project would not adversely impact the surrounding networks and would be designed to prioritize the safety of bicyclists and pedestrians. Additionally, development of the Project would not affect the future implementation of improvements to the surrounding networks. Therefore, the Project would not conflict with this policy.</p>
<p>Chapter 3: Access for All Angelenos</p>	
<p><u>Policy 3.1 Access for All</u></p> <p>Recognize all modes of travel, including pedestrian, bicycle, transit, and vehicular modes - including goods movement - as integral components of the City's transportation system.</p>	<p>No Conflict. While this policy generally applies to the City and not specific development projects, the Project would be inclusive of all modes of transportation, including pedestrian, bicycle, transit, and vehicles, thereby supporting the City's transportation system. As discussed throughout this section, the Project would support safe and accessible transportation for all different types of users. Specifically, the Project would include a new driveway with an access gate along South Flower Drive that would provide ingress and egress into the</p>

Objective, Policy, Program or Plan	Analysis of Project Consistency
	<p>at-grade residential and commercial parking lot. This improvement would consolidate the existing driveways on site, reducing hazards to bicyclists and pedestrians. Additionally, the Project provides ample space and access for pedestrians along its frontages with full width sidewalks. The Project's access locations would comply with City standards and safety requirements, which mandate providing adequate sight lines, safe distances to potential conflicts, traversable sidewalks, crosswalks and pedestrian movement controls.</p> <p>The Project would also include bicycle parking, which would encourage the use of alternative modes of travel. Additionally, it is located within close proximity to transit stops. Specifically, the Project Site is located 0.3 miles from the Expo Park/USC Metro Station which serves the E Line of the Metro Rail System. 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. Therefore, the Project would not conflict with this policy.</p>
<p>Policy 3.2 People with Disabilities Accommodate the needs of people with disabilities when modifying or installing infrastructure in the public right-of-way.</p>	<p>No Conflict The Project would be designed to comply with ADA requirements. Additionally, the Project would not have an impact on any existing accessibility features at nearby crosswalks. Therefore, the Project would not conflict with this policy.</p>
<p>Policy 3.3 Land Use Access and Mix Promote equitable land use decisions that result in fewer vehicle trips by providing greater proximity and access to jobs, destinations, and other neighborhood services.</p>	<p>No Conflict. The Project would include the development of 209 residential units of various affordability types as well as 2,705 square feet of ground-level commercial uses. As previously discussed, the Project site is located 0.3 miles from the Expo Park/USC Metro station, which serves the Metro E Line. 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. As such, the Project would place both residential and employment opportunities near transit stops.</p> <p>Additionally, the Project would include 16 total short term bicycle parking spaces on South Figueroa Street and West 38th Street in bicycle racks. In addition, 130 long-term bicycle spaces would be located on the first floor of the Project Site within the at-grade garage, thereby promoting the use of alternative forms of transportation and resulting in fewer vehicle trips. Therefore, the Project would not conflict with this policy.</p>

Objective, Policy, Program or Plan	Analysis of Project Consistency
<p><u>Policy 3.4 Transit Services</u> Provide all residents, workers and visitors with affordable, efficient, convenient, and attractive transit services.</p>	<p>No Conflict. While this policy generally applies to the City and not specific development projects, the Project would promote the use of transit services. As previously discussed, the Project is located in close proximity to the Expo Park/USC Metro station as well as stops for five different bus lines operated by Metro and LADOT. Therefore, the Project would not conflict with this policy.</p>
<p><u>Policy 3.5 Multi-Modal Features</u> Support “first-mile, last-mile solutions” such as multi-modal transportation services, organizations, and activities in the areas around transit stations and major bus stops (transit stops) to maximize multi-modal connectivity and access for transit riders.</p>	<p>No Conflict. As discussed above, the Project would promote the use of transit services because it is located in close proximity to a Metro station as well as stops for five different bus lines operated by Metro and LADOT. The Project would also provide short-term and long-term bicycle parking spaces as well as full width sidewalks. Additionally, the Project is designed to consolidate all of the existing driveways on the Project site to one driveway to reduce obstacles and conflicts for pedestrians and bicyclists. Therefore, the Project would not conflict with this policy.</p>
<p><u>Policy 3.8 Bicycle Parking</u> Provide bicyclists with convenient, secure and well-maintained bicycle parking facilities.</p>	<p>No Conflict. The Project would provide short- and long-term bicycle spaces for both residential and commercial uses. A total of 16 short-term bicycle parking spaces would be located on South Figueroa Street and West 38th Street in bicycle racks proposed to be located in the public right-of-way. In addition, 130 long-term bicycle spaces would be located on the first floor of the Project Site within the at-grade garage directly behind the main entrance lobby and garage. Therefore, the Project would not conflict with this policy.</p>
Chapter 4: Collaboration, Communication, & Informed Choices	
<p><u>Policy 4.8 Transportation Demand Management Strategies</u> Encourage greater utilization of Transportation Demand Management (TDM) strategies to reduce dependence on single-occupancy vehicles.</p>	<p>No Conflict. The Project would encourage alternative modes of travel through its proximity to multiple transit services and the provision of short-term and long-term bicycle parking, which would reduce reliance on single-occupancy vehicle trips to the Project site. Therefore, the Project would not conflict with this policy.</p>
<p><u>Policy 4.13 Parking and Land Use Management</u> Balance on-street and off-street parking supply with other transportation and land use objectives.</p>	<p>No Conflict. The Project would include 40 vehicle spaces that would consist of 34 residential parking spaces and six commercial parking spaces within the at-grade garage, in addition to 146 bicycle parking spaces on-site. The Project would also encourage pedestrian circulation at the street level by including additional trees and landscaping. The Project would improve the public-facing pedestrian realm by</p>

Objective, Policy, Program or Plan	Analysis of Project Consistency
	developing commercial uses along South Figueroa Street that would include floor-to-ceiling windows at the ground level providing visual transparency into the Project Site. Additionally, full-width sidewalks with tree wells are proposed along South Figueroa Street and West 38th Street. Therefore, the Project would not conflict with this policy.
Chapter 5: Clean Environments & Healthy Communities	
<p><u>Policy 5.1 Sustainable Transportation</u></p> <p>Encourage the development of a sustainable transportation system that promotes environmental and public health.</p>	<p>No Conflict. While this policy generally applies to the City and not specific development projects, the Project would promote the use of other transportation modes (bicycle and transit) and encourage pedestrian circulation at the street level with full width sidewalks, thereby reducing reliance on single-occupancy vehicles and reducing VMT. Therefore, the Project would not conflict with this policy.</p>
<p><u>Policy 5.2 Vehicle Miles Traveled (VMT)</u></p> <p>Support ways to reduce vehicle miles traveled (VMT) per capita.</p>	<p>No Conflict. While this policy generally applies to the City and not specific development projects, the Project would promote the use of other transportation modes (bicycle and transit) and encourage pedestrian circulation at the street level with full width sidewalks, thereby reducing reliance on single-occupancy vehicles and reducing VMT.</p> <p>Additionally, the Project's proposed residential area would generate a lower VMT per capita than the average for the area as discussed further in threshold (b). Therefore, the Project would not conflict with this policy.</p>
<p><u>Policy 5.4 Clean Fuels and Vehicles</u></p> <p>Continue to encourage the adoption of low and zero emission fuel sources, new mobility technologies, and supporting infrastructure.</p>	<p>No Conflict. 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. Therefore, the Project would not conflict with this policy.</p>
<p>Source: Kimley-Horn and Associates, Inc., 2025. City of Los Angeles General Plan, Mobility Plan 2035.</p>	

South Figueroa Street within the Project's Study Area is included as part of the Complete Streets Corridors outlined in the Mobility Plan. Although the Project is not required to provided dedications of public right-of-way for any of the streets within the Study area, the Project may be required to make roadway modifications (widening of approximately 1.5 feet) along South Figueroa Street to ensure compliance Mobility Plan 2035 standards and will implement such improvements as required.

As described in Section II, Project Description, of this Draft EIR, the Project's mix of residential and commercial uses located in close proximity to various activity hubs and a variety of public transit options, including the Metro E rail line located 0.3 miles north of the Project Site on Exposition Boulevard and multiple local and express bus lines that would encourage the development of a sustainable transportation system and would support ways to reduce VMT consistent with the Mobility Plan's Clean Environments & Healthy Communities policies. The Project would also provide bicycle parking for employees, residents, and visitors, thereby promoting public and active transportation modes.

Overall, as detailed in Table IV.G-1 on page IV.G-25, the Project would not conflict with and would not obstruct the implementation of the Mobility Plan 2035.

(c) Plan for a Healthy Los Angeles

The Plan for a Healthy Los Angeles addresses GHG emission reductions and social connectedness, which are affected by the land use pattern and transportation opportunities.

Overall, the Project strives to reduce VMT by providing a mixed-use development in a neighborhood with high walkability and transit access. As discussed below in Table IV.G-2, the Project would be located in a Transit Priority Area (TPA) among a dense and highly urbanized environment, and would be surrounded by a variety of transit services that would encourage the reduction of VMT. The Project would encourage alternative transportation choices by improving the pedestrian experience along South Figueroa Street and by providing 146 bicycle parking spaces on-site. Additionally, the Project's residential component would include both market-rate housing and affordable housing, which supports the plan's vision of access to affordable, healthy, and safe housing for residents of all ages and income levels.

Therefore, the Project would not conflict with the applicable goals set forth in the Health and Wellness Element adopted for the purpose of avoiding or mitigating an environmental effect.

Table IV.G-2: Project Consistency with Applicable Policies of the Plan for Healthy Los Angeles

Objective, Policy, Program, and Plan	Analysis of Project Consistency
<p><u>Policy 1.5 Plan for Health.</u></p> <p>Improve Angelenos' health and well-being by incorporating a health perspective into land use, design, policy, and zoning decisions through existing tools, practices, and programs.</p>	<p>No Conflict. The Project is a mixed-use development near existing transit. The Project would provide on-site bicycle parking and amenities to encourage bicycling for employees and visitors to the Project Site. As such, the Project would encourage the use of active travel modes and thereby promote healthy living. The Project would also provide pedestrian enhancements around the Project Site, including new street trees and other landscaping elements. Therefore, the Project would not conflict with this policy.</p>
<p><u>Policy 1.7 Displacement and Health.</u></p> <p>Reduce the harmful health impacts of displacement on individuals, families, and communities by pursuing strategies to create opportunities for existing residents to benefit</p>	<p>Potential Conflict. The Project would result in the replacement of 51 residential units with 209 mixed-income units, which would include 42 affordable units, with four units designated for Extremely Low Income households, 22 units designated for Very Low Income households, and</p>

Objective, Policy, Program, and Plan	Analysis of Project Consistency
<p>from local revitalization efforts by: creating local employment and economic opportunities for low-income residents and local small businesses; expanding and preserving existing housing opportunities available to low-income residents; preserving cultural and social resources; and creating and implementing tools to evaluate and mitigate the potential displacement caused by large-scale investment and development.</p>	<p>16 units designated for Low Income households. The Project's 209 units would exceed the number of existing housing units that would be displaced by the Project, for a net increase of 158 units. In addition, new employment opportunities would be created as part of the Project's new commercial component. Existing residents living on the Project Site would be temporarily displaced, although they would be subject to the Rent Stabilization Ordinance. Lower income households on the Project Site are entitled to relocation benefits subject to Government Code Section 7260 et seq. and the right of first refusal (Right to Return) to a comparable unit (same bedroom type) when the Project is completed.</p> <p>Therefore, there is potential for the Project to conflict with this objective and policy.</p>
<p><u>Policy 2.2 Healthy Building Design and Construction.</u></p> <p>Promote a healthy built environment by encouraging the design and rehabilitation of buildings and sites for health living and working conditions, including promoting enhanced pedestrian-oriented circulation, lighting, attractive and open stairs, healthy building materials and universally accessibility using existing tools, practices, and programs.</p>	<p>No Conflict. The Project would develop a mixed-use development on an urban infill site located near multiple public transportation options, jobs, and educational facilities, and would provide bicycle parking and pedestrian infrastructure to incentivize increased biking and walking.</p> <p>The Project would enhance pedestrian access within and around the Project Site. The Project provides ample space and access for pedestrians along its frontages. Full width sidewalks with tree wells are proposed along South Figueroa Street and West 38th Street. Additionally, the Project would remove one existing driveway along West 38th Street and consolidate four driveways into a single driveway leading into the wrapped parking garage that is encompassed within the building and fully screened from view along South Flower Drive, enhancing pedestrian safety.</p> <p>The ground floor level along South Figueroa Street would activate the street level with the inclusion of ground floor restaurant and retail uses. Floor-to-ceiling windows would further activate the street and provide visual transparency into the Project Site.</p> <p>Commercial signage would be mounted to the canopy awning above the restaurant and retail 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 and lighting on the Project Site would comply with the requirements of the LAMC.</p> <p>The Project would provide 23,127 square feet of open space that would include courtyards, a pool, roof decks,</p>

Objective, Policy, Program, and Plan	Analysis of Project Consistency
	recreation rooms, and private patios. To encourage bicycle use, the Project would also provide 128 residential long-term bicycle spaces, 14 short-term residential bicycle spaces, two commercial long-term bicycle spaces, and two short-term bicycle spaces for a total of 146 bicycle spaces. Therefore, the Project would not conflict with this policy.
<p><u>Policy 5.1 Air Pollution and Respiratory Health.</u></p> <p>Reduce. Air pollution from stationary and mobile sources; protect human health and welfare and promote improved respiratory health</p>	<p>No Conflict. The Project would include characteristics and design features that support reductions in GHG emissions and encourage alternative modes of transportation. The Project Site is surrounded by residential, entertainment, open space, educational, and commercial uses, and is located near transit, reducing reliance on automobiles and VMT. The Project would emphasize energy and water conservation, which would be achieved through the use of energy-efficient heating, ventilation, 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.</p> <p>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. Therefore, the Project would not conflict with this policy.</p>
<p><u>Policy 5.7 Land Use Planning for Public Health and GHG Emission Reduction.</u></p> <p>Promote land use policies that reduce per capita greenhouse gas emissions, result in improved air quality and decreased air pollution, especially for children, seniors, and others susceptible to respiratory diseases.</p>	<p>No Conflict. As discussed in more detail under Policy 5.1 Air Pollution and Respiratory Health, the Project adheres to smart growth principles by locating infill development adjacent to existing employment centers, educational facilities, commercial use and transit. Furthermore, as discussed in this section below, the Project would result in a reduction of VMT. The Project's energy efficiency features and location near public transit reduces the energy and emission footprint of the Project and GHG emissions of the residents and visitors from private automobile travel. Therefore, the Project would not conflict with this policy.</p>
<p>Source: Kimley-Horn and Associates, Inc., 2024. City of Los Angeles Health and Wellness Element.</p>	

(d) South Los Angeles Community Plan

As discussed above in the Regulatory Framework subsection, the applicable objectives of the South Los Angeles Community Plan call for encouraging an active street environment, transit-oriented development, a street system that is accessible, safe, and diverse that balances the needs of pedestrians, bicyclists, transit users, mobility-challenged persons and vehicles, and reduces automobile trips. One of the major objectives of the current South Los Angeles Community Plan is to make provisions for a street system that are diverse and balance the needs

of all road users while providing sufficient mobility. While this is a community-wide objective, the Project would support its implementation. Specifically, the Project Site is located in a highly urbanized area that is well-served by public transit and is highly walkable. Furthermore, the Project would provide short-term and long-term bicycle parking spaces on and surrounding the Project Site. Thus, the Project would promote the use of alternative modes of transportation, including use of public transportation, walking, and bicycling.

The Project would also be consistent with the mobility and implementation goals within the South Los Angeles Community Plan Update, which include implementing a multi-modal transportation system in which jobs, services, and amenities are easily accessible to all residents and visitors. The Project proposes residential and commercial land uses, which would provide a variety of housing opportunities and less dependence on automobiles due to easily accessible jobs and services in an area in close proximity to various transit options including bus and rail transit. The Project would be consistent with the policies of the South Los Angeles Community Plan Update as shown in Table IV.G-3 below.

Table IV.G-3: Project Consistency with Applicable Goals, Objectives, and Policies of the South Los Angeles Community Plan

Objective, Policy, Program or Plan	Analysis of Project Consistency
Land Use Element and Design	
<p><u>Policy LU1.2: Adequate Lighting and Street Maintenance.</u></p> <p>Encourage safe streets, parks, recreation facilities, sidewalks, and bike facilities by providing adequate lighting and well-kept, paved surfaces.</p>	<p>No Conflict. 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 and lighting on the Project Site would comply with the requirements of the LAMC. Therefore, the Project would not conflict with this policy.</p>
<p><u>Policy LU8.5 Freeway Adjacencies.</u></p> <p>Support efforts to protect the public from the adverse effects of vehicle-generated air emissions, noise, and vibration along freeway corridors using techniques such as extensive landscaping and trees along freeway-fronting elevations, and including design elements that</p>	<p>No Conflict. The Project would include numerous trees and landscaping including 54 trees on the Project Site and landscaping along South Flower Drive, which is located adjacent to I-110. The Project's amenities such as the interior courtyards would be centrally located within the Project area, and not immediately adjacent to the I-110 freeway. The Project would include Project Design Feature NOI-</p>

Objective, Policy, Program or Plan	Analysis of Project Consistency
<p>reduce noise and provide for proper filtering, ventilation, and exhaust of vehicle air emissions.</p>	<p>PDF-1 which would limit the hours and volumes of any wired sound systems of the rooftop pool deck and ground floor parklets. Therefore, the Project would not conflict with this policy.</p>
<p>Goal LU9: Areas of high pedestrian activity that thrive and vibrant, cohesive neighborhoods that feel inviting and safe.</p> <p>LU9.1: Design for Pedestrians. Preserve, enhance and expand existing pedestrian orientation along commercial streets through design standards such as maintaining a uniform street frontage and locating parking at the rear of lots.</p> <p>LU9.2 Active Streets. Encourage an active street environment along commercial corridors by incorporating commercial or other active public uses along street frontages.</p>	<p>No Conflict. The Project would include numerous street trees, and the ground floor level along South Figueroa Street would activate the street level with the inclusion of ground floor commercial uses. Floor-to-ceiling windows would further activate the street and provide visual transparency into the Project. 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 Parking for the Project is contained within a wrapped at-grade parking garage that is encompassed within the building and is fully screened from view on all sides. Therefore, the Project would not conflict with this policy.</p>
<p>LU9.8 Reduce Conflicts. Design mixed-use projects to mitigate potential conflicts between commercial and residential uses (e.g., noise, lighting, security, truck and automobile access), and provide adequate amenities for residential occupants.</p>	<p>No Conflict. The Project would separate pedestrian and vehicle access to minimize conflicts. The Project would include a new driveway with an access gate along South Flower Drive that would provide ingress and egress into the at-grade residential and commercial parking lot that is encompassed within the building that is fully screened from view on all sides.</p> <p>Residents would access the residential building from the public sidewalk to the main lobby along South Figueroa Street and a secondary lobby along West 38th Street. Pedestrian commercial access would be provided directly from the sidewalk along South Figueroa Street. The Project would provide 22,840 sf of common and private open space that would include courtyards, pool, roof decks, recreation rooms, and private patios. Open space areas would be accessible for residents via entrances on South Figueroa Street, West 38th Street, and from the interior of the Project Site. Therefore, the Project would not conflict with this policy.</p>
<p>Goal LU19: Transit-Oriented Districts around light rail transit stations and select Metro Rapid bus stops that are characterized by a mixture of uses, a safe and attractive pedestrian environment, reduced parking, direct and convenient access to transit facilities, and moderate- to higher-density as appropriate to the existing scale and context.</p>	<p>No Conflict. The Project would provide new market rate housing and affordable housing and commercial uses in a TPA. The Project Site is within close proximity to several transit options including the Metro E rail line located 0.3 miles north of the Project Site on Exposition Boulevard, and multiple local and express bus routes including Metro bus lines Metro 2, 81, and 550 Lines and the DASH Southeast and DASH King-East service routes that would provide visitors and</p>

Objective, Policy, Program or Plan	Analysis of Project Consistency
	residents easy access to jobs, services, and educational institutions. Therefore, the Project would not conflict with this policy.
Mobility	
<p>Goal M3: Throughout the community, a street environment that is pleasant, universally accessible, safe, and convenient for pedestrians.</p>	<p>No Conflict. The Project would encourage a pleasant, accessible, safe, and convenient street environment for pedestrians by providing access to the Project Site from the public sidewalk to the main lobby along South Figueroa Street. Additionally, pedestrian commercial access would be direct from the public sidewalk along South Figueroa Street. Therefore, the Project would not conflict with this policy.</p>
<p>Policy M3.1 Pedestrian Access: Encourage walking by orienting building entrances to face the street and sidewalks when designing access to new developments and buildings.</p>	<p>No Conflict. The Project would encourage pedestrian access by orienting the main entry lobby for residential uses and entrances to the ground floor commercial uses along South Figueroa Street. The Project would also provide a secondary lobby along West 38th Street. Therefore, the Project would not conflict with this policy.</p>
<p>Policy M4.3 Bicycle Amenities. Incorporate bicycle amenities (such as parking, lockers, changing rooms, and showers) in public facilities, parks, commercial, and multi-family residential developments, employment, and transit centers, as well as park-and-ride facilities.</p>	<p>No Conflict. The Project would provide short- and long-term bicycle spaces for both residential and commercial uses. Specifically, a total of 16 short-term bicycle spaces would be located on South Figueroa Street and West 38th Street in bicycle 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. Therefore, the Project would not conflict with this policy.</p>
<p>Goal M5: An integrated land use and transit strategy that directs growth to areas accessible by transit facilities and services.</p> <p>Policy M5.5 Land Uses Adjacent to Stations. Encourage a coordinated integration of development around transit stations to improve services, access, and the economic vitality of the community.</p>	<p>No Conflict. The Project would be developed on a fully developed Project Site located in an existing urbanized area within an established network of roads and freeways that provides local and regional access to the Project Site. The Project Site is accessible to a variety of mobility options as it is within close proximity to several transit service providers, including being the Metro E line rail station located 0.3 miles north of the Project Site and numerous Metro and LADOT DASH bus routes. Further, the Project Site is within walkable distances to jobs, schools, residences, entertainment, and commercial uses. The Project would also include bicycle parking to encourage bicycle use. Therefore, the Project would not conflict with this policy.</p>

Objective, Policy, Program or Plan	Analysis of Project Consistency
<p>Goal M9: Improved air quality and health of residents as a result of decreased single-occupant automobile demand and reduced vehicle miles traveled.</p>	<p>No Conflict. The Project would include characteristics and design features that support reductions in air emissions and encourage alternative modes of transportation. The Project Site is surrounded by supportive residential, entertainment, educational, and commercial uses within walking distance, and is located near transit, reducing reliance on automobiles. In addition, as described in Threshold (b) below, the Project would result in a reduction of VMT. Therefore, the Project would not conflict with this policy.</p>
<p><u>Policy M9.2 Reduce Auto Trips.</u> Create incentives for employers, institutions, and residential neighborhoods to reduce their vehicle trips by encouraging mixed-use development at appropriate sites that are well-served by transit in order to minimize Vehicle Miles Traveled (VMT).</p>	<p>No Conflict. The Project would be a mixed-use development in an infill setting, close to transit and in walking distance to jobs, schools, residences, and commercial areas, which would result in a reduction in VMT, as specified in Threshold (b) discussed below. Therefore, the Project would not conflict with this policy.</p>
<p><u>Policy M11.4 Connections for Electric Vehicles</u> Encourage new construction to include vehicle access to properly wired outdoor receptacles to accommodate zero emission vehicles (ZEVs) and plug-in electric hybrids (PHEV).</p>	<p>No Conflict. 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. Therefore, the Project would not conflict with this policy.</p>
<p>Source: Los Angeles Department of City Planning, 2017. South Los Angeles Community Plan. https://planning.lacity.gov/odocument/b909e749-754e-4caa-af7f-14c82adaa2b7/South_Los_Angeles_Community_Plan.pdf, accessed September 26, 2024.</p>	

(e) Exposition/University Park Redevelopment Plan

The Redevelopment Plan includes goals aimed at encouraging the retention and development of affordable housing, improvement of neglected community facilities and the promotion of economic development opportunities, and includes specific objectives that focus on preserving and protecting historic structures, encouraging commercial development, and to make provisions for well planned community uses, facilities, pedestrian and vehicular circulation, and adequate parking, particularly as these relate to Exposition Park.

The following goal related to transportation and circulation is listed below:

- To make provisions throughout the Expanded Project Area, for well-planned community uses, facilities, pedestrian and vehicular circulation, and adequate parking, particularly as these related to Exposition Park.

The Project would be consistent with this goal, as the Project would support a well-planned community by developing a mix of residential and commercial uses in close proximity to transit

and complementary land uses including residential, school, commercial and recreational and institutional uses near Exposition Park. The Project would support the mobility goals of the City by including bicycle parking and pedestrian improvements. Therefore, the Project would not conflict with this goal.

(f) Los Angeles Municipal Code (LAMC)

LAMC Section 12.21 A.16 requires bicycle parking spaces and use facilities for new developments or additions based on the floor area.

The Project proposes 146 bicycle parking spaces, including 130 long-term spaces and 16 short-term spaces. A total of 14 short-term residential and two short-term commercial bicycle spaces would be located on South Figueroa Street and West 38th Street in bicycle racks proposed to be located in the public right-of-way. In addition, 128 long-term residential and two long-term commercial bicycle spaces would be located on the first floor of the Project Site within the at-grade garage directly behind and with easy access from the main entrance lobby and garage. The bicycle parking would comply with the applicable requirements of the LAMC.

Per AB 2097, the Project is not required to provide a minimum number of parking spaces as it is a mixed-use residential and commercial project located within 0.5 miles of 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. As such, the Project is not subject to the LAMC requirements regarding the provision of a minimum amount of vehicle parking.

(g) LADOT Vision Zero

Vision Zero Los Angeles is a plan with the goal of eliminating traffic deaths in Los Angeles and to design streets to increase the safety of pedestrians. The City has identified a number of streets as part of the HIN. The HIN represents 6 percent of city streets (over 450 miles) that account for 70 percent of deaths and severe injuries for people walking. The Project Site is located on South Figueroa Street, which is included in the HIN. Although the Project Site is located along the HIN (South Figueroa Street), it would not add new vehicular access points on South Figueroa Street (vehicular access is provided only on South Flower Drive). The Project would not interfere with implementation of the Vision Zero Action Plan or any proposed improvement plans. and therefore, would be consistent with, and not conflict with the implementation of future Vision Zero projects in the public right-of-way.

(h) Citywide Design Guidelines

Citywide Design Guidelines are a set of design guidelines for the City of Los Angeles intended to encourage design innovation, foster a sense of community, and facilitate safe, functional, and attractive development. The Citywide Design Guidelines are organized around three design approaches: pedestrian-first design, 360 degree design, and climate-adapted design. The Pedestrian-First Design approach of the Citywide design guidelines identifies design strategies that “create human scale spaces in response to how people actually engage with their

surrounding, by prioritizing active street frontages, clear paths of travel, legible wayfinding, and enhanced connectivity. Pedestrian-First Design promotes healthy living, increases economic activity at the street level, enables social intersection, creates equitable and accessible public spaces, and improves public safety.” The Pedestrian-First Design Guidelines are as follows:

- Guideline 1: Promote a safe, comfortable and accessible pedestrian experience for all.
- Guideline 2: Carefully incorporate vehicular access such that it does not degrade the pedestrian experience.
- Guideline 3: Design projects to actively engage with streets and public space and maintain human scale.

The Project provides ample space and access for pedestrians along its frontages. No driveways are proposed along South Figueroa Street and West 38th Street, eliminating any vehicle-pedestrian conflict points. Vehicular access is exclusively via South Flower Drive, ensuring the pedestrian experience and safety are maintained along South Figueroa Street and West 38th Street. Full width sidewalks with tree wells are proposed along South Figueroa Street and West 38th Street. Additionally, the Project will remove one existing driveway along 38th Street and consolidate four driveways into a single driveway along South Flower Drive, further enhancing pedestrian safety. Overall, the Project would not conflict with the transportation-related Citywide Design Guidelines. Refer to Section IV.D, Land Use and Planning, of this Draft EIR, for addition analysis of the Project’s consistency with the Citywide Design Guidelines.

(i) Conclusion

As discussed above, the Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. As such, impacts would be less than significant.

(2) Mitigation Measures

Project-level impacts related to a conflict with a program, plan, ordinance or policy addressing the circulation system would be less than significant. Therefore, no mitigation is required.

(3) Level of Significance After Mitigation

Project-level impacts related to a conflict with a program, plan, ordinance or policy addressing the circulation system were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

Threshold (b): Would the Project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?

(1) Impact Analysis

As discussed above, Section 15064.3 of the CEQA Guidelines describes specific considerations for evaluating a project's transportation impacts. As set forth therein, for land use projects, VMT exceeding an applicable threshold of significance may indicate a significant impact. Projects that decrease VMT in the project area compared to existing conditions should be presumed to have a less-than-significant transportation impact.

As shown in the approved LADOT MOU (Appendix I), the Project is estimated to generate 717 net daily trips. Because the Project would generate more trips than the 250 daily trip screening threshold, an analysis is required to assess whether the Project would exceed the City's residential VMT per capita threshold. The LADOT Referral Form for the Project (Appendix I) confirms the requirement to conduct a VMT analysis. Table IV.G-4: VMT Analysis Summary below shows the Project's proposed land uses and VMT analysis results. The Project is estimated to generate 6,656 daily VMT, 2,474 home-based production VMT, and 25 home-based work attraction VMT.

Table IV.G-4: VMT Analysis Summary

Land Use Information	Project
Multi-Family Housing	167 du
Affordable Family Housing	42 du
General Retail	2,705 sf
VMT Analysis	
Resident Population	508
Employee Population	5
Project Area Planning Commission	South LA
Total Daily VMT	6,656
Home-Based Production VMT	2,474
Home-Based Work Attraction VMT	25
Household VMT per Capita	4.9
Impact Threshold	6.0
Significant Impact	No
Work VMT per Employee	N/A
Impact Threshold	N/A
Significant Impact	N/A
du = dwelling units sf = square feet Source: 3822 South Figueroa Street Student Housing Project Transportation Assessment, March 2025.	

(a) Residential Uses

Based on the Project's proposed use, the residential land use criteria for market rate multifamily housing and affordable housing were analyzed. The City of Los Angeles VMT calculator Version 1.4, as described in the LADOT Transportation Assessment Guidelines, was used to determine the Project's VMT for its residential uses. Based on LADOT's VMT impact

criteria, because the Project is located within the South Los Angeles APC and proposes residential uses, the applicable VMT impact criteria is 6.0 daily household VMT per capita.

The Project's proposed residential floor area of 249,443 square feet would result in an estimated household VMT per capita of 4.9, which is more than 15 percent below the City's threshold for the South Los Angeles APC. The detailed VMT calculator results are shown in Appendix I. Therefore, the Project's residential component has a less than significant VMT impact.

(b) Commercial Uses

Per the LADOT Transportation Assessment Guidelines, the commercial portion of the Project is screened out of the VMT analysis since it is less than 50,000 square feet in size (2,705 square feet); therefore, based on the City's criteria, the commercial portion of the Project results in no VMT impact.

Moreover, the Project is an infill redevelopment and located in a fully developed, highly urbanized area that promotes the use of a variety of transportation options, which include walking, biking, and proximity to numerous public transportation options. The Project would provide approximately 144 dwelling units per acre, consistent with the Urban Mixed Use and City Mixed Use land use categories from SCAG's Scenario Planning Model (SPM) Technical Report Appendix¹¹ in terms of location, land use, and density.

As discussed above under Threshold (a), the Project would be applicable with State, regional, and local regulations that pertain to VMT. Specifically, the Project aligns with the RTP/SCS by providing new affordable and market rate multifamily housing and jobs close to transit and other services. Therefore, both the residential and commercial uses would result in less than significant impacts related to VMT. **Based on the above, the Project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3(b), and, as such, impacts associated with VMT would be less than significant.**

(2) Mitigation Measures

Project-level impacts related to Project VMT would be less than significant. Therefore, no mitigation is required.

(3) Level of Significance After Mitigation

Project-level impacts related to Project VMT were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

¹¹ SCAG, Scenario Planning Model, https://scag.ca.gov/sites/default/files/2024-05/spm_technical_summary_suppl.pdf, December 2020, accessed June 2024.

Threshold (c): Would the Project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

(1) Impact Analysis

(a) *Geometric Design Feature*

(i) *Pedestrians and Bicyclists*

Pedestrians and bicyclists would be able to access the Project Site via the public sidewalk to the main lobby along South Figueroa Street and a secondary lobby along West 38th Street. Direct pedestrian access to the Project's commercial space is provided from the public sidewalk on South Figueroa Street. Bicycle parking facilities would be provided on-site as part of the Project, including short-term and long-term bicycle stalls. The Project's access locations would comply with City standards and safety requirements, which mandate providing adequate sight lines, safe distances to potential conflicts, traversable sidewalks, crosswalks, and pedestrian movement controls. Accordingly, the geometric design of the Project's pedestrian and bicycle features would not create potential significant hazard impacts.

(ii) *Vehicular Access*

Vehicular access to the Project Site would be provided by a single driveway on South Flower Drive. The driveway would include an access gate that would control ingress and egress into the Project's at-grade residential and commercial parking lot. The driveway would be on a low-volume local street with no existing bicycle lane or transit stops. Although South Figueroa Street within the Study Area is a part of the City's HIN, the Project's driveway would be along South Flower Drive. Moreover, since the Project would eliminate one existing driveway on South Figueroa Street and consolidate four driveways on South Flower Drive into a single driveway, the Project would reduce the potential for vehicular conflict with other vehicles, bicyclists, or pedestrians as compared to the current condition. The Project's driveway, drive aisles, and parking stalls would be designed to comply with LADOT, Bureau of Engineering, and Los Angeles Department of Building and Safety (LADBS) standards, and would be reviewed during site plan review to ensure code compliance and safe pedestrian and vehicular design. The Project would not modify roadway widths or otherwise affect the geometric design of roads surrounding the Project Site or implement any features that would obstruct sight distance or paths of vehicular, pedestrian, or bicycle travel.

Based on the discussion above, and as concluded in the Transportation Assessment, the Project's design does not include hazardous geometric design features. The roadways adjacent to the Project Site are part of the urban roadway network and contain no sharp curves, and the development of the Project would not result in roadway alterations, such that hazards would be introduced adjacent to the Project Site.

(b) Incompatible Uses

The Project would not introduce incompatible motor vehicle types to the local street system. None of the Project's elements or land uses would be considered incompatible with the surrounding uses. There are no unusual or new obstacles that would be considered hazardous to motorized vehicles, non-motorized vehicles, or pedestrians.

(c) Freeway Safety Analysis

The Project was screened by distributing the Project trips as determined in the trip generation analysis across the A.M. and P.M. peak hours and the multiple freeway off-ramps in the Project vicinity. The closest freeway ramps to the Project Site are 0.13 miles away, along I-110. Based on the A.M. and P.M. peak hour trips, it was determined that the Project would not add more than 25 trips to any freeway off-ramp in either the A.M. or P.M. peak hour, and therefore, a freeway off-ramp analysis is not required. The approved MOU, included in Appendix I, shows the location of the nearby freeway off-ramps and confirms that a freeway off-ramp analysis is not required.

(2) Mitigation Measures

Project-level impacts related to substantially increasing hazards due to a geometric design feature or incompatible use would be less than significant. Therefore, no mitigation is required.

(3) Level of Significance After Mitigation

Project-level impacts related to substantially increasing hazards due to a geometric design feature or incompatible use were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

Threshold (d): Would the Project result in inadequate emergency access?

(1) Impact Analysis

(a) Construction Impacts

For purposes of analyzing the Project's potential impacts, this analysis assumes a Project construction schedule of approximately 33 months, with construction beginning in the first quarter of 2027 and final construction ending in the fourth quarter of 2029. The Project would be operational in 2030. Construction activities would be performed in compliance with all applicable laws, ordinances, and regulations. Construction activities would include demolition, site preparation, grading and excavation, as well as building construction, paving, finishing, and architectural coatings. These construction activities have the potential to result in temporary impacts to surrounding roadways.

(i) *Temporary Traffic Constraints*

During construction, traffic on South Figueroa Street and South Flower Drive could be intermittently disrupted due to vehicle loading and unloading. Such intermittent travel lane closures may disrupt local traffic. However, a Construction Traffic Management Plan, which would include a worksite traffic control plan, would be prepared, in accordance with Project Design Feature TRAF-PDF-1, applicable City guidelines, and in consultation with multiple City departments to provide for the safe and efficient movement for vehicular, bicycle, and pedestrian traffic during Project construction.

(ii) *Temporary Access Impacts*

During construction, the Project Site would be secured with perimeter fencing. The existing land uses in the proximity of the Project Site would remain open throughout the construction period. Pedestrian and vehicular access to properties near the Project Site would also remain open for the duration of construction. During construction, the sidewalks along South Figueroa Street, West 38th Street, and South Flower Drive may be temporarily disrupted. A pedestrian walkway or pedestrian rerouting would be provided as an alternative for pedestrians during construction and would also be addressed in the worksite traffic control plans and the Construction Traffic Management Plan. Appropriate signage would be implemented to direct pedestrians to accessible routes during this time. Safety measures such as covered walkways and other protective measures would be implemented, where appropriate.

Short-term and temporary construction activities could temporarily increase response time for emergency vehicles due to travel delays caused by the Project's construction phase. However, travel lanes would be maintained in each direction on all the streets adjacent to the Project site throughout the construction period and emergency access would not be impeded. Additionally, with implementation of the Construction Traffic Management Plan, included as Project Design Feature TRAF-PDF-1, construction-related vehicles trips would be scheduled at off-peak hours and an approved construction site traffic controls plan would route vehicles, bicyclists and pedestrians around the area during any parking, travel lane, or sidewalk closures.

(iii) *Transit and Parking*

The construction of the Project would not result in any temporary loss of bus stops or rerouting of bus lines. However, temporary closure of on-street parking along South Flower Drive adjacent to the property frontage would be requested to allow for ongoing construction access and vehicle staging, as well as loading and unloading. These closures would be implemented pursuant to the Construction Traffic Management Plan, be temporary in nature and only occur during construction of the Project, and would therefore not be expected to result in a significant impact. **Therefore, construction-related impacts would be less than significant.**

(b) *Operation Impacts*

As discussed above, the Project would provide ingress and egress via one driveway located on South Flower Drive. The Project driveway as well as internal circulation to the parking garage would be designed to meet all applicable City Building Code and Fire Code requirements

regarding site access, which includes emergency vehicle access. Compliance with applicable codes and regulations would be confirmed as part of the Los Angeles Fire Department (LAFD) fire/life safety plan review and inspections for new construction projects as detailed in LAMC Section 57.118 prior to issuance of a building permit. The Project does not include any design features or barriers that could impede emergency vehicle access. Additionally, pursuant to California Vehicle Code Section 21806, the drivers of emergency vehicles are generally able to avoid traffic in the event of an emergency by using sirens to clear a path of travel or by driving in the lanes of opposing traffic. Therefore, because the Project operations would not impact emergency vehicle access, operation impacts would be less than significant. **Therefore, impacts related to emergency access would be less than significant, and no further analysis is required.**

(2) Mitigation Measures

Project-level impacts related to inadequate emergency access would be less than significant. Therefore, no mitigation is required.

(3) Level of Significance After Mitigation

Project-level impacts related to inadequate emergency access were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

e. Cumulative Impacts

(1) Impacts Analysis

In addition to potential Project-specific impacts, both CEQA and TAG require that the Project be reviewed in combination with nearby Related Projects (and in the case of CEQA and/or projected ambient growth) to determine if there may be a cumulatively significant impact resulting from inconsistencies with applicable transportation plans (or the goals, objectives, and policies thereof), VMT, hazardous geometric design features, or emergency access. In accordance with TAG, cumulative analysis with transportation plans and policies must consider projects within 0.5 miles of the Project Site and any transportation system improvements in the vicinity of the Project Site. A list of proposed development projects in the vicinity of the Project Site that could affect conditions in the Project area (e.g., by generating construction noise and/or generating population increases) was prepared based on information obtained primarily from LADOT and the Department of City Planning in Section III, Environmental Setting, of this Draft EIR. A total of seven potential related development projects (Related Projects) have been identified within 0.5 miles of the Project Site for inclusion in the cumulative impact analysis for this Draft EIR. These Related Projects are in varying stages of the approval/entitlement/development process and consist of a variety of land uses reflecting the diverse range of land uses in the vicinity of the Project Site. Although the buildout years of many of these Related Projects are uncertain and may extend beyond the Project's buildout year, all Related Projects were assumed to be completed by the estimated Project buildout year for purposes of the traffic analysis. The Project's

construction is expected to be completed in the fourth quarter of 2029, and the project would be operational in 2030.

(a) Consistency with Transportation Plans and Policies

Some of the programs, plans, and policies discussed in this section do not apply cumulatively to multiple development projects, but rather are Project-specific or site specific (i.e., LAMC bicycle parking requirements included in Section 12.21 A.16). Overall, the Project would support key policies related to pedestrian and vehicle safety, reducing VMT, and promoting alternative fuels that would impact or interfere with other cumulative projects' ability to also be consistent with the plans, programs, and policies discussed above. Moreover, all of Related Projects would need to be separately reviewed and approved by the City with their own consistency analysis. As identified above, the project-level analysis under Threshold (a) found that the Project would not result in significant inconsistency with applicable transportation, plans, policies, and ordinances. **Therefore, Project impacts with respect to conflicts with transportation-related programs, plans, policies, and ordinances would not be cumulatively considerable, and cumulative impacts would be less than significant.**

(b) Vehicle Miles Traveled

Per TAG guidance, a development project would have a cumulative VMT impact if it were to result in significant Project-level VMT and was deemed inconsistent with the SCAG RTP/SCS, specifically as it relates to location, density, and intensity. As discussed under Threshold (b) above, the Project would have a less than significant Project-level impact related to VMT. Additionally, as discussed under Threshold (a), the Project would be consistent with policies, goals, and guidelines of the RTP/SCS. **Therefore, the Project would result in a less than significant cumulative VMT impact. Thus, Project impacts with respect to VMT would not be cumulatively considerable, and cumulative impacts would be less than significant.**

(c) Hazardous Design Features

According to TAG, a cumulative impact analysis should consider the effect of access to Related Projects in the same block of the Project site. Of the cumulative projects included in Section III, Environmental Setting, of this Draft EIR, none of the Related Projects are on the same block as the Project. As such, there would be no conflict in access between the Project and any of the other Related Projects analyzed in the cumulative analysis. **As such, the Project impacts with respect to hazardous design features would not be cumulatively considerable, and cumulative impacts would be less than significant.**

(d) Emergency Access

As discussed under Threshold (d) above, the Project would have a less than significant impact related to emergency access, and would implement a Construction Traffic Management Plan to ensure that temporary construction impacts would not impede emergency response vehicles. All of the Related Projects included in Section III, Environmental Setting, of this Draft EIR, would be required to comply with all applicable City Building Code and Fire Code requirements regarding site access, including the provision of adequate emergency vehicle

access. The compliance with these requirements would be confirmed by the LAFD's fire/safety plan review and inspection for new development projects, which would occur prior to the issuance of any building permits. **As such, the Project impacts with respect to inadequate emergency access would not be cumulatively considerable, and cumulative impacts would have be less than significant.**

(2) Mitigation Measures

Cumulative impacts related to transportation would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Cumulative impacts related to transportation would be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.