Attachment A

Project: Martin Luther King Jr. Blvd Safety and Mobility Project

I. Project Description

The project focuses on key corridors of Martin Luther King Jr. Boulevard, Broadway Place, and 39th Street to enhance safety for people walking, biking, and accessing transit, while also addressing accessibility concerns and reducing conflicts between vehicles, cyclists, and pedestrians. The proposed project involves the implementation of bike facilities across three key segments: Martin Luther King Jr. Boulevard from Broadway to Hooper Avenue (1.5 miles); 39th Street from Broadway Place to Figueroa Street (0.37 mile); Broadway Place from Martin Luther King Jr. Boulevard to Main Street (0.41 mile).

Specifically, the project includes the following elements:

- Reducing the number of vehicle travel lanes from two travel lanes in each direction to one travel lane in each direction
- Reducing the number of vehicle travel lanes from two travel lanes to one travel lane in the west bound direction, while maintaining the existing two travel lanes in the east bound direction
- Upgrading the existing unprotected Class II bike lanes to protected Class IV bike lanes, using vertical separation elements such as flexible posts or rubber curbs
- Converting the existing peak hour travel lane into full time parking lane
- Installing new Class IV protected bike lanes using vertical separation elements such as flexible posts or rubber curbs

The project will also install a new signalized crossing on 39th Street at Broadway Place and a bicycle signal at the I-110 Freeway Express Lane Entrance on 39th Street to minimize conflicts between vehicles with people walking and biking and facilitate active transportation connections to Exposition Park and the MyFigueroa corridor.

Other key improvements include the installation of accessible parking stalls as part of the new parking-protected bike lanes, the implementation of ADA-compliant curb ramps, street repavement to facilitate bike facilities, and the installation of Accessible Pedestrian Signals (APS) at intersections along the corridors, all aimed at improving accessibility for individuals with disabilities. These upgrades ensure compliance with the latest Public Right-of-Way Accessibility Guidelines (PROWAG) and make the street network more inclusive and pedestrian-friendly.

In addition, neighborhood street improvements are proposed along Martin Luther King Jr. Boulevard between Central Avenue and Hooper Avenue. These treatments include speed humps, sharrow markings, and bike wayfinding signage to create a safer, more comfortable route for cyclists and reduce vehicular speeds.

The project remains entirely within the existing City right-of-way, requiring no roadway widening and excavation. Only one tree removal is required.[1] It will reallocate street space to prioritize

[1] As a part of accessibility requirements related to curb ramps, in September 2025 the City installed mid-block cross ramps on Martin Luther King Jr. Boulevard, which necessitated the removal of a Canary Island Pine Tree (Pinus canariensis). Per City requirements, the removed tree will be replaced by the planting of two Canary Island Pine

safety, enhance access, and improve connectivity for people utilizing the active transportation network in South Los Angeles. By linking residents to vital destinations—including Expo Park, the Metro E and J Line Stations, schools, parks, and employment hubs like the Goodyear Tract—this initiative will foster healthier, more active communities. LADOT's project page (including linked documents) provides more detailed information regarding the project.[2]

II. Project History

Martin Luther King Jr. Boulevard is a key segment of the city's future mobility, identified in **The Mobility Plan 2035** as part of the **Tier 1 Protected Bike Lanes Network**[3].

Currently, high vehicle speeds, narrow bike lanes, and a lack of physical protection discourage use by all but the most confident cyclists. This is a critical safety and connectivity issue, as Martin Luther King Jr. Boulevard serves as an essential link in the city's growing bicycle network. The corridor connects residents to vital destinations such as Expo Park, the Metro E and J Line Stations, schools, parks, and employment centers like the Goodyear Tract. The existing facility simply does not offer the comfort and safety required to support broad community ridership.

Recognizing this high-priority need for safety improvements, the **City of Los Angeles Department of Transportation (LADOT)** collaborated with the **Council District 9 (CD9)** office, leveraging CD9's district-level bicycle network plan. The project gained momentum after the City secured the **Metro Active Transport (MAT) Cycle 1 grant** from the Los Angeles County Metropolitan Transportation Authority (Metro) in 2021.

With funding secured, the project team officially initiated design work in Summer 2022 for purposes of feasibility and environmental review. The proposed final design, solidified in 2024, is a direct result of public outreach and stakeholder engagement, which began in 2023 and incorporated extensive corridor-specific needs and community feedback gathered through surveys, meetings, and community events.

III. Environmental Review

A. Basis for Categorical Exemption

A project qualifies for a Class 1, Category 3 categorical exemption under City CEQA Guidelines and a Class 1(c) categorical exemption under State CEQA Guidelines (CCR Sec. 15301 (c)) if it consists of operation, repair, maintenance, or minor alteration of existing streets, sidewalks, and gutters involving negligible or no expansion of use beyond that previously existing; and does not involve the removal of a scenic resource (the City CEQA Guidelines, Class 1, Category 3, further explain that a scenic resource is defined as "including but not limited to a stand of trees, a rock outcropping or an historic building.").

Trees at or near the vicinity of the removed tree. The project would not result in any conflicts with the installed mid-block cross ramps.

[2] LADOT Liveable Streets, *Martin Luther King Jr. Blvd Safety and Mobility Project*, last accessed March 4, 2026 https://ladotlivablestreets.org/projects/MLK

[3] Mobility Plan 2035: Bicycle Lane Network, *Map D1*, page 142 (PDF page 161) https://planning.lacity.gov/odocument/523f2a95-9d72-41d7-aba5-1972f84c1d36/Mobility_Plan_2035.pdf

The project qualifies for this categorical exemption because it consists of the operation and minor alteration of existing streets (Martin Luther King Jr. Boulevard, Broadway Place, and 39th Street); does not involve an expansion of use beyond those previously existing, as the project only upgrades existing bike lanes along Martin Luther King Jr. Boulevard from standard stripe bike lanes to protected bike lanes as well as converting an existing peak hour travel lane into a full time parking lane.

The capacity along Martin Luther King Jr. Boulevard will be managed by maintaining the existing two full-time vehicle travel lanes in each direction and reconfiguring the peak-hour travel lane in the eastbound direction to a full-time parking lane. On Broadway Place, the existing two vehicle travel lanes in each direction will be reconfigured to one vehicle travel lane in each direction. Lastly, along 39th Street, the existing two vehicle travel lanes in each direction will be reconfigured to one vehicle travel lane in the westbound direction, while the two existing vehicle travel lanes in the eastbound will be maintained.

After analyzing the Average Daily Traffic (ADT) as well as referencing the LADOT Design Element: Lane Reconfiguration Guidelines, the future configuration of all 3 segments suggest limited impact on traffic volume.[4,5] Overall, the project would accommodate any project growth already analyzed and approved from the Bicycle Lane Network in Mobility Plan 2035 and does not involve the removal of scenic resources including no removal of rock outcroppings, or historic buildings (see below on Consideration of Potential exception to the use of a Categorical Exemption, Aesthetics and Scenic Highway sections).

Further, a project qualifies for a Class 1, Category 15 categorical exemption if it consists of the installation of traffic signs, signals and pavement markings, including traffic channelization using paint and raised pavement markers. Moreover, a project qualifies for a Class 1, Category 20 categorical exemption if it consists of the modernization of an existing highway or street by construction of improvements and adding auxiliary lanes for localized purposes such as turning, involving negligible or no expansion of use beyond that previously existing, except where extensive tree removal will be involved.

The project qualifies for these categorical exemptions because it involves the following improvements on existing streets, all of which avoid extensive tree removal:

- **Bikeways:** Converting Class II standard striped bike lanes to Class IV protected bike lanes via pavement markings and installing new Class IV protected bike lanes.
- **Traffic Control:** Installing a new traffic signal.
- **Modernization:** Modernizing Martin Luther King Jr. Boulevard, 39th Street, and Broadway Place through the construction of improvements such as the Class IV protected bike lanes.

As set forth above, the project does not involve an expansion of use beyond that previously existing. Finally, a project qualifies for a Class 4, Category 13 categorical exemption under City CEQA Guidelines and a Class 4(h) categorical exemption under State CEQA Guidelines (CCR Sec. 15304 (h)) if it consists of the creation of bicycle lanes on existing rights-of-way. The project qualifies for this exemption because it is creating Class IV protected bike lanes to replace the existing Class II standard stripe bike lanes along the

[4] See Attachment B for Martin Luther King Jr. Boulevard, Broadway Pl and 39th St vehicle counts
[5] LADOT Design Element: Lane Reconfiguration Guidelines, *Volume Analysis* and *Delay Guideline*, Pg 4-5, April 2023, https://ladot.lacity.gov/sites/default/files/2024-09/lane-reconfiguration-guidelines-update-april-2023.pdf

project limits of Martin Luther King Jr. Boulevard and installing new Class IV protected bike lanes along the project limits of 39th Street and Broadway Place.

Consideration of Potential Exceptions to use of a Categorical Exemption
The State CEQA Guidelines (CCR Sec 15300.2) limit the use of categorical exemptions in the circumstances that follow. The narrative below substantiates through facts why these exceptions do not apply.

1. Location. Exemption Classes 3, 4, 5, 6, and 11 are qualified by consideration of where the project is to be located—a project that is ordinarily insignificant in its impact on the environment may be significant in a particular sensitive environment. Therefore, these classes are considered to apply to all instances, except where the project may impact on an environmental resource of hazardous or critical concern where designated, precisely mapped, and officially adopted pursuant to law by federal, state, or local agencies. This exception is known as the "location exception."

Those project features covered under the Class 1 categories are not subject to the location exception.

Those project features that include roadway restriping to feature bicycle lanes are eligible for a Class 4 exemption and therefore are potentially subject to the location exception. A review and analysis of relevant City and other databases (including ZIMAS and NavigateLA) show that there are no precisely mapped, officially adopted areas of environmental resources of hazardous or critical concern at the project site.

2. Cumulative Impact. This exemption applies when, although a particular project may not have a significant impact, the cumulative impact of successive projects of the same type in the same place, over time is significant.

While other similar projects are occurring elsewhere in the City, they have been determined to be happening in different neighborhoods, locations, and times.[6,7] Given the nature of the project, this project is not anticipated to result in a cumulative impact when included with successive projects in the same place and over time.

3. Significant Effect. This exception applies when, although the project may otherwise be exempt, there is a reasonable possibility that the project will have a significant effect due to unusual circumstances.

A. No Unusual Circumstances

There are no unusual circumstances for this project compared to other road improvement projects that typically qualify for categorical exemptions for existing facilities or minor alterations to land. This work is a typical minor alteration and improvement project for a street, sidewalk, gutter, and bicycle and pedestrian

[6] LADOT Liveable Streets, *Our Projects*, last accessed March 4, 2026, https://ladotlivablestreets.org/projects
[7] See Attachment B for Projects Summary Table

way, that falls under the Class 1 exemption. The City has successfully implemented over 300 lane reconfiguration projects, many on similar streets with comparable bicycle and automobile configurations.[8]

B. No Significant Impacts

Aesthetics
This exception applies when a project may cause a substantial adverse change in the significance of a visual resource. As stated in Section I: Project Description, the project only consists of reconfiguring lanes to upgrade the existing bicycle lanes to protected bike lanes and other re-configurations of existing roadways; it would not impact any aesthetic resources. Furthermore, the project would not impact any zoning and other regulations governing scenic quality in the Zoning Code, Southeast Los Angeles Community Plan, the South Los Angeles Community Plan, or other applicable plans.[9]

Noise
The work shall be performed in accordance with Ordinance No. 144.331, "Noise Regulation" in Chapter XI of the Los Angeles Municipal Code of March 1982. The City will restrict demolition, construction, and striping on Martin Luther King Jr. Boulevard, 39th Street, and Broadway Place in locations near sensitive uses (such as residences) to daytime hours and in accordance with the City's noise regulations. The installation process would not be expected to exceed ambient noise by more than 5 dBA for more than 10 continual days; thus, there will be less than significant noise impacts on the neighborhood immediately surrounding the project area. Furthermore, extensive noise analyses from similar streetscape improvement projects, such as the My Figueroa Project, have consistently determined that construction and operation impacts related to noise and vibration would be less than significant, requiring no mitigation measures.[10]

Biological Resources
The proposed project involves a removal of only one Canary Island Pine Tree (Pinus canariensis), not a stand of trees, and does not include any future removal of existing trees. Per City requirements, the removed tree will be replaced by the planting of two Canary Island Pine Trees at or near the vicinity of the removed tree.[11]

Traffic/Transportation
The proposed project reallocates vehicle travel lanes and reduces through travel lanes to create space for protected bike lanes on Broadway Place (Main Street and Martin Luther King Jr. Boulevard), 39th Street (Broadway Place and Figueroa Street) and on Martin Luther King Jr. Boulevard (Main Street and Broadway). Such a change could increase travel delay in the peak periods, however, the project-related delays are not unusual as would occur with similar roadway

[8] LADOT Lane Reconfiguration Guidelines, April 2023, https://ladot.lacity.gov/sites/default/files/2024-09/lane-reconfiguration-guidelines-update-april-2023.pdf
[9] (LADOT Memo, 2026).
[10] City of Los Angeles 2010 Bicycle Plan, *4.4 Noise and Vibration* https://planning.lacity.gov/eir/BicyclePlan/DEIR/4.4%20Noise.pdf
[11] (LADOT Memo, 2026a).

reconfiguration projects explored elsewhere in the City. Between 2010 and 2016, the City has implemented 64.5 miles of similar roadway reconfiguration that have resulted in reduction of the travel lane capacity along arterials, many with volumes that are comparable or higher as compared to the project corridor.[12]

In addition, substantial travel delay no longer qualifies as an exception under the Section 15300.2 (c) of the CEQA Guidelines that could disqualify a lane striping project covered under a Class 1 or Class 4 exemption due to the adoption and rulemaking procedures of Senate Bill (SB) 743. Upon adopting SB 743 into law, the legislature and Governor directed the Office of Planning and Research (OPR) to replace delay and capacity-based metrics such as level of service (LOS) when lead agencies are evaluating transportation impacts under CEQA. The legislature further found that new transportation analysis under CEQA was needed to promote the state's goals of reducing greenhouse gas (GHG) emissions and traffic-related air pollution, promote the development of a multimodal transportation system (including bicycle lanes), and provide clean, efficient access to destinations. The California Natural Resources Agency certified and adopted the CEQA Guidelines in December of 2018, and are now in effect.[13]

In its document, 'Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA', the OPR recommended that a vehicle miles traveled (VMT) per capita metric replace delay-based metric throughout the State when identifying transportation impacts under CEQA. OPR finds that a VMT per capita metric is in direct correlation with the state's goals of reducing GHG emissions and traffic-related air pollution, promoting the development of a multimodal transportation system, and providing clean, efficient access to destinations. OPR further finds that delay-based metric of LOS, in congruence with the legislative direction and intent, to be in conflict with achieving improved environmental outcomes, and is ill suited in defining environmental outcomes under CEQA, regardless of location.

In its 'Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA', OPR has further indicated that both active transportation projects (which include bicycle lanes), and transportation projects that reduce number of lanes should generally not lead to substantial increase in VMT, and further not be considered to contribute to a significant impact under CEQA. In the presumption of less than significant impacts for active transportation projects, OPR finds that streamlining active transportation projects align with three of the statutory goals of SB 743, which include reducing greenhouse gas emissions, increasing multimodal transportation networks, and facilitating mixed-use development.

In summary, the actions of the California Legislature in adopting SB 743, as well as the record of evidence and preliminary guidance as provided by OPR, Caltrans, and the Natural Resource Agency support the conclusion that travel delay is not considered an exception of hazardous and critical concern that would

[12] Severin Martinez, *Who Wins When Streets Lose Lanes?: An Analysis of Safety on Road Diet Corridors in Los Angeles*, applied planning research project, UCLA Luskin School of Public Affairs, June 2016.
[13] State of California, Natural Resources Agency, Final Adopted Text, December 2018. https://resources.ca.gov/admin/Legal

disqualify the application of a Class 1 or Class 4 Exemption pursuant to Section 15300.2 (c) of the CEQA Guidelines.

With respect to construction-related transportation impacts, the restriping of the work of restriping of the project corridor shall be performed in accordance with work area traffic control handbook (WATCH). City construction crews will coordinate with schools and the Department of Transportation according to WATCH and provide flaggers when required. When the activity site encroaches upon a sidewalk, walkway or crosswalk area, pedestrians shall be provided advance warning if they are detoured away from the activity site. Advance notification of sidewalk closures shall be provided according to WATCH. At least one lane of traffic in each direction will be maintained at all times.

Hazardous Waste and Historic Resources
The project would not have a significant impact on hazardous waste and historic resources, as set forth below in the other 15300.2 exception areas.

Non-implicated impact Areas
The project does not involve any activities that would impact agriculture, air, energy, geology and soils, greenhouse gas emissions, water quality and supply, mineral resources, population and housing, public services, recreation, and public utilities (related to the need for new facilities), and wildfire, as it only involves non-excavation work on an existing roadway.

C. Conclusion
The project involves routine repair and maintenance work to enhance pedestrian and bicycle safety per the City's 2035 Mobility Plan. Standard conditions and construction practices are anticipated for this project.[14] As set forth above, no unusual circumstances are present, and no reasonable possibility has been identified that the project will have a significant effect. As such, this exception does not apply.

4. Scenic Highways. A categorical exemption shall not be used for a project which may result in damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as a state scenic highway.

The Citywide General Plan Circulation System designates Martin Luther King Jr. Boulevard and Broadway Place as Avenue I, while 39th Street as Avenue II. The project corridors are not designated as a state scenic highway. There are no scenic features or a scenic highway at any of the project sites, on the project corridor, nor crossing the project corridor. The proposed project does involve a removal of one tree, not a stand of trees and does not include any future extensive removal of existing trees or medians. There are also no rock outcropping or historic buildings removed in the proposed plan. Therefore, this exception does not apply.

[14] See LADOT Technical Reference Library, at https://ladot.lacity.gov/businesses/technical-reference-library

5. Hazardous Waste Sites. This exception applies when a project is located on a site listed as a hazardous waste site under Government Code Section 65962.5.

None of the sites along the streets on which the project will take place appear on the sites listed under Government Code Section 65962.5.[15] Therefore, this exception has no application here.

6. Historical Resources. This exception applies when a project may cause a substantial adverse change in the significance of a historical resource. A search of the City's Declared Monuments, in addition to HistoricPlacesLA (formerly SurveyLA), showed portions along and adjacent to Martin Luther King Jr. Boulevard are designated as South Los Angeles Canary Island Pine Street Trees – a Historic-Cultural Monuments (HCM).[16] However the project consists of restriping a street to include protected bike lanes on an existing right of way with similar pavement markings and traffic safety and control elements. As such the project will not adversely change the significance of the nearby historical resources.[17]

The proposed project includes non-extensive tree removal to preserve the City's Declared Monuments designation.

[15]California Department of Toxic Substance Control, *EnviroStor* Hazardous Waste and Substance Site List, last accessed February 23, 2026, CalEPA Cortese List Data Resources, http://www.envirostor.dtsc.ca.gov/public/; https://calepa.ca.gov/sitecleanup/corteselist/

[16] City of Los Angeles City Planning, "Historic-Cultural Monument (HCM) List," last accessed January, 2025, https://planning.lacity.gov/preservation-design/historic-landmark-programs.

[17] (LADOT Memo, 2026).