Inglewood Transit Connector Project



Draft Environmental Impact Report

December 2020

State Clearinghouse No. 2018071034

Lead Agency: City of Inglewood, Economic and Community Development, Planning Division
One West Manchester Boulevard, 4th Floor, Inglewood CA 90301

Meridian Consultants

Draft

Environmental Impact Report

for the

Inglewood Transit Connector Project

SCH NO. 2018071034

PREPARED FOR:

City of Inglewood
One W. Manchester Boulevard, 4th Floor
Inglewood CA 90301

PREPARED BY:

Westlake Village Office
920 Hampshire Road, Suite A5
Westlake Village, CA 91361

Meridian Consultants

Los Angeles Office
706 S. Hill Street, 11th Floor
Los Angeles, CA 90014

December 2020

TABLE OF CONTENTS

1.0 EXECUTIVE SUMMARY 1.0-1

2.0 INTRODUCTION 2.0-1

2.1 Purpose and Type of EIR 2.0-1
2.2 Summary of Public Outreach 2.0-4
2.3 Organization of this Draft EIR 2.0-18
2.4 Public Review of the Draft EIR 2.0-20

3.0 PROJECT DESCRIPTION 3.0-1

3.1 Background 3.0-1
3.2 ITC Project Overview 3.0-5
3.3 Project Location 3.0-7
3.4 Project Objectives 3.0-11
3.5 Project Characteristics 3.0-11
3.6 Property Acquisitions 3.0-94
3.7 Construction 3.0-97
3.8 Entitlements 3.0-112
3.9 Required Approvals and Actions 3.0-115

4.0 ENVIRONMENTAL IMPACT ANALYSIS 4.0-1

4.0.1 Introduction 4.0-1
4.0.2 Definitions of Terms Used in the EIR 4.0-1
4.0.3 Section Format 4.0-3
4.0.4 Comments Received During Scoping 4.0-5
4.0.5 Adjusted Baseline 4.0-11
4.0.6 Cumulative Assumptions 4.0-13
4.0.7 Sensitive Receptors 4.0-14

4.1 AESTHETICS 4.1-1
4.2 AIR QUALITY 4.2-1
4.3 BIOLOGICAL RESOURCES 4.3-1
4.4 CULTURAL RESOURCES 4.4-1
4.5 ENERGY RESOURCES 4.5-1
4.6 GEOLOGY AND SOILS 4.6-1
4.7 GREENHOUSE GAS EMISSIONS 4.7-1
4.8 HAZARDS AND HAZARDOUS MATERIALS 4.8-1
4.9 LAND USE AND PLANNING 4.19-1
4.10 NOISE AND VIBRATION 4.10-1
4.11 POPULATION, EMPLOYMENT, AND HOUSING 4.11-1
4.12 TRANSPORTATION 4.12-1
4.13 TRIBAL CULTURAL RESOURCES 4.13-1
4.14 UTILITIES AND SERVICE SYSTEMS 4.14-1

TABLE OF CONTENTS (CONTINUED)

5.0 ALTERNATIVES 5.0-1

5.1 Introduction 5.0-1
5.2 Significant Impacts of the Inglewood Transit Connector Project 5.0-2
5.3 Project Objectives 5.0-3
5.4 Alternatives 5.0-4
5.5 Evaluation of Alternatives 5.0-22
5.6 Environmentally Superior Alternative 5.0-49

6.0 OTHER ENVIRONMENTAL CONSIDERATIONS 6.0-1

6.1 Introduction 6.0-1
6.2 Significant Unavoidable Impacts 6.0-1
6.3 Significant Irreversible Environmental Changes 6.0-2
6.4 Effects Found Not to Be Significant 6.0-5
6.5 Growth Inducing Effects 6.0-45

7.0 LIST OF PREPARERS, ORGANIZATIONS AND PERSONS CONSULTED 7-1

8.0 TERMS, DEFINITIONS, AND ACRONYMS 8-1

9.0 REFERENCES 9-1

List of Appendices

1.0 EXECUTIVE SUMMARY

None

2.0 INTRODUCTION

2.0.1a Recirculated Notice of Preparation
2.0.1b Original Notice of Preparation
2.0.2a Recirculated Initial Study
2.0.2b Original Initial Study
2.0.3 Summary of Comments Received on the Revised and Original NOP and IS Memorandum

3.0 PROJECT DESCRIPTION

3.0.1 Inglewood Transit Connector EIR Operating Systems Conceptual Planning EIR Project Definition, December 2020
3.0.2 Envision Inglewood
3.0.3 Inglewood Transportation Center Design Guidelines, December 2020
3.0.4 ITC Construction Scenarios for the EIR, June 2020
3.0.5 Inglewood Transportation Connector Construction Commitment Program, December 2020

4.0 TOPICAL SECTIONS

4.1 Aesthetics

None

4.2 Air Quality and Human Health Risk Assessment

4.2.1 Air Quality and Health Risk Assessment Technical Report for the Inglewood Transit Connector Project, RCH Group, September 2020

4.3 Biological Resources

4.3.1 Preliminary Tree Survey of APM Alignment
4.3.2 Preliminary Tree Survey of Potential Support Facility Sites
4.3.3 Tree Inventory
4.3.4 CNDDB Survey

4.4 Cultural Resources

4.4.1 Cultural Resource Investigation
4.4.2 Historic Resources Impact Memo
4.4.3 Historic Resources Technical Report

4.5 Energy

4.5.1 Existing Conditions Energy Calculations
4.5.2 Electricity Calculations for Project Construction
4.5.3 Vehicle Fuel Calculations for Project Construction
4.5.4 Project Operational Energy Calculations
4.5.5 Operational Vehicle Fuel Calculations

List of Appendices (Continued)

4.6 Geology and Soils

4.6.1 Fault Rupture Study
4.6.2 Seismic Design Criteria
4.6.3 Technical Memorandum, Geology and Soils

4.7 Greenhouse Gas Emissions

None

4.8 Hazards and Hazardous Materials

4.8.1 Hazardous Material Assessment
4.8.2 Hazards and Hazardous Materials
4.8.3 The EDR Radius Map Report

4.9 Land Use

4.9.1 Existing Land Use Setting for Parcels Adjacent to the APM System

4.10 Noise and Vibration

4.10.1 Ambient Noise Measurements
4.10.2 Roadway Noise Levels
4.10.3 Vibration Monitoring Data Sheets
4.10.4 Construction Noise Worksheets
4.10.5 Construction Vibration Worksheets
4.10.6 Operational Noise Worksheets

4.11 Population, Employment and Housing

None

4.12 Traffic and Circulation

4.12.1 Transportation Assessment Study

4.13 Tribal Resources

4.13.1 AB 52 Tribal Notification and Outreach Summary Memorandum
4.13.2 AB 52 Meeting Summary

4.14 Utilities

4.14.1 Utility Impact Worksheets

List of Figures

Figure		Page
ES-1	Project Regional Location Map	3.0-8
ES-2	City of Inglewood	3.0-8
ES-3	Project Vicinity Map	3.0-8
ES-4	Location of Alternative Alignments in the LPA Report	3.0-8
3.0-1	Project Regional Location Map	3.0-8
3.0-2	City Location Map	3.0-9
3.0-3	Project Vicinity Map	3.0-10
3.0-4	Proposed Project Alignment Plans and Profiles	3.0-16
3.0-5	Typical Station Design	3.0-38
3.0-6	MSF Site Plan	3.0-39
3.0-7	MSF Plan and Section Views	3.0-40
3.0-8	Potential Locations for Traction Power Substations	3.0-41
3.0-9	Typical TPSS Layout	3.0-42
3.0-10	Striping Plans	3.0-50
3.0-11	Striping Plans	3.0-51
3.0-12	Striping Plans	3.0-52
3.0-13	Striping Plans	3.0-53
3.0-14	Striping Plans	3.0-54
3.0-15	Striping Plans	3.0-55
3.0-16	Striping Plans	3.0-56
3.0-17	Striping Plans	3.0-57
3.0-18	Striping Plans	3.0-58
3.0-19	Striping Plans	3.0-59
3.0-20	Striping Plans	3.0-60
3.0-21	Striping Plans	3.0-61
3.0-22	Striping Plans	3.0-62
3.0-23	Striping Plans	3.0-63
3.0-24	Striping Plans	3.0-64
3.0-25	Cross-sections	3.0-65
3.0-26	Cross-sections	3.0-66
3.0-27	Cross-sections	3.0-67
3.0-28	Cross-sections	3.0-68
3.0-29	Cross-sections	3.0-69
3.0-30	Cross-sections	3.0-70
3.0-31	Cross-sections	3.0-71
3.0-32	Cross-sections	3.0-72
3.0-33	Market Street/Florence Avenue Station Proposed Parking Plan	3.0-73
3.0-34	150 S. Market Street Proposed Parking Plan	3.0-74
3.0-35	MSF Site Proposed Parking Plan	3.0-75
3.0-36	Proposed Construction Staging Areas and Haul Routes	3.0-96
4.0-1	Cumulative Projects Map	4.0-37
4.0-2	Project Area Quarter-Mile Buffer	4.0-38
4.0-3	Sensitive Receptors within a Quarter-Mile of the Project Area	4.0-39

List of Figures (Continued)

Figure		Page
4.1-1	View Point Location Map	4.1-20
4.1-2	View 1 - Florence Avenue and Locust Street	4.1-21
4.1-3	View 2 - Florence Avenue and Market Street	4.1-22
4.1-4	View 3 – Manchester Boulevard and Locust Street	4.1-23
4.1-5	View 4 – Prairie Avenue and Manchester Boulevard	4.1-24
4.1-6	View 5 – Prairie Avenue and Pincay Street	4.1-25
4.1-7	View 6 – Prairie Avenue and 97th Street	4.1-26
4.1-8	View 7 – Manchester Boulevard and Spruce Avenue	4.1-27
4.3-1	Existing Trees – CVS Plaza(a)	4.3-24
4.3-2	Existing Trees – CVS Plaza(b)	4.3-25
4.3-3	Existing Trees – CVS Plaza(c)	4.3-26
4.3-4	Existing Trees – Market Street	4.3-27
4.3-5	Existing Trees – Market Street/Manchester Boulevard	4.3-28
4.3-6	Existing Trees – Manchester Boulevard(a)	4.3-29
4.3-7	Existing Trees – Manchester Boulevard/Vons Plaza(a)	4.3-30
4.3-8	Existing Trees – Manchester Boulevard/Vons Plaza(b)	4.3-31
4.3-9	Existing Trees – Vons Plaza	4.3-32
4.3-10	Existing Trees – Manchester Boulevard(b)	4.3-33
4.3-11	Existing Trees – Manchester Boulevard(c)	4.3-34
4.3-12	Existing Trees – Manchester Boulevard/Prairie Avenue	4.3-35
4.3-13	Existing Trees – Osage Avenue	4.3-36
4.3-14	Existing Trees – Prairie Avenue(a)	4.3-37
4.3-15	Existing Trees – Prairie Avenue(b)	4.3-38
4.3-16	Existing Trees – Prairie Avenue(c)	4.3-39
4.3-17	Existing Trees – Prairie Avenue(d)	4.3-40
4.3-18	Existing Trees – Prairie Avenue(e)	4.3-41
4.3-19	Existing Trees – Prairie Avenue(f)	4.3-42
4.3-20	Potential Tree Impacts – Market Street/Florence Avenue Station(a)	4.3-66
4.3-21	Potential Tree Impacts – Market Street/Florence Avenue Station(b)	4.3-67
4.3-22	Potential Tree Impacts – Market Street/Florence Avenue Station(c)	4.3-68
4.3-23	Potential Tree Impacts – Market Street	4.3-69
4.3-24	Potential Tree Impacts – Market Street/Manchester Boulevard	4.3-70
4.3-25	Potential Tree Impacts – Manchester Boulevard(a)	4.3-71
4.3-26	Potential Tree Impacts – Manchester Boulevard/MSF Site(a)	4.3-72
4.3-27	Potential Tree Impacts – MSF Site	4.3-73
4.3-28	Potential Tree Impacts – Manchester Boulevard/MSF Site (b)	4.3-74
4.3-29	Potential Tree Impacts – Manchester Boulevard(b)	4.3-75
4.3-30	Potential Tree Impacts – Manchester Boulevard(c)	4.3-76
4.3-31	Potential Tree Impacts – Manchester Boulevard/Prairie Avenue	4.3-77
4.3-32	Potential Tree Impacts – Prairie Avenue(a)	4.3-78
4.3-33	Potential Tree Impacts – Prairie Avenue(b)	4.3-79
4.3-34	Potential Tree Impacts – Prairie Avenue(c)	4.3-80
4.3-35	Potential Tree Impacts – Prairie Avenue(d)	4.3-81

List of Figures (Continued)

Figure		Page
4.3-36	Potential Tree Impacts – Prairie Avenue(e)	4.3-82
4.6-1	Faults within the Project Area	4.6-13
4.6-2	Location of Active Faults and the APM System	4.6-25
4.9-1	General Plan Land Use Designations	4.9-19
4.9-2	Zoning Map	4.9-20
4.9-3	Map of Property Acquisitions and Easements	4.9-29
4.9-4	Transportation Corridor Overlay Zone	4.9-34
4.9-5	ALUP Noise Contours	4.9-49
4.10-1	FTA Noise Impact Criteria for Transit Project	4.10-10
4.10-2	Traffic Study Areas and Intersections	4.10-20
4.10-3	Generalized Ground-Surface Vibration Curves	4.10-26
4.10-4	State Criteria for Noise-Compatible Land Use	4.10-30
4.10-5	Noise Sensitive Receptor Groups	4.10-39
4.10-6	ALUP Noise Contours	4.10-48
4.10-7	Proposed Project with Rubber Tired APM Train Noise Contour Map (Daytime)	4.10-75
4.10-8	Proposed Project with Rubber Tired APM Train Noise Contour Map (Nighttime)	4.10-76
4.10-9	Monorail Noise Contour Map (Daytime)	4.10-77
4.10-10	Monorail Noise Contour Map (Nighttime)	4.10-78
4.13-1	Native American Village Sites	4.13-19
5.0-1	Location of Alternative Alignments in the LPA Report	5.0-5

List of Tables

Table		Page
1.0-1	Comments Received on the Original Notice of Preparation and Original Initial Study	1.0-3
1.0-2	Comments Received on the Revised Notice of Preparation and Revised Initial Study	1.0-5
1.0-3	Post Scoping Public Agency Outreach	1.0-9
1.0-4	Summary of Findings	1.0-19
2.0-1	Comments Received on the Original Notice of Preparation and Original Initial Study	1.0-7
2.0-2	Comments Received on the Revised Notice of Preparation and Revised Initial Study	1.0-8
2.0-3	Post Scoping Public Agency Outreach	2.0-18
3.0-1	ITC Project Component Locations and Sizes (Conceptual)	3.0-14
3.0-2	Projected Ridership Projections	3.0-24
3.0-3	Peak Period Ridership Headway Fleet Capacity	3.0-25
3.0-4	Forecasted Northbound Station-to-Station In-Vehicle APM Train Travel Times	3.0-27
3.0-5	Proposed Sustainability Guidelines	3.0-89
3.0-5	Anticipated Project Acquisitions	3.0-82
4.0-1	Adjusted Baseline Projects	4.0-12
4.0-2	Cumulative Projects List	4.0-15
4.1-1	ITC Project Component Locations and Sizes (Illustrative)	4.1-28
4.1-2	Scenic Quality Consistency with General Plan Land Use Element	4.1-40
4.1-3	Visual Consistency with the Hollywood Park Specific Plan	4.1-44
4.2-1	Federal and State Ambient Air Standards	4.2-23-24
4.2-2	South Coast Air Basin Attainment Status (Los Angeles County)	4.2-40
4.2-3	Air Quality Data Summary (2017–2019)	4.2-42
4.2-4	Existing Emissions for Existing Uses	4.2-42
4.2-5	Mass Daily Emissions Thresholds	4.2-44
4.2-6	Ambient Air Quality Significance Thresholds for Criteria Pollutants	4.2-45
4.2-7	Daily Unmitigated Construction Emissions for Proposed Project	4.2-59
4.2-8	Operational Air Quality Emissions – Normal Conditions	4.2-60
4.2-9	Estimated Daily Operational Emissions/Reductions for Proposed Project Motor Vehicles	4.2-61
4.2-10	Estimated Daily Emissions for Proposed Project Backup Generators	4.2-62
4.2-11:	Estimated Total Daily Emissions for Proposed Project	4.2-63
4.2-12:	Daily Mitigated Construction Emissions for Proposed Project	4.2-68
4.2-13	Estimated Unmitigated Concentration Impacts from Construction Activities for Morning/Evening Scenario	4.2-72
4.2-14	Estimated Unmitigated Concentration Impacts from Construction Activities for Morning/Night Scenario	4.2-73
4.2-15	Estimated Unmitigated Health Impacts from Construction Activities for Morning/Evening Scenario	4.2-76
4.2-16	Estimated Unmitigated Health Impacts from Construction Activities for Morning/Night Scenario	4.2-78
4.2-17	Estimated Mitigated Concentration Impacts from Construction Activities for Morning/Evening Scenario	4.2-81
4.2-18	Estimated Mitigated Concentration Impacts from Construction Activities for Morning/Night Scenario	4.2-82

List of Tables (Continued)

Table		Page
4.2-19	Estimated Mitigated Health Impacts from Construction Activities for Morning/Evening Scenario	4.2-83
4.2-20	Estimated Mitigated Health Impacts from Construction Activities for Morning/Night Scenario	4.2-85
4.2-29	Estimated Mitigated Concentration Impacts from Construction Activities for Morning/Evening Scenario	4.2-101
4.2-30	Estimated Mitigated Concentration Impacts from Construction Activities for Morning/Night Scenario	4.2-102
4.2-31	Estimated Mitigated Health Impacts from Construction Activities for Morning/Evening Scenario	4.2-103
4.2-32	Estimated Mitigated Health Impacts from Construction Activities for Morning/Night Scenario	4.2-105
4.3-1	Summary of Protected Trees Along Market Street	4.3-18
4.3-2	Summary of Protected Trees Along Manchester Boulevard	4.3-19
4.3-3	Summary of Protected Trees Along Prairie Avenue	4.3-20
4.3-4	Summary of Protected Trees Within the CVS Plaza	4.3-22
4.3-5	Summary of Protected Trees Within the Retail Plaza	4.3-23
4.4-1	Summary List of Historic Resources	4.4-33
4.5-1	Annual Energy Demand of Existing Uses within the Project Footprint	4.5-20
4.5-2	Total Electricity Uses During Project Construction	4.5-21
4.5-3	Total Vehicle Fuel Use During Project Construction	4.5-23
4.5-4	Annual Project Electricity Use from Operation	4.5-27
4.5-5	Annual Natural Gas Use During Project Operation	4.5-27
4.5-6	Annual VMT With and Without ITC Project	4.5-29
4.5-7	Annual Vehicle Fuel Use With and Without ITC Project	4.5-30
4.6-1	Significant Seismic Sources Within 100 KM of Project Alignment	4.6-12
4.6-2	Project Consistency with General Plan Safety Element	4.6-36
4.7-1	Description of Identified Greenhouse Gases	4.7-9
4.7-2	California GHG Inventory 2009-2017	4.7-37
4.7-3	City of Inglewood Community GHG Emissions by Sector	4.7-39
4.7-4	Existing Uses Greenhouse Gas Emissions	4.7-41
4.7-5	Estimated Construction Greenhouse Gas Emissions for the Proposed Project	4.7-44
4.7-6	Estimated Annual GHG Emissions for Proposed Project Components	4.7-45
4.7-7	Daily and Annual VMT for the Six Operational Scenarios	4.7-46
4.7-8	Estimated Annual Operational Emissions for Proposed Project for Motor Vehicles	4.7-47
4.7-9	Estimated Annual GHG Emissions for Proposed Project	4.7-48
4.8-1	Civic Center Site-Specific Investigations	4.8-21
4.9-1	Anticipated Project Acquisitions And Easements	4.9-27
4.9-2	SCAG 2020–2045 RTP/SCS Analysis	4.9-46
4.9-3	Project Consistency with General Plan Land Use Element	4.9-52
4.9-4	Project Consistency with Environmental Justice Element	4.9-59

List of Tables (Continued)

Table		Page
4.9-5	Project Consistency with New Downtown and Fairview Heights TOD Plan and Design Guidelines	4.9-65
4.9-6	Project Consistency with Hollywood Park Specific Plan	4.9-68
4.10-1	Common Sounds on the A-Weighted Decibel Scale	4.10-6
4.10-2	Land Use Categories and Metrics for Transit Noise Impact Criteria	4.10-8
4.10-3	FTA Levels of Impact	4.10-9
4.10-4	Proposed Project Anticipated Construction Equipment by Phase	4.10-12
4.10-5	Estimate of Hourly Construction Activity Levels	4.10-15
4.10-6	Proposed Project Study Intersections	4.10-19
4.10-7	Ground-borne Vibration Criteria—Human Annoyance	4.10-21
4.10-8	Ground-borne Vibration Criteria—Architectural Damage	4.10-22
4.10-9	Exterior APM Train Noise Limits	4.10-24
4.10-10	Permissible Noise Exposures for Workers	4.10-28
4.10-11	Long-term (24-hour) Ambient Noise Measurements	4.10-42
4.10-12	Short-term (1-hour) Ambient Noise Measurements (Daytime)	4.10-43-44
4.10-13	Short-term (15-minute) Ambient Noise Measurements (Nighttime)	4.10-45
4.10-14	24-hour Vibration Measurements in Project Vicinity	4.10-50
4.10-15	Phase 1 Proposed Project Construction Noise Levels	4.10-56
4.10-16	Phase 2 Proposed Project Construction Noise Levels	4.10-58
4.10-17	Phase 3 Proposed Project Construction Noise Levels	4.10-60
4.10-18	Phase 4 Proposed Project Construction Noise Levels	4.10-62-63
4.10-19	APM Trains Exterior Noise Levels	4.10-74-75
4.10-20	Source Reference Levels at 50 feet from Border of the MSF Site, Stationary Sources	4.10-80
4.10-21	Modeled Operational Noise Levels	4.10-82-83
4.10-22	Composite Operational Noise (Roadway, APM Trains, and Stationary Sources)	4.10-88-89
4.10-23	Proposed Project Construction Related Vibration Impacts – Building Damage	4.10-93
4.10-24	Proposed Project Construction Related Vibration Impacts – Human Annoyance	4.10-94
4.10-25	Mitigated Proposed Project Construction Related Vibration Impacts – Human Annoyance	4.10-101
4.11-1	Population Growth in the City	4.11-8
4.11-2	Number of Households in the City	4.11-9
4.11-3	Number of Jobs in the City	4.11-10
4.11-4	Job Numbers by Sector in the City	4.11-10
4.11-5	Employment Centers For Inglewood Residents	4.11-11
4.11-6	Estimated Existing Employment	4.11-14
4.11-7	Adjusted Baseline Projects Employment Characteristics	4.11-15
4.11-8	Construction Workforce by Phase	4.11-17
4.11-9	Estimated Job Co-Benefits	4.11-22
4.14-1	Projected Water Supply and Demand in Multiple Dry Years	4.14-21
4.14-2	Water Demand from Existing Uses to be Removed	4.14-22
4.14-3	Wastewater Generation from Existing Uses to be Removed	4.14-24
4.14-4	County of Los Angeles Annual Disposal Tonnage for 2018	4.14-29
4.14-5	In-County Class III Landfills Servicing the City of Inglewood	4.14-29

List of Tables (Continued)

Table		Page
4.14-6	Existing Solid Waste Generation from Existing uses to be Removed	4.14-30
4.14-7	Existing Water and Sewer Utilities	4.14-33-38
4.14-8	Existing Electrical Utilities	4.14-44
4.14-9	Existing Gas Utilities	4.14-46
4.14-10	Proposed Project Water Demand	4.14-55
5.0-1	Environmental Impact Summary	5.0-2
5.0-2	Alternatives Summary	5.0-50
6.0-1	CNDDB Inglewood Quadrant Species List	6.0-12

1.0 EXECUTIVE SUMMARY

This document is a Draft Environmental Impact Report (Draft EIR) for the Inglewood Transit Connector (ITC) Project (proposed Project). This Draft EIR has been prepared by the City of Inglewood (City) as the lead agency for the environmental review of this proposed Project in conformance with the California Environmental Quality Act (CEQA).

1.1 SUMMARY OF PUBLIC OUTREACH

1.1.1 Scoping

The City of Inglewood (City or Inglewood) as the Lead Agency prepared a Notice of Preparation (Original NOP) and an Initial Study (Original IS) which was published on July 16, 2018 (SCH 2018071034) identifying the environmental topics that could have potential significant impacts from the construction and operation of the proposed Project. The Original IS determined that an Environmental Impact Report (EIR) would be prepared in compliance with CEQA to assess potentially significant impacts that may result from the proposed Project. Comments were received from the public and agencies during a 30-day comment period for the Original NOP that ended on August 15, 2018.

As a result of the comments received and in response to refinements and modifications to the proposed Project identified in the Original NOP and Original IS, a Revised NOP and IS were re-circulated to provide an additional opportunity for comment on the potential environmental effects of the from September 10, 2020 to October 12, 2020. Subsequent to the circulation of the Original IS, the State of California Office of Planning and Research (OPR) updated and revised the thresholds contained in the State CEQA Guidelines Appendix G. The Revised IS was updated to address the updated Appendix G checklist that became effective on December 28, 2018.

The Revised NOP and Revised IS reflect the following refinements and modifications made to the proposed Project:

- Changes to proposed Project from an approximately 1.8-mile long alignment with 5 stations to an approximately 1.6-mile long alignment with 3 stations. The revised alignment follows the same route as the original alignment from Market Street and Florence Avenue to Manchester Boulevard to Prairie Avenue terminating at the intersection of Prairie Avenue and Hardy Street.
- Refinements and modifications to the proposed stations as follows:
  - Modify the proposed Project to reduce the total number of stations from the five stations previously considered to the three stations. The original five station locations were at the following:

  - Market Street Station: at the intersection of Market Street and Regent Street on Market Street;
  - Manchester Boulevard Station: between Hillcrest Boulevard and Spruce Avenue on Manchester Avenue adjacent to the proposed Projects maintenance and storage facility (MSF);
  - Forum Station: north of the intersection of Prairie Avenue and Pincay Drive on Prairie Avenue;
  - Hollywood Park Station: between Arbor Vitae Street and Hardy Street on Prairie Avenue adjacent to the City's proposed intermodal transit facility (ITF) located on the southeast corner of Prairie Avenue and E. Arbor Vitae Street; and
  - Century Boulevard Station: at the intersection of Prairie Avenue and Century Boulevard on Prairie Avenue.
- The new locations for the three stations are located at:
  - Market Street/Florence Avenue Station: at an existing commercial plaza on the southeast corner of the intersection of Market Street and Florence Avenue between Market Street and Locust Street;
  - Prairie Avenue/Arbor Vitae Street Station: at the intersection of Prairie Avenue and Pincay Drive; and
  - Prairie Avenue/Hardy Street Station: at the intersection of Prairie Avenue and Hardy Street.
- A pedestrian bridge linkage has been added to connect the Market Street/Florence Avenue Station with the Metro Crenshaw line on the northside of Florence Avenue.

- Removal of the Intermodal Transit Facility (ITF) as part of the proposed Project; the City is proceeding with the ITF project separately.
- Reduce the potential number of traction power substations from three to two. One will be co-located with the proposed Project's maintenance and storage facility (MSF facility) and the other will be located on the City's ITF site on Prairie Avenue.

(See **Appendix 2.0.1a: Revised Notice of Preparation (Revised NOP) and 2.0.1b Original NOP**; **Appendix 2.02a Revised Initial Study (IS) and 2.0.2b Original IS**; and **Appendix 2.0.3 Summary of Comments Received on the NOP and IS Memorandum**).

The City submitted both the Original and Revised NOPs and Initial Studies to the Governor's Office of Planning and Research State Clearinghouse for distribution to State agencies; applicable trustee or responsible federal, State, regional, and local agencies identified for the proposed Project, including adjacent cities and counties; the County of Los Angeles; local Native American tribes; and all interested parties requesting such notice to allow for comment on the IS during the 30-day comment period. The Original and Revised NOP distribution lists indicating the agencies, departments, tribes, and parties that

were mailed certified copies of the Original and Revised NOPs is provided as **Appendix 2.0.1: Notice of Preparation**. In addition, copies of the Original and Revised ISs were made available for review at Inglewood City Hall and the Inglewood Public library, as well as on the City's website, to give the public the opportunity to comment on the both the Original and Revised ISs during the respective 30-day comment periods.

A robust public outreach effort has been conducted to over a two year period starting in 2018 until the publication of this document in 2020. This effort includes over 35 community and stakeholder outreach meetings with a variety of stakeholders including local Inglewood block clubs, neighborhood watch groups and homeownership associations (HOA) such as the Renaissance HOA, Carlton Square HOA, Briarwood HOA, Regent Street HOA, and the Hyde Park Village HOA. The City also engaged the NCAAP Inglewood Chapter, Inglewood Airport Area Chamber of Commerce, Rotary Club of Inglewood, Inglewood Unified School District, local churches, and community-based nonprofits including the Social Justice Learning Center Institute, Move LA, The Enrichment Center, and the Coalition for Clean Air.

1.2 SUMMARY OF THE PROPOSED PROJECT

1.2.1 Project Overview

The proposed Project will provide a transit connection from downtown Inglewood and the Crenshaw/LAX Metro line to the City's major activity centers, including the Forum, the Los Angeles Stadium and Entertainment District (LASED) as Hollywood Park, and the Inglewood Basketball and Entertainment Center (IBEC). The transit system will consist of an elevated automated people mover (APM) system that will have dual guideways to allow trains to travel continuously in each direction. Several trains will likely be operating at any time, depending upon ridership needs.

As currently envisioned, the transit system will have three stations including: Market Street/Florence Avenue station, Prairie Avenue/Pincay Drive station, and Prairie Avenue/Hardy Street station. Station design capacity would be established by pedestrian demand volumes under typical peak conditions, in addition to increased demand during special events, service disruptions, and emergency evacuation situations. Stations would provide pedestrian access to the elevated APM from existing sidewalk and pedestrian travel areas adjacent to the station locations. Final station locations and configurations will be determined during the design and procurement process.

Upon approval, the City anticipates to contract with a design/build/finance/operate/maintain (DBFOM) contractor to complete the proposed Project. With the DBFOM approach, the responsibilities for designing, building, financing, operating, and maintaining the Project are bundled together and transferred to private sector partners. More detailed design plans and design specifications would be

drafted and included as part of the procurement process. As part of the procurement and project implementation process, the Public Works Director in consultation with the Economic & Community Development Director will have the authority to review each ITC system project for compliance with all applicable provisions of (i) the ITC Design Guidelines, (ii) the ITC Construction Commitment Program, (iii) all additional technical, aesthetic, and other specifications contained in the procurement document(s) for the applicable ITC system component(s), and (iv) all requirements of the Mitigation Monitoring and Reporting Program that will be included in the ITC Final Environmental Impact Report.

Existing infrastructure along the transit alignment may need to be relocated or reconfigured to accommodate new elevated transit guideway structures and stations. In addition to surface improvements, utility infrastructure under the roadway surface may need to be relocated to accommodate the guideway columns, footings, and other components.

1.2.2 Background

The City of Inglewood is currently undergoing continued transformation into a sports and entertainment destination within the greater Los Angeles region through a number of completed and ongoing projects in the City. The Metro Crenshaw/LAX Line, set to open in 2021, will enhance transit access to the City. The revitalized Forum now hosts some of the largest entertainment acts in the country. The redevelopment of approximately 298 acres at the Los Angeles Sports and Entertainment District at Hollywood Park (LASED) includes new residential, commercial, and recreational uses. At the centerpiece of LASED is the new SoFi Stadium which is home to the Los Angeles Rams and the Los Angeles Chargers.

In 2018, the Los Angeles Clippers of the National Basketball Association (NBA) announced a proposal to relocate the team's headquarters, training facilities, and new arena to the City. In August 2020, the City approved the Inglewood Basketball and Entertainment Center and now the project is moving into implementation. In addition, a new Los Angeles Philharmonic music and cultural campus for the Youth Orchestra Los Angeles (YOLA) designed by architect Frank Gehry, will also be headquartered in Inglewood and is set to open in 2021

As Inglewood is transformed into a major regional activity center, the number of vehicular trips associated with new jobs, retail, entertainment, and residential opportunities is anticipated to increase. Based on historic traffic counts, traffic volumes have been increasing at the rate of 1.5 percent per year, and many key intersections and highway corridors are already experiencing congestion. According to the traffic study for the Hollywood Park Stadium Alternative project performed in 2015, while roughly 85 percent of patrons are anticipated to use privately owned vehicles and 15 percent will rely on transit or charter buses for stadium events and games, these modes will still compete to utilize the same traffic corridors within the City that may be physically constrained or congested. Moreover, the Southern California Association

of Government's (SCAG) *2016–2040 Regional Transportation Plan/Sustainable Communities Strategy* Regional Travel Demand Forecasting Model projects substantial socioeconomic and demographic growth throughout the six-county Southern California region. According to SCAG, population, housing, and employment growth are expected throughout the Cities of Los Angeles, Inglewood, and Culver City; unincorporated areas of Los Angeles County; and portions of the South Bay, consisting of the Cities of El Segundo and Hawthorne, among others. The City is working to manage this growth in a sustainable and responsible way, ensuring that residents, businesses, and visitors have convenient and efficient access to new housing, employment, and destination centers, and important city resources.

The City is building on the progress made by the Los Angeles County Metropolitan Transportation Authority (Metro) to develop the County's regional rail network and to create more transportation options associated with the opening of the Crenshaw/LAX Line. The need exists for Inglewood's existing transportation infrastructure and circulation system to be updated, for capacity to be maintained or enhanced on major arterial streets where possible; for Metro and municipal bus operations and service to be increased, and most importantly, for the Metro Rail system to be directly connected to the City's major housing, employment and activity centers.

To address these critical mobility issues, Inglewood has partnered with Metro to analyze viable transit connection options from the Metro Crenshaw/LAX light rail line to the LASED. With the City's input, in 2017, Metro conducted a study to explore how best to connect Inglewood's future LASED to Metro's rail system via a high-capacity transit connection. The Metro study analyzed (1) an interlined operability connection from the Crenshaw/LAX Line in a subway under Prairie Avenue, which also would jointly operate on a portion of the Crenshaw/LAX Line; and (2) independent operability options for independent services that could provide connections from the Metro Rail system at nearby Metro stations along the Crenshaw/LAX line to the NFL stadium. At the conclusion of the study, the City and Metro agreed that the interlined operability scenario is infeasible due to the cost and complexity that would be created on the Metro Rail system. Now, consistent with Metro's recommendations, Inglewood has analyzed alternatives and developed an independent operability transit proposal to connect the City's activity centers to Metro Rail system.

The City proposes the Inglewood Transit Connector project to increase transit mode split, reduce vehicle trips, improve congestion and circulation, and reduce per-capita vehicle miles traveled to the City's major activity centers, with corresponding improvement in air quality, public health, and reductions in greenhouse gas emissions from transportation sources in accordance with the City's goals under SB 375 and State policy with respect to climate change. When completed, the project would also provide a critical transportation connection during the 2028 Summer Olympic Games as the new SoFi Stadium is slated to host the Opening and Closing Olympic Ceremonies.

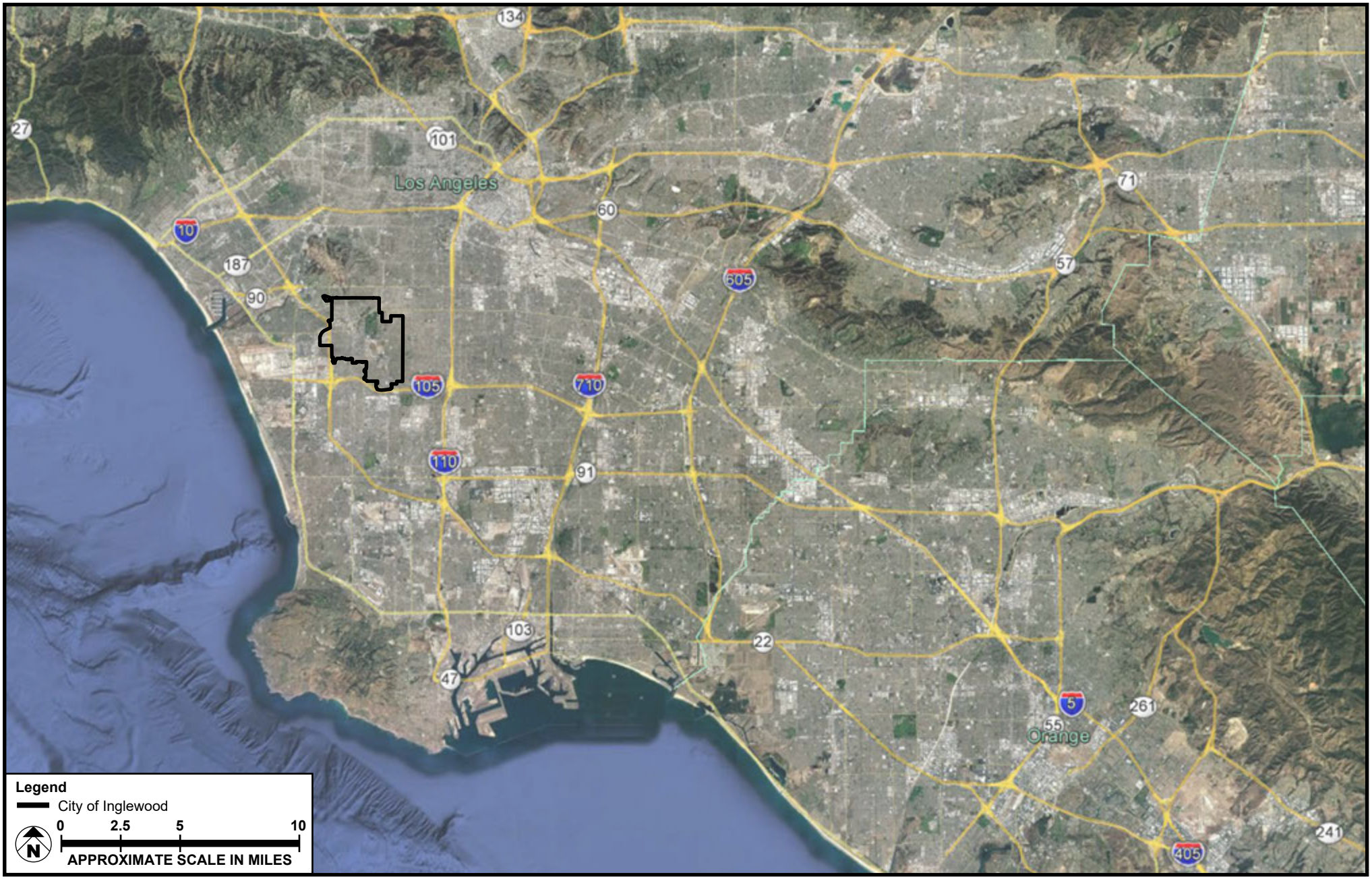
On April 21, 2020, the California State Transportation Agency awarded Inglewood a $95.2 million grant that will go toward the Inglewood Transit Connector Project (ITC Project). Additionally, on March 9, 2020, the South Bay Cities Council of Governments also voted to reallocate $233 million in Measure R sales tax revenue that had been slated for highway improvements to the ITC Project.

This EIR describes the City's further examination and comparative analysis of alternative transit connection concepts, as well as the Project's delivery and implementation strategies.

1.2.3 Project Location

The proposed Project is located in the central and northern portions of the City of Inglewood east of the San Diego Freeway (I-405) and north of the Glen Anderson Freeway (I-105) in Los Angeles County, California (see **Figure ES-1: Project Regional Location Map**).

The ITC will be constructed in an area generally bounded by the Metro Crenshaw/LAX Line in the north; Century Boulevard in the south; the NFL stadium and the Forum to the east; and La Brea Avenue to the west (see **Figure ES-2: City of Inglewood**). The Project extends from the intersection with the Metro Crenshaw/LAX Line north of downtown Inglewood, south through Market Street, then east on Manchester Boulevard, turning south on Prairie Avenue until its intersection with Hardy Street (see **Figure ES-3: Project Vicinity Map**). The APM will be largely located within the public rights-of-way for the streets and sidewalk areas along Market Street, Manchester Boulevard, and Prairie Avenue **(See Figure ES-4: Location of Alternative Alignments in the LPA Report**). The entire Project is situated within the City of Inglewood, an incorporated city within Los Angeles County.

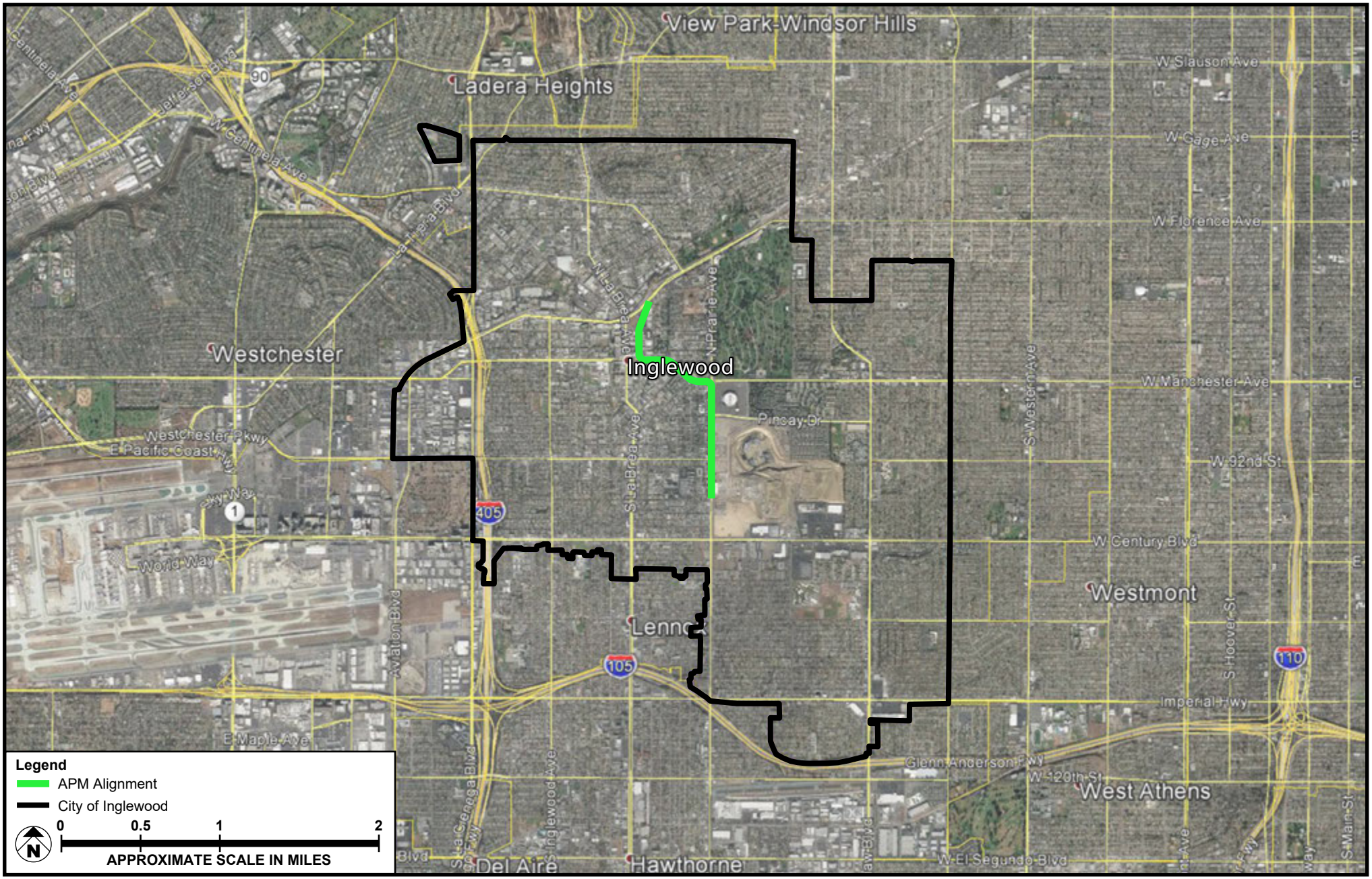


SOURCE: Google Earth - 2020

FIGURE **ES-1**

Project Regional Location Map

208-001-18

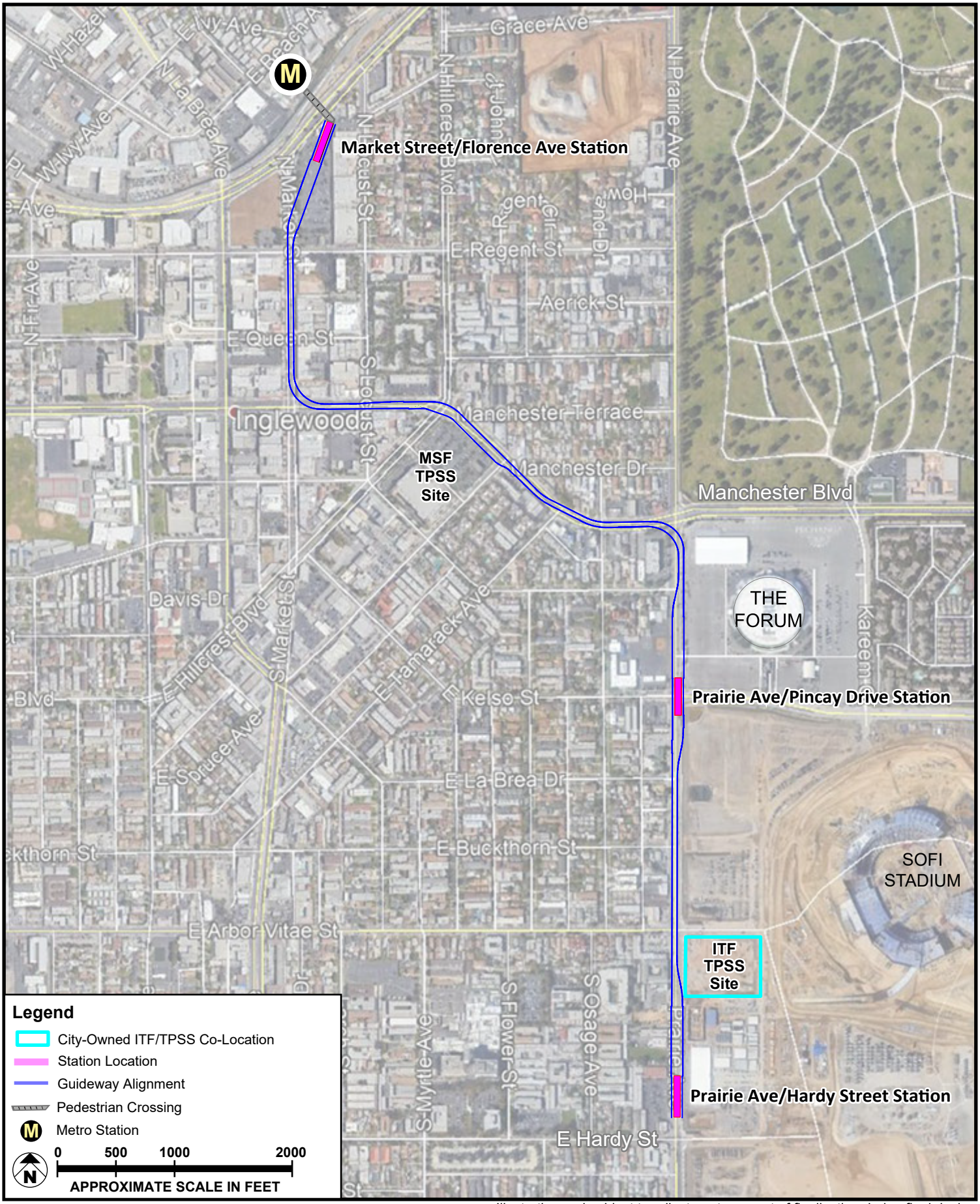


SOURCE: Google Earth - 2020; Meridian Consultants - 2020

FIGURE **ES-2**

City of Inglewood

208-001-18



SOURCE: Google Earth - 2020; Meridian Consultants LLC - 2020

Illustrative and subject to adjustments as part of finalization during final design

FIGURE **ES-3**

Project Vicinity Map

208-001-18



SOURCE: City of Inglewood - 2018; Meridian Consultants - 2019

FIGURE **ES-4**

Location of Alternative Alignments in the LPA Report

208-001-18

1.2.4 Project Objectives

Section 15124(b) of the State CEQA Guidelines states that the Project Description shall contain "[a] statement of the objectives sought by the proposed project." In addition, Section 15124(b) of the State CEQA Guidelines further states, "[t]he statement of objectives should include the underlying purpose of the project."

The City's goals and objectives for the Inglewood Transit Connector Project are as follows:

- Provide direct and convenient connection to the Metro regional transit system for local residents and the region to access the City's new major employment, commercial, and activity centers;
- Provide sufficient transit connection capacity between the Metro regional transit system and the City's new major activity centers with enhanced travel time certainty and sufficient capacity to meet peak ridership demands to encourage transit as a travel mode choice;
- Maintain existing roadway capacity;
- Reduce the City's traffic congestion and alleviate growing demand on the existing roadway network on both major arterials and residential streets for both nonevent and event days;
- Encourage intermodal transportation systems by providing convenient, reliable time-certain transit;
- Increase transit mode split, reduce vehicle trips, and reduce per-capita vehicle miles traveled to the City's major activity centers, with corresponding improvement in air quality, public health, and reductions in greenhouse gas emissions from transportation sources in accordance with the City's goals under SB 375 and State policy with respect to climate change;
- Support the ongoing economic revitalization, growth opportunities for transit-oriented development (TOD) within the Downtown TOD Plan area, including commercial and residential uses, including through the creation of public parking facilities;
- Encourage redevelopment and investment within the City in areas served by the proposed Project;
- Provide safe, reliable, and convenient access to businesses in the City so that they are accessible to their workforce and customers;
- Connect the Inglewood community and citizens to jobs, education, services, and destinations within the City and within the region by providing transit within safe and accessible walking distances; and
- Support regional efforts to become more efficient, economically strong, equitable, and sustainable.

The ITC Project reflects the City's commitment to providing adequate transportation connections to its current and proposed major housing, employment, and activity centers, and to address the critical first/ last mile gap with a fixed-guideway transit connector.

1.2.5 Construction Commitment Program

As part of the Project, the City of Inglewood has developed a Construction Commitment Program to pro-actively address the effects of the construction of the APM project on the community.

To address the effects of the construction activities on traffic conditions, the City will establish a Project Task Force for the ITC Project that would review worksite traffic control plans and other traffic management plans developed by the Project contractor(s) for the Project to ensure these plans address:

- Assessing traffic conditions to determine the need for additional traffic signals, signs, lane restriping, signal modifications, etc.
- Establishing detour routes after assessing the effect on passenger, bicycle and vehicle traffic and businesses
- Maintenance of adequate access for businesses and residents
- Coordination of any temporary street closures and restricted access with all special events
- Notification of the public through signs and web-based media
- Coordination with residential and commercial neighbors on scheduled construction activities
- Working with City of Inglewood and LA County police and fire personnel regarding maintenance of emergency access and response times
- Monitoring and coordination of deliveries

All haul routes and activities will need to be reviewed and approved with truck deliveries of bulk materials and hauling of soil scheduled during off-peak hours to the extent feasible and on designated routes including freeways and nonresidential streets.

Parking, staging, or queuing of Project-related vehicles, including workers' vehicles, trucks, and heavy vehicles, shall be prohibited on City streets at all times except in defined workspace areas defined in an approved Worksite Traffic Control Plan. Construction Staging or Worksite Traffic Control Plans will also be required to include a parking management plan to ensure on-street and other publicly available parking remains available.

Construction noise reduction measures in this Program require the use of construction equipment that generates the least amount of noise, use of temporary noise barriers, and restrictions on the use of heavy equipment that create vibration near sensitive uses and buildings. Contact information for a Community Affairs Liaison will be posted throughout the construction area. This liaison shall respond to any noise complaints within 24 hours.

The air emissions reduction measures require use of the best commercially available equipment meeting the highest standard for minimizing air emissions and the use of electric powered equipment or equipment not powered by diesel engines where possible.

To ensure that any hazardous materials encountered during construction are appropriately addressed, building demolition, hazardous materials contingency, soils management, and health and safety plans will be prepared and implemented during construction.

All lighting needed to support construction activities will be required to meet defined standards to avoid impacts to adjacent uses and all stockpile area will be required to be in the least visible areas as approved by the City.

Removal of trees and other landscaping will be minimized and any trees removed will be replaced within 6 months of work being completed in affected areas.

The Construction Commitment Program also includes business and community support programs, including advertising support for businesses, advance notice of construction activities that may affect businesses or the community, and access to a Project Public Liaison to address any concerns related to construction. These programs will include:

- Business outreach and support programs for the purpose of assisting those businesses financially affected by the construction;
- Planning and scheduling construction activities to minimize effects on community gatherings, special celebrations, or other similar events;
- Public information campaigns conducted to encourage patronage of businesses during the construction period; and
- Implementation of educational safety awareness program at schools adjacent to construction activity along the proposed Project to provide information to students and parents.

1.2.5 Project Characteristics

The proposed Project includes the following components:

- An APM train operating on an elevated dual lane guideway with three stations;
- Passenger walkway systems connecting the stations to the street, mezzanine areas, escalators and elevators, storage areas, communications systems, and signage, among other features;
- An MSF to provide regular and preventive maintenance of the APM trains and equipment, as well as space for storage of the vehicle fleet and the operations control center, among other functions;

- TPSSs located at the MSF site and the City's Civic Center site on Prairie Avenue to provide power for the proposed Project including traction/propulsion, auxiliary and housekeeping power;
- Utility infrastructure—new, modified and/or relocated—to support the proposed Project;
- Roadway and streetscape modifications and improvements to accommodate the guideway alignment and support structures; and
- Surface public parking lots located at the Market Street/Florence Avenue Station, which will also contain multimodal pick-up and drop-off areas, 150 S. Market Street, and the MSF site to support use of the ITC Project and Downtown Inglewood; and
- Land acquisitions, acquisitions of air rights, easements and encroachment rights, subdivision of parcels, and/or other reconfigurations of parcels, dedications, vacations and/or temporary closures of public rights-of-way, as necessary. The City will contract with a design/build/finance/operate/maintain (DBFOM)contractor to complete the proposed Project. With the DBFOM approach, the responsibilities for designing, building, financing, operating, and maintaining the Project are bundled together and transferred to private sector partners. In this structure, the City will enter into an agreement with a private sector party to finalize the design, build, operate, and maintain the APM system.

1.3 SUMMARY OF ENVIRONMENTAL IMPACTS

Based on the Revised Initial Study (September 2020), the City determined that preparation of an EIR was required to further evaluate potentially significant impacts of the Project related to the following environmental topics: Aesthetics, Air Quality, Biology Resources, Cultural Resources, Energy, Geology and Soils, Greenhouse Gas, Hazards and Hazardous Waste, Land Use, Noise and Vibration, Population, Employment, and Housing, Transportation, Tribal Cultural Resources, and Utilities and Service Systems..

Impacts related to Agricultural and Forestry Resources, Hydrology and Water Quality, Mineral Resources, Public Services, Recreation, and the Initial Study Mandatory Findings of Significance were determined to be less than significant in the Revised Initial Study. These environmental topics are not evaluated further in this Draft EIR.

Table 1.0-4: Summary of Findings included at the end of this section presents a summary of findings for each of the resources analyzed in this EIR for the proposed Project. A summary of impacts for each resource category is presented below. Detailed analysis is included in **Section 4.0: Environmental Impact Analysis** of this Draft EIR.

1.3.1 Aesthetics

Existing Conditions

The proposed Project is located entirely within the City, approximately 5.5 miles east of the Pacific Ocean, within a broad coastal plain surrounded by rising land to the south and north, and more-level terrain extending east. The City is a highly developed urban area containing moderately dense development along major corridors that consist of commercial, residential, and industrial uses. Street corridors in the City provide the only long-range views available in the City, including limited views of Baldwin Hills to the north and other urban areas in and surrounding the City. Overall, the views within and surrounding the City are consistent with the views of a highly developed urban area.

No designated or otherwise identified scenic views or vistas are located within or visible from the City.[1] The City's General Plan states that no forest resources, wildlife, fisheries, shorelines, or agricultural land are present in the City,[2] nor does the General Plan designate any scenic vistas within the City or its vicinity. Further, there are no designated or eligible State scenic highways within or adjacent to the Project area.[3] The nearest State scenic highway is Interstate 110 between mile post 25.7 and 31.9, which is located north of downtown Los Angeles and south of Interstate 210 in Pasadena. The closest portion of this scenic highway is approximately ten miles northeast of the Project boundary.

Additionally, the Project area is not near any designated wild or scenic rivers pursuant to the National Wild and Scenic Rivers System.[4] The nearest mountains, the Santa Monica Mountains, are more than 10 miles north of the Project boundary. No views of these mountains or of any other focal points or broad panoramic view corridors are available from public rights-of-way along the proposed alignment.

Visual Impacts

Overall, the APM structure, including the stations, guideway, MSF, and support facilities, would complement the existing surrounding by using transparent and neutral tones as part of its design character. The design would be in the modernist style to enhance the aesthetically pleasing quality of the structure. To prevent unsightly views and defacing of the structure, the exterior material would be anti-graffiti and anti-vandalism. The final design of the stations would also reflect its surroundings in Downtown Inglewood and the new developments on Prairie Avenue. The light and glare impacts during construction

1 Google Earth, 2020.
2 City of Inglewood *General Plan*, "Conservation Element" (1997), 1.
3 California Department of Transportation, California Scenic Highway Mapping System, Los Angeles County, http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/, accessed August 2018.
4 US Fish and Wildlife Service, *National Wild and Scenic Rivers System*, available at https://www.rivers.gov/, accessed August 31, 2018.

and operation would be less than significant with the incorporation of various measures and compliance with the ITC Design Guidelines.

The design of the APM guideway would generally allow the continued expression of the buildings identified as historic resources along Market Street in Downtown Inglewood. While the Project would not result in significant impacts to the overall visual character of Downtown Inglewood along Market Street, the guideway would obstruct views of the former Fox Theater building, identified as a historic resource due the architectural design of the building. Mitigation measures and project design features included in the ITC Design Guidelines would reduce this impact to the extent feasible, however, this indirect impact on the visual character of this building would be a significant and unavoidable impact of the Project.

Visual impacts associated with construction of the proposed Project would be less than significant with the implementation of various measures included in the ITC Construction Commitment Program or identified as mitigation measures. The construction activities would also be phased to limit the exposure of one segment from continual exposure to construction activities and unpleasant views. Construction activities on each segment, and overall, would be temporary in nature and visual impacts would be alleviated once the construction is completed.

Additionally, the proposed Project would be generally consistent with the existing zoning and planning regulations governing scenic quality. The proposed Project would be designed to be complementary with the visual character defined in the City's Downtown TOD Plan and the Hollywood Park Specific Plan for areas located adjacent to the proposed alignment to the extent feasible. An amendment to General Plan Policy 2.3, Preservation of Historic Fabric, is proposed as part of the Project to recognize the incorporation of the proposed Project into Market Street in Downtown Inglewood. This amendment would be consistent with the goals of the General Plan.

1.3.2 Air Quality

Emissions Thresholds

During operation, emissions would be generated by the proposed Project from various sources including employee trips, deliveries, area sources, energy sources (natural gas), and motor vehicles. However, operation of the proposed Project would reduce emissions from motor vehicles when compared to future conditions without the proposed Project. As such, due to the reduction in motor vehicle emissions and elimination of existing sources, the proposed Project would result in net negative emissions. Moreover, during normal operation the proposed Project would not exceed SCAQMD operational thresholds.

Construction of the proposed Project has the potential to temporarily emit air pollutants through the use of heavy-duty construction equipment, through vehicle trips generated from workers and haul trucks

traveling to and from the Project Site, from demolition and various soil-handling activities, and from the use of diesel powered on-and off-road vehicles and equipment. In addition, fugitive dust emissions would result. Because of the size and number of overlapping construction activities, even with implementation of mitigation measures, such as use of off-road diesel-powered construction equipment that meets or exceeds Tier 4 Final off-road emissions standards or equivalent for all equipment rated at 50 horsepower or greater, dust control measures, and maximizing the use of electric-powered construction equipment, construction-related daily emissions would exceed the SCAQMD significance threshold for NOx.

Exposure to Pollutants

The analysis in the EIR evaluated the exposure of people to a range of specific pollutants, including CO and NO_2, both of which can contribute to breathing disorders and compromised lung function. In all cases, the concentrations of these pollutants with mitigation, even when combined with existing ambient concentrations and the effects of increased activity in the vicinity from future off-site projects, are below the State and federal health-based thresholds. In addition, concentrations of small particulate matter would be less than the allowable incremental increase thresholds established by the SCAQMD.

The analysis also examined the potential for sensitive receptors (residents, workers, school children, and day-care children) in the Project vicinity to be exposed to toxic air contaminants which are known to cause health risks, including cancer. The analyses concluded that, after mitigation, exposures to contaminants that would increase cancer or non-carcinogenic risks would be below the established thresholds.

1.3.3 Biological Resources

The proposed Project is located within a highly developed and urbanized area and potential biological resources are limited to a few small parks. Sensitive animal and plant species and vegetation communities identified in the California Natural Diversity Database as having the potential to occur within a 0.25 mile radius of either side of the proposed Project guideway, stations, and support facility sites are largely absent. Biological resources that would be affected by development of the proposed Project are limited to trees located along the Project alignment and within the property proposed for acquisition as part of the Project. None of the trees potentially affected are native or considered to be rare, endangered, or sensitive species, but 541 are protected under the City of Inglewood Tree Protection Ordinance (Inglewood Municipal Code Chapter 12, Article 32), and these or others could serve as nesting habitat for migratory or other protected bird species. The removal of these trees could create impacts, especially if the trees are removed during the bird nesting season. These impacts would be mitigated to a less-than-significant level through the conduct of preconstruction surveys prior to any nesting season tree removal, protection of trees with active nest sites during construction, through obtaining necessary City permits to remove existing trees, and through protection or replacement of removed trees at a 1:1 ratio minimum as

determined by the City. All trees removed to accommodate the Project will be replaced in accordance with the City's Tree Protection Ordinance and additional standards in the ITC Construction Commitment Program. No permanent impacts to trees located along the alignment would, therefore, result from the Project.

1.3.4 Cultural Resources

Historic Resources Impacts

The Project Site is located in a part of Inglewood known to contain historic-age buildings, which include eleven identified historical resources.[5] Of these historical resources, the proposed APM guideway would result in significant impact to two of these resources: the former Fox Theater at 115 Market Street and the former People's Federal Building & Loan Association building located at 150 Market Street. The APM guideway would be located directly in front of the former Fox Theater building and would visually obscure a portion of the sign pylon, creating a visual separation between the uppermost portion of the pylon and the lower portion of the building containing the theater marquee and public entrance. The APM guideway would also block views of the primary façade of the building, making it difficult to appreciate the overall design of the building. Because the ability of the former Fox Theater to convey its historic significance would be impaired following the implementation of the proposed Project, the indirect impact on the former Fox Theater is identified as a significant impact of the Project that cannot be avoided.

As the guideway turns east on Manchester Boulevard, it would partially intrude into the former People's Federal Building & Loan Association building located at 150 S. Market Street. The intrusion is necessary to accommodate for the turning radius of the guideway at this location. Acquisition and demolition of this building is proposed to accommodate the guideway. Demolition of this building is identified as a significant impact of the Project that cannot be avoided.

Archaeological Resources Impacts

The cultural resource records search and field visit conducted did not result in identifying any prehistoric or historical archaeological resources within the Project study area.[6] Further, the built nature of the area indicates a high degree of disturbance suggesting the likelihood of encountering intact archaeological deposits near the surface of the Project area to be very low. Implementation of mitigations would reduce the potential impacts to archaeological resources to a less than significant level.

---

5 Historical Resources Technical Report. Inglewood Transit Connector. November 19, 2020.

6 See **Appendix 4.4.1** of this Draft EIR.

Human Remains

Implementation of mitigations would reduce the potential impacts to human remains to a less than significant level.

1.3.5 Energy Resources

Operation of the proposed Project would reduce annual VMTs under all scenarios and would therefore reduce annual petroleum consumption. Specifically, under the Adjusted Baseline scenario, the proposed Project would reduce annual fuel consumption from 49,373,645 gallons to 49,049,088 gallons, a decrease of 324,557 gallons. Under the Future (2026) Non-Event scenario, the proposed Project would reduce annual fuel consumption from 46,722,216 gallons to 46,341,084 gallons, a decrease of 381,133 gallons. Under the Future (2026) All Event scenario, the proposed Project would reduce annual fuel consumption from 50,499,092 gallons to 49,377,161 gallons, a decrease of 1,121,931. Under the Future (2045) Non-Event scenario, the proposed Project would reduce annual fuel consumption from 41,714,897 gallons to 41,353,725 gallons, a decrease of 361,172 gallons. Under the Future (2045) All Event scenario, the proposed Project would reduce annual fuel consumption from 44,782,905 gallons to 43,660,847 gallons, a decrease of 1,122,058 gallons.

During construction, the proposed Project would generate a demand for 172,177 kWh of electricity and up to 568,815,635 gallons of petroleum each year. Electricity for operation of the proposed APM system would be provided via two traction power substations (MSF TPSS and TPSS at the City's Civic Center site on Prairie Avenue). The electricity demand for the proposed Project during normal operation would be 22,003,403 kWh (22.0 GWh) per year.

Because the proposed Project would support statewide efforts to improve transportation efficiency, comply with the CALGreen building code, and comply with other State and local plans and policies, the energy consumption from the proposed Project would not be wasteful, inefficient, or unnecessary, and would impacts would be less than significant.

1.3.6 Geology and Soils

The proposed Project would be constructed consistent with the requirements of the California Building Code. The Project study area is in a relatively level area with soils made up of artificial fill overlying native alluvial and older alluvial deposits, liquefaction zone area, or within areas designated as having the potential for seismically induced landslides and is not be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the proposed Project. The Project alignment is located in an area that contains potentially active faults, including the Townsite, Centinela Creek, Cemetery Fault, and Manchester Faults. The Townsite fault may intersect the Project alignment, stations, and near the MSF.

Although the Townsite, Centinela Creek, Cemetery, and Manchester faults are not presently mapped as Alquist-Priolo Earthquake Zoning Act (APEFZ) faults, or situated within a delineated APEFZ, their location within the active Newport-Inglewood fault zone and proximity to the Project alignment suggests these faults should be considered active with the potential for fault rupture and impacts would be potentially significant. Designing the Project in conformance with the 2019 CBC[7], Caltrans guidance, and applicable seismic design criteria identified in mitigation measures would reduce potential impacts to less than significant.

The Potrero Fault lies approximately one-quarter mile to the east of the project study area; however, compliance with the California Building Code would avoid the creation of seismic hazards. Construction of the Proposed Project would involve substantial grading and excavation that could leave soils exposed for periods of time and susceptible to erosion. This potential impact would be mitigated through the preparation of a Stormwater Pollution Prevention Plan (SWPPP), which would describe best management practices (BMPs) to ensure the proposed Project would not result in substantial erosion or loss of topsoil.

As mentioned above, the Project alignment is known to be underlain by artificial fill atop undisturbed alluvial soils and geological formations in which Ice Age fossils have been found within several miles of the Project alignment and that are considered paleontologically sensitive. Thus, it is possible that previously unknown buried paleontological resources within the Project alignment could be impacted during construction. To reduce potential impacts to less than significant, a qualified paleontologist would be required to develop a program for monitoring of certain ground disturbing activities, and for handling of paleontological materials if discovered.

1.3.7 Greenhouse Gas Emissions

By providing a new transit option in the City, the proposed Project will reduce VMTs and GHG emissions generated by vehicular travel. Specifically, annual $MTCO_2e$ would be reduced by 2,831 $MTCO_2e$ when compared to the Adjusted Baseline without proposed Project, 9,809 $MTCO_2e$ when compared to the 2026 opening year without proposed Project, and 9,778 $MTCO_2e$ when compared to the 2045 future year without proposed Project. The proposed Project would be consistent with State and local plans and policies to achieve Statewide goals for GHG reduction, including Governor's Executive Order S-3-05, the California Air Resources Board 2017 Scoping Plan, SCAG's 2020 RTP/SCS, and the City's Energy and Climate Action Plan.

---

[7] 2019 California Building Standards Code (Cal. Code Regs., Title 24) published July 1, 2019.

Construction of the Project is estimated to generate approximately 14,348 metric tons of CO_2e greenhouse gas (GHG) emissions. Given the five-year construction period, the annual construction GHG emissions for the proposed Project would be 2,870 metric tons of CO_2e. Operational emissions were estimated for the anticipated start of operations in late 2026 and a milestone year of 2045. Due to advances in technology and regulations to reduce GHG emissions operational emissions would continue to decline by 2056, and thereafter. The normal operation of the proposed Project would generate 7,742 $MTCO_2e$ per year from the operation of the MSF, stations, and other facilities. Each TPSS will be equipped with backup power generators which are estimated to generate 311 $MTCO_2e$ per year, bringing the total GHG emissions from operations to 8,053 $MTCO_2e$ per year.

1.3.8 Hazards and Hazardous Materials

The Hazards and Hazardous Materials section addresses potential effects of the proposed Project that Based on searches of environmental database and collection of on-site soil and soil gas samples, the proposed Project is located in an area that includes historic land uses that used or stored hazardous materials.

Operation of the Project would include the use and storage of hazardous materials typical of those used in an industrial setting and would comply with federal, State, and local regulations governing the handling of any hazardous materials, and applicable regulatory requirements to responding to accidental release of such hazardous maintenance materials. Operation of the proposed Project would not interfere or impair with the City's ability to increase public awareness or make any improvements to emergency services and warning systems. With adherence to the federal, State, and local safety requirements, the proposed Project would not conflict with the requirements of an emergency response plan or emergency evacuation plan and impacts from operation of the Project would be less than significant.

Soil sampling confirms the potential for encountering contaminants of concern that could result in adverse health effects if not handled appropriately during construction. In addition, structures within the APM guideway footprint that would be demolished prior to construction of the proposed Project could contain hazardous building materials that would require appropriate identification, handling, and disposal. The potential exposure of construction workers or nearby residents and workers to these existing hazards would be reduced to a less than significant level through compliance with existing State and federal laws and regulations, and through implementation of plans addressing the handling of any hazardous materials encountered during construction that would be developed as part of the ITC Construction Commitment Program prior to the start of construction.

1.3.9 Land Use and Planning

Analysis of the potential for the proposed Project to physically divide the existing community and conflict with applicable land use plans, policies, and regulations was conducted. The proposed Project would primarily be contained within the public right of way of Market Street, Manchester Boulevard, and Prairie Avenue with the MSF and other support facilities, including public parking, located on adjacent properties. The APM guideway, stations, and associated facilities would not physically divide the community, nor disrupt existing patterns of traffic connecting different parts of the community. While the proposed Project infrastructure would be constructed over existing streets, these streets would be reconfigured to maintain the same number of lanes as currently exist.

The proposed Project includes amendments to the City's General Plan and the proposed adoption of the Transportation Corridor Overlay Zone to reflect the integration of the ITC Project into the City's circulation system. The proposed General Plan Amendment and Transit Overlay Corridor Zone are consistent the overall goals of the City's General Plan. The proposed Project is also consistent with the goals or transportation planning in the SCAG 2020-2045 Regional Transportation Plan/Sustainable Community Plan as the Project will reduce VMT in the City and region. The proposed Project would not conflict with goals, objectives, or policies adopted for the purpose of mitigating environmental impacts.

1.3.10 Noise and Vibration

Operational Noise

The ITC Project is designed to meet the City's goals and objectives related to the reducing the City's traffic congestion and alleviate growing demand on the existing roadway network by encouraging and providing the use of intermodal transportation systems. The proposed Project is intended to reduce vehicle trips and roadway noise levels. Under all operational scenarios, the roadway conditions with implementation of the proposed Project would not exceed the threshold of significance of an increase in noise level of 3 dBA Leq to or within the "normally unacceptable" or "clearly unacceptable" land use compatibility categories or result in an increase of 5 dBA or greater at the sensitive land use when it would exceed 65 dBA DNL or CNEL.

The proposed Project would either utilize large, automated monorail technologies or rubber-tire vehicles operating along a fixed guideway. When compared to ambient conditions, daytime noise level increases from the rubber-tired APM trains would result in a maximum of 0.2 dBA Leq (Lday). Additionally, nighttime noise levels increase would result in a maximum of 0.8 dBA Leq (Lnight). When compared to ambient conditions, daytime noise level increases from the monorail technology would result in a maximum of 0.7 dBA Leq (Lday). Additionally, nighttime noise levels increase would result in a maximum of 1.9 dBA Leq

(Lnight). As such, operational noise levels would not result in increases of 3 dBA to or within the "normally unacceptable" or "clearly unacceptable" compatibility category for land uses.

Anticipated noise levels from stationary sources from the proposed MSF would range from no increase to a high of 4.4 dBA. Considering the ambient environment, exterior noise levels during the nighttime period at Site I would be 62.9 dBA Leq (Lnight). Although nighttime noise levels would increase by more than 3 dBA, nighttime noise levels would not result in an exterior environment that exceeds the "normally unacceptable" or "clearly unacceptable" land use compatibility categories. Operation of the two TPSS sites would result in a maximum increase of 0.1 dBA Leq, which is technically considered not perceivable. With the concurrent operation of noise generated from the MSF, the noise levels generated by the transformers would be negligible. The anticipated noise increase from operation of the stations would not result in an increase in noise level of 3 dBA to or within the "normally unacceptable" or "clearly unacceptable" land use compatibility categories. Noise impacts from operation of the proposed Project would be less than significant.

Construction Noise

Construction noise levels were calculated for each phase of construction (Phases 1 through 4) at the location of noise sensitive uses. During Phase 1, construction noise level increases over the significance threshold during the daytime period would result in a maximum of 14.5 dBA Leq1-hour. Additionally, construction noise level increases over the significance threshold during the nighttime period would result in a maximum of 18.8 dBA Leq1-hour.

During Phase 2, construction noise level increases over the significance threshold during the daytime period would result in a maximum of 8.1 dBA Leq1-hour. Additionally, construction noise level increases over the significance threshold during the nighttime would result in maximum of 14.4 dBA Leq1-hour.

During Phase 3, construction noise level increases over the significance threshold during the daytime would result in a maximum of 20.5 dBA Leq1-hour. Additionally, construction noise level increases over the significance threshold during the nighttime would result in a maximum of 23.8 dBA Leq-1hour.

During Phase 4, construction noise level increases over the significance threshold during the daytime would result in a maximum of 8.3 dBA Leq-1hour. Additionally, construction noise level increases over the significance threshold during the nighttime would result in a maximum of 11.1 dBA Leq-1hour.

A variety of heavy trucks will travel to and from the proposed Project during various phases of construction. As compared to adjusted baseline average daily traffic volumes along West Century Boulevard, Manchester Boulevard, and South Prairie Avenue, the sound power generated by the maximum

anticipated number of construction trucks would not be equivalent or greater to a doubling of both the minimum and maximum average daily traffic (ADT) along West Century Boulevard, Manchester Boulevard or South Prairie Avenue and therefore would not result in a 5 dBA increase along those roadways.

In order to mitigate the proposed Project daytime and nighttime construction noise and heavy-duty construction vehicle noise, the ITC Construction Commitment Program identifies measures to reduce construction noise levels, including, but would not be limited to, installing temporary noise barriers that block line-of-sight to noise sensitive uses, reducing the simultaneous use of heavy-duty construction equipment, enclosing stationary noise sources with acoustical barriers where possible, using hydraulic or electric impact tools with external noise jackets, use of quiet pile driving technology, and designation of a Community Affairs Liaison responsible for responding to local complaints about construction. This mitigation program would include feasible measures to reduce construction impacts to less than significant.

Vibration

Estimated vibration levels from construction activities would exceed the building damage significance threshold of 0.2 PPV inches per second (ips), and the human annoyance significance threshold of 72 PPV ips at several locations in the vicinity of the proposed Project. In addition, construction delivery/haul trucks would generate ground-borne vibration as they travel along the proposed Project's anticipated off-site truck travel routes. However, off-site truck travel would not exceed the building damage significance threshold of 0.2 PPV inches per second (ips), and the human annoyance significance threshold of 72 PPV ips.

In order to mitigate these vibration impacts, a Construction Noise Control Plan will be prepared prior to the start of construction that could include, but would not be limited to, identifying and recording existing conditions of buildings and structures that could be damaged from construction activities, implementing a Vibration Plan during demolition and construction, and limiting the location of heavy equipment activity near sensitive receptors. This mitigation program will include feasible measures to reduce construction vibration levels, and impacts would be less than significant.

The estimated ground-borne vibration levels would be approximately 67 VdB for monorail trains (rapid transit or light rail vehicles) and 64 VdB for rubber-tired APM trains. Consequently, the maximum vibration level of the uses along the guideway would be below the FTA recommended maximum acceptable level threshold of 72 VdB and impacts from operation of the Project would be less than significant.

1.3.11 Transportation and Circulation

The assessment of transportation and circulation system impacts considers the existing traffic conditions, including existing street system, public transit service, and bicycle facilities, that may be affected by the ITC Project. The transportation analysis evaluated seventy-five (75) key roadway segments within the study area, identified fourteen (14) bus lines providing service in the study area, listed existing bicycle and pedestrian facilities, and presented transit ridership data obtained from Metro.

Operational Impact Analysis

The analysis summarizes the average daily traffic (ADT), ITC ridership, and vehicle miles travelled (VMT), estimates for the following scenarios: Adjusted Baseline Conditions Non-Event Weekdays without Project; Adjusted Baseline Conditions Non-Event Weekdays with Project; Future Opening Year (2026) Conditions with Event without Project; Future Opening Year (2026) Conditions with Event with Project; Future Horizon Year (2045) Conditions with Event without Project; and Future Horizon Year (2045) Conditions with Event with Project.

Under the Adjusted Baseline Non-Event with Project Traffic scenario, the daily traffic volumes are projected to decrease along key corridors including Prairie Avenue, Manchester Boulevard and Century Boulevards within the study area, thereby improving traffic flows compared to the Adjusted Baseline Non-Event without Project daily traffic volumes. Overall, the analyzed corridors would experience less congestion on a system-wide basis, particularly during the peak periods with implementation of the proposed Project.

Compared to the Future Opening Year (2026) with Event without Project scenario, the daily traffic volumes under the Future Opening Year (2026) with Event with Project scenario would decrease daily traffic volumes between approximately 920 to 1,410 vehicle trips per day along Prairie Avenue between Manchester Boulevard and Century Boulevard; approximately 430 to 757 vehicle trips per day along Manchester Boulevard between La Brea Avenue and Crenshaw Boulevard; and approximately 1,078 to 1,170 vehicle trips per day along Century Boulevard between La Brea Avenue and Crenshaw Boulevard. Additionally, the estimated non-event daily ridership under Future Opening Year (2026) conditions is 3,098 daily pedestrians. The Future Opening Year (2026) with Event conditions includes a sold-out NFL football game at the SoFi Stadium. The estimated daily ridership under Future Opening Year (2026) with Event (NFL) conditions is 25,056 daily pedestrians.

The daily traffic volumes under the Future Horizon Year (2045) with Event and Project scenario would decrease between approximately 1,085 to 1,725 vehicles per day along Prairie Avenue between Manchester Boulevard and Century Boulevard; approximately 575 to 985 vehicles per day along

Manchester Boulevard between La Brea Avenue and Crenshaw Boulevard; and approximately 1,335 to 1,400 vehicles per day along Century Boulevard between La Brea Avenue and Crenshaw Boulevard when compared to the Future Horizon Year (2045) with Event without Project scenario. The ITC ridership analysis for the Future Horizon Year (2045) with Event with Project estimated the non-event daily ridership to be 4,405 daily pedestrians. The Future Horizon Year (2045) with NFL Game Event conditions includes a sold-out event with 70,240 attendees and 6,000 employees on a weekday at the Sofi Stadium. The daily ridership under Future Horizon Year (2045) with NFL Game Event with Project scenario is estimated at approximately 31,089 daily pedestrians.

Based on the analysis of these scenarios, implementation of the proposed Project would reduce daily traffic volumes along key roadway corridors on an average weekday basis. When an NFL game event at the Sofi Stadium is evaluated, the reduction is more substantial. When other events occur at the surrounding venues, it is anticipated the increase in ITC ridership would be more substantial. Therefore, impacts during operation related to ADT and ITC ridership would be less than significant.

CEQA Guidelines section 15064.3 establishes that vehicle miles traveled (VMT) is generally the most appropriate measure of transportation impacts. Compared to the Adjusted Baseline Conditions Non-Event Weekdays without Project, the annual VMT in the City of Inglewood would be reduced by approximately 6.56 million vehicle-miles under the Adjusted Baseline with Project Conditions Non-Event Daily VMT scenario. The weekday daily VMT would be reduced by approximately 227,739 vehicle-miles (4.3%) with the implementation of the proposed Project under Future Opening Year (2026) with Event conditions in comparison to the Future Opening Year (2026) Conditions with Event without Project. The weekday VMT under the Future Horizon Year (2045) with Project with Event scenario would be reduced by approximately 297,080 vehicle-miles (5.2%) from the Future Horizon Year (2045) Conditions with Event without Project. As such, the proposed Project would result in a reduction of VMT under all scenarios and would not conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b). Therefore, impacts during operation related to VMT would be less than significant.

The proposed Project would connect the rest of the regional mass-transit system to and from major housing, employment and activity centers and adjacent uses in the City of Inglewood. The proposed Project is a 1.6-mile, dual lane, elevated mass-transit system with three stations. The proposed Project would accommodate all users, including pedestrians, bicyclists, drivers, transit users, and those operating emergency vehicles. The proposed Project would also include pedestrian access improvements, including mezzanine level at each station to provide connectivity to pedestrian bridges for traveling over active roadways. The pedestrian bridges will be designed to improve both pedestrian access and comfort between the stations and the street level, in addition to providing multimodal access to adjacent bus facilities, pick-up and drop-off areas, and other adjacent resources. The proposed Project will also upgrade

the existing sidewalks to ensure consistent ADA appliance along the transit corridor. The proposed Project would provide for the City to maintain streetscape consistent with the requirements of the Municipal Code. Accordingly, the proposed Project would not create or substantially increase safety hazards due to a design feature or incompatible uses.

Construction Impact Analysis

An estimate of the proposed manpower workforce, on-road on-site equipment (trucks) and on-road off-site equipment (trucks) for each phase of construction. Approximately 682 daily trips are associated with Phase 1 construction, approximately 572 daily trips are associated with Phase 2 construction, approximately 604 daily trips are associated with Phase 3 construction and approximately 200 daily trips are associated with Phase 4 construction. The total trips include both the construction worker and truck trips broken down by each phase. Construction of the APM guideway, columns and station components that could affect Prairie Avenue and Manchester Boulevard would involve construction-related traffic occurring during the off-peak hours and night hours in order to minimize effects to daily commuter traffic and potential event traffic. Delivery of construction materials could occur during the night shift. Construction activities during the day shift would primarily consist of work that could proceed without substantial disruption to daily commuter traffic and potential event traffic along Prairie Avenue and Manchester Boulevard. Additionally, some minor activity could potentially occur during periods in between construction shifts for logistics, moving equipment, etc.

The ITC Project Construction Commitment Program includes a Construction Staging and Traffic Control Program to ensure access can circulation remains adequate for all uses along the Project alignment during construction. Implementation of this program would ensure adequate circulation and access for all uses located along the propose alignment of the APM system, including access to businesses at all times, and transportation related inconveniences would be reduced to the extent feasible. Bus stop relocation and bicycle/pedestrian detours facilitates access by other modes of transportation and ensures continued operation and connectivity to nearby communities. While access to some uses would be disrupted and detoured for short periods of time during construction, through implementation of the Worksite Traffic Control Plans, and adequate access and circulation would continue to be available at all times during construction of the Project. Additionally, construction of the proposed Project, particularly during Phases 2 and 3, would have the potential to result in temporary impacts on access and circulation. The Construction Commitment Program, which includes Worksite Traffic Control Plans and traffic management plans to ensure access and circulation remains adequate for all uses along the Project alignment during construction. Thus, the proposed Project would result in less than significant transportation and circulation impacts during construction.

The proposed Project is consistent with the goals of Senate Bill 743 for reduction of GHG emissions, developing multi-modal transportation networks; and encouraging and supporting mixed use development. The ITC Project is also consistent with Goals 1, 2, 4, 5, 6, 7 and 8 identified in the 2020-2045 RTP/SCS.

The proposed Project includes a proposed amendment to the Circulation Element of the City's General Plan to reflect the integration of the proposed APM system into the City's circulation system. With the proposed amendments, the proposed Project would be consistent with the Circulation Element. The proposed Project is consistent with the Land Use Element goals by increasing existing capacity and providing additional access to public transportation within the City and the region by adding a transit system to connect visitors and residents with Downtown Inglewood and activity centers in the City to the regional light rail system. As such, the proposed Project would not conflict with Inglewood General Plan policies related to transportation.

1.3.12 Tribal Cultural Resources

Tribal cultural resources may include sites, features, places, cultural landscapes, sacred places, or objects with cultural value to a California Native American tribe that are listed or determined to be eligible for listing in the California Register of Historic Places (CRHR) or included in a local register of historical resources, or a resource determined by the lead California Environmental Quality Act (CEQA) agency, in its discretion and supported by substantial evidence, to be significant and eligible for listing on the CRHR.

In accordance with AB 52, the City initiated the consultation process and distributed notification letters on July 31, 2018 to the four tribes which has requested future notification of proposed projects, including the Gabrielino–Tongva Tribe, Gabrielino Tongva Indians of California Tribal Council, Gabrielino/Tongva Nation, and the Gabrieleno/Tongva San Gabriel Band of Mission Indians. Additionally, the Gabrieleno Band of Mission Indians–Kizh Nation was identified as a relevant party. One response requesting consultation were received from the Gabrieleno Band of Mission Indians- Kizh Nation (Tribe).

As a result of consultation, the Tribe shared information including maps of the area that depict the historic and prehistoric trading routes, and suggested mitigation measures that may be considered to assist in reducing potential impacts from the proposed Project to any cultural resources that could be unearthed during ground disturbing activities.

With implementation of the mitigation measures, potentially significant impacts to tribal cultural resources, including related the unanticipated discovery of human remains, would be reduced to a level that is less than significant. These measures would work to prevent the destruction and loss of sensitive tribal cultural resources and ensure the proper disposition of human remains.

1.3.13 Utilities and Service Systems

Operation

Existing water and sewer lines are located within the footprint of the proposed Project along Market Street, Manchester Boulevard, and Prairie Avenue. Project components including the MSF and stations would connect to these existing water and sewer lines. The proposed Project stations and MSF would use approximately 8.5 afy less water than the existing uses located on the sites proposed for these facilities.

Southern California Edison (SCE) estimates that normal operation of the proposed Project would have an estimated peak power load flow of 4,127 kilowatts (kW). Electricity upgrades would be completed by SCE and would be subject to its procedures and requirements for construction and environmental clearance.

Existing storm drains are located within the alignment along Market Street, Manchester Boulevard, and Prairie Avenue. It is anticipated that the proposed Project would not interfere with these storm drains during operation. Moreover, storm drains would be kept and maintained by the Los Angeles County Flood Control District (LACFCD) and the City.

No new gas connections to serve the proposed Project elements would be required except at the proposed MSF. Natural gas would be used at the MSF to serve the pressure wash system, and for space and water heating. It is anticipated that the MSF would connect to existing gas infrastructure along Manchester Boulevard at the discretion of the Southern California Gas Company (SoCalGas). Moreover, as described under **Section 1.3.5: Energy Resources**, the proposed Project would result in a net decrease in natural gas usage compared to the current uses.

Relocation or Construction of Utilities

There are several major utility lines identified within the Market Street segment of the proposed Project including water, sewer, stormwater, and electrical lines. Additionally, utility lines identified within the Manchester Boulevard segment of the alignment include water, sewer, wastewater, stormwater, and gas lines. Utility lines within the Prairie Avenue segment of the alignment include water, sewer, wastewater, stormwater, electrical, and gas lines. Based upon preliminary review, it appears that all utilities within these segments can be avoided and no major utilities will require relocation. However, the location of utilities is based on a review of existing documentation and the exact locations have not been field verified. Additionally, several storm drains have been identified along these segments which may require relocation due to column placement. In addition, SCE has determined that the proposed Project would likely utilize the existing 16 kva circuit located within the right-of-way of Market Street to provide power for the proposed. SCE has also noted that utilization of this existing circuit would require infrastructure upgrades to accommodate the proposed Project.

Because the locations of utilities identified based on review of existing documentation may not be accurate, utility lines could occur within areas that require excavation for foundations or drilling for columns. Construction could require the potential relocation of utility lines to accommodate the support structure foundations or columns.

1.4 ALTERNATIVES

Section 15126.6(e)(2) of the State CEQA Guidelines requires an EIR to identify an environmentally superior alternative. If the environmentally superior alternative is the No Project alternative, the EIR must identify an environmentally superior alternative among the other alternatives.

As described in **Section 5: Alternatives** of this Draft EIR, a range of alternatives to the proposed Project were considered, with some alternatives initially considered determined to be not feasible. A summary of the alternatives evaluation is presented below.

1.4.1. Alternative 1: No Project

The No Project Alternative considers conditions if the proposed Project is not built. No new transportation infrastructure would be built within the Project study area, aside from transportation projects that are currently under construction or funded for construction and operation by 2026. These projects include transit projects funded by Measure R, Measure M, and specified in the Southern California Association of Governments (SCAG) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). Existing infrastructure and future planned and funded projects assumed under the No Project alternative include:

- Metro Crenshaw/LAX Line –Currently under construction (2020), operating start date (Fall 2021)
- Implementation of the Citywide Event Transportation Management and Operations Plan
- Street improvements being constructed as part of the Los Angeles International Airport Landside Access Modernization Program and the Inglewood Basketball and Entertainment Center (IBEC) projects.
- Existing Bus Service – Metro Rapid and Metro Local

1.4.2 Alternative 2: Bus Rapid Transit (BRT) System

Bus rapid transit (BRT) is a public transit system designed to provide improved capacity and reliability relative to a conventional bus system. Typically, a BRT system includes roadway lanes that are dedicated to buses, with signal priority to buses at intersections where buses may interact with other traffic, with enhanced coordinated flow. BRT systems typically include design features to optimize passenger boarding and alighting activities, as well as ticket purchases. A BRT corridor is a section of roadway or contiguous

roadways served by the uniquely-branded buses along routes with a minimum length of approximately 1.5 to 2 miles.

Under this alternative, the City would construct and operate a BRT system that would connect the Forum, the SoFi Stadium, the Performance Arena, the IBEC and the Hollywood Park mixed uses to the Crenshaw/LAX Line Downtown Inglewood station. The proposed route of this alternative would be a loop route starting along Florence Avenue to travel east to North Prairie Avenue where it would turn south along Prairie Avenue to the Inglewood Transit Center Facility at Prairie Avenue and Arbor Vitae adjacent to the Hollywood Park site, and then return via Prairie Avenue northbound to travel westbound along Manchester Boulevard to Market Street to traverse northbound to Florence Avenue. The BRT would be located entirely within the public right-of-way. This route is generally consistent with the route as described in the City's New Downtown and Fairview Heights Transit Oriented Development Plan and Design Guidelines.[8]

1.4.3 Alternative 3: Market Street Pedestrian Promenade

Under the Market Street Pedestrian Promenade Alternative, the proposed Project and all of its components would be constructed and operate. With this alternative, Market Street between Florence Avenue and Manchester Boulevard would be entirely closed to vehicular traffic**.** Regent and Queen streets would have barricades to prevent traffic turning onto Market Street in both directions. East-west traffic along Regent Street and Queen Street would be allowed without being able to turn on to Market Street. Traffic would be diverted to surrounding streets including La Brea Avenue and Locust Street. The establishment of this pedestrian promenade would encourage pedestrian activity by improving walkability within Downtown Inglewood.

1.4.4 Alternative 4: 4th Station Alternative

This alternative considers the addition of a fourth station to the APM system as proposed at Manchester Boulevard, east of the Market Street/Manchester Boulevard intersection as shown in **Figure 5.0-3, Alternative 4: 4th Station Alternative – Manchester Boulevard Station**.

The station configuration would consist of a center platform with vertical circulation to a pedestrian bridge located under the station platform level. Passengers would have the ability to access the station through a pedestrian bridge. As with the other ITC stations, this additional station would consist of a center platform configuration with the platform located at level 3 (approximately 50 feet above the existing grade). Passengers would access the platform from a mezzanine (at level 2) connected by pedestrian

[8] City of Inglewood, *New Downtown and Fairview Heights Transit Oriented Development Plan and Design Guidelines,* November 1, 2016

bridges to vertical circulation elements to provide access to the sidewalk (at level 1) on the north side of Manchester Boulevard. Providing this additional station in Downtown would:

1. Support ongoing economic revitalization in Downtown Inglewood;
2. Provide a direct connection from Downtown Inglewood to the regional rail system, the Forum, the LASED, including SoFi Stadium, and the IBEC; and
3. Enhance the connection of Inglewood and residents to jobs, education, services, and destinations within the City and within the region; and support regional efforts to become more efficient, economically strong, equitable, and sustainable.

1.4.5 Alternative 5: Prairie Avenue Single Station Alternative

The proposed Project modifies and relocates Prairie Avenue to the east to maintain the current roadway capacity. The relocation of Prairie Avenue and the need for a passenger station connection on the sidewalk/ground level affects properties located east of Prairie Avenue. This Alternative avoids affecting these properties by consolidating the two proposed stations on Prairie Avenue into a single station that would be located adjacent to the City's Intermodal Transit Facility at the City's Civic Center site. Passengers would connect to the ground/sidewalk level within the City-owned Civic Center site. **Figure 5.0-4: Alternative 5: Prairie Avenue Single Station Alternative** illustrates this alternative.

This Alternative maintains Prairie Avenue within its existing right-of-way; however, one to two lanes would be lost, thereby reducing the capacity of the roadway. Specifically, one travel lane in each direction along Prairie Avenue between Arbor Vitae and La Palma, one lane in the southbound direction between La Palma and Pincay Drive, and one lane in each direction between Pincay Drive and Manchester Boulevard would be lost under this Alternative 5: Prairie Avenue Single Station Alternative.

1.4.6 Environmental Superior Alternative

An EIR is required to identify the Environmentally Superior Alternative from among the range of reasonable alternatives that are evaluated. CEQA Guidelines section 15126.6(e)(2) requires that an environmentally superior alternative be designated and states that if the Environmentally Superior Alternative is the No Project alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.

Of the alternatives evaluated in this EIR, the Environmentally Superior Alternative would be Alternative 2, Bus Rapid Transit (BRT) System Alternative. This alternative would avoid the unavoidable significant aesthetic and cultural resource impacts that would result from the Project on the Market Street segment. The BRT System Alternative would, however, not meet the City's basic objectives for the proposed Project.

Under the BRT System Alternative, the proposed Project would not be constructed. No demolition or construction activities would occur, except along the public right-of-way where BRT-only lanes along the route are implemented. The BRT System Alternative would avoid all significant construction related effects and impacts identified for the proposed Project. Unlike the No Project Alternative, the BRT System Alternative would meet some of the City's objectives including providing a direct and convenient connection to the Metro regional transit system, encouraging intermodal transportation systems by providing convenient transit, and providing safe, reliable, and convenient access to businesses in the City. The BRT System Alternative would also meet the City's objectives to support the ongoing economic revitalization, growth opportunities within the Downtown TOD Plan area, and encourage redevelopment and investment within the City in areas served by the proposed Project. However, the objective related to providing sufficient transit connection capacity between Metro's regional transit system and the City's new major activity centers would not be met by this BRT alternative, resulting in limited increased transit mode split, limited reduction in vehicle trips, and consequently, limited reduction in per-capita vehicle miles traveled to the City's major activity centers. The estimated daily BRT ridership with Event Conditions would be approximately 20 percent of the projected ridership for the proposed APM system, providing transit options, increasing transit mode split, reducing vehicle trips, and reducing per capita vehicle miles traveled to the City's major activity centers. Additionally, the BRT System Alternative would not meet the City's objectives to maintain existing roadway capacity, reduce the City's traffic congestion and alleviate growing demand on the existing roadway network on both major arterials and residential streets for both nonevent and event days.

1.5 AREAS OF KNOWN CONTROVERSY AND ISSUES TO BE RESOLVED

The State CEQA Guidelines[9] require that a Draft EIR summary identify areas of controversy known to the lead agency, including issues raised by other agencies and the public. In addition to those areas identified in the NOP as potentially significant, some issues of concern were expressed at a public scoping meeting for the draft EIR and through responses to the NOP.

The primary environmental concerns associated with the Inglewood Transit Connector Project and potential future related development that were raised are summarized below. The NOP and Recirculated NOP comments are included in **Appendix 2.0.3: Summary of Comments Received on the Revised and Original NOP and IS Memorandum** of this EIR. These issues have been incorporated into the environmental analysis of the proposed Project contained within **Section 4.0: Environmental Impact Analysis** of this draft EIR.

9 California Public Resources Code, tit. 14, Div. 6, ch. 3, State CEQA Guidelines, sec. 15123.

A summary of the issues identified in these comments is provided below.

Alignment and Operation

The Original NOP identified a potential option for the Maintenance and Storage Facility at Kelso School. Representatives of the Inglewood Unified School District (Inglewood USD) raised issues regarding the proposed Project's support facilities and stated that any acquisition or demolition of the Kelso Elementary School property to implement the proposed Project would have an impact on district facilities. Inglewood USD recommend the reconsideration of the alignment. The Inglewood USD submitted a second comment letter after the release of the Revised IS/NOP indicting the District supports the Project, which will play an important role in ongoing revitalization efforts by providing convenient, reliable, and efficient public transportation to major activity centers within the City, to the benefit of the Inglewood community, and reduce extra vehicular traffic. The second letter did not request changes to the proposed alignment for the proposed Project but requested evaluation of the potential for the Project to result in impacts to school facilities located along the alignment.

In regard to public comments, several commenters voiced concerns, suggestions, and inquiries regarding the final alignment and operation of the proposed Project. Commenters suggested a number of modifications to alignment and support facility alternatives. Suggestions included adding connection to the I-105 freeway; creating an alignment along Locust Street; utilizing a portion of Edward Vincent Junior Park for the MSF; and incorporating the MSF into the Inglewood Basketball and Entertainment Center (IBEC) due to less interference with traffic, available open space, and optimal access. Further, one commenter noted that more alternatives should be considered to provide more economic development to all of the City, including Market Street.

In terms of operation of the proposed Project, one comment received noted that a station at Market Street and Florence Avenue would be a major benefit for people connecting to other locations and shopping. Another commenter stated that displacing businesses and/or residences should be avoided, and that by removing the retail shopping center, a source of healthy and organic produce would be eliminated. Other commenters expressed concerns about operation of the proposed Project, including where users would park and whether there would be fares on event and nonevent days. Another commenter would like the proposed Project to be free for seniors and lower income people. One commenter expressed concern regarding financing the proposed Project and questioned whether funding would come from property taxes, sales taxes, or parcel taxes.

Construction Phasing and Impacts

The physical impacts of construction activity were a concern voiced by several public commenters. Comments included concerns that heavy machinery and construction operations would damage or crack adjacent properties; potentially cause loss of rental income due to undesirability of rental properties near an active construction zone; and disturb current tenants.

In response to the project as originally proposed, Inglewood USD representatives stated that acquisition or demolition of the Kelso Elementary School property to implement the proposed Project would have an impact on district facilities by requiring the construction of a new school for 523 displaced students. As described above, the Project was redesigned to avoid impacting this school.

Thomas Safran & Associates (TSA) representatives commented on behalf of TSA owned properties designated for mixed-use and residential developments near the proposed Project. TSA requested analysis of the potential for aesthetics, air quality, GHG, and noise impacts on properties located at 139 North Market Street and 158 North Market Street planned for mixed use development.

Historic Resources

The Los Angeles Conservancy (LA Conservancy) expressed concern regarding the potential for the Project to impact nine historic resources located along the proposed alignment. The LA Conservancy recommended consideration of alternative routes to avoid impacts to nearby historic resources located along the proposed alignment.

Mobility Issues

Caltrans recommended the incorporation of multimodal and complete street transportation elements that will actively promote alternatives to car use and better manage existing parking assets. The recommendation aligns with Caltrans' support for transportation and land use that reduces vehicle miles traveled (VMT) and greenhouse gas (GHG) emissions by shortening trip lengths and achieving a high level of nonmotorized travel and transit use. Caltrans also support the implementation of pedestrian safety measures such as road diets and other traffic calming measures.

Culver CityBus recommended the proposed Project to locate stations near existing transit services in the area in order to allow smooth transit connections.

In addition, one public comment recommended that the proposed Project be free for seniors and low-income people and one comment suggested that a zone limited to pedestrians be extended from the proposed Metro Crenshaw/LAX Line station in downtown Inglewood to other locations along the alignment.

Policy, Plan, and Program Consistency

Southern California Association of Governments (SCAG) recommended the incorporation of the proposed Project into the Regional Transportation Plan (RTP)/Sustainable Community Strategy (SCS) project list in order to enable access to State or federal funding. SCAG also recommends the proposed Project to recognize and consider RTP/SCS goals.

Public Services

The County of Los Angeles Fire Department (County Fire) commented on potential for the Project to impact circulation and access for emergency vehicles. Consideration of alternative route (detour) plans with a tentative schedule of planned closures prior to the beginning of construction was requested. Coordination of any disruptions to water service during construction with County Fire was also requested to ensure alternative water sources would be provided.

Transportation Impacts

A number comments were received on potential impacts on the street and roadway network were received. A primary concern was the potential for increased traffic throughout the City due to construction and potential modifications to existing streets.

The California Public Utilities Commission (CPUC) commented on the potential for the proposed Project to disrupt the roadway network in the surrounding community during construction, and recommended consideration of traffic circulation and queuing, level of service, emergency service response, and Americans with Disabilities Act (ADA) compliance. The CPUC also noted that automated people mover (APM) trains must comply with CPUC rules and regulations, CPUC General Orders, and American Society of Civil Engineers Automated People Mover Standards.

Additionally, one public comment expressed concern regarding the loss of pedestrian access along Market Street. Caltrans also commented that the proposed Project should incorporate multimodal and complete streets transportation elements to actively promote alternatives to car use and better manage existing parking assets, and requested that the City evaluate the proposed Project for access problems, vehicle miles traveled, and service needs that may need to be addressed.

Tribal Resources Impacts

The Native American Heritage Commission (NAHC) recommended that the City consult with California Native American tribes that are traditionally and culturally affiliated with the geographic area of the proposed Project in accordance with applicable State laws in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources.

Utility Impacts

The West Basin Municipal Water District (West Basin) noted that most West Basin recycled water distribution pipelines are located at least 3.5 feet below ground and within the public right-of-way. If relocation of the pipelines would be needed, a request should be submitted at least 6 months in advance of the required relocation. Additionally, the West Basin Kenneth Hahn Lateral project is investigating opportunities to provide recycled water from the existing 36-inch pipeline that ends at the intersection of Prairie Avenue and Florence Avenue, in the City of Inglewood, to Kenneth Hahn State Park, Baldwin Hills area, and into Culver City.

The County of Sanitation Districts of Los Angeles County (Sanitation District) and the Los Angeles Department of Public Works (LADWP) commented that the proposed Project may impact existing and/or proposed facilities (e.g., trunk sewers, waterlines, drainage pipes, etc.) over which it will be constructed. Both agencies indicated utility facilities are directly under and/or cross directly beneath the proposed Project footprint. Both agencies requested that project plans and specifications be provided for review. Once the plans and specifications are submitted, the agencies can provide additional responses and issue permits for construction.

Cumulative Impacts

The Centinela/Florence Avenues Grade Separation Project by Metro will have construction activities concurrent with the schedule of the proposed Project. Metro requested that analysis take into consideration the construction impacts and activities of the Centinela/Florence Avenues Grade Separation Project as it relates to the proposed Project.

1.6 PROPOSED MITIGATION MEASURES

Table 1.0-4: Summary of Mitigation Measures provides the mitigation program for the proposed Project that has been identified to reduce potentially significant impacts to less than significant. In addition, the proposed Project includes the ITC Construction Commitment Program (CCP) and the ITC Design Guidelines to proactively address the potential effects of the construction and operation of the proposed Project on the community. The CCP and the ITC Design Guidelines identify features and actions incorporated into the proposed Project to lessen or avoid potential impacts.

1.7 SIGNIFICANT AND UNAVOIDABLE ENVIRONMENTAL EFFECTS

As required by the State CEQA Guidelines Section 15126.2(b), this section identifies the significant environmental effects that cannot be avoided if the proposed Project is implemented. The State CEQA Guidelines require that an EIR “Describe any significant impacts, including those which can be mitigated but not reduced to a level of insignificance. Where there are impacts that cannot be alleviated without

imposing an alternative design, their implications, and the reasons why the project is being proposed, notwithstanding their effect, should be described."[10]

The following impacts have been identified in the analyses in the Draft EIR as having significant and unavoidable impacts. The corresponding EIR section is listed for reference purposes. The threshold under which a significant and unavoidable impact is identified is provided, followed by a summary discussion of the proposed Project's impact under the threshold(s).

1.7.1 Aesthetics

Impact AES-1a: The proposed Project would substantially degrade the existing visual character or quality of public views of the site and its surroundings. This also applies under cumulative conditions.

While the Project would not result in significant impacts to the overall visual character of Downtown Inglewood along Market Street, the guideway would obstruct views of the former Fox Theater building, identified as a historic resource due the architectural design of the building. Mitigation measures and project design features included in the ITC Design Guidelines would reduce this impact to the extent feasible, however, this indirect impact on the visual character of this building would be a significant and unavoidable impact of the Project

1.7.2 Air Quality

Impact AQ-1: Conflict with or obstruct implementation of the applicable air quality plan.

Impact AQ-2: Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or State ambient air quality standard.

Even with the implementation of all feasible mitigation measures, including requiring use of off-road diesel-powered construction equipment that meets or exceeds Tier 4 Final off-road emissions standards or equivalent for all equipment rated at 50 horsepower or greater, dust control measures, and maximizing the use of electric-powered construction equipment, construction-related daily emissions would exceed the SCAQMD significance threshold for NOx.

10 California Code of Regulations, tit. 14, div. 6, ch. 3, California Environmental Quality Act Guidelines, sec. 15126.2(b).

1.7.3 Cultural

Impact CUL-1: The proposed Project would cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5.

The proposed APM guideway would be located directly in front of the former Fox Theater building on Market Street and visually obscure a portion of the sign pylon, creating a visual separation between the uppermost portion of the pylon and the lower portion of the building containing the theater marquee and public entrance. The APM guideway would also block views of the primary façade of the building, making it difficult to appreciate the overall design of the building. Because the ability of the former Fox Theater to convey its historic significance would be impaired following the implementation of the proposed Project, the indirect impact on the former Fox Theater is identified as a significant impact of the Project that cannot be avoided.

As the guideway turns east on Manchester Boulevard, it would partially intrude into the former People's Federal Building & Loan Association building located at 150 S. Market Street. The intrusion is necessary to accommodate for the turning radius of the guideway at this location. Acquisition and demolition of this building is proposed to accommodate the guideway. Demolition of this building is identified as a significant impact of the Project that cannot be avoided.

1.8 SUMMARY TABLE

Table 1.0-4: **Summary of Findings** has been organized to correspond with the environmental issues discussed in **Section 4.0**, Impacts, and Mitigation Measures. The summary table is arranged in four columns:

1. Environmental impacts ("Impact").

2. Level of significance without mitigation ("Significance Before Mitigation").

3. Mitigation measures ("Mitigation Measure").

4. The level of significance after implementation of mitigation measures ("Significance After Mitigation").

If an impact is determined to be significant or potentially significant, feasible mitigation measures are identified, where appropriate. More than one mitigation measure may be required to reduce the impact to a less-than-significant level. The analysis in the Draft EIR assumes all applicable plans, policies, and regulations would be implemented, including, but not necessarily limited to, City General Plan policies, laws, and requirements or recommendations of the City of Inglewood. Applicable plans, policies, and regulations are identified and described in the Regulatory Setting of each issue area and within the

relevant impact analysis. A description of the organization of the environmental analysis, as well as key assumptions regarding the approach to the analysis, is provided in **Section 4.0.**

Table 1.0-4
Summary of Findings

Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
NOTES: LS = less than significant; PS = potentially significant; S = Significant; SU = significant and unavoidable; NI = no impact; NA = not applicable			
4.1 Aesthetics			
Impact AES-1a: Would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings. (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project cause degradation to visual character?	PS	See **MM CUL-1** to **MM CUL-3**	SU
Threshold AES-1b: If the project is in an urbanized area, would the project be consistent with applicable zoning and planning regulations governing scenic quality?	LS	None Required	LS

Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
NOTES: LS = less than significant; PS = potentially significant; S = Significant; SU = significant and unavoidable; NI = no impact; NA = not applicable			
Threshold AES-2: Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area.	LS	None Required	LS
4.2 Air Quality			
Impact AQ-1: Conflict with or obstruct implementation of the applicable air quality plan.	PS	**See MM AQ-1 to MM AQ-11.**	SU
Impact AQ-2: Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or State ambient air quality standard.	PS	**MM AQ-1:** Construction contractors shall, at a minimum, use equipment that meets the USEPA's Final Tier 4 emissions standards for off-road diesel-powered construction equipment with 50 horsepower (hp) or greater, for all phases of construction activity, unless it can be demonstrated to the City of Inglewood Planning Division with substantial evidence that such equipment is not available. To ensure that Final Tier 4 construction equipment or better shall be used during the proposed Project's construction, the City of Inglewood shall include this requirement in applicable bid documents, purchase orders, and contracts. The City of Inglewood shall also require periodic reporting and provision of written construction documents by construction contractor(s) and conduct regular inspections to the maximum extent feasible to ensure and enforce compliance. Such equipment will be outfitted with Best Available Control Technology devices including a CARB certified Level 3 Diesel Particulate Filters (DPF). Level 3 DPF are capable of achieving at least 85 percent reduction in particulate matter emissions. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by Final Tier	SU

Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
NOTES: LS = less than significant; PS = potentially significant; S = Significant; SU = significant and unavoidable; NI = no impact; NA = not applicable			

4 emissions standards for a similarly sized engine, as defined by the CARB's regulations. Successful contractors must demonstrate the ability to supply the compliant construction equipment for use prior to any ground disturbing and construction activities. The proposed Project representative will make available to the lead agency and SCAQMD a comprehensive inventory of all off-road construction equipment, equal to or greater than 50 horsepower, that will be used during construction. The inventory will include the horsepower rating, engine production year, and certification of the specified Tier standard. A copy of each unit's certified tier specification, BACT documentation, and CARB or SCAQMD operating permit shall be maintained on site at the time of mobilization for each applicable piece of construction equipment.

If any of the following circumstances listed below exist and the Contractor provides written documentation consistent with project contract requirements, the Contractor shall submit an alternative compliance plan that identifies operational changes or other strategies that can reduce a comparable level of NOx emissions as Tier 4-certified engines during construction activities.

- The Contractor does not have the required type of off-road construction equipment within its current available inventory as to a particular vehicle or equipment by leasing or short-term rent, and the Contractor has attempted in good faith and with due diligence to lease or short-term rent the equipment or vehicle, but the equipment or vehicle is not available for lease or short-term rent within 120 miles of the Project alignment, and the Contractor has submitted documentation to the City of Inglewood showing that the requirements of this exception provision apply.
- The Contractor has been awarded funding by SCAQMD or another agency that would provide some or all of the cost to retrofit, repower, or purchase a piece of equipment or vehicle, but the funding has not yet been provided due to circumstances beyond the Contractor's control, and the Contractor

Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
NOTES: LS = less than significant; PS = potentially significant; S = Significant; SU = significant and unavoidable; NI = no impact; NA = not applicable			

has attempted in good faith and with due diligence to lease or short-term rent the equipment or vehicle that would comply, but the equipment or vehicle is not available for lease or short-term rent within 120 miles of the Project alignment, and the Contractor has submitted documentation to the City of Inglewood showing that the requirements of this exception provision apply.

- Contractor has ordered equipment or vehicle to be used on the construction project in compliance at least 60 days before that equipment or vehicle is needed at the Project alignment, but that equipment or vehicle has not yet arrived due to circumstances beyond the Contractor's control, and the Contractor has attempted in good faith and with due diligence to lease or short-term rent the equipment or vehicle that would comply, but the equipment or vehicle is not available for lease or short-term rent within 120 miles of the project site, and the Contractor has submitted documentation to the City of Inglewood showing that the requirements of this exception provision apply.
- Construction-related diesel equipment or vehicle will be used on the Project alignment for fewer than 20 calendar days per calendar year. The Contractor shall not consecutively use different equipment or vehicles that perform the same or a substantially similar function in an attempt to use this exception to circumvent the intent of this mitigation measure.
- Documentation of good faith efforts and due diligence regarding the previous exceptions shall include written record(s) of inquiries (i.e., phone logs) to at least three leasing/rental companies that provide construction on-road trucks and off-road equipment, documenting the availability/unavailability of the required types of truck/equipment. The City of Inglewood will, from time-to-time, conduct independent audit of the availability of such vehicles and equipment for lease/rent within a 120 mile

Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
NOTES: LS = less than significant; PS = potentially significant; S = Significant; SU = significant and unavoidable; NI = no impact; NA = not applicable			

radius of the project site, which may be used in reviewing the acceptability of the Contractor's good faith efforts and due diligence.

MM AQ-2: Equipment such as concrete/industrial saws, pumps, aerial lifts, light stands, air compressors, and forklifts shall be electric or alternative-fueled (i.e., non-diesel). Pole power shall be utilized at the earliest feasible point in time and shall be used to the maximum extent feasible in lieu of generators. If stationary construction equipment, such as diesel-powered generators, must be operated continuously, such equipment must be Final Tier 4 construction equipment or better and located at least 100 feet from air quality sensitive land uses (e.g., residences, schools, childcare centers, hospitals, parks, or similar uses), whenever possible.

MM AQ-3: At a minimum, require that construction vendors, contractors, and/or haul truck operators commit to using 2010 model year trucks (e.g., material delivery trucks and soil import/export with a gross vehicle weight rating of at least 14,001 pounds), or best commercially available equipment, that meet CARB's 2010 engine emissions standards at 0.01 g/hp-hour of particulate matter and 0.20 g/hp-hour of NOx emissions or newer, cleaner trucks, unless the Contractor provides written documentation consistent with project contract requirements the circumstances identified in MM AQ-1 exist and the Contractor submits an alternative compliance plan. Operators shall maintain records of all trucks associated with Project construction to document that each truck used meets these emission standards. The City of Inglewood shall include this requirement in applicable bid documents, purchase orders, and contracts. Operators shall maintain records of all trucks associated with Project construction to document that each truck used meets these emission standards and make the records available for inspection.

MM AQ-4: Require the use of electric or alternatively fueled (e.g., natural gas) sweepers with high-efficiency particulate air (HEPA) filters.

Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
NOTES: LS = less than significant; PS = potentially significant; S = Significant; SU = significant and unavoidable; NI = no impact; NA = not applicable			
		MM AQ-5: A publicly visible sign shall be posted with the telephone number and person to contact at the City of Inglewood regarding dust complaints. This person shall respond and take corrective action with 24 hours. The Air District's phone number shall also be visible to ensure compliance with applicable regulations. **MM AQ-6:** All roadways, driveways, sidewalks, etc., being installed as part of the project should be completed as soon as practical; in addition, building pads should be laid as soon as practical after grading. **MM AQ-7:** To the extent feasible, allow construction employees to commute during off-peak hours. **MM AQ-8:** Make access available for on-site lunch trucks during construction, as feasible, to minimize off-site construction employee vehicle trips. **MM AQ-9:** Every effort shall be made to utilize grid-based electric power at any construction site, where feasible. Grid-based power can be from a direct hookup or a tie into electricity from power poles. **MM AQ-10:** Contractors shall maintain and operate construction equipment to minimize exhaust emissions. All construction equipment must be properly tuned and maintained in accordance with the manufacturer's specifications and documentation demonstrating proper maintenance, in accordance with the manufacturer's specifications, shall be maintained on site. Tampering with construction equipment to increase horsepower or to defeat emission control devices must be prohibited. **MM AQ-11:** Enter into applicable bid documents, purchase orders, and contracts to notify all construction vendors, contractors, and/or haul truck operators that vehicle and construction equipment idling time will be limited to no longer than five minutes, consistent with the CARB's policy. For any idling that is expected to take longer than five minutes, the engine should be shut off. Notify construction vendors, contractors, and/or haul truck operators of these idling requirements at the time that the purchase order is issued and again when vehicles enter the	

Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
NOTES: LS = less than significant; PS = potentially significant; S = Significant; SU = significant and unavoidable; NI = no impact; NA = not applicable			
		Project alignment. To further ensure that drivers understand the vehicle idling requirement, post signs at the proposed Project entry gates and throughout the Project alignment, where appropriate, stating that idling longer than five minutes is not permitted.	
Impact AQ-3: Expose sensitive receptors to substantial pollutant concentrations.	PS	**See MM AQ-1 to MM AQ-11.**	LS
4.3 Biology Resources			
Impact BIO-1: Interfere substantially with the movement of any resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites.	PS	**BIO-1 Conservation of Faunal Resources: Nesting Birds/Raptors:** The City shall require demolition and construction contractors to implement the following measures: • Prior to initiating any demolition and/or construction activities, a nesting bird survey shall be conducted to determine the presence of any nesting birds within 500 feet of demolition and/or construction activities. In addition, nesting bird surveys shall be conducted at least every six (6) months until the completion of construction activities, as specified below. Nesting bird survey shall include: – Prior to any demolition and/or construction, and a least every six (6) months during and prior to the raptor nesting season until the completion of construction activities, January 1 to September 1, a qualified biologist shall conduct a site survey for active nests 30 days prior to any scheduled clearing, demolition, grading, or construction activities. The survey shall be conducted within all trees, manmade structures, and any other potential raptor nesting habitat. – Prior to any vegetation disturbance between March 1 and September 15, and a least every six (6) months until the completion of construction	LS

Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
NOTES: LS = less than significant; PS = potentially significant; S = Significant; SU = significant and unavoidable; NI = no impact; NA = not applicable			

activities, a qualified biologist shall conduct a survey for nesting birds in all breeding/nesting habitat within the construction or demolitions areas and within 300 feet of all disturbance areas. The surveys shall be conducted within trees and structures, wherever nesting bird species may be located. Nesting bird surveys shall be conducted no earlier than 30 days prior to the initiation of ground or vegetation disturbance. If no breeding/nesting birds are observed, site preparation, demolition and construction activities may begin. If breeding activities and/or an active bird nest is located, the breeding habitat/nest site shall be fenced by the biological monitor a minimum of 300 feet (500 feet for raptors) in all directions, and this area shall not be disturbed until the nest becomes inactive, the young have fledged, the young are no longer being fed by the parents, the young have left the area, and/or the young shall no longer be impacted. If the qualified biologist determines that a narrower buffer between the demolition and/or construction activities and the observed active nests is warranted, the biologist may submit a written explanation as to why (e.g., species-specific information; ambient conditions and bird's habituation to them; terrain, vegetation, and birds' lines of sight between the demolition and/or construction activities and the nest and foraging areas) to the District and, upon request, the CDFW. Based on the submitted information, the District, acting as the lead agency (and CDFW, if CDFW requests) shall determine whether to allow a narrower buffer.

- During the year prior to demolition and/or construction, a survey shall be conducted by a qualified biologist for bat habitat areas within the construction footprint of the proposed Project between March 1 and September 30 and a least every six (6) months until the completion of construction activities. The areas shall be characterized as to their potential for supporting a bat maternal colony or nursery site. The survey

Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
NOTES: LS = less than significant; PS = potentially significant; S = Significant; SU = significant and unavoidable; NI = no impact; NA = not applicable			
		shall include all trees and any manmade structures, or other bat habitat areas that could be affected. If bat maternal colony or nursery sites are identified, then these areas shall be avoided by demolition and/or construction during the bat breeding season, from March 1 through September 30. Each tree or structure supporting an active maternity roost shall be inspected a week prior to disturbance to determine the presence or absence of roosting bats. • The biologist shall submit weekly reports to the City's Parks, Recreation and Library Services Director, or designated representative, regarding the results of the nesting bird surveys.	
Impact BIO-2: Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.	LS	None Required	LS
4.4 Cultural Resources			
Impact CUL-1: Cause a substantial adverse change in the significance of a historical resource as	PS	**MM CUL-1:** The building located at 150 S. Market Street (the former People's Federal Building & Loan Association Building) shall be documented to Historic American Buildings Survey (HABS) Level III prior to demolition. HABS Level III documentation includes a sketch plan, photographs with large-format negatives or exterior and interior views, and the completion of an architectural data form. Copies of the	SU

defined in Section 15064.5.		completed HABS documentation shall be archived with the South Central Coast Information Center at California State University, Fullerton, as well as with the Los Angeles Conservancy and the Inglewood Public Library. An additional archival copy of the documentation shall be offered to the Inglewood Historic Preservation Alliance. **MM CUL-2:** Wherever support columns would come into close proximity to the Fox Theater building, these columns shall be situated as far away as possible from the publicly visible façades of the building as feasible; and to the extent possible, the location of the columns shall be shifted to either side of the building rather than directly in front of it, to minimize visual impacts. **MM CUL-3:** Wherever APM station vertical circulation elements, such as escalators, elevators, and stairs, would come into close proximity with the Fox Theater building, these elements shall be situated with as much distance from the publicly visible façades of the building as is feasible; and to the extent possible, the placement of these elements shall be shifted to either side of the resource rather than directly in front of it, to minimize visual impacts.	
Impact CUL-2: Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	PS	**See MM TCR-1 to MM TCR-4.**	LS
Impact CUL-3: Disturb any human remains, including those interred outside of formal cemeteries.	PS	**See MM TCR-1, MM TCR-3, MM TCR-5.**	LS

4.5 Energy			
Impact E-1: Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation.	LS	None Required	LS
Impact E-2: Conflict with or obstruct a State or local plan for renewable energy or energy efficiency.	LS	None Required	LS
4.6 Geology			
Impact GEO-1: Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map, issued by the State Geologist for the area or based on other substantial evidence of a known	PS	**MM GEO-1:** The proposed Project shall be designed to accommodate fault rupture where present in accordance with applicable Caltrans guidelines, including Memo to Designers 20-8 (Analysis of Ordinary Bridges that Cross Faults), dated January 2013; and Memo to Designers 20-10 (Fault Rupture), dated January 2013, where any portion of a structure falls within an APEFZ, or where any portion of a structure falls within approximately 100 meters (330 feet) of well-mapped active faults, or within 300 meters (1,000 feet) of an un-zoned fault (not in an APEFZ) that is Holocene or younger in age. Stations and elevated structures for the APM Guideway shall be located to avoid the fault rupture hazard where present with refinement of station and APM Guideway placement worked into final design as needed. As noted in Caltrans Memorandum to Designers (MTD) 20-8, bridge type structures, such as the APM Guideway, must be designed for the displacement demand resulting from a static fault offset, the dynamic response due to ground shaking, and any other fault-induced	LS

fault. Refer to Division of Mines and Geology Special Publication 42.

hazards (e.g., creep) that may occur at the site. Caltrans MTD 20-8 provides a method for obtaining the displacements at columns and abutments at fault crossings; all the requirements must also be followed. Adequate bearing seats must be provided so the superstructure can slide at the abutment, bent, or hinge seats without falling.

MM GEO-2: During site investigation prior to the start of construction, the location of the anticipated trend of the Townsite Fault shall be further defined via a phased investigation process to identify and locate active fault traces in the Project area to support adjustments to the proposed Project's design.

The investigation shall include a supplemental fault investigation conducted along the trace of the Townsite fault to further refine the location of the feature and assess the activity level where it crosses the proposed APM alignment and any stations.

The investigation shall include the following surface and subsurface methods:

- Aerial photograph analysis;
- Geophysical surveys (e.g., seismic reflection and/or seismic refraction) to refine the identified geophysical anomaly associated with the Townsite fault and inform subsequent targeted fault hazard exploration as necessary;
- Targeted fault trenching based on the findings of additional geophysical studies to locate the potential Townsite fault where it crosses the proposed ITC alignment; and
- Exploratory drilling and sampling (e.g., hollow stem auger and CPT borings), as necessary, if definitive information regarding the trace of the Townsite fault cannot be adequately delineated across the proposed ITC alignment within the limits of fault trenching.

Based on the results of these investigations, column placements and facility designs would be adjusted to accommodate geologic conditions identified. Further, the facilities shall be designed in accordance with

		applicable Caltrans guidelines including Memo to Designers 20-8 (Analysis of Ordinary Bridges that Cross Faults) and 20-10 (Fault Rupture). Stations/structures shall be located to avoid the fault rupture hazard where present. Columns and foundations for the guideway and stations, as well as any other APM facilities shall be located to avoid the fault rupture hazard where present. The design fault offset where evaluating features crossing the APM guideway alignment shall be determined as the larger of the: • Deterministically derived average displacement. • Probabilistically derived displacement consistent with a 5 percent in 50-years probability of exceedance. Probabilistic procedures shall follow those outlined in Abrahamson [2008] and Petersen et al., [2011] of the *Fault Rupture Hazard Evaluation* (Appendix 4.6.1: Fault Rupture Study). These procedures allow for evaluation of offset based on the results of field investigation. If further study of the fault rupture is conducted, then procedures as outlined in CGS Note 4911 shall be followed. **MM GEO-3:** The proposed APM system facilities shall be designed in accordance with applicable Caltrans guidelines including Memo to Designers 20-8 (Analysis of Ordinary Bridges that Cross Faults) and 20-10 (Fault Rupture). The response spectra provided in the Development of Seismic Design Criteria in Support of Draft EIR - Seismic Design Criteria (**Appendix 4.6.2**) shall be considered applicable for both aerial guideway and ancillary structures within each segment of the alignment under the guideway and each station. Probabilistic procedures also shall follow those outlined Caltrans memo to Designers 20-10 -Fault Rupture, dated January 2013.	
Impact GEO-2: Directly or indirectly cause	LS	None required.	LS

[11] California Geological Survey, Note 49: Guidelines for Evaluating the Hazard of Surface Fault Rupture, https://www.conservation.ca.gov/cgs/Documents/Publications/CGS-Notes/CGS-Note-49.pdf

potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking.			
Impact GEO-3: Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	PS	**MM GEO-4:** A qualified paleontologist meeting the Society of Vertebrate Paleontology (SVP) Standards (SVP, 2010) shall be retained by the project applicant and approved by the City prior to the approval of grading permits. The qualified paleontologist shall: a) Prepare, design, and implement a monitoring and mitigation program for the Project consistent with Society of Vertebrate Paleontology Guidelines. The Plan shall define pre-construction coordination, construction monitoring for excavations based on the activities and depth of disturbance planned for each portion of the Project Site, data recovery (including halting or diverting construction so that fossil remains can be salvaged in a timely manner), fossil treatment, procurement, and reporting. The Plan monitoring and mitigation program shall be prepared and approved by the City prior to the issuance of the first grading permit. If the qualified paleontologist determines that the Project-related grading and excavation activity would not affect Older Quaternary Alluvium, then no further mitigation is required. b) Conduct construction worker paleontological resources sensitivity training at the Project kick-off meeting prior to the start of ground disturbing activities (including vegetation removal, pavement removal, etc.) and would present the Plan as outlined in (a). In the event construction crews are phased or rotated, additional training shall be conducted for new construction personnel working on ground-disturbing activities. The training session shall provide instruction on the recognition of the types of paleontological resources that could be encountered within the Project Site and the procedures to be followed if they are found. Documentation shall be retained by the qualified	LS

		paleontologist demonstrating that the appropriate construction personnel attended the training. c) Direct the performance of paleontological resources monitoring by a qualified paleontological monitor (meeting the standards of the SVP, 2010). Paleontological resources monitoring shall be conducted pursuant to the monitoring and mitigation program developed under (a), above. Monitoring activities may be altered or ceased if determined adequate by the qualified paleontologist. Monitors shall have the authority to and shall temporarily halt or divert work away from exposed fossils or potential fossils and establish a 50-foot radius temporarily halting work around the find. Monitors shall prepare daily logs detailing the types of ground disturbing activities and soils observed, and any discoveries. d) If fossils are encountered, determine their significance, and, if significant, supervise their collection for curation. Any fossils collected during Project-related excavations, and determined to be significant by the qualified paleontologist, shall be prepared to the point of identification and curated into an accredited repository with retrievable storage. e) Prepare a final monitoring and mitigation report for submittal to the City in order to document the results of the paleontological monitoring. If there are significant discoveries, fossil locality information and final disposition shall be included with the final report which would be submitted to the appropriate repository and the City. The final monitoring report shall be submitted to the City within 90 days of completion of excavation and other ground disturbing activities that could affect Older Quaternary Alluvium.	
4.7 Greenhouse Gas			
Impact GHG-1: Generate greenhouse gas emissions, either directly or indirectly,	LS	None Required	LS

that may have a significant impact on the environment.			
Impact GHG-2: Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.	LS	None Required	LS
4.8 Hazards and Hazardous Waste			
Impact HAZ-1: Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.	LS	None Required	LS
Impact HAZ-2: Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	LS	None Required	LS
4.9 Land Use			

Impact LU-1: Physically divide an established community.	LS	None Required	LS
Impact LU-2: Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.	LS	None Required	LS
4.10 Noise and Vibration			
Impact NOI-1: Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	PS	**MM 4.10-1 Construction Noise Control Plan:** Prior to the issuance of any demolition or construction permit for each phase of project development, the Construction Manager shall develop a Construction Noise Control Plan demonstrating how to ensure increases in ambient noise levels are less than 5 dBA Leq over existing conditions. The Construction Noise Control Plan shall be developed in coordination with a certified acoustical/vibration consultant and the Construction Manager and shall be approved by the City's Director of Public Works prior to construction. The Plan shall include the following elements: • Measurements of existing one-hour Leq noise levels at sensitive receptors prior to construction activities. • Construction noise measures necessary to ensure increase in noise are less than 5 dBA Leq over existing conditions. This plan could include, but would not be limited to, the following strategies: – Install temporary noise barriers that block line-of-sight to sensitive receptors.	LS

  - Reduce the simultaneous use of heavy-duty construction equipment.
  - Operate equipment at the lowest possible power levels.
  - Use solar, battery powered, or hybrid equipment whenever practical.
  - Locate staging areas as far away from sensitive receptors as feasible.
- Work on elevated guideways and stations areas shall use temporary noise barriers where possible.
- Enclose stationary noise sources with acoustical barriers where possible.
  - Stationary noise sources (e.g., generators) shall be muffled and enclosed within sheds, incorporate insulation barriers, or other measures to the extent feasible. Pole power shall be utilized at the earliest feasible point in time, and to the maximum extent feasible in lieu of generators. If stationary equipment such as diesel- or gasoline-powered generators are not enclosed within a shed or barrier, such equipment must be located at least 100 feet from sensitive land uses (e.g., residences, schools, childcare centers, hospitals, parks, or similar uses), whenever possible.
- Impact tools (i.e., jack hammers, pavement breakers, and rock drills) used for project construction shall be hydraulically or electrically powered wherever possible to avoid noise associated with compressed air exhaust from pneumatically powered tools. Where use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust and external jackets shall be used where feasible to lower noise levels. Quieter procedures shall be used, such as drills rather than impact equipment, whenever feasible. Limiting the use impact pile drivers and impact hammers operating simultaneously to reduce Lmax noise levels by approximately 7 dBA. Additionally, use of “quiet” pile driving technology (such as auger displacement installation), where

		feasible in consideration of geotechnical and structural requirements and conditions shall be considered. • Contractors shall coordinate with Kelso Elementary School administrators to avoid disruptive activities during school hours. **MM 4.10-2 Designate Community Affairs Liaison. Designate a Community Affairs Liaison Officer:** This person's contact information shall be posted around the Project area, in adjacent public spaces, and in construction notifications. The Community Affairs Liaison shall be responsible for responding within 24 hours to any local complaints about construction activities. This Community Affairs Liaison shall receive all public complaints about construction noise and vibration disturbances and be responsible for determining the cause of the complaint and implementation of feasible measures to be taken to alleviate the problem. The Community Affairs Liaison shall have the authority to coordinate with a designated construction contractor representative for the purpose of investigating the noise disturbance and undertaking all feasible measures to protect public health and safety, and shall ensure that steps be taken to reduce construction vibration levels as deemed appropriate and safe by the designated construction contractor representative. Such steps could include the application of noise and vibration absorbing barriers, substitution of lower noise and vibration generating equipment or activity, rescheduling of noise and vibration-generating construction activity, or other potential adjustments to the construction program to reduce noise and vibration impacts at the adjacent noise and vibration-sensitive receptors.
Impact NOI-2: Generation of excessive groundborne vibration or groundborne noise levels?	LS	**MM 4.10-3 Construction Vibration Reduction Plan:** Prior to the issuance of any demolition or construction permit for each phase of project development, a Construction Vibration Reduction Plan shall be prepared to minimize construction vibration at nearby sensitive receptors from vibration created by construction activities. The Plan shall be developed in coordination with a certified acoustical/vibration consultant and the Construction Manager and shall be approved by the City's Director of Public Works. The Plan shall include but not be limited

to the following elements to ensure impacts from groundborne vibration are less than significant:

A. A Pre-Demolition and Construction Plan that includes but not limited to:

   i. Photos of current conditions of buildings and structures that could be damaged from construction activities. This crack survey shall include photos of existing cracks and other material conditions present on or at the surveyed buildings. Images of interior conditions shall be included if possible. Photos in the report shall be labelled in detail and dated.

   ii. Identify representative cracks in the walls of existing buildings, if any, and install crack gauges on such walls of the buildings to measure changes in existing cracks during project activities.

   Crack gauges shall be installed on multiple representative cracks, particularly on sides of the building facing the project.

   iii. Determine the number and placement of vibration sensors at the affected buildings in consultation with a qualified architect. The number of units and their locations shall take into account proposed demolition and construction activities so that adequate measurements can be taken illustrating vibration levels during the course of the project, and if/when levels exceed the established threshold.

   iv. A line and grade pre-construction survey at the affected buildings shall be conducted.

B. A Vibration Plan During Demolition and Construction:

   i. The Construction Manager shall regularly inspect and photograph crack gauges, maintaining records of these inspections to be included in postconstruction reporting. Gauges shall be inspected every two weeks, or more frequently during periods of active project actions in close proximity to crack monitors.

   ii. The vibration monitoring system shall measure and continuously store the peak particle velocity (PPV) in

inches/second. Vibration data shall be stored on a one-second interval. The system shall also be programmed for two preset velocity levels: a regulatory level that represents when PPV levels would exceed the FTA's threshold of significance for a building given its conditions, and a warning level that is 0.05 inch/second (PPV) less than the regulatory level. The system shall also provide real-time alert when the vibration levels exceed either of the two preset levels.

iii. In the event the warning level (PPV) is triggered, the contractor shall identify the source of vibration impacts and establish steps to reduce the vibration levels, including but not limited to halting or staggering concurrent activities and using lower vibratory techniques.

iv. In the event the regulatory level (PPV) is triggered, the Construction Manager shall halt the construction activities in the vicinity of the Project area and visually inspect the building for any damage. Results of the inspection must be logged. The Construction Manager shall identify the source of vibration generation and provide steps to reduce the vibration level. Vibration measurement shall be made with the new construction method to verify that the vibration level is below the warning level (PPV). Construction activities may then restart.

v. In the event damage occurs to historic finish materials due to construction vibration, such materials shall be repaired in consultation with a qualified preservation consultant.

vi. The Construction Manager shall collect vibration data from receptors and report vibration levels to the City Chief Building Official on a daily basis.

The reports shall include annotations regarding project activities as necessary to explain changes in vibration levels.

C. Post-Construction:

i. The Construction Manager shall provide a report to the City Chief Building Official regarding crack and vibration monitoring conducted during demolition and construction. In addition to a narrative summary of the monitoring activities and their findings, this report shall include photographs illustrating the post-construction state of cracks and material conditions that were presented in the pre-construction assessment report, along with images of other relevant conditions showing the impact, or lack of impact, of project activities. The photographs shall sufficiently illustrate damage, if any, caused by the project and/or show how the project did not cause physical damage to the buildings. The report shall include analysis of vibration data related to project activities, as well as summarize efforts undertaken to avoid vibration impacts. Finally, a postconstruction line and grade survey shall also be included in this report.

ii. The Construction Manager shall be responsible for repairs and damage to buildings if damage is caused by vibration or movement during the demolition and/or construction activities. Repairs may be necessary to address, for example, cracks that expanded as a result of the project, physical damage visible in post-construction assessment, or holes or connection points that were needed for shoring or stabilization. Repairs shall be directly related to project impacts and will not apply to general rehabilitation or restoration activities of the buildings.

MM 4.10-4 Construction Equipment Locations (Building Damage): To address potential structural and building damage, the following measures are proposed to reduce vibration impacts:

- Limit the location of pile driving and vibratory roller activity to not be within 55 feet and 30 feet of the nearest off-site sensitive receptor, respectively.
- Limit the number of jackhammers operating simultaneously to one (1) piece operating within 45 feet of off-site sensitive receptors.

		• In the event impact pile driving is required, equipment shall only be used from the hours of 7:00 AM to 7:00 PM. If feasible, pile driving should use alternative technology such as vibration or hydraulic insertion. **MM 4.10-5 Construction Equipment Locations (Human Annoyance):** To reduce construction vibration impacts related to human annoyance, the following measures are proposed: • Limit the location of pile driving to 310 feet of off-site vibration sensitive receptors. • Limit the location of vibratory roller to 150 feet of off-site vibration sensitive receptors. • Limit the location of large bulldozer to 85 feet of off-site vibration sensitive receptors. • Limit the location of caisson drilling to 85 feet of off-site vibration sensitive receptors. • Limit the location of loaded trucks to 75 feet of off-site vibration sensitive receptors. • Limit the location of jackhammers to 45 feet of off-site vibration sensitive receptors. • Limit the location of small bulldozer to 25 feet of off-site vibration sensitive receptors.	
4.11 Population, Employment, and Housing			
Impact POP-1: Induce substantial unplanned population or employment growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of	LS	None Required	LS

roads or other infrastructure)?			
4.12 Transportation			
Impact T-1: Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	LS	None Required	LS
Impact T-2: Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	LS	None Required	LS
Impact T-3: Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	LS	None Required	LS
Impact T-4: Result in inadequate emergency access?	LS	None Required	LS
4.13 Tribal Cultural Resources			
Impact TCR-1: Cause a substantial adverse change in the	PS	**MM TCR-1: Retention of a Tribal Cultural Resources Monitor/Consultant**. Prior to the commencement of any ground disturbing activity at the project site, the project applicant shall retain	LS

significance of a tribal cultural resource, defined in Public Resources Code § 21074 as either a site, feature, place, or cultural landscape that is geographically defined in terms of size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k); or

ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code §

a qualified archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for archaeology (US Department of the Interior, 2008) to carry out all mitigation related to cultural resources. In addition, a Native American Monitor shall be designated by the Gabrieleno Band of Mission Indians-Kizh Nation – the tribe that consulted on this project pursuant to Assembly Bill A52 (the "Tribe" or the "Consulting Tribe"). If no Native American Monitor is designated within a reasonable period of time (not to exceed 30 days), the activity can commence without the designated Monitor. A copy of the executed contract shall be submitted to the City of Inglewood Planning and Building Department prior to the issuance of any permit necessary to commence a ground-disturbing activity. The Tribal monitor will only be present on- site during the construction phases that involve ground-disturbing activities. Ground disturbing activities are defined by the Tribe as activities that may include, but are not limited to, pavement removal, potholing or auguring, grubbing, tree removals, boring, grading, excavation, drilling, and trenching, within the project area. The Tribal Monitor will complete daily monitoring logs that will provide descriptions of the day's activities, including construction activities, locations, soil, and any cultural materials identified. The on-site monitoring shall end when all ground-disturbing activities on the Project Site are completed, or when the Tribal Representatives and Tribal Monitor have indicated that all upcoming ground- disturbing activities at the Project Site have little to no potential for impacting Tribal Cultural Resources. Upon discovery of any Tribal Cultural Resources, construction activities shall cease in the immediate vicinity of the find (not less than the surrounding 50 feet) until the find can be assessed. All Tribal Cultural Resources unearthed by project activities shall be evaluated by the qualified archaeologist and Tribal monitor approved by the Consulting Tribe. If the resources are Native American in origin, the Consulting Tribe will retain it/them in the form and/or manner the Tribe deems appropriate, for educational, cultural and/or historic purposes. If human remains and/or grave goods are discovered or recognized at the Project Site, all ground disturbance shall

5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

immediately cease, and the county coroner shall be notified per Public Resources Code Section 5097.98, and Health & Safety Code Section 7050.5. Human remains and grave/burial goods shall be treated alike per California Public Resources Code section 5097.98(d)(1) and (2). Work may continue on other parts of the Project Site while evaluation and, if necessary, mitigation takes place (CEQA Guidelines Section 15064.5[f]). If a non-Native American resource is determined by the qualified archaeologist to constitute a "historical resource" or "unique archaeological resource," time allotment and funding sufficient to allow for implementation of avoidance measures, or appropriate mitigation, must be available. The treatment plan established for the resources shall be in accordance with CEQA.

Guidelines Section 15064.5(f) for historical resources and PRC Sections 21083.2(b) for unique archaeological resources. Preservation in place (i.e., avoidance) is the preferred manner of treatment. If preservation in place is not feasible, treatment may include implementation of archaeological data recovery excavations to remove the resource along with subsequent laboratory processing and analysis. Any historic archaeological material that is not Native American in origin shall be curated at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County or the Fowler Museum, if such an institution agrees to accept the material. If no institution accepts the archaeological material, it shall be offered to a local school or historical society in the area for educational purposes.

MM TCR-4 and **MM TCR-5** will supplement **MM TCR-1**.

MM TCR-2: Monitoring and Mitigation Plan. Prepare, design, and implement a monitoring and mitigation program for the Project. The Plan shall define pre-construction coordination, construction monitoring for excavations based on the activities and depth of disturbance planned for each portion of the Project area, data recovery (including halting or diverting construction so that archaeological

remains can be evaluated and recovered in a timely manner), artifact and feature treatment, procurement, and reporting. The Plan shall be prepared and approved by a qualified archaeologist prior to the issuance of the first grading permit.

MM TCR-3: Cultural Resources Sensitivity Training.

The qualified archaeologist and Native American Monitor shall conduct construction-worker archaeological resources sensitivity training at the Project kick-off meeting prior to the start of ground disturbing activities (including vegetation removal, pavement removal, etc.) and will present the Plan as outlined in (a), for all construction personnel conducting, supervising, or associated with demolition and ground disturbance, including utility work, for the Project. In the event construction crews are phased or rotated, additional training shall be conducted for new construction personnel working on ground-disturbing activities. Construction personnel shall be informed of the types of prehistoric and historic archaeological resources that may be encountered, and of the proper procedures to be enacted in the event of an inadvertent discovery of archaeological resources or human remains. Documentation shall be retained by the qualified archaeologist demonstrating that the appropriate construction personnel attended the training.

MM TCR-4: Archaeological and Native American Monitoring. The qualified archaeologist will oversee archaeological and Native American monitors who shall be retained to be present and work in tandem, monitoring during construction excavations such as grading, trenching, or any other excavation activity associated with the Project and as defined in the Monitoring and Mitigation Plan. If, after advanced notice, the Native American representative declines, is unable, or does not respond to the notice, construction can proceed under supervision of the qualified archaeologist. The frequency of monitoring shall be based on the rate of excavation and grading activities, the materials being excavated, and the depth of excavation, and if found, the quantity and type of archaeological resources encountered. Full-time monitoring may be reduced to part-time inspections, or ceased

entirely, if determined adequate by the qualified archaeologist and the Native American monitor.

1. In the event of the discovery of any archaeological materials during implementation of the Project, all work shall immediately cease within 50 feet of the discovery until it can be evaluated by the qualified archaeologist. Construction shall not resume until the qualified archaeologist has made a determination on the significance of the resource(s) and provided recommendations regarding the handling of the find. If the resource is determined to be significant, the qualified archaeologist will confer with the project applicant regarding recommendation for treatment and ultimate disposition of the resource(s).

2. If it is determined that the discovered archaeological resource constitutes a historical resource or a unique archaeological resource pursuant to CEQA, avoidance and preservation in place is the preferred manner of mitigation. Preservation in place may be accomplished by, but is not limited to, avoidance, incorporating the resource into open space, capping, or deeding the site into a permanent conservation easement.

3. In the event that preservation in place is demonstrated to be infeasible and data recovery through excavation is the only feasible mitigation available, a Cultural Resources Treatment Plan shall be prepared and implemented by the qualified archaeologist in consultation with the project applicant, and appropriate Native American representatives (if the find is of Native American origin). The Cultural Resources Treatment Plan shall provide for the adequate recovery of the scientifically consequential information contained in the archaeological resource through laboratory processing and analysis of the artifacts. The Treatment Plan will further make recommendations for the ultimate curation of any archaeological materials, which shall be curated at a public, non-profit curation facility, university, or museum with a research interest in the materials, if such an institution agrees to accept them. If resources are determined to be Native American in origin, they will first be offered to the Tribe for

		permanent curation, repatriation, or reburial, as directed by the Tribe. If no institution or Tribe accepts the archaeological material, then the material shall be donated to a local school or historical society in the area for educational purposes. 4. If the resource is identified as a Native American, the qualified archaeologist and the City shall consult with appropriate Native American representatives, as identified through the AB 52 consultation process in determining treatment for prehistoric or Native American resources to ensure cultural values ascribed to the resource, beyond that which is scientifically important, are considered. 5. Prepare a final monitoring and mitigation report for submittal to the City, and the South Central Coastal Information Center (SCCIC), in order to document the results of the archaeological and Native American monitoring. If there are significant discoveries, artifact and feature analysis and final disposition shall be included with the final report, which will be submitted to the SCCIC and the applicant. The final monitoring report shall be submitted to the applicant within 90 days of completion of excavation and other ground disturbing activities that require monitoring.	
4.14 Utilities			
Impact U-1: Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which	PS	**MM UT-1:** Prior to the award of the DBFOM contract, and start of any demolition or construction activities, the City shall be responsible identifying the locations of existing utilities potentially affected by the Project. This shall include coordinating with all existing utility providers for wet and dry utilities (water, sewer, gas, electric, and telecommunications) to obtain documentation of existing utility locations. Field verification (i.e., potholing and other methods as appropriate) shall be conducted to document the locations of all utilities within 20 feet of the proposed Project's guideway and station foundations. Based on the information from the field investigations, the DBFOM contractor shall be responsible for coordinating with the appropriate utility owners/operators to determine specific set back requirements	LS

could cause significant environmental effects.	for each utility line and the need for any stabilization for protection in place or relocation measures. **MM UT-2:** Prior to the award of the DBFOM contract, and start of construction, the City shall contact SCE and request an updated system Distribution Study to determine the amount of load that SCE could accommodate and required infrastructure upgrades in order to meet the proposed Project's recommended full redundancy design. Should SCE determine that additional system upgrades are required, such upgrades shall be the responsibility of the DBFOM contractor and/or the City to complete (including design and any additional environmental clearance), subject to the review and approval of SCE and the City, as applicable.

2.0 INTRODUCTION

This document is a Draft Environmental Impact Report (Draft EIR) for the Inglewood Transit Connector Project (proposed Project). This Draft EIR has been prepared by the City of Inglewood (City), acting as the Lead Agency in conformance with the California Environmental Quality Act (CEQA).

2.1 PURPOSE AND TYPE OF EIR

2.1.1 Statutory Authority

Under CEQA, public agencies are required to evaluate proposed development projects for their effect on the physical environment and identify any feasible measures that would avoid or lessen significant environmental effects. The EIR is an information document used in the planning and decision-making process and is intended to provide disclosure of the environmental consequences of a project to the public and agency decision makers before action is taken to approve project permits.

All projects within the State of California are required to undergo environmental review to analyze the environmental impacts associated with implementation of the project in accordance with CEQA.[1] The preparation of an EIR provides information to assist a lead agency in making decisions on the project but does not control the lead agency's exercise of discretion. Specifically, as noted in the State CEQA Guidelines:[2]

> *(a) An EIR is an informational document which will inform public agency decision-makers and the public generally of the significant environmental effect of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project. The public agency shall consider the information in the EIR along with other information which may be presented to the agency.*
>
> *(b) While the information in the EIR does not control the agency's ultimate discretion on the project, the agency must respond to each significant effect identified in the EIR by making findings under Section 15091 and if necessary, by making a statement of overriding consideration under Section 15093.*
>
> *(c) The information in an EIR may constitute substantial evidence in the record to support the agency's action on the project if its decision is later challenged in court.*

1 California Public Resources Code (PRC), sec. 21000 et seq., California Environmental Quality Act (CEQA).
2 California Code of Regulations, tit. 14, div. 6, ch. 3, State CEQA Guidelines, sec. 15121.

This EIR was prepared in accordance with the California Environmental Quality Act of 1970[3] and the *Guidelines for Implementation of the California Environmental Quality Act* (State CEQA Guidelines), published by the Natural Resources Agency of the State of California.[4]

The City of Inglewood is the Lead Agency for the proposed Project under CEQA[5] and is responsible for the preparation of this EIR.

2.1.2 Type of Environmental Document

As provided for in the State CEQA Guidelines Section 15161, this EIR for is a project EIR.[6] A project EIR examines the environmental impacts of a specific development project. This type of EIR should focus primarily on the changes in the environment that would result from the development project. The EIR shall examine all phases of the proposed Project including planning, construction, and operation.

2.1.3 Purpose and Scope of the EIR

As described in the CEQA Guidelines,[7] an EIR is a public information document that assesses potential environmental effects of a proposed project, as well as identifies mitigation measures and alternatives to a proposed project that could reduce or avoid adverse environmental impacts. CEQA requires that State and local government agencies consider the environmental consequences of projects over which they have discretionary authority.

The proposed Project, as defined in **Section 3: Project Description**, would require a discretionary action under CEQA and is the subject of this EIR. The EIR is used in the planning and decision-making process. The purpose of an EIR is not to advocate or recommend either approval or denial of a proposed project.

An EIR, under the provisions of CEQA, identifies "the significant effects on the environment of a project, to identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided."[8] This EIR assesses the potential environmental effects of the proposed Project and related implementing approvals and documents.

3 CEQA, Section 21000 et seq.
4 State CEQA Guidelines, sec. 15000 et seq.
5 PRC, sec. 21067 as amended, CEQA.
6 State CEQA Guidelines, sec. 15161.
7 CEQA Guidelines Section 15121(a).
8 PRC, sec/ 21002.1[a].

This EIR was prepared to provide information to public agencies, the general public, and decision makers regarding potential environmental impacts related to the components of the construction and operation of the proposed Project.

The intentions of CEQA are to (1) inform governmental decision makers and the public about the potentially significant environmental effects of proposed activities; (2) identify the ways that environmental damage can be avoided or significantly reduced; (3) prevent significant, avoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible; and (4) disclose to the public the reasons why a governmental agency approved the project in the manner the agency chose if significant environmental effects are involved.[9]

Because the Initial Study determined that the proposed Project may have a significant environmental effect on the environment, the State CEQA Guidelines require the preparation of this Draft EIR. The City has undertaken this Draft EIR for the following purposes:

- To evaluate the potentially significant environmental effects associated with the implementation of the proposed Project, as required by CEQA;
- To indicate the manner in which those significant impacts can be avoided or significantly lessened;
- To identify any significant and unavoidable adverse impacts that cannot be mitigated;
- To identify reasonable and potentially feasible alternatives to the proposed Project that would eliminate any significant adverse environmental impacts or reduce the impacts to less than significant levels;
- To inform the general public, the local community, and responsible trustee, State, and federal agencies of the nature of the proposed Project, its potentially significant environmental effects, feasible mitigation measures to mitigate those effects, and reasonable and feasible alternatives;
- To enable City decision makers to consider the environmental consequences of the proposed Project and make findings regarding each significant effect that is identified;
- To provide a basis for preparation of any future environmental documents; and
- To facilitate responsible agencies in issuing permits and approvals for the proposed Project.

According to CEQA and the State CEQA Guidelines, public agencies must avoid or lessen significant environmental impacts where feasible. Where impacts cannot be mitigated to less than significant levels,

9 State CEQA Guidelines, sec. 15002; PRC, sec. 21002.1.

public agencies have an obligation to balance a project's significant impacts on the environment against other factors, including economic, social, technological, legal, and other benefits.

The City must certify the EIR before approving the proposed Project. Upon certification, the EIR will serve as the base environmental document for the City and will be used as a basis for decisions on implementation of the proposed Project. Other agencies may also use this EIR in their review and approval processes.

This EIR was prepared in accordance with Section 15151 of the State CEQA Guidelines, which defines the standards for EIR adequacy as follows:

> *An EIR should be prepared with a sufficient degree of analysis to provide decision makers with information which enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. The courts have looked not for perfection; but for adequacy, completeness, and good faith effort at full disclosure.*

2.2 SUMMARY OF PUBLIC OUTREACH

2.2.1 Scoping

The City of Inglewood (City or Inglewood) as the Lead Agency prepared a Notice of Preparation (Original NOP) and an Initial Study (Original IS) which was published on July 16, 2018 (SCH 2018071034) identifying the resource areas that could have potential significant impacts from the construction and operation of the proposed Project. The Original IS determined that an Environmental Impact Report (EIR) would be prepared in compliance with CEQA to assess for potentially significant impacts that may result from the proposed Project. A Notice of Preparation (Original NOP) was circulated and comments were received from the public and agencies following a 30-day comment period that ended on August 15, 2018.

As a result of the comments received and refinements and modifications to the proposed Project identified in the Original NOP and Original IS, a Revised NOP and IS were re-circulated for public review and comment from September 10, 2020 to October 12, 2020. Subsequent to the circulation of the Original IS, the State of California Office of Planning and Research (OPR) updated and revised the thresholds contained in the State CEQA Guidelines Appendix G. The Revised IS was updated to address the updated Appendix G checklist that became effective on December 28, 2018.

The Revised NOP and Revised IS reflect the following refinements and modifications made to the proposed Project:

- Changes to proposed Project from an approximately 1.8-mile long alignment with 5 stations to an approximately 1.6-mile long alignment with 3 stations. The revised alignment follows the same route as the original alignment from Market Street and Florence Avenue to Manchester Boulevard to Prairie Avenue terminating at the intersection of Prairie Avenue and Hardy Street.
- Refinements and modifications to the proposed stations as follows:

– Modify the proposed Project to reduce the total number of stations from the five stations previously considered to the three stations. The original five station locations were at the following:

  - Market Street Station: at the intersection of Market Street and Regent Street on Market Street;
  - Manchester Boulevard Station: between Hillcrest Boulevard and Spruce Avenue on Manchester Avenue adjacent to the proposed Projects maintenance and storage facility (MSF);
  - Forum Station: north of the intersection of Prairie Avenue and Pincay Drive on Prairie Avenue;
  - Hollywood Park Station: between Arbor Vitae Street and Hardy Street on Prairie Avenue adjacent to the City's proposed intermodal transit facility (ITF) located on the southeast corner of Prairie Avenue and E. Arbor Vitae Street; and
  - Century Boulevard Station: at the intersection of Prairie Avenue and Century Boulevard on Prairie Avenue.

– The new locations for the three stations are located at:

  - Market Street/Florence Avenue Station: at an existing commercial plaza on the southeast corner of the intersection of Market Street and Florence Avenue between Market Street and Locust Street;
  - Prairie Avenue/Arbor Vitae Street Station: at the intersection of Prairie Avenue and Pincay Drive; and
  - Prairie Avenue/Hardy Street Station: at the intersection of Prairie Avenue and Hardy Street.

– A pedestrian bridge linkage has been added to connect the Market Street/Florence Avenue Station with the Metro Crenshaw line on the northside of Florence Avenue.

- Removal of the Intermodal Transit Facility (ITF) as part of the proposed Project; the City is proceeding with the ITF project separately.

- Reduce the potential number of traction power substations from three to two. One will be co-located with the proposed Project's maintenance and storage facility (MSF facility) and the other will be located on the City's ITF site on Prairie Avenue.

(For copies, see **Appendix 2.0.1a: Revised Notice of Preparation (Revised NOP) and 2.0.1b Original NOP**; **Appendix 2.02a Revised Initial Study (IS) and 2.0.2b Original IS**; and **Appendix 2.0.3 Summary of Comments Received on the NOP and IS Memorandum**).

The City submitted both the Original and Revised NOPs and Initial Studies to the Governor's OPR; applicable trustee or responsible federal, State, regional, and local agencies identified for the proposed Project, including adjacent cities and counties; the County of Los Angeles; relevant Native American tribes; and all interested parties requesting such notice to allow for comment on the IS during the 30-day comment period. The Original and Revised NOP distribution lists indicating the agencies, departments, tribes, and parties that were mailed certified copies of the Original and Revised NOPs is provided as **Appendix 2.0.1: Notice of Preparation**. In addition, copies of the Original and Revised ISs were made available for review at Inglewood City Hall and the Inglewood Public library, as well as on the City's website, to give the public the opportunity to comment on the both the Original and Revised ISs during the respective 30-day comment periods.

The purpose of the Original and Revised NOPs were to provide information describing the proposed Project and its potential environmental effects to those who might wish to comment regarding the scope and content of the information to be included in the EIR. The City encouraged all notified agencies, adjacent cities and counties, and interested members of the public to provide comments on the Original and Revised NOPs and respective ISs to the City so the City could ensure the Draft EIR addresses the appropriate topics and considers all potential environmental impacts that may result from the construction and operation of the proposed Project.

As part of the Original NOP/IS process, a scoping meeting was held on July 26, 2018, from 6 PM to 8 PM at the Inglewood Senior Citizens Center, 111 N. Locust Street, Inglewood, CA 90301. The City also provided the opportunity for comments to be submitted at the scoping meeting.

Three State agencies, five regional agencies, and one local agency submitted comment letters during the public circulation period for the Original IS prepared for this EIR. In addition, comments were received from 17 individuals at the public scoping meeting held on July 26, 2018. A list of agencies and individuals is provided in **Table 2.0-1: Comments Received on the Original Notice of Preparation and Original Initial Study**.

Table 2.0-1
Comments Received on the Original Notice of Preparation and Original Initial Study

Agency/Entity	Name of Commenter
State of California, Native American Heritage Commission	Gayle Totton, MA, PhD, Associate Governmental Program Analyst
State of California, Public Utilities Commission	Daren Gilbert, Manager, Rail Transit Safety Branch, Safety and Enforcement Division
State of California, Department of Transportation	Miya Edmonson, IGR/CEQA Branch Chief
Southern California Association of Governments	Ping Chang, Acting Manager, Compliance and Performance Monitoring
West Basin Municipal Water District	Run Chen, Engineering Supervisor
South Coast Air Quality Management District	Daniel Garcia, Program Supervisor Planning, Rule Development & Area Sources
County Sanitation Districts of Los Angeles County	Adriana Raza, Customer Service Specialist, Facilities Planning Department
Los Angeles County Fire Department	Michael Y. Takeshita, Acting Chief, Forestry Division, Prevention Services Bureau
Inglewood Unified School District	Jennifer S. Recine, Esq.

The following members of the public also provided comments:

Kathy Alston
Joan Beck
T. Bunn
Gerald Chernick
Daniel J. Coles
Randal Curtis
William Harris
Wilma Kaufman
Harriet Keyes
Gary Kynard
Erica Nelson
Diana Patterson
Richard Purdy
Alma Quijas/Steven Aquino
Owen Smith
Holly Tempo

A total of two State agencies, four regional agencies, three local agencies, two interested parties, and one individual submitted comment letters during the public circulation period for the Revised IS prepared for this EIR. A list of agencies and individuals is provided in **Table 2.0-2: Comments Received on the Revised Notice of Preparation and Revised Initial Study**.

The following members of the public also provided comments:

William Harris

Based on a preliminary review of the proposed Project as part of the Revised IS, the City determined that potentially significant effects could occur with respect to aesthetics; air quality; biological resources; cultural resources; energy resources; geology and soils; greenhouse gas emissions; hazards and hazardous materials; land use and planning; noise and vibration; transportation and traffic; tribal cultural resources;

and utilities and service systems. These issues have been incorporated into the environmental analysis of the proposed Project contained within **Section 4.0: Environmental Impact Analysis** of this Draft EIR.

Table 2.0-2
Comments Received on the Revised Notice of Preparation and Revised Initial Study

Agency/Entity	Name of Commenter
State of California, Native American Heritage Commission	Andrew Green, Cultural Resources Analyst
State of California, Department of Transportation	Miya Edmonson, IGR/CEQA Branch Chief
Los Angeles County Transportation Agency	Shine Ling, Manager
Los Angeles County Public Works	Toan Duong, Civil Engineer
Los Angeles County Fire Department	Ronald M. Durbin, Chief
South Coast Air Quality Management District	Lijin Sun, Program Supervisor CEQA IGR Planning, Rule Development & Area Sources
City of Culver City (Culver CityBus)	Kaitlyn Zhang, Management Analyst/ Transportation Planner
Inglewood Unified School District	Erika F. Torrex, Ed. D., MSW, County Administrator
Thomas Safran & Associates	Jordan Pynes, President
Build Your Dreams Transit Solutions	Patrick Duan
Los Angeles Conservancy	Adrian Scott Fine, Director of Advocacy

2.2.2 Concerns and Issues Raised During Scoping

The State CEQA Guidelines[10] require that a Draft EIR summary identify areas of issues raised by other agencies and the public. In addition to those areas identified in the NOP as potentially significant, some issues of concern were expressed at the public scoping meeting for the Draft EIR and through responses to the NOP.

The following are the concerns noted in the comments received.

Alignment and Operation

The Original NOP identified a potential option for the Maintenance and Storage Facility at Kelso School. Representatives of the Inglewood Unified School District (Inglewood USD) raised issues regarding the proposed Project's support facilities, and stated that any acquisition or demolition of the Kelso Elementary School property to implement the proposed Project would have an impact on district facilities. In response to the Revised NOP, which identified a different proposed site for the Maintenance and Storage Facility, Inglewood USD indicated support for the Project and requested analysis of the potential effects of the proposed Project on school facilities.

10 PRC, tit. 14, div. 6, ch. 3, State CEQA Guidelines, sec. 15123.

In regard to public comments, several commenters voiced concerns, suggestions, and inquiries regarding the final alignment and operation of the proposed Project. Commenters suggested a number of modifications to alignment and support facility alternatives. Suggestions included adding connection to the I-105 freeway; creating an alignment along Locust Street; utilizing a portion of Edward Vincent Junior Park for the MSF; and incorporating the MSF into the Inglewood Basketball and Entertainment Center (IBEC) due to less interference with traffic, available open space, and optimal access. Further, one commenter noted that more alternatives should be considered to provide more economic development to all of the City, including Market Street.

In terms of operation of the proposed Project, one commenter noted that a station at Market Street and Florence Avenue would be a major benefit to people connecting to other locations and shopping. Another commenter stated that displacing businesses and/or residences should be avoided, and that by removing the Vons shopping center, a source of healthy and organic produce would be eliminated. Other commenters expressed concerns about operation of the proposed Project, including where users would park and whether there would be fares on event and nonevent days. Another commenter would like the proposed Project to be free for seniors and lower income people. One commenter expressed concern regarding financing the proposed Project and questioned whether funding would come from property taxes, sales taxes, or parcel taxes.

Construction Phasing and Impacts

The physical impacts of construction activity were a concern voiced by several public commenters. Comments included concerns that heavy machinery and construction operations would damage or crack adjacent properties; potentially cause loss of rental income due to undesirability of rental properties near an active construction zone; and disturb current tenants.

Inglewood USD representatives stated that any acquisition or demolition of the Kelso Elementary School property to implement the proposed Project would have an impact on district facilities by shutting down the school and requiring the construction of a new school for 523 displaced students. In response to the Revised NOP, which identified a different proposed site for the Maintenance and Storage Facility, Inglewood USD indicated support for the Project and requested analysis of the potential for aesthetics, air quality, hazards and hazardous materials, noise, traffic, vibration, safety, and utility impacts on school facilities.

Thomas Safran & Associates (TSA) representatives commented on behalf of TSA owned properties designated for mixed-use and residential developments near the proposed Project. TSA requested analysis of the potential aesthetics, air quality, GHG, and noise effects of the Project, especially as related to

development planned at 139 North Market Street and 158 North Market Street. The City has not received plans for these projects. TSA requested these two locations be considered sensitive receptors.

Historic Resources

Los Angeles Conservancy (LA Conservancy) expressed concern regarding historic resources within and adjacent to the Project area, identifying nine historic resources along the route. LA Conservancy recommends that alternative routes be explored and reviewed to avoid impacts along Market Street and reduce impacts to nearby historic resources.

Mobility Issues

Caltrans recommend the incorporation of multimodal and complete street transportation elements that will actively promote alternatives to car use and better manage existing parking assets. The recommendation aligns with Caltrans' support for transportation and land use that reduces vehicle miles traveled (VMT) and greenhouse gas (GHG) emissions by shortening trip lengths and achieving a high level of nonmotorized travel and transit use. Caltrans also supports the implementation of pedestrian safety measures such as road diets and other traffic calming measures.

Culver CityBus recommends the proposed Project to locate stations near existing transit services in the area in order to allow smooth transit connections.

In addition, one public commenter concerned with mobility issues recommended that the proposed Project be free for seniors and low-income people. In addition, one commenter suggested that a zone limited to pedestrians be extended from the proposed Metro Crenshaw/LAX Line station in downtown Inglewood to other locations along the alignment.

Policy, Plan, and Program Consistency

Southern California Association of Governments (SCAG) recommends the incorporation of the proposed Project into the Regional Transportation Plan (RTP)/Sustainable Community Strategy (SCS) project list in order to enable access to State or federal funding. SCAG also recommends the proposed Project to recognize and consider RTP/SCS goals.

Public Services

The County of Los Angeles Fire Department (County Fire) is concerned for sufficient ingress/egress access points for the circulation of traffic and emergency response issues. County fire requests alternative route (detour) plans with a tentative schedule of planned closures prior to the beginning of construction.

Disruptions to water service shall also be coordinated with County Fire to ensure alternative water sources would be provided.

Transportation Impacts

A number of comment letters were related to the proposed Project's impacts on transportation local surface transportation in the area. Public comments praised the potential ability of the proposed Project to provide easy access from the Los Angeles County Metropolitan Transportation Authority (Metro) system to LAX and provide intermodal services for both residents and customers near the area. A primary concern was the potential for increased traffic throughout the City due to construction and any roadway modifications.

Public Utilities Commission stated that the proposed Project would disrupt the heavily used roadway network in the surrounding community and that potential impacts should be identified, discussed, and evaluated for necessary safety improvements and mitigations at each proposed construction stage. This includes considering traffic circulation and queuing, level of service, emergency service response, and Americans with Disabilities Act (ADA) compliance. Further, Public Utilities Commission stated that the automated people mover (APM) trains must comply with California Public Utility Commission (CPUC) rules and regulations, CPUC General Orders, and American Society of Civil Engineers Automated People Mover Standards.

Additionally, one public commenter expressed concern regarding lost pedestrian access along Market Street. Caltrans also touched on this point by stating that the proposed Project should incorporate multimodal and complete streets transportation elements that will actively promote alternatives to car use and better manage existing parking assets, requesting that the City evaluate the proposed Project for access problems, vehicle miles traveled, and service needs that may need to be addressed.

Tribal Resources Impacts

The Native American Heritage Commission (NAHC) recommends lead agencies consult with all California Native American tribes that are traditionally and culturally affiliated with the geographic area of the proposed Project in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. NAHC pointed out that the proposed Project will be required to comply with AB 52 and SB 18.

Utility Impacts

The West Basin Municipal Water District (West Basin) notified the proposed Project that most West Basin recycled water distribution pipelines are located at least 3.5 feet below ground and within the public right-

of-way. If a relocation of the pipelines would be needed, a request should be submitted at least 6 months in advance of the required relocation. Additionally, the Kenneth Hahn Lateral project by West Basin is investigating opportunities to provide recycled water from the existing 36-inch pipeline that ends at the intersection of Prairie Avenue and Florence Avenue, in the City of Inglewood, to Kenneth Hahn State Park, Baldwin Hills area, and into Culver City. The complete Kenneth Hahn Lateral Feasibility Study is available upon request.

The Sanitation Districts of Los Angeles County (Sanitation District) and the Los Angeles Department of Public Works (LADWP) identified that the proposed Project may impact existing and/or proposed facilities (e.g., trunk sewers, waterlines, drainage pipes, etc.) over which it will be constructed. Both agencies indicated utility facilities are directly under and/or cross directly beneath the proposed Project footprint. Both agencies requested the submittal of plans and specifications for the Project address any affected facilities and be submitted for review for review. Once the plans and specifications are submitted, both agencies indicated responses would be provided, followed by permits for construction.

Consultation with the Southern California Edison Company (SCE) was conducted regarding the Project. Based on a distribution study completed by SCE, upgrades to the existing distribution system were identified. These improvements are addressed in this EIR.

Cumulative Impacts

The Centinela/Florence Avenues Grade Separation Project by Metro will have construction activities concurrent with the schedule of the proposed Project. Metro would like the EIR to take into consideration the construction impacts and activities of the Centinela/Florence Avenues Grade Separation Project as it relates to the proposed Project.

2.2.3 Tribal Consultation

A part of the AB 52 process, the City has been notified by tribes that may have interest in tribal cultural resources in the region. Four tribes had previously notified the City and requested future notification of, with the possibility of providing consultation on, any projects that proceed under CEQA. These tribes include the Gabrielino–Tongva Tribe, Gabrielino Tongva Indians of California Tribal Council, Gabrielino/Tongva Nation, and the Gabrieleno/Tongva San Gabriel Band of Mission Indians. Additionally, the Gabrieleno Band of Mission Indians–Kizh Nation was identified as a relevant party.

In accordance with AB 52, the City sent notification letters on July 31, 2018 notifying the four tribes identified above that the City was planning the proposed Project. Additionally, the Gabrieleno Band of Mission Indians–Kizh Nation was mailed a Notice of Preparation of this Draft EIR. Each tribe notified has 30 days from receipt of the letter to notify the City that they wish to engage in the AB 52 consultation

process on the proposed Project. As of December 6, 2018, the City had received only one response requesting consultation vie email from Brandy Salas, Administrative Specialist, for the Gabrieleno Band of Mission Indians–Kizh Nation (Tribe).[11] The Tribe indicated that if there would be any ground disturbance activity associated with the proposed Project, they would like to consult.

Consultation between the Gabrieleno Band of Mission Indians–Kizh Nation Tribe and the City, and the City's consultant team was initiated vie conference call on February 6, 2019. As part of the consultation, the City noted that it completed record searches to date to identify existing archaeological records, and that that information would be made available to the Tribe if requested.

Members of the Tribe provided an overview of the Tribes experience with other projects in the Los Angeles Basin including work that the Tribe has completed with LA Metro and other transit efforts. As part of the other projects, the Tribe noted that artifacts had been unearthed as part of ground disturbing activities. The Tribe also noted that many of these discoveries were located along historic roads and routes in the LA Basin that followed Native American tribal routes.

As a result of consultation, the Tribe shared information including maps of the area that depict the historic and prehistoric trading routes, and suggested mitigation measures that may be considered to assist in reducing potential impacts to any cultural resources that could be unearthed during ground disturbing activities.

The tribal notification and outreach process for the proposed Project is included in the appendices of this Draft EIR and listed as follows:

- *AB 52 Tribal Notification and Outreach Summary Memorandum*, Meridian Consultants LLC, December 6, 2018 (included as **Appendix 4.13.1**); and
- *AB 52 Consultation Summary*, Meridian Consultants LLC, February 6, 2019 (included as **Appendix 4.13.2**).

Please see **Section 8.0** for a glossary of terms, definitions, and acronyms used in this Draft EIR.

This information as well as the recommendations of the tribe have been included in the Draft EIR.

2.2.4 Public Outreach and Community Engagement

The City initiated a comprehensive outreach program for the proposed Project in 2018, at the outset of the environmental clearance phase. As the Draft EIR was prepared, the City continued to keep elected

11 See **Appendix 4.13.1** and its attachments therein of this Draft EIR.

officials, community leaders and the general public informed of the status of the technical analysis and schedule for completion of the environmental documents throughout the preparation of this Draft EIR. The outreach program is focused on increasing project awareness and education, disseminating project information, garnering public input, and supporting the technical and legal environmental processes. To learn more about the local community's needs for the proposed Project, the City held over 35 community and stakeholder outreach meetings over the past 2 years during the planning, environmental and design process.

Stakeholders have included local Inglewood block clubs, neighborhood watch groups and homeownership associations (HOA) such as the Renaissance HOA, Carlton Square HOA, Briarwood HOA, Regent Street HOA, and the Hyde Park Village HOA. The City also engaged the NCAAP Inglewood Chapter, Inglewood Airport Area Chamber of Commerce, Rotary Club of Inglewood, Inglewood Unified School District, local churches, and community-based nonprofits including the Social Justice Learning Center Institute, Move LA, The Enrichment Center, and the Coalition for Clean Air.

A complete listing of stakeholders and meetings is included in **Appendix 2.0.1a: Revised Notice of Preparation (Revised NOP) and 2.0.1b Original NOP**; **Appendix 2.02a Revised Initial Study (IS) and 2.0.2b Original IS**; and **Appendix 2.0.3 Summary of Comments Received on the Revised and Original NOP and IS Memorandum** of this Draft EIR.

Through the use of focus groups, workshops, tours, participation in community events, social media outlets, and webinars, project stakeholders have been involved in each of the major technical milestones of the project development process that has occurred to date.

Public Engagement Process

The public engagement process included compilation of a stakeholder database, development of project related meeting materials and collateral materials, proactive outreach, public meetings, participation in community events and coordination meetings with public agencies.

Stakeholder Database

To properly inform the public, the City compiled a list of key individuals located throughout and adjacent to the proposed Project and public agencies that have jurisdiction in the area. In addition to key individuals and/or groups identified as part of the initial due diligence, the database includes a listing of all stakeholders who have attended public meetings, participated in a key stakeholder meeting, community events or who have otherwise asked to be added to the database. It is used to notify stakeholders of public meetings, to send out the electronic Newsletter, or other updates as needed.

The stakeholder database includes the following groups:

City Council

- Mayor James T. Butts, Jr.
- Councilman George W. Dotson, District No. 1
- Councilman Alex Padilla, District No. 2
- Councilman Eloy Morales, Jr., District No. 3
- Councilman Ralph Franklin, District No. 4

City Commissions

- Parking & Traffic Commission
- Parking Authority
- Park & Recreation Commission
- Planning Commission
- Senior Center Advisory Committee
- South Bay Cities Service Council
- Citizen Advisory Committee
- Community Development Committee
- Inglewood Housing Authority – RAB Committee

Community Based Organizations and Religious Community Institutions

- Inglewood Teen Center
- Lockhaven Community Center
- Social Justice Learning Center Institute
- The Enrichment Center
- Amassi Center
- Briarwood Community Center
- Inglewood Cultural Arts Center
- Uplift Inglewood Coalition
- Inglewood Forward
- We Can Help Foundation Inc.
- Great Beginnings for Black Babies, Inc.
- American Legion
- Women Infant Children (WIC) Inglewood Chapter
- South Bay Workforce Investment Board
- Faithful Central Bible Church
- Inglewood Ministerial Alliance
- Brotherhood Crusade
- Inglewood Community Church
- Christ Centered Ministries
- Coalition for Clean Air
- Champions for Progress
- St. John Chrysostom Church

Transit Advocacy Groups

- LA County Bicycle Coalition
- Alliance for Community Transit LA
- Southern California Transit Advocates
- Cherrywood-Leimert Block Club
- Empowerment Congress West
- Move LA

Local and Regional Agencies

- Inglewood Unified School District
- Los Angeles County Metropolitan Transportation Agency
- Southern California Association of Governments
- South Bay Cities Council of Government
- Los Angeles World Airport
- University of California, Los Angeles
- Los Angeles/Orange Counties Building and Construction Trades Council

Regional Stakeholders

- A.G. Spanos, Los Angeles Chargers, President of Los Angeles Chargers
- Kevin Demoff, Los Angeles Rams, Chief Operating Officer and Executive Vice President
- Steve Ballmer, Chairman, Los Angeles Clippers
- Stadco LA, LLC, SoFi Stadium Owner
- University of California, Los Angeles
- Los Angeles/Orange Counties Building and Construction Trades Council
- Southwest Regional Council of Carpenters
- Los Angeles Cleantech (LACI)
- The Inglewood Airport Area Chamber of Commerce
- LAX Coastal Chamber of Commerce
- National Association for the Advancement of Colored People
- Ironworkers Local 433 – International Association of Bridge, Structural & Ornamental Iron Workers A.F.L – C.I.O

Other Public Officials[12]

- U.S. Senator Dianne Feinstein
- U.S Representative Maxine Waters
- California Assemblywoman Autumn Burke
- California Senator Steven C. Bradford
- Los Angeles County Supervisor Mark Ridley-Thomas
- Los Angeles County Supervisor Janice Hahn

12 Note: It is envisioned that these public officials would be contacted and briefed by the City and/or the outreach team in connection with the Inglewood Transit Connector project. At those meetings, information can also be provided on shorter-range planning efforts, which would include the TMOP.

- Los Angeles County Supervisor Hilda L. Solis
- Los Angeles City Councilmember Herb J. Wesson, Jr.
- Los Angeles Mayor Eric Garcetti
- City of El Segundo Mayor Drew Boyles
- City of Carson Mayor Cedric L. Hicks
- Casey Wasserman (Los Angeles Olympics 2028 Committee Chairperson)
- *California Senator Holly Mitchell*
- California Senator Maria Elena Durazo

Project Materials and Resources

To inform and update stakeholders about the proposed Project's progress, the outreach team developed collateral materials for distribution through various channels and means of communication. These included project related fact sheets, frequently asked questions, meeting notices, electronic newsletters/e-bulletins, and other collateral materials. In addition, a complete set of collateral pieces was developed and distributed at community meetings, stakeholder briefings, and public events, as well as electronically when requested. These collateral materials were updated throughout the proposed Project's development process and were produced in English and Spanish.

The City's project website served as the central point where stakeholders went to obtain a variety of information about the proposed Project. The website is located at:

http://envisioninglewood.org/transportation-solutions/inglewood-transit-connector/

The website contains maps of the proposed Project, and other collateral materials and key documentation such as the NOP, Initial Study Report, the Draft Environmental Impact Report, planning workshops and working group presentations. The website also contains a "Contact Us" sections where people can provide their input to the study, ask questions, and add themselves to the proposed Project database to be notified of future meetings and project related updates.

2.2.5 Post Scoping Outreach

General Public

After the initial scoping period and during the preparation of the technical reports and Draft EIR, the City held over 35 community and stakeholder outreach meetings over the past 2 years during the planning, environmental and design process. Stakeholders have included property and landowners adjacent to the proposed Project including but not limited to business and property owners along Market Street, Stadco LA, LLC (SoFi Stadium Owner), Steve Ballmer (owner of the Forum and proposed Inglewood Basketball and Entertainment Center), the Rams and the Chargers. The City also engaged with local Inglewood block

clubs, neighborhood watch groups and HOAs such as the Renaissance HOA, Carlton Square HOA, Briarwood HOA, Regent Street HOA, and the Hyde Park Village HOA. The City also presented at local community groups and organizations including but not limited to the NCAAP Inglewood Chapter, Inglewood Airport Area Chamber of Commerce, Rotary Club of Inglewood, Inglewood Unified School District, local churches, and community-based nonprofits including the Social Justice Learning Center Institute, Move LA, The Enrichment Center, and the Coalition for Clean Air.

At the meetings, residents expressed significant interest in and support for the proposed Project. The overarching themes summarized below emerged as priority interests and needs the community would like to see addressed by the proposed Project, including but not limited to creating economic development opportunities along the corridor, specifically Downtown Inglewood; increasing transit options for local residents and visitors; connecting communities and residents to jobs and educational opportunities, services and destinations locally and regionally; reducing traffic congestion and the growing demand on the existing roadway networks on both event and nonevent days; providing a transit system that preserves existing traffic lanes along Prairie Avenue and Manchester Avenue for vehicular traffic; reducing potential impacts to local businesses during construction; ensuring stations are designed to promote safety, and be easy to access for multiple modes including pedestrians, bicyclists, and park-and-ride users. The City has embraced the stakeholder input received to date and addressed various community needs identified into the design of the proposed Project, including supporting TOD development in Downtown Inglewood, a direct transit connection to the Metro Crenshaw/LAX Line, a fully elevated transit system that does not remove any existing vehicular travel lanes, a phased construction approach focused on helping local businesses, and designed state-of-the-art stations integrated into its surrounding environment. The City will continue to host public workshops, design charettes and stakeholder meetings throughout the CEQA, design, procurement, construction and project implementation process.

Public Agency

In addition to the scoping meeting, the City also participated in various meetings with public agencies to allow concerns to be identified and addressed early in the development process of the proposed Project. This effort was designed to present information on the proposed Project's concept design, to discuss relevant issues related to each agency's jurisdiction and proactively consult with these agencies prior to formal agency consultation. Agency involved in these meetings are list in **Table 2.0-3: Post Scoping Public Agency Outreach.**

Table 2.0-3
Post Scoping Public Agency Outreach

Agency/Entity/Individual	Summer 2018	Spring 2019	Winter 2019	Summer 2020
Los Angeles Department of Transportation	X	X	X	X
City of Hawthorne		X	X	
City of Lawndale	X	X	X	
South Bay Council of Governments	X	X	X	X
Los Angeles County, Public Works Department	X	X	X	
Los Angeles County Metropolitan Transportation Authority	X	X	X	X
Santa Monica Big Blue Bus	X	X	X	X
City of Gardena – GTrans	X	X	X	X
City of Santa Monica – Big Blue Bus	X	X	X	X
City of Culver City – Culver City Bus	X	X	X	X
City of Redondo Beach – Beach Cities Transit	X	X	X	X
City of Long Beach Transit		X	X	
Inglewood Unified School District			X	
Los Angeles County Fire Department				X
California Department of Transportation (Caltrans)	X	X	X	X
South Coast Air Quality Management District (SCAQMD)	X	X	X	X

2.3 ORGANIZATION OF THIS DRAFT EIR

This EIR is organized as follows:

Section 1.0: Executive Summary provides a summary of the proposed Project. This chapter includes an overview of the proposed Project description and areas of controversy, a discussion of key environmental effects, a discussion of significant and unavoidable impacts, a discussion of cumulative effects, an overview of alternatives, and a summary table that includes each environmental impact, level of impact, and all applicable mitigation measures.

Section 2.0: Introduction and Environmental Setting provides information on the background of the proposed Project, the environmental review process, and organization of the Draft EIR, and describes the existing physical setting of the proposed Project and the surrounding area.

Section 3.0: Description of the Proposed Project presents a description of the proposed Project that addresses its location, the objectives, and the approvals being requested from the City.

Section 4.0: Environmental Impact Analysis contains information and analysis of the potential for the proposed Project to result in significant environmental effects for each of the following topics evaluated in this Draft EIR:

- **Section 4.1: Aesthetics**
- **Section 4.2: Air Quality**
- **Section 4.3: Biological Resources**
- **Section 4.4: Cultural Resources**
- **Section 4.5: Energy Resources**
- **Section 4.6: Geology and Soils**
- **Section 4.7: Greenhouse Gas Emissions**
- **Section 4.8: Hazards and Hazardous Materials**
- **Section 4.9: Land Use and Planning**
- **Section 4.10: Noise and Vibration**
- **Section 4.11: Population, Employment, and Housing**
- **Section 4.12: Transportation**
- **Section 4.13: Tribal Cultural Resources**
- **Section 4.14: Utilities and Service Systems**

Section 5.0: Alternatives discusses alternatives to the proposed Project that have been developed and analyzed to provide additional information on ways to avoid or lessen the impacts of the proposed Project. The alternatives include the "No Project Alternative" as required by the CEQA Guidelines along with other alternatives.

Section 6.0: Other Environmental Considerations is divided into five subsections.

- **Section 6.1: Introduction**;
- **Section 6.2: Significant Unavoidable Impacts**;
- **Section 6.3: Significant Irreversible Environmental Changes** discusses the significant irreversible and irretrievable commitment of resources associated with the implementation of the proposed Project;
- **Section 6.4: Effects Not Found to Be Significant** discusses the potential impacts of the proposed Project that were determined not to be significant and were therefore not discussed in detail in this Draft EIR; and
- **6.5: Growth Inducing Effects**.

Section 7.0: List of Preparers, Organizations and Persons Consulted, and Parties to Whom Sent lists persons involved in the preparation of this Draft EIR or who contributed information incorporated into this Draft EIR and parties to whom this Draft EIR was sent.

Section 8.0: List of Terms, Definitions, and Acronyms includes specifically defined term, definitions, and acronyms used throughout this Draft EIR.

Section 9.0: List of References includes the principal documents, reports, maps, and other information sources referenced in this Draft EIR.

Appendices to this Draft EIR include technical information and other materials prepared for this EIR and the City's environmental review of the proposed Project.

2.4 PUBLIC REVIEW OF THE DRAFT EIR

The Draft EIR is available for public review and comment beginning December 18, 2020 and concluding at 5 PM on February 1, 2020. The Draft EIR can be accessed at the following locations:

- City of Inglewood website at:

  https://www.cityofinglewood.org/1016/Environmental-Documents

During the review and comment period, written comments (including email) regarding the Draft EIR may be submitted to Ms. Mindy Wilcox, AICP, Planning Manager, at the following:

By mail:

City of Inglewood
Planning Division
One W. Manchester Boulevard, 4th Floor
Inglewood, CA 90301

By email: inglewoodtransitconnector@cityofinglewood.org

3.0 PROJECT DESCRIPTION

3.1 BACKGROUND

The City of Inglewood (City) is undergoing a historic transformation into a world-class sports and entertainment destination and a major employment center within the greater Los Angeles region. First, in 2012, over $100 million was invested in the Forum, making it one of the largest indoor concert venues and host of some of the largest entertainment acts in the country. Next, the redevelopment of approximately 298 acres at Hollywood Park includes thousands of new residential units, millions of square feet (SF) of commercial and recreational uses as part of the Los Angeles Stadium and Entertainment District (LASED) project. At the centerpiece of the LASED is the new $5 billion-dollar, 70,240-seat SoFi Stadium shared by the Los Angeles Rams and Los Angeles Chargers. SoFi Stadium will host Super Bowl LVI in Winter 2022, the 2026 FIFA World Cup, and the 2028 Summer Olympic Games. In August 2020, the City approved the Inglewood Basketball and Entertainment Center (IBEC), which will be home to the Los Angeles Clippers of the National Basketball Association (NBA) and includes the team's arena, headquarters, and training facilities. There are other exciting developments in the City including housing, retail commercial and hotel projects in the application pipeline. Additionally, the new Los Angeles Philharmonic music and cultural campus for the Youth Orchestra Los Angeles (YOLA), designed by architect Frank Gehry which will be headquartered near Inglewood City Hall and, is currently anticipated to be completed by Winter 2020.[1]

Pivotal to the City's transformation is the new 8.5-mile Metro Crenshaw/LAX Line. Scheduled to begin service in 2021, the Metro Crenshaw/LAX Line will enhance transit access to the City and include stations at Aviation/Century, Westchester/Veterans, Downtown Inglewood, Fairview Heights, Hyde Park, Leimert Park, MLK Jr., and Expo/Crenshaw. It will extend light-rail transit from the existing Metro Expo Line station at Crenshaw/Exposition Boulevards to the Metro Green Line station at Aviation/Century Boulevards and provide a transit connection to Los Angeles International Airport (LAX) via the City of Los Angeles's automated people mover (APM) train at the Airport Metro Connector 96th Street Transit Station, set to begin passenger service in 2023. Upon completion of the Metro Crenshaw/LAX Line, patrons who wish to use the Metro rail system to travel to events at the Forum, LASED including SoFi Stadium, the IBEC, or other employment, commercial, and activity sites in the City would face a "last-mile" gap of approximately 1.5 to 2 miles between the Metro Crenshaw/LAX Line and the City's new activity centers. This gap is longer than a convenient walking distance for patrons traveling to the City's activity centers.

As Inglewood transforms into a major regional housing, employment and activity center, the number of vehicular trips associated with new jobs, retail, entertainment, and residential opportunities is anticipated

1 Los Angeles Times, *How will the L.A. Phil carry on amid COVID-19? Dudamel and Smith lay out a plan,* July 16, 2020.

to increase. Based on historic traffic counts, traffic volumes have been increasing at the rate of 1.5 percent per year, and many key intersections and highway corridors already experience congestion. According to the Southern California Association of Government's (SCAG) *Connect SoCal - 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy* Demographics and Growth Forecast, substantial socioeconomic and demographic growth is projected in the region. The City is projected to be one of the highest growing housing and employment centers in Los Angeles County, with growth rates of 20 percent in population, 27 percent in number of households, and 36 percent in employment from 2016 to 2045[2]. In response to the anticipated increases in traffic associated with these new sports and entertainment venues in the City is updating its Mobility Plan, developing a Stadium Events Transportation Management and Operations Plan (TMOP), working with transit agencies to improve transit operations to the City given existing limited service, creating an off-site satellite parking program with event shuttle service, installing a comprehensive intelligent transportation system, and implementing a city-wide permit parking program to protect neighborhoods. The physical capacity of the existing local and regional roadway network may still challenge the ability of residents and visitors to access the City's amenities easily in the future. Bus transit, shuttles, and other alternative modes still compete with existing traffic on the City's roadway network.

The City proposes the Inglewood Transit Connector Project (ITC or proposed Project) to close the last-mile gap between the Crenshaw/LAX line and the City's new activity centers, allowing passengers to transfer to or from the Crenshaw/LAX line. The ITC is a 1.6-mile, three station, fully elevated, electrically powered APM system that will connect passengers directly from the Metro Crenshaw/LAX Line Downtown Inglewood station.

Over 80 percent of the Project corridor (defined as the area within ½ mile of the proposed Project stations) is located within census tracts ranked in the top 25% of census tracts in California with the highest pollution burden and socioeconomic vulnerabilities based on the CalEnviroScreen Model[3]. The proposed Project will offer the community a new transit connection to the Metro Rail system and regional employment opportunities including those at LAX. The Project would also ensure that long-time residents, employees, and business are provided a direct connection to the Metro Rail system while also providing visitors with a seamless connection to event venues, which, in turn, would assist Inglewood's transformation into a world-class city.

2 SCAG. *2020-2045 RTP/SCS - ConnectSocal. Demographics and Growth Forecast.* https://www.connectsocal.org/Documents/Adopted/fConnectSoCal_Demographics-And-Growth-Forecast.pdf. September 1, 2020.

3 *California Office of Environmental Health and Hazard Assessment (OEHHA),* CalEnviroScreen. https://oehha.ca.gov/calenviroscreen.

The City proposes the Project to address projected future congestion, improve overall mobility and levels of service, and advance its sustainability goals. Providing transit access to the City's new activity centers would advance local and regional goals to increase transportation choice, significantly reduce Greenhouse Gas (GHG) emissions, improve air quality and human health, reduce per-capita Vehicle Miles Traveled (VMT), reduce the growth of congestion on local and regional roads, and encourage sustainable development patterns. The City recognizes that an efficient and effective transportation network is essential to achieving the full benefits of ongoing and widespread investment. The proposed Project is designed to support the City's growth by serving an annual ridership of 13.9 million by 2076, reducing over 2.3 billion VMT by 2076, and improving air quality throughout the South Coast Air Basin by reducing GHG emissions by approximately 768,922 metric tons of carbon dioxide equivalent (MTCO2e) over the life of the Project.

3.1.1 Evolution of the Inglewood Transit Connector Project

As early as 2017, in an effort to address the City's critical mobility issues, the City partnered with Metro to analyze viable transit connection options from the Metro Crenshaw/LAX Line to the LASED, which includes SoFi Stadium. With the City's input, Metro conducted a study[4] to explore how best to connect the LASED to the Metro Rail system via a high-capacity transit connection. The Metro study analyzed (1) an interlined operability connection from the Metro Crenshaw/LAX Line in a subway under Prairie Avenue, which also would jointly operate on a portion of the Metro Crenshaw/LAX Line; and (2) operability options for independent services that could provide connections from the Metro Rail system at nearby Metro stations along the Metro Crenshaw/LAX Line to SoFi Stadium. At the conclusion of the study, the City and Metro agreed that the interlined operability scenario is infeasible due to the cost and complexity that would be created on the Metro Rail system.

Consistent with Metro's recommendations, the City continued to analyze several independent operability transit connections to the City's activity centers. In July 2018, pursuant to the requirements of the California Environmental Quality Act (CEQA), the City as the Lead Agency prepared a Notice of Preparation (Original NOP) and an Initial Study (Original IS) (SCH 2018071034). The Original IS determined that an Environmental Impact Report (EIR) would be prepared in compliance with CEQA to assess for potentially significant impacts that may result from the Project. The Original NOP and IS were circulated and comments were received from the public and agencies following a 30-day comment period that ended on August 15, 2018.

4 Los Angeles County Metropolitan Transportation Authority, *City of Champions/Inglewood (NFL) Focused Analysis of Transit Connection (August 2017)*.

Since 2018, the City has collaborated with a myriad of key stakeholders, including the City's residential, commercial, and nonprofit leaders, and other jurisdictions, including but not limited to the South Bay Cities Council of Governments, Caltrans, Metro, other transit agencies, the City of Los Angeles, the County of Los Angeles, and representatives from the LASED, IBEC, and Forum event venues, and refined the proposed Project.

The City revised and recirculated the NOP and IS to reflect the following refinements to the Project:

- Changes to the proposed Project's alignment from an approximately 1.8-mile long alignment with 5 stations to an approximately 1.6-mile long alignment with 3 stations. The revised alignment follows the same route as the original alignment Beginning at the intersection of Market Street and Florence Avenue, continuing along Manchester Avenue and Prairie Avenue, and terminating at the intersection of Prairie Avenue and Hardy Street.
- Refinements and modifications to the proposed stations as follows:
  - Modify the proposed Project to reduce the total number of stations from the five stations previously considered to three stations. The original five station locations were at the following locations:
    - Market Street Station: at the intersection of Market Street and Regent Street on Market Street;
    - Manchester Boulevard Station: between Hillcrest Boulevard and Spruce Avenue on Manchester Avenue adjacent to the maintenance and storage facility (MSF);
    - Forum Station: north of the intersection of Prairie Avenue and Pincay Drive on Prairie Avenue;
    - Hollywood Park Station: between Arbor Vitae Street and Hardy Street on Prairie Avenue adjacent to the City's intermodal transit facility (ITF) located on the southeast corner of Prairie Avenue and E. Arbor Vitae Street; and
    - Century Boulevard Station: at the intersection of Prairie Avenue and Century Boulevard on Prairie Avenue.
  - New locations for the three stations:
    - Market Street/Florence Avenue Station: at an existing commercial plaza on the southeast corner of the intersection of Market Street and Florence Avenue between Market Street and Locust Street;
    - Prairie Avenue/ Pincay Drive Station: at the intersection of Prairie Avenue and Pincay Drive; and
    - Prairie Avenue/Hardy Street Station: at the intersection of Prairie Avenue and Hardy Street
  - A passenger connection, consisting of an elevated pedestrian bridge over Florence Avenue, has been added to connect the Market Street/Florence Avenue Station with the Metro Crenshaw/LAX line Downtown Inglewood station on the northside of Florence Avenue.

- Removal of the ITF as part of the proposed Project. The City has already constructed the ITF project as a separate and independent project on the City's Civic Center site on Prairie Avenue.
- Reduce the potential number of traction power substations from three to two. One will be located on the MSF site and the other will located on the City's Civic Center site on Prairie Avenue.

3.2 ITC PROJECT OVERVIEW

The proposed APM guideway is approximately 1.6-miles long, elevated, and primarily located within the public right-of-way along Market Street, Manchester Boulevard, and Prairie Avenue with limited encroachments in some locations outside of the public right-of-way. The proposed Project will serve three stations with an elevated guideway with dual lanes to allow trains to travel continuously in each direction. Several trains would likely be operating at the same time, depending on ridership needs.

The proposed transit technology is a form of light rail technology that can be rubber tired, magnetically levitated, or steel-wheel/steel rail, supported on dual rails, which may be steel rail or concrete plinths, or straddling or suspended from a single beam/rail such as in a monorail type technology and that will operate within a dedicated trainway. Power distribution will be through a third rail instead of overhead catenary to avoid the visual impacts associated with overhead catenary system wires and support structures. It will be fully automated (i.e., driverless) which is necessary to operate at the headways to meet the projected ridership needs. The vehicles are smaller than traditional heavy rail technology and can maneuver the tight curves required for the site-specific conditions. This type of technology is often times also referred to as automated guideway transit, automated people mover or simply monorail; regardless of the terminology used, it is a form of a light rail technology.

The APM trains will operate in a pinched loop mode on dual tracks along the alignment, wherein trains follow each other and switch back at the end-of-line stations to make the return journey on the other track. As planned, the trains can be operated in multiple different configurations, ranging from a one-car train to multiple-car length trains with a maximum train length of approximately 200 feet. Depending on the ridership demands, which will be time of day and event day dependent, multiple trains of up to the maximum train length can be operated at varying headways, as close as 1.5 minutes, to provide the necessary peak and reserve capacity. Scenarios for ridership demand, operating strategies and resultant capacities are provided in **Table 3.0-3: Peak Period Ridership Headway Fleet Capacity**.

The three stations are:

- The Market Street/Florence Avenue station generally located between Market Street and Locust Street that provides connections to the Metro Crenshaw/LAX Line and Downtown Inglewood;
- The Prairie Avenue/Pincay Drive station generally located at the intersection of Prairie Avenue and Pincay Drive that provides connections to the Forum and LASED including SoFi Stadium; and

- The Prairie Avenue/Hardy Street station located just north of the intersection of Prairie Avenue and Hardy Street that provides connections to the LASED including SoFi Stadium, and the IBEC.

The station locations were chosen to be near major activity centers, including the Forum, LASED and SoFI Stadium, the IBEC, and Downtown Inglewood, which the City is seeking to enhance and activate.

The proposed stations are configured as center-station platforms. This configuration minimizes the total footprint of the station and guideways, provides easy way-finding for passengers by directing all passengers to the same platform where they board their train. This configuration also provides greater flexibility in maintaining operations in the event of equipment failures.

Each station includes ground, mezzanine, and platform levels. From the ground level, each station includes vertical circulation elements, consisting of stairs, escalators, and elevators from grade at existing sidewalks and passenger areas adjacent to the stations to the mezzanine and platform levels of the station. The mezzanine level provides passenger walkways to travel over streets located below the stations and avoid at-grade passenger crossings. The stations will be sized to support the projected ridership demands, including the boarding and deboarding demands at the station, under normal scenarios as well as in a worst case event scenario due to emergency conditions and/or system failure.

Existing roadways and infrastructure along the transit alignment will require reconfiguration to accommodate new elevated transit guideway structures and stations. In addition to surface improvements, utility infrastructure located under roadways may need to be relocated to accommodate the guideway columns, footings, and other components. The roadway reconfigurations proposed along Market Street, Manchester Boulevard, and Prairie Avenue are necessary to assure that the existing roadway travel capacity is not diminished or reduced to accommodate the proposed Project.

The proposed Project includes a Maintenance and Storage Facility (MSF) to provide regular and preventive maintenance for the APM trains, vehicle storage, and an operations control center. **Figure 3.0-2: Vicinity Map**, identifies the location of the proposed MSF. The MSF building will be approximately 97,400 SF in size and will be elevated to match the track elevation. A limited amount of parking will be provided under the MSF for employees and visitors. The MSF will be designed in accordance with the Design Guidelines for the Inglewood Transportation Connection (ITC Design Guidelines) which address the massing, façade, materials, colors, roof, and lighting for this facility, how the MSF will engage with the pedestrian and vehicular circulation around it, and sustainability features. (see **Appendix 3.0.3: Draft Design Guidelines**).

The proposed Project also includes two traction power substations (TPSSs). These substations will be the service connection points and will provide the necessary power for the proposed Project including traction power, auxiliary power, and housekeeping power for the stations and related infrastructure. The

proposed locations for the TPSSs are shown on **Figure 3.0-14: Potential Locations for Traction Power Substations**.

Additional public parking would be provided as part of the Project at three locations:

- Approximately 650 parking spaces would be provided in a surface parking lot at the Market Street/Florence Avenue Station along with pickup and drop off areas on Locust Avenue and Regent Street.
- Approximately 50 parking spaces would be provided in a surface parking lot at 150 S. Market Street.
- Approximately 450 parking spaces would be provided in a surface parking lot at the MSF Facility site at 500 E. Manchester Boulevard.

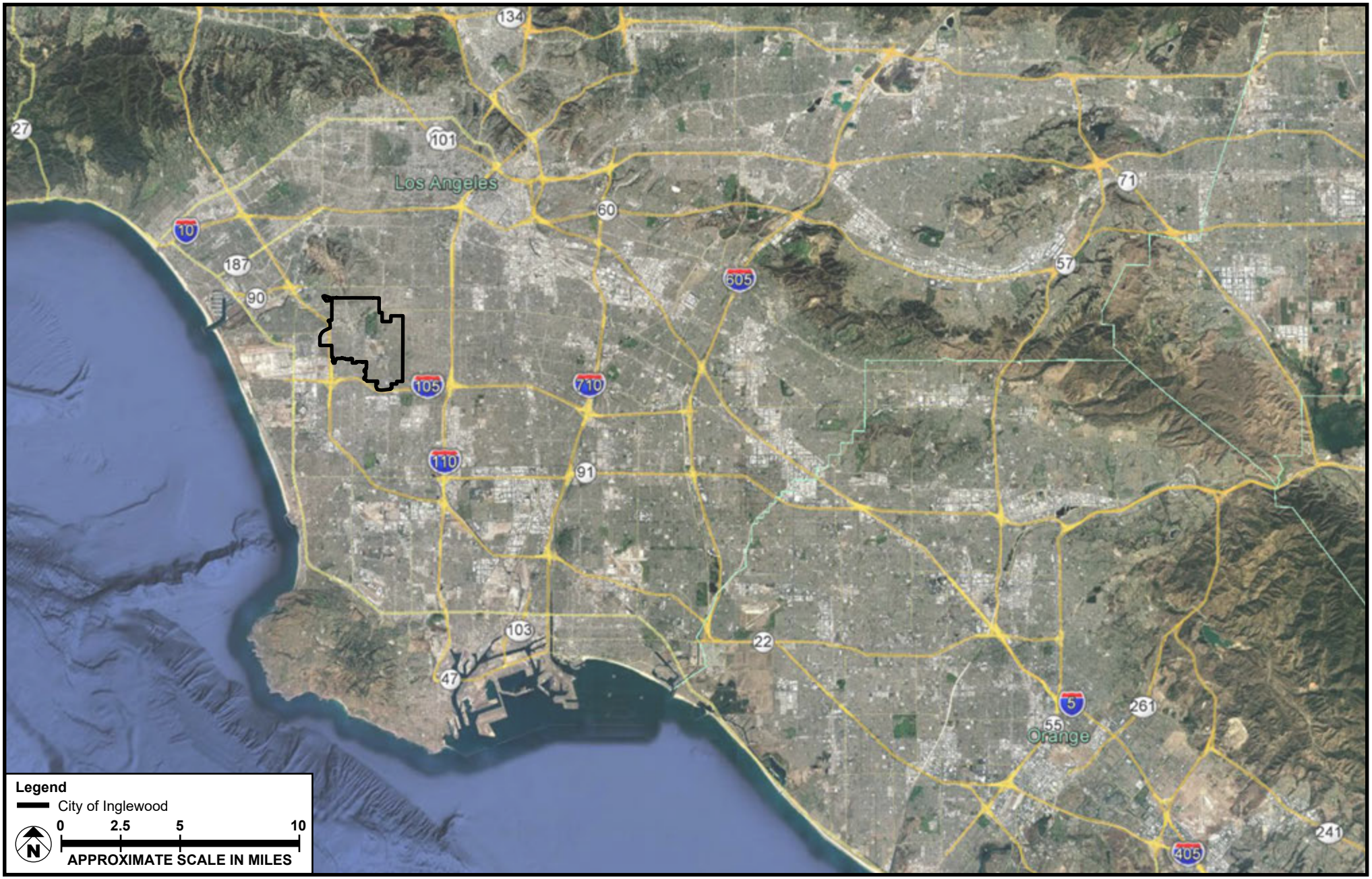
These parking areas will be used as staging areas during construction but will ultimately provide public parking needed in the City to support use of the ITC Project. While the ITC Project is designed and intended to attract transit riders from the Metro Rail system, the City recognizes that many visitors will also still drive to the City in search of convenient parking with proximity to commercial uses and access to a direct transportation connection to the City's major event venues. To avoid visitors parking in residential areas, the City proposes to provide parking in close proximity to the ITC Project stations and downtown Market Street area. These parking areas will also provide replacement parking for public parking on streets that may be removed as part of the implementation of the ITC Project.

3.3 PROJECT LOCATION

The proposed Project is located in the central and northern portions of the City, east of the San Diego Freeway (I-405) and north of the Glenn Anderson Freeway (I-105) in Los Angeles County, California, as shown in **Figure 3.0-1: Project Regional Location Map**.

The Project would be constructed in an area generally bounded by the Metro Crenshaw/LAX Line to the north; Hardy Street to the south; the LASED including SoFi stadium, and the Forum to the east; and La Brea Avenue to the west, as shown in **Figure 3.0-2: City Location Map**.

The Project extends from the Metro Crenshaw/LAX Line Downtown Inglewood station southwest to the intersection of Market Street and Regent Street, continues south on Market Street, east on Manchester Boulevard, and south on Prairie Avenue to Hardy Street, as shown in **Figure 3.0-3: Project Vicinity Map**. The elevated guideway and stations would be largely located within the public rights-of-way for the streets and sidewalk areas along Market Street, Manchester Boulevard, and Prairie Avenue with some limited encroachments on property located adjacent to the public right of way for vertical circulation features, such as stairways.

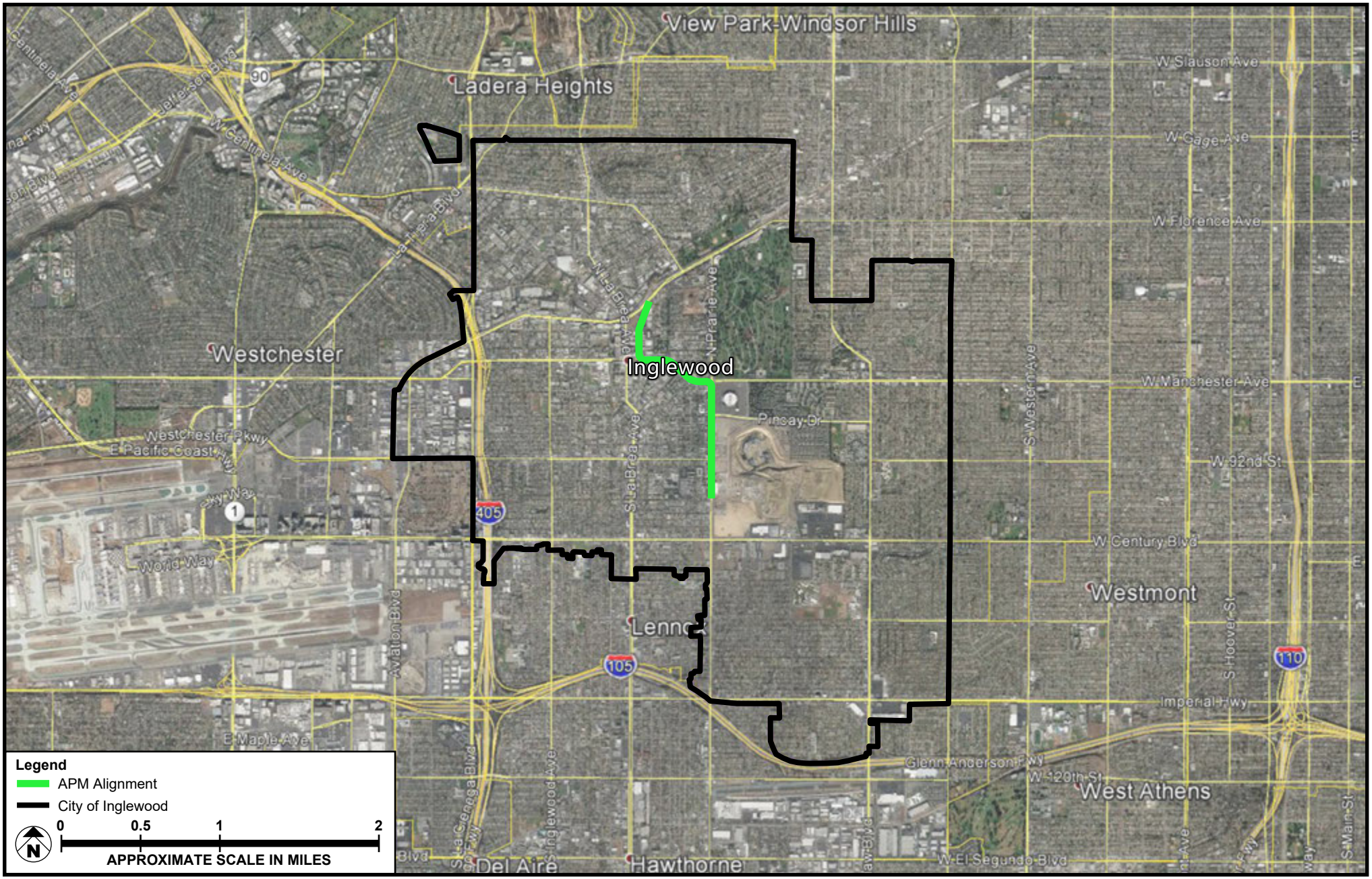


SOURCE: Google Earth - 2020

FIGURE **3.0-1**

Project Regional Location Map

208-001-18

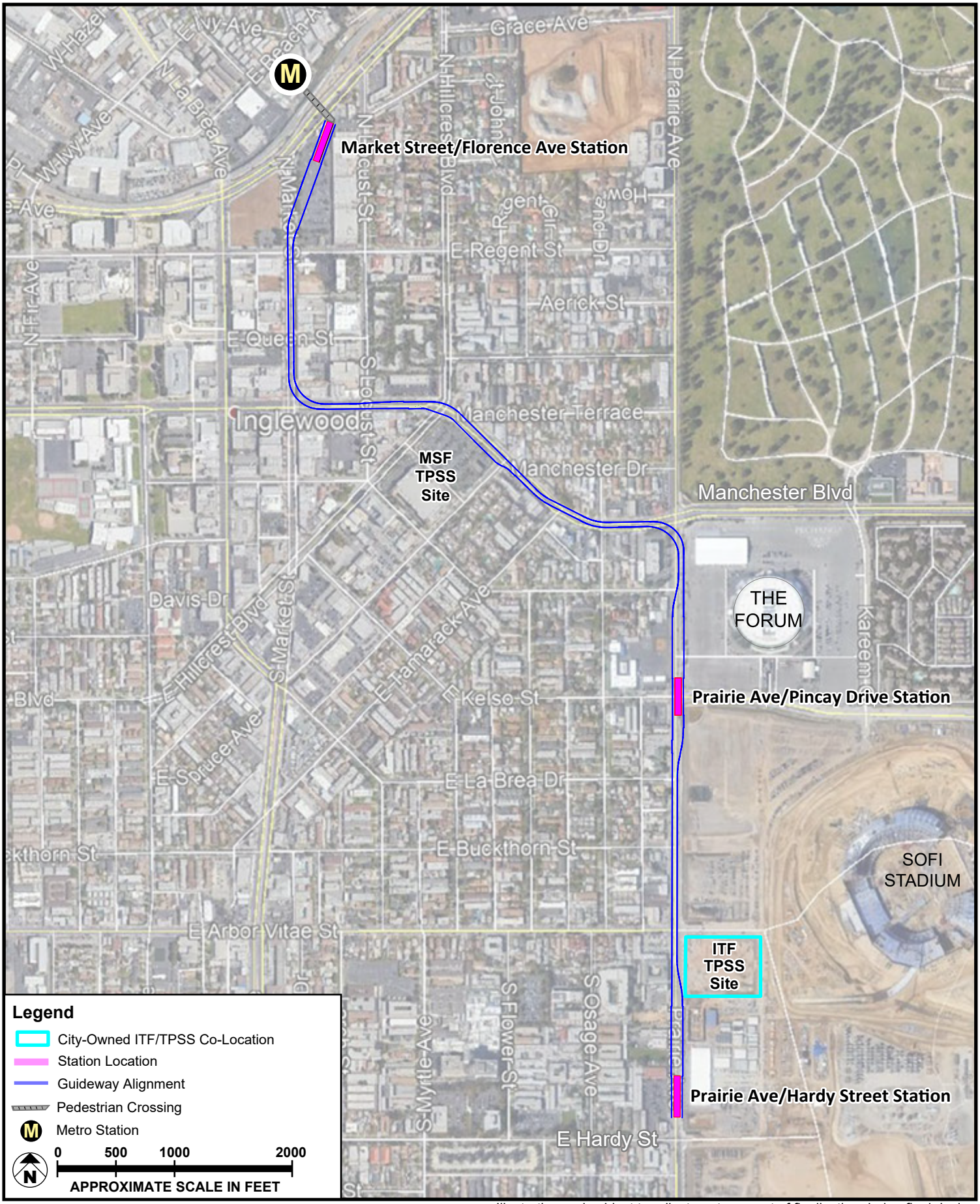


SOURCE: Google Earth - 2020; Meridian Consultants - 2020

FIGURE **3.0-2**

City of Inglewood

208-001-18



SOURCE: Google Earth - 2020; Meridian Consultants LLC - 2020

Illustrative and subject to adjustments as part of finalization during final design

FIGURE **3.0-3**

Project Vicinity Map

208-001-18

3.4 PROJECT OBJECTIVES

Section 15124(b) of the State CEQA Guidelines states that the Project Description shall contain "[a] statement of the objectives sought by the proposed project." In addition, Section 15124(b) of the State CEQA Guidelines further states, "[t]he statement of objectives should include the underlying purpose of the project."

The City's goals and objectives for the proposed Project are as follows:

- Provide direct and convenient connection to the Metro regional transit system for local residents and the region to access the City's new major employment, commercial, and activity centers;
- Provide sufficient transit connection capacity between the Metro regional transit system and the City's new major activity centers with enhanced travel time certainty and sufficient capacity to meet peak ridership demands to encourage transit as a travel mode choice;
- Maintain existing roadway capacity;
- Reduce the City's traffic congestion and alleviate growing demand on the existing roadway network on both major arterials and residential streets for both nonevent and event days;
- Encourage intermodal transportation systems by providing convenient, reliable time-certain transit;
- Increase transit mode split, reduce vehicle trips, and reduce per-capita vehicle miles traveled to the City's major activity centers, with corresponding improvement in air quality, public health, and reductions in greenhouse gas emissions from transportation sources in accordance with the City's goals under SB 375 and State policy with respect to climate change;
- Support the ongoing economic revitalization, growth opportunities for transit-oriented development (TOD) within the Downtown TOD Plan area, including commercial and residential uses, including through the creation of public parking facilities;
- Encourage redevelopment and investment within the City in areas served by the proposed Project;
- Provide safe, reliable, and convenient access to businesses in the City so that they are accessible to their workforce and customers;
- Connect the Inglewood community and citizens to jobs, education, services, and destinations within the City and within the region by providing transit within safe and accessible walking distances; and
- Support regional efforts to become more efficient, economically strong, equitable, and sustainable.

3.5 PROJECT CHARACTERISTICS

The Project Description and analysis in this EIR are based on the Conceptual Plans for the ITC Project[5]. The Conceptual Plans identify the proposed Alignment for the APM, which will be in the public right-of-way, with some supporting facilities on private property located adjacent to the public right-of-way as described further in this section. These Conceptual Plans will likely be refined as design of the Project progresses; however, for EIR purposes, the Conceptual Plans, including, among other things, the APM Guideway, columns, and other components of the Project as defined in the Conceptual Plans are analyzed to disclose the likely maximum potential impact of the Project. The location, layout, and size of the proposed stations, traction power substations, and maintenance and storage facility as illustrated in the Conceptual Plans also represent the likely maximum potential size of these facilities for the purpose of analyzing the potential impacts of the Project. The description of the proposed changes to streets described in this section are also illustrative and identify the likely maximum potential extent of changes to existing streets proposed as part of the Project. Engineering and design-level details of the Project will be refined as the Project moves through the environmental review, approval, procurement, and design phases.

Table 3.0-1: ITC Project Component Locations and Sizes provides information on the components of the proposed Project which include:

- An APM train operating on an elevated dual lane guideway with three stations;
- Passenger walkway systems connecting the stations to the street, mezzanine areas, escalators and elevators, storage areas, communications systems, and signage, among other features;
- An MSF to provide regular and preventive maintenance of the APM trains and equipment, as well as space for storage of the vehicle fleet and the operations control center, among other functions;
- TPSSs located at the MSF site and the City's Civic Center site on Prairie Avenue to provide power for the proposed Project including traction/propulsion power, auxiliary power, and housekeeping power; surface public parking lots located at the Market Street/Florence Avenue Station, which will also contain multimodal pick-up and drop-off areas, 150 S. Market Street, and the MSF site to support use of the ITC Project and Downtown Inglewood;
- Utilities infrastructure—new, modified and/or relocated—to support the proposed Project;
- Roadway and streetscape modifications and improvements to accommodate the guideway alignment and support structures; and

5 Lea+Elliott, Inc. *Inglewood Transit Connector EIR Operating Systems Conceptual Planning EIR Project Definition DRAFT - June 2020.* (**Appendix 3.0-1**)

- Land acquisitions, acquisitions of air rights, easements and encroachment rights, subdivision of parcels, and/or other reconfigurations of parcels, dedications, vacations and/or temporary closures of public rights-of-way, as necessary.

The City will contract with a design/build/finance/operate/maintain (DBFOM) contractor to complete the proposed Project. With the DBFOM approach, the responsibilities for designing, building, financing, operating, and maintaining the Project are bundled together and transferred to private sector partners. In this structure, the City will enter into an agreement with a private sector party to finalize the design, build, operate, and maintain the APM system.

Figure 3.0-4a to **3.0-4g: Proposed Project Alignment Plans and Profiles** shows the proposed alignment through the City and the locations of the three proposed stations. The alignment runs south for approximately 0.35 miles on Market Street, turning east at Manchester Avenue for another 0.50 miles until turning south on Prairie Avenue. The alignment continues south on Prairie Avenue for approximately 0.75 miles. ending north of Century Boulevard at approximately Hardy Street. The alignment profile was developed assuming that a minimum clearance of 16 feet 6 inches is required above all roadways. The height of the guideway is dictated by the elevation at the stations and the existing grade, which varies along the alignment.

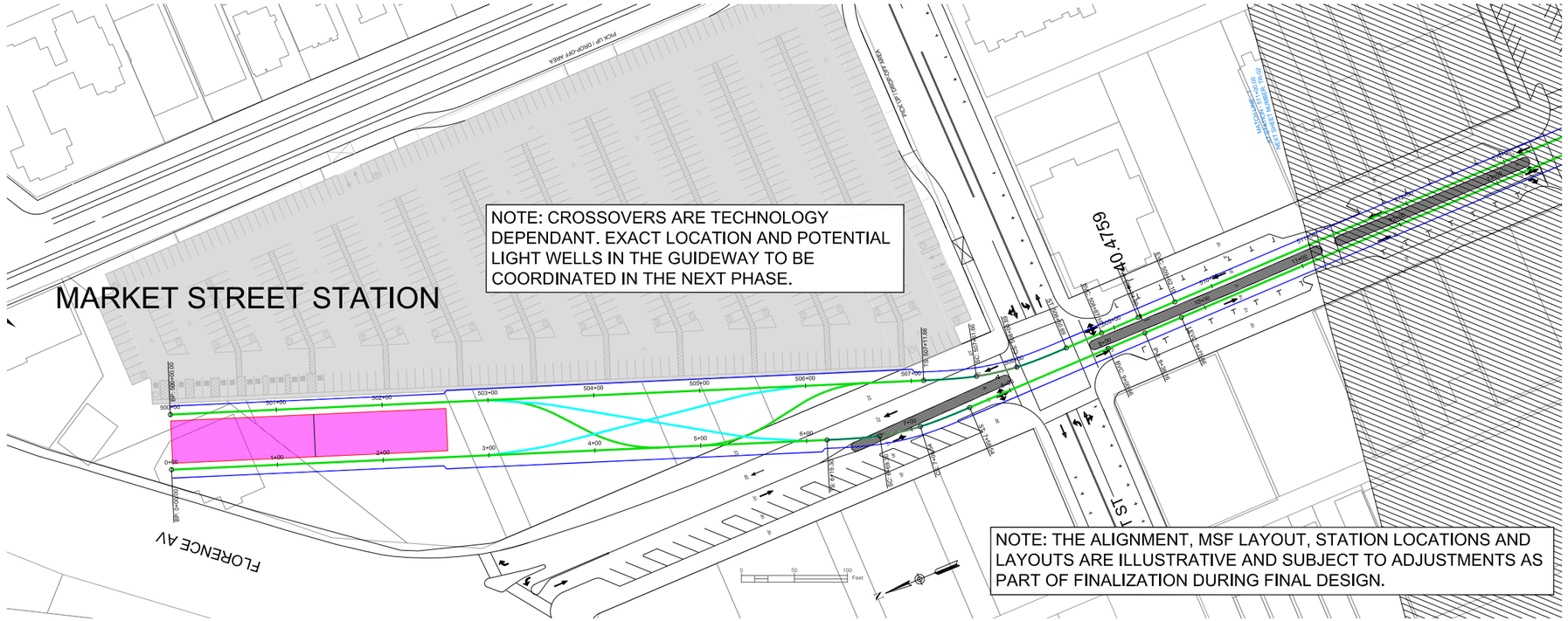
The Market Street/Florence Avenue station is located on Market Street, just south of Florence Avenue, to provide a connection to the future Metro Crenshaw/LAX Line Downtown Inglewood Station on Florence Avenue. The two stations located along Prairie Avenue – the Prairie Avenue/Pincay Drive station and Prairie Avenue/Hardy Street station are centered over the roadways to minimize impacts to existing developments.

The proposed Project will be a pinched-loop system, with APM trains operating back and forth from the Market Street/Florence Avenue station to the Prairie Avenue/Hardy Street station, stopping at each station along the way and reversing at the end of the system. Trains will crossover to the adjacent guideway prior to entering the Market Street/Florence Avenue station and reverse direction when leaving the station. At the Prairie Avenue/Hardy Street station, trains will also crossover prior to entering the station and reverse direction when leaving the station. Where possible, the dual tracks are narrowed and configured to facilitate the use of single columns to support the structure, thus minimizing the infrastructure needs.

Table 3.0-1
ITC Project Component Locations and Sizes (Conceptual)

Project Component	General Location	Approximate Size
Guideway	• Located within the existing public rights-of-way of Market Street, Manchester Boulevard, and Prairie Avenue • Acquisitions, and some encroachments onto existing private properties for air rights and/or easements may be required	• Approximately 1.6 miles dual lane, end to end • The guideway will vary in height from a minimum of ~35 feet to a maximum of ~60 feet measured from existing grade to top of guideway deck • The dual lane guideway width will vary from a minimum of ~30 feet to a maximum of ~75 feet. Maximum widths are at stations and approach to stations.
Stations		
Market Street / Florence Avenue Station	• Located on private property (to be acquired by the City) at the southeast corner of Market Street/Florence Avenue	• Up to ~90 feet measured from existing grade to top of station canopy • ~75 feet wide (station structure and guideway only; not including vertical circulation) • ~250 feet long platform for train berthing
Prairie Avenue / Pincay Drive Station	• Located within the public right-of-way at the intersection of Prairie Avenue / Pincay Drive	• Up to ~90 feet measured from existing grade to top of station canopy • ~75 feet wide (station structure and guideway only; not including vertical circulation) • ~250 feet long platform for train berthing
Prairie Avenue / Hardy Street Station	• Located within the public right-of-way just north of the Prairie Avenue / Hardy Street intersection	• Up to ~90 feet measured from existing grade to top of station canopy • ~75 feet wide (station structure and guideway only, not including vertical circulation) • ~250 feet long platform for train berthing
Vertical Circulation Elements	• Located at each station within the public right-of-way • Locations will depend on station specific requirements to connect to existing sidewalk/passenger walkways. In some cases, may be located within adjacent private properties beyond existing public rights-of-way	• Vertical circulation elements will exist at each station to provide access from the platform level to the mezzanine level and ground level
Passenger Walkway	• Located above Florence Avenue connecting the Market Street/Florence Avenue Station to the Metro Crenshaw/LAX Line Downtown Inglewood Station • Specific location will be determined at time of design and coordinated with Metro	• Up to ~65 feet measured from existing grade to top of structure • ~30 feet wide for passenger walkway • ~280 feet long • Minimum vertical clearance of 10 feet within the walkway interior
Maintenance and Storage Facility (MSF)	• Located on private property (to be acquired by the City) at 500 E. Manchester Boulevard	• ~97,400 sf building area • Up to ~75 feet measured from existing grade to top of roof
Traction Power Substation (TPSS)	• Two TPSS's; one located at the MSF site and the second at the	• ~30 feet wide x ~100 feet long

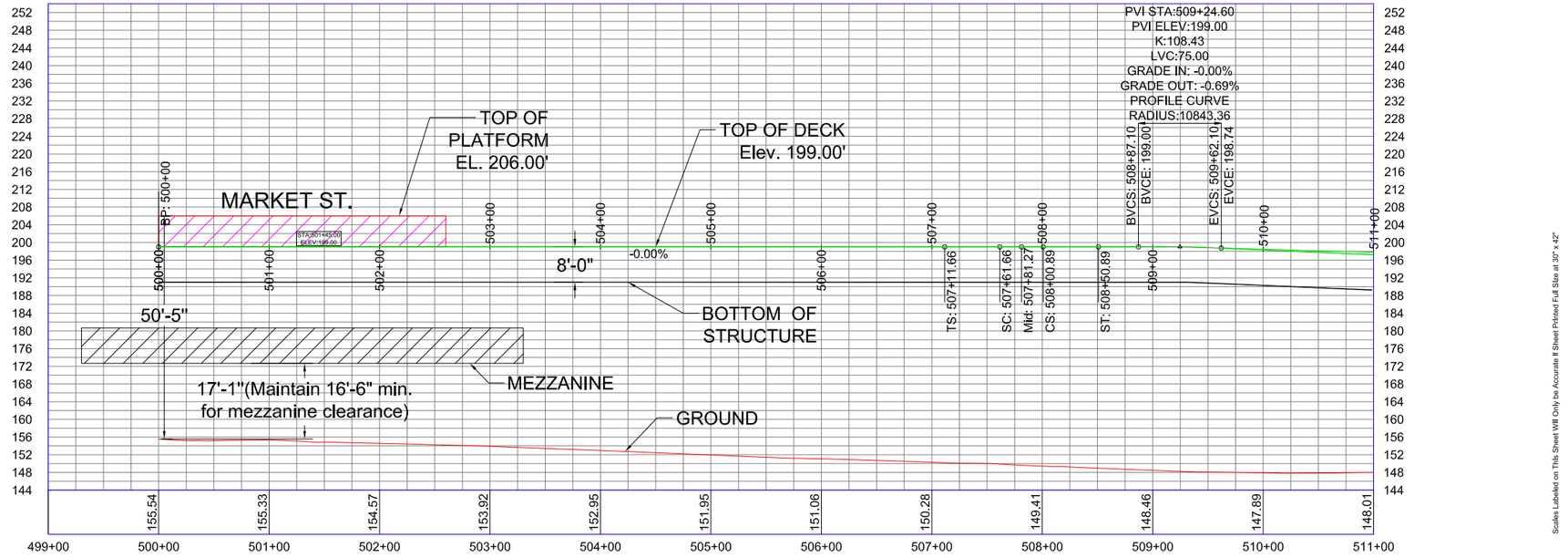
Project Component	General Location	Approximate Size
	City's Civic Center Intermodal Transportation Facility (ITF) site located at the southeast corner of Prairie Avenue and Arbor Vitae Street • Specific locations within each site will be determined during the design phase	• Up to ~20 feet clearance measure from floor to ceiling • If located below grade, an additional space of ~30 feet wide x ~30 feet long for vertical circulation • ~20 feet wide x ~40 feet long additional space for auxiliary equipment such as a backup generator, if necessary
Roadway Improvements	• Market Street, Manchester Boulevard and Prairie Avenue	• New roadway striping, lane re-configurations, partial relocation, on-street parking adjustments, new sidewalks, lighting improvements, and traffic signal adjustments as needed
Pick-Up/Drop-Off Areas, Surface Parking Lots and Staging Areas During Construction	• Market Street/Florence Avenue Station site • 150 S. Market Street • 500 E. Manchester Boulevard	Surface level parking at each site: • ~650 spaces at Market Street/Florence Station • ~50 spaces at 150 S. Market Street • ~450 spaces at 500 E. Manchester Boulevard Pick-Up/Drop-Off Area: • Market Street/Florence Avenue Station site on Locust Street south of Florence Avenue, and Regent Street between Locust Street and Market Street



Scales Labeled on This Sheet Will Only be Accurate If Sheet Printed Full Size at 30" x 42"

BASE PROJECT PLAN AND PROFILE; NOV 2020.

East Track PROFILE



Scales Labeled on This Sheet Will Only be Accurate If Sheet Printed Full Size at 30" x 42"

Legend

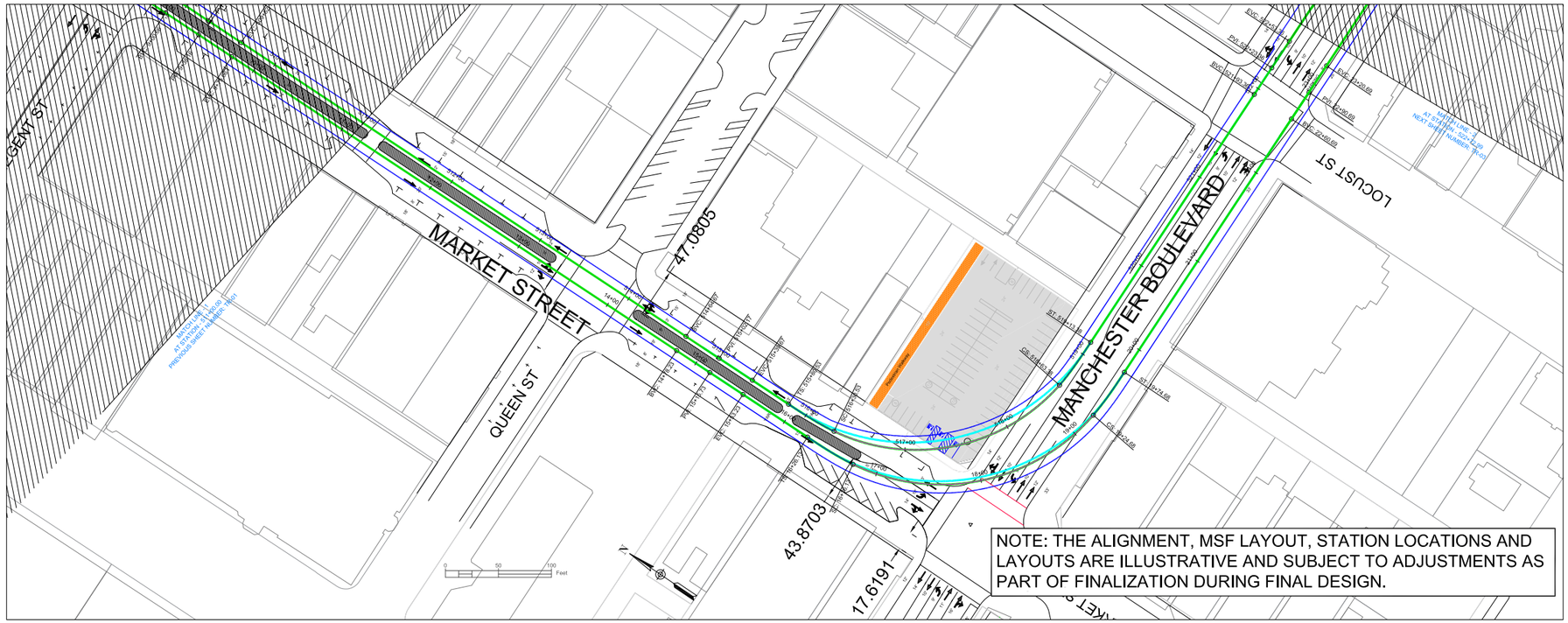
- Edge of Guideway
- APM Tracks
- Monorail Tracks
- Station Location

SOURCE: Lee+Elliott - 2020; Meridian Consultants - 2020

Illustrative and subject to adjustments as part of finalization during final design

FIGURE **3.0-4a**

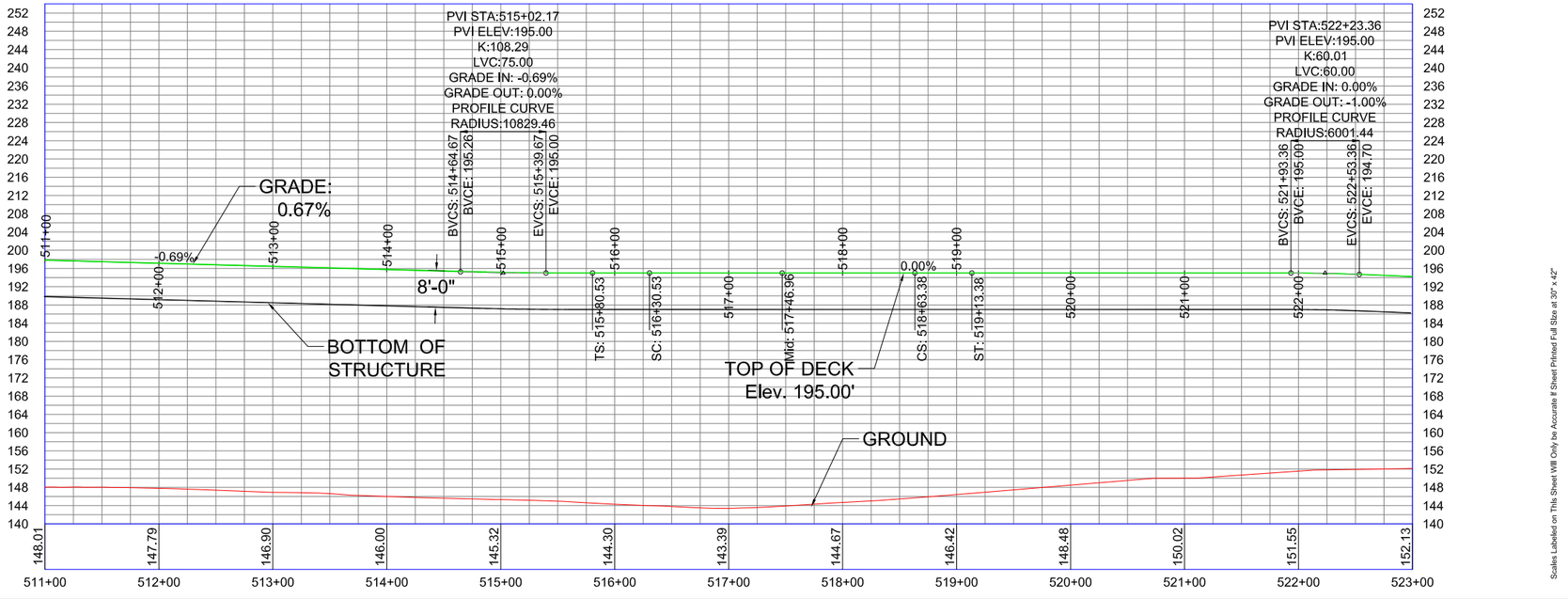
Proposed Project Alignment Plans and Profiles – Market Street and Market Street/Florence Avenue Station



Scales Labeled on This Sheet Will Only be Accurate If Sheet Printed Full Size at 30" x 42"

East Track PROFILE

BASE PROJECT PLAN AND PROFILE; NOV 2020.



Legend

- Edge of Guideway
- APM Tracks
- Monorail Tracks

Scales Labeled on This Sheet Will Only be Accurate If Sheet Printed Full Size at 30" x 42"

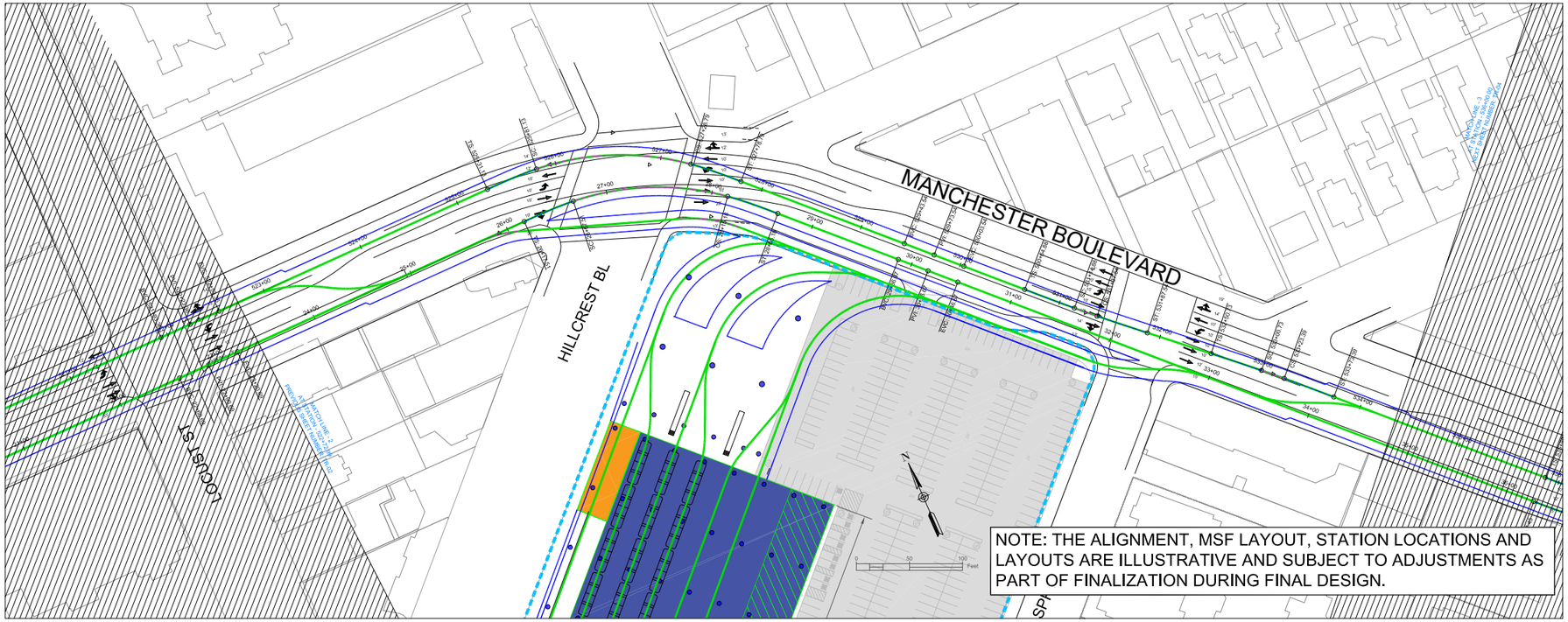
SOURCE: Lee+Elliott - 2020; Meridian Consultants - 2020

Illustrative and subject to adjustments as part of finalization during final design

FIGURE **3.0-4b**

Proposed Project Alignment Plans and Profiles – Market Street and Manchester Boulevard

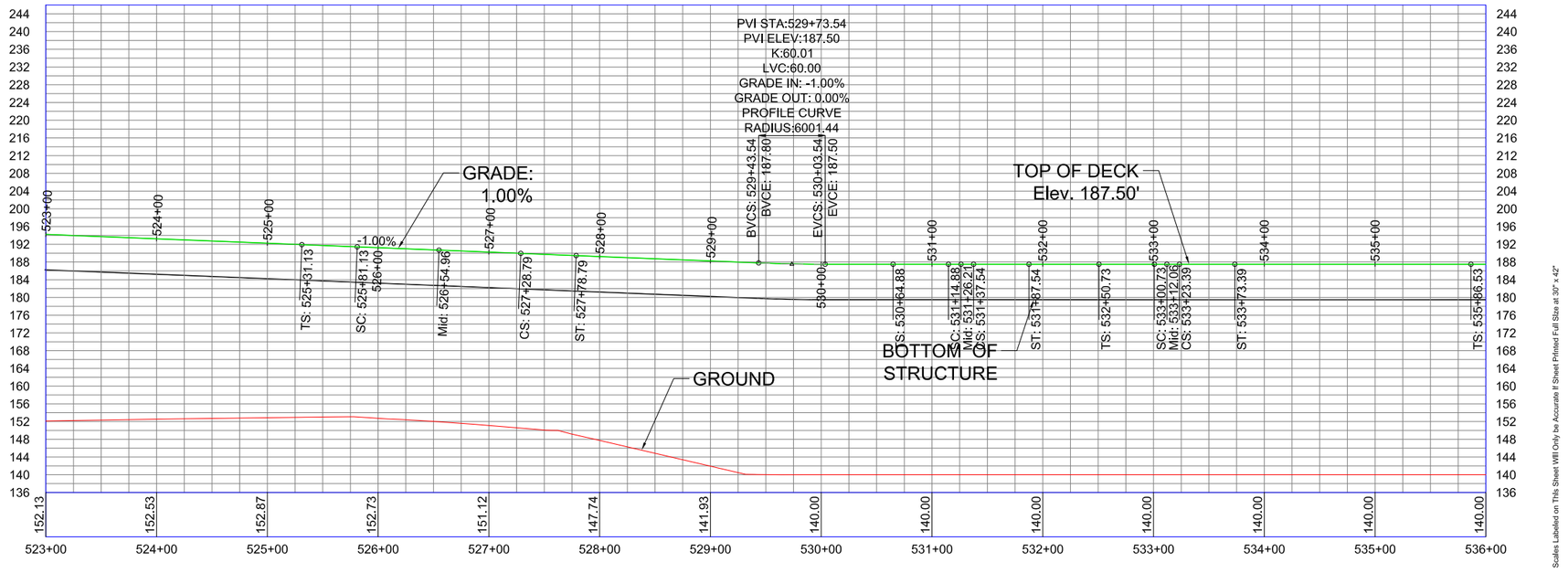
208-001-18



Scales Labeled on This Sheet Will Only be Accurate If Sheet Printed Full Size at 30" x 42"

East Track PROFILE

BASE PROJECT PLAN AND PROFILE; NOV 2020.



Legend

- Edge of Guideway
- APM Tracks
- Monorail Tracks
- MSF Site

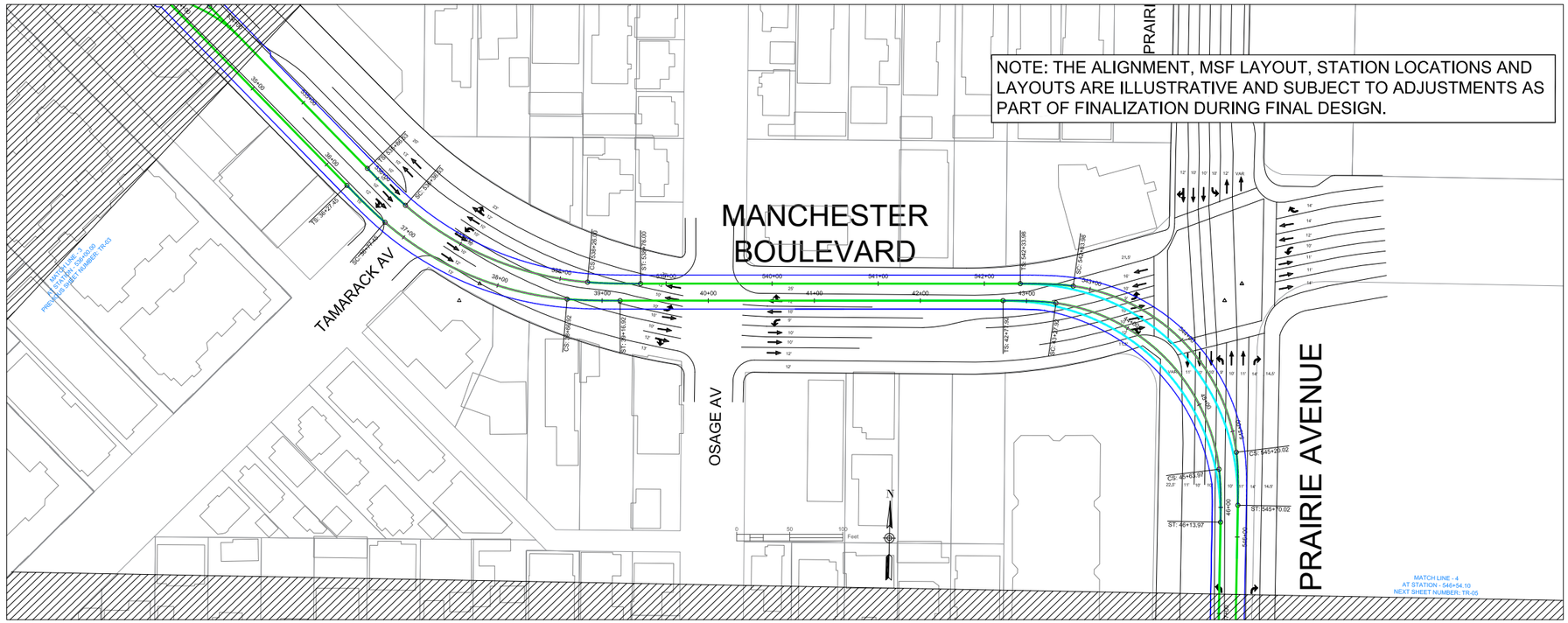
SOURCE: Lee+Elliott - 2020; Meridian Consultants - 2020

Illustrative and subject to adjustments as part of finalization during final design

FIGURE **3.0-4c**

Proposed Project Alignment Plans and Profiles – Manchester Boulevard and MSF Site

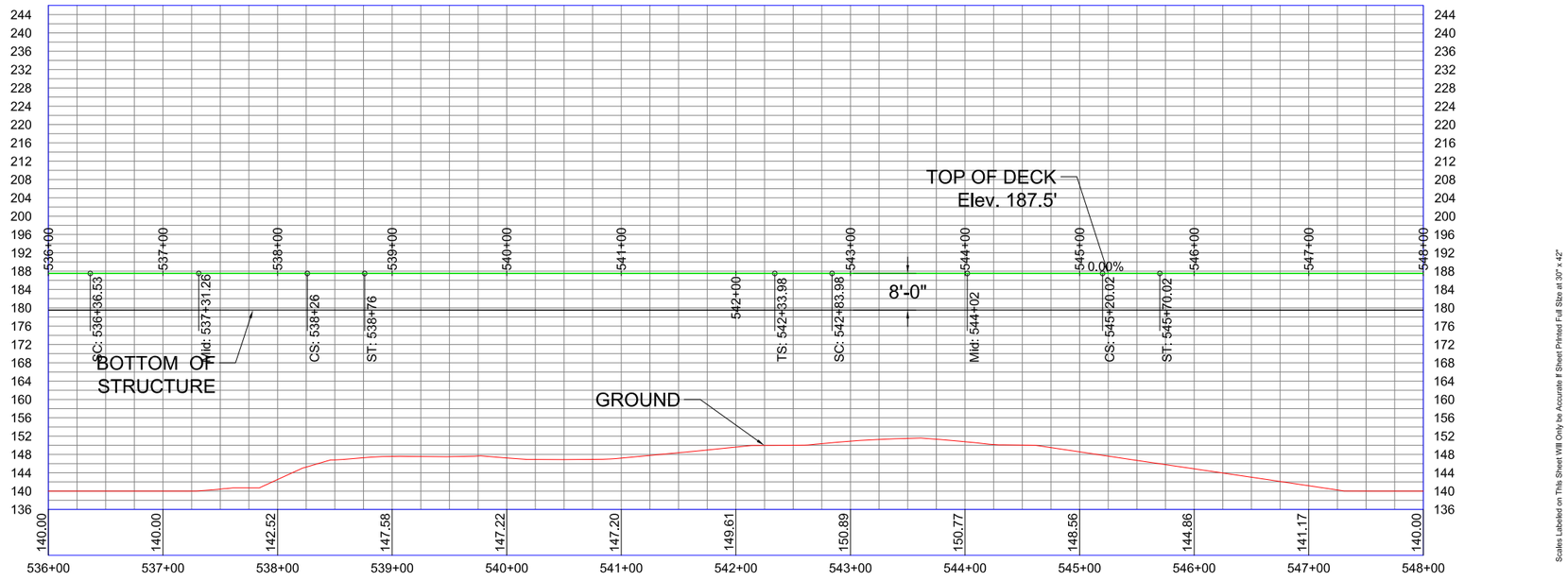
208-001-18



Scales Labeled on This Sheet Will Only be Accurate If Sheet Printed Full Size at 30" x 42"

BASE PROJECT PLAN AND PROFILE; NOV 2020.

East Track PROFILE



Scales Labeled on This Sheet Will Only be Accurate If Sheet Printed Full Size at 30" x 42"

Legend

- Edge of Guideway
- APM Tracks
- Monorail Tracks

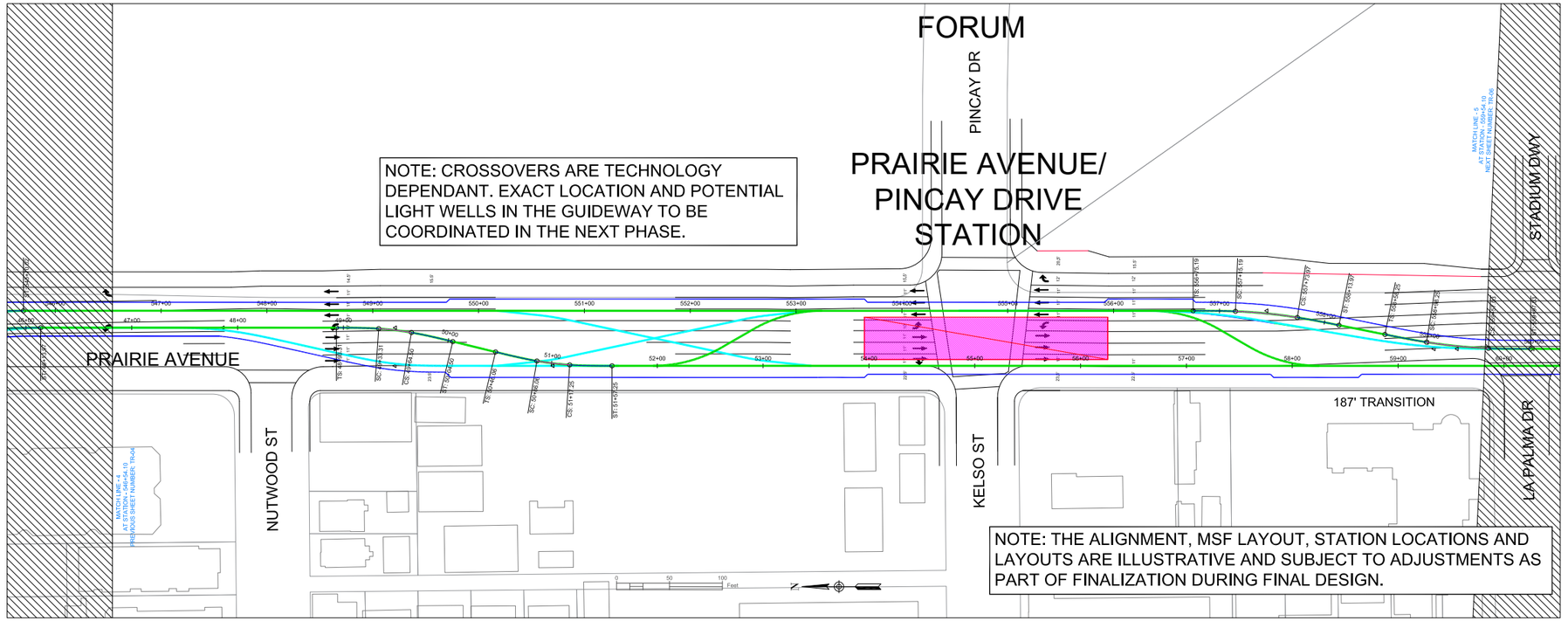
SOURCE: Lee+Elliott - 2020; Meridian Consultants - 2020

Illustrative and subject to adjustments as part of finalization during final design

FIGURE **3.0-4d**

Proposed Project Alignment Plans and Profiles - Manchester Boulevard and Prairie Avenue

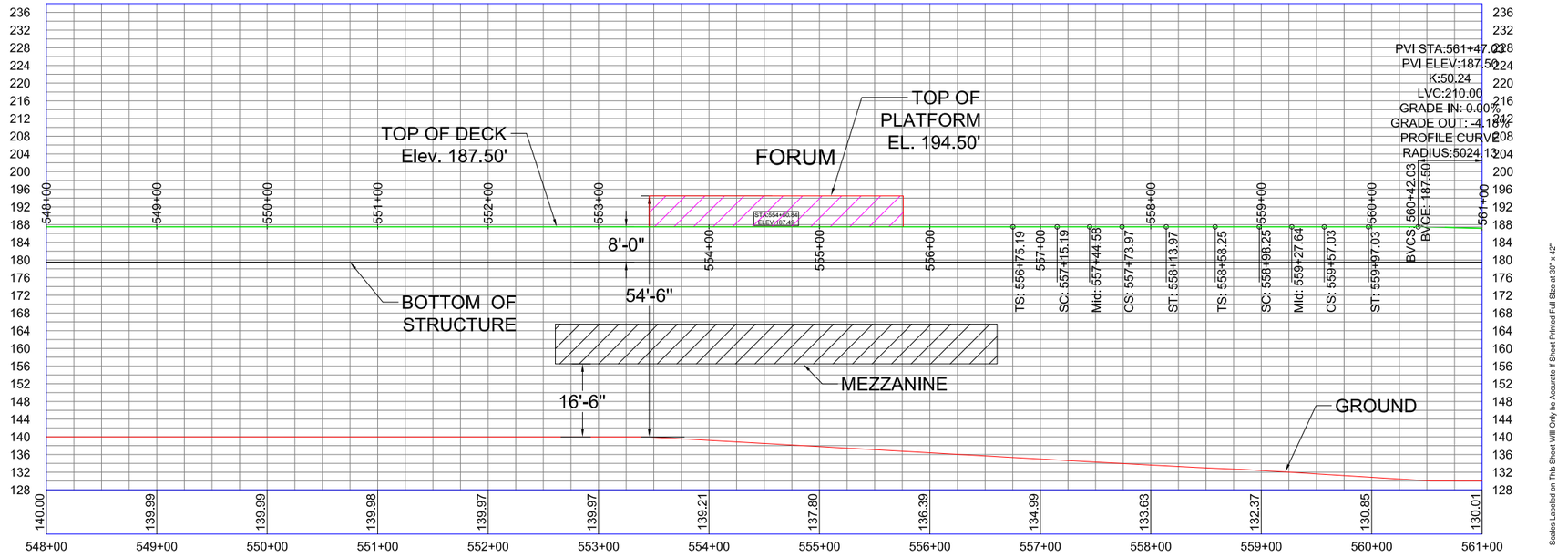
208-001-18



Scales Labeled on Thls Sheet Will Only be Accurate If Sheet Prlnted Full SIze at 30" x 42"

East Track PROFILE

BASE PROJECT PLAN AND PROFILE; NOV 2020.



Legend

- Edge of Guideway
- APM Tracks
- Monorail Tracks
- Station Location

Scales Labeled on This Sheet Will Only be Accurate if Sheet Printed Full Size at 30" x 42"

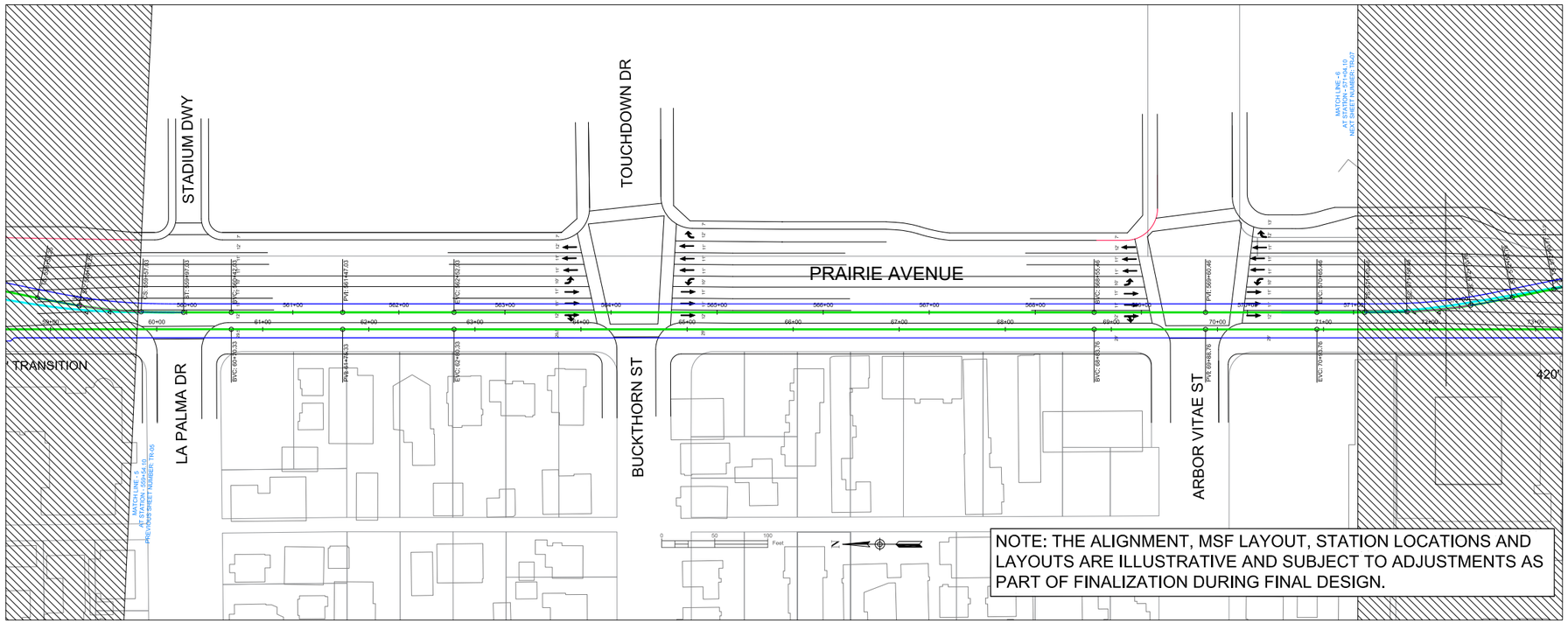
SOURCE: Lee+Elliott - 2020; Meridian Consultants - 2020

Illustrative and subject to adjustments as part of finalization during final design

FIGURE **3.0-4e**

Proposed Project Alignment Plans and Profiles – Prairie Avenue and Prairie Avenue/Pincay Drive Station

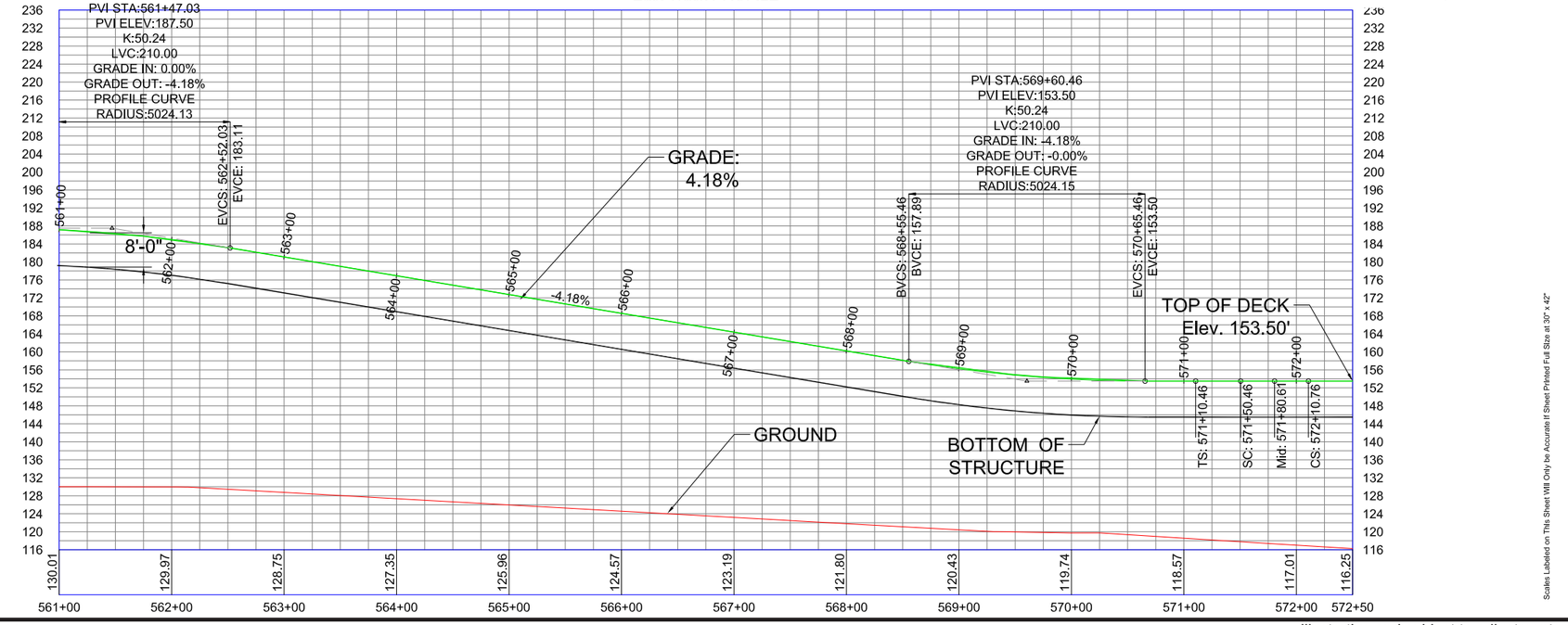
208-001-18



Scales Labeled on This Sheet Will Only be Accurate If Sheet Printed Full Size at 30" x 42"

East Track PROFILE

BASE PROJECT PLAN AND PROFILE; NOV 2020.



Scales Labeled on This Sheet Will Only be Accurate If Sheet Printed Full Size at 30" x 42"

Legend

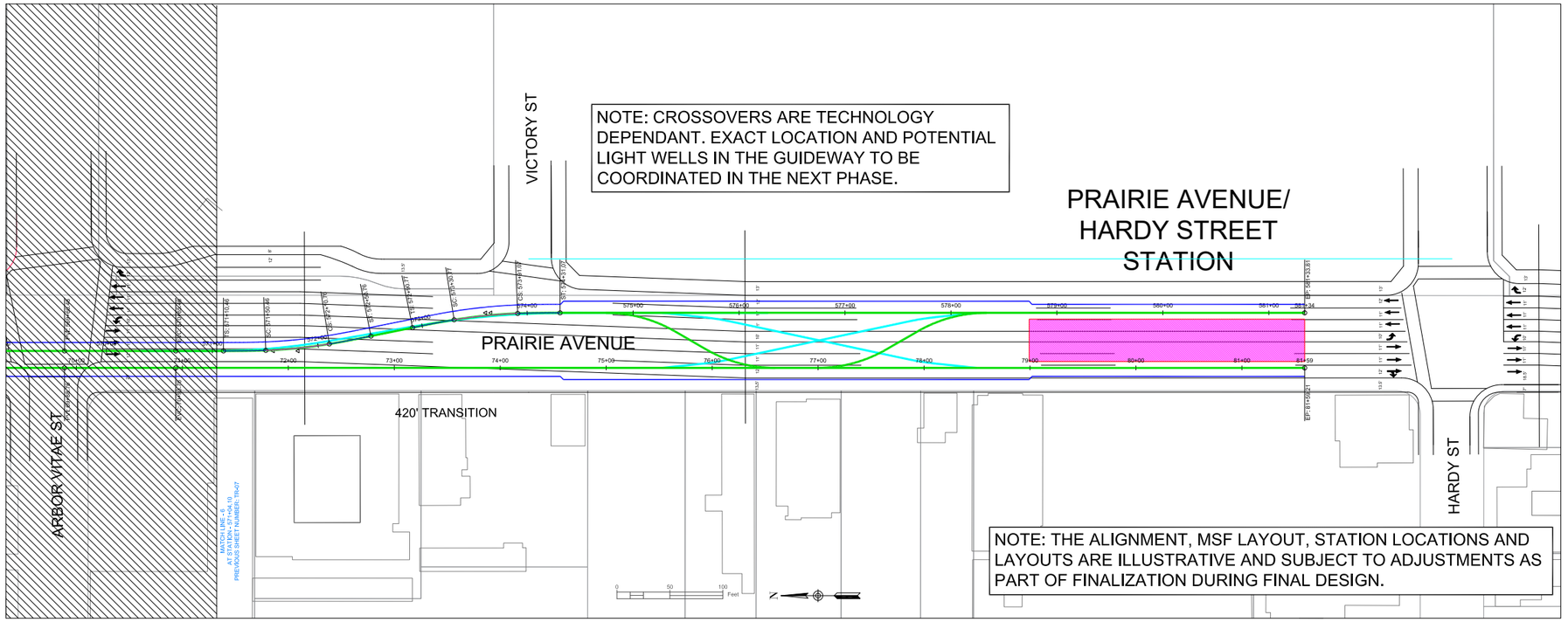
- Edge of Guideway
- APM Tracks
- Monorail Tracks

SOURCE: Lee+Elliott - 2020; Meridian Consultants - 2020

Illustrative and subject to adjustments as part of finalization during final design

FIGURE **3.0-4f**

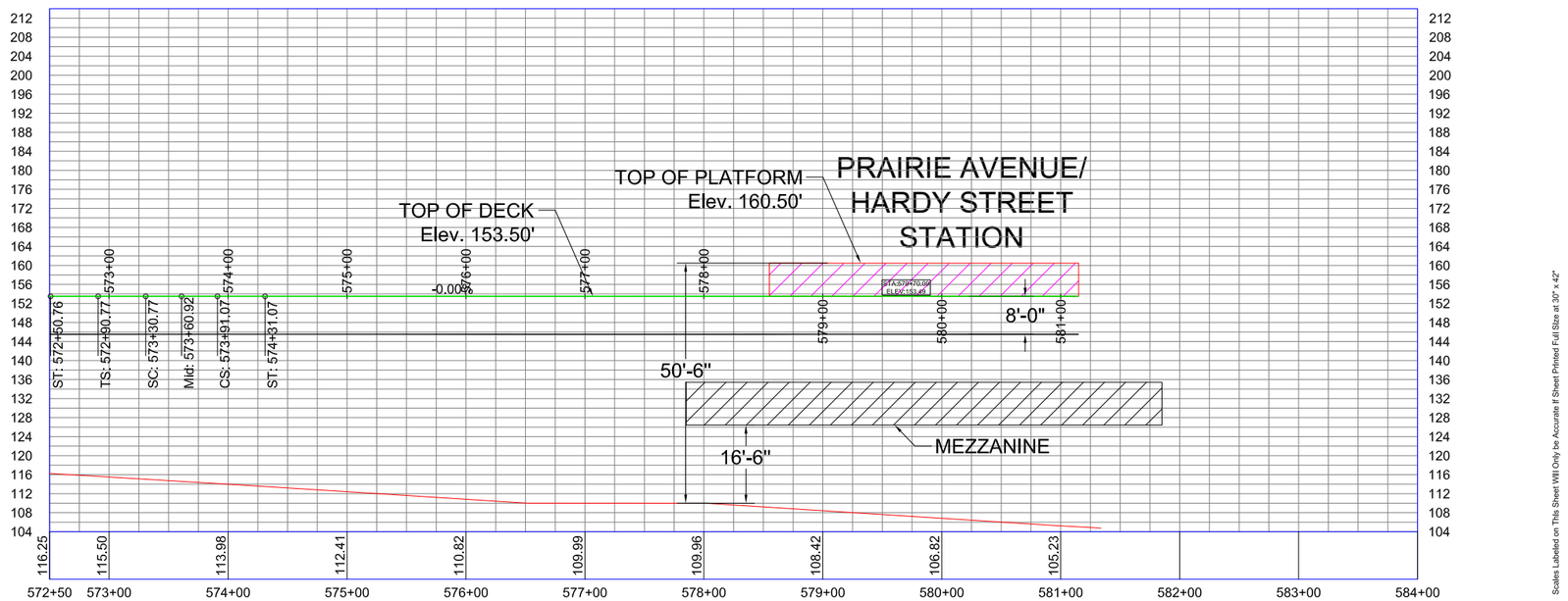
Proposed Project Alignment Plans and Profiles - Prairie Avenue from La Brea Drive to Arbor Vitae Street



Scales Labeled on This Sheet Will Only be Accurate If Sheet Printed Full Size at 30" x 42"

BASE PROJECT PLAN AND PROFILE; NOV 2020.

East Track PROFILE



Scales Labeled on This Sheet Will Only be Accurate If Sheet Printed Full Size at 30" x 42"

Legend

- Edge of Guideway
- APM Tracks
- Monorail Tracks
- Station Location

SOURCE: Lee+Elliott - 2020; Meridian Consultants - 2020

Illustrative and subject to adjustments as part of finalization during final design

FIGURE **3.0-4g**

Proposed Project Alignment Plans and Profiles – Prairie Avenue and Prairie Avenue/Hardy Street Station

3.5.1 Operational Characteristics

The operating system for the proposed Project consists of various integrated subsystems including the APM train vehicles, automated train control, power distribution, guidance, propulsion, communications systems, and other equipment to create a fully functional, automated, and driverless system.

Automated People Mover Technology

The physical requirements for the proposed Project including the turn radii required for the alignment, guideway widths, station dimensions, traction power substations and MSF were developed based on maximizing the types of automated transit system technologies that may be viable options for the Project. Factors affecting the viability of available technology options include ridership capacity, ability to fit within the physical limitations of the existing rights-of-way, APM train requirements, operational flexibility, and noise during operations.

The APM trains would be either a rubber-tire, steel-wheel system, or a monorail system. The technical requirements for large, automated monorail, rubber-tire APM train, and automated steel-wheel/steel-rail, also known as automated light rail transit (ALRT) were reviewed against the public rights of-way and property availability to determine the technologies best applicable for the proposed Project. While rubber tired APM trains (including monorail systems) can meet the Project's defined physical requirements, steel wheel/steel rail technologies may also be viable provided this technology can comply with the established Project requirements including maximum limits on noise and ability to fit within the defined physical space available for the Project. Certain suppliers offer or are in the process of updating their steel wheel/steel rail technologies, such that they may meet these requirements. For these reasons, it is prudent to allow the market to determine the best solution in terms of the proposed technology as part of the procurement process.

In addition, the proposed Project would include equipment to guide the movement of trains between stations, emergency lighting, communications and wayfinding systems, a command and control system, a public information system, and security systems to monitor activity at station platforms, along the guideway, and at the MSF.

Operation and Ridership

The operating system components are sized based on the projected future peak demand. Ridership projections[6] were based on existing and future mode-share assumptions and future passenger volumes.

6 Lea+Elliott, Inc. I*nglewood Transit Connector EIR Operating Systems Conceptual Planning EIR Project Definition DRAFT - June 2020.*

Ridership

Weekday and weekend ridership demand was estimated and used to determine the peak hour demands to determine the required operations for the proposed Project. For event ridership, pre-and post-event demand for small, medium, and large events at the Forum, the SoFi Stadium at LASED and IBEC were estimated using an event based travel demand model. It is anticipated and assumed that riders will be distributed at various points as they travel to the Prairie Avenue and Hardy Station from the event venues, including through walking distances to the stations from venue locations, ticket purchase areas at each Station, passage through fare gates and passage through designated exists. Riders were assumed to arrive in a fairly consistent rate throughout the hour.

Table 3.0-2: Projected Ridership Projections shows the projected ridership for the proposed Project. The proposed Project has been designed to accommodate a projected demand of approximately 8,910 passengers per hour per direction (pphpd) for NFL events.[7] In addition, the operations to serve the normal weekday peak-hour are planned to be approximately 441 pphpd.[8] At 2.1 minutes headway, the system capacity is approximately 11,500 pphpd (assuming increased operating fleet by introducing a "spare train" into service).

Table 3.0-2
Projected Ridership Projections

Event	Projected Peak Ridership
Normal Weekday/Weekend	441 peak hour passengers
Single Large Event (NFL game)	8,910 passengers departing within the one hour after the end of the event
Three-event scenario (SoFi event, IBEC or Forum concert)	9,600 passengers departing Market Street/Florence Station

Source: Lea& Elliott Inc. Inglewood Transit Connector EIR Operating Systems Conceptual Planning EIR Project Definition DRAFT -. June 2020. Table 4-1

Fleet Size and Line Capacity

Line capacity is defined as the number of pphpd that the system can carry past any particular point. The estimated fleet size considers the operating fleet, which is the number of vehicles required to provide the necessary line capacity to meet the projected demand, as well as the spare fleet, comprised of the "hot"

7 Lea+Elliott, Inc. *Inglewood Transit Connector EIR Operating Systems Conceptual Planning EIR Project Definition DRAFT - June 2020*.-.

8 Lea+Elliott, Inc. Inglewood Transit Connector EIR Operating Systems Conceptual Planning EIR Project Definition DRAFT - June 2020

8 Lea+Elliott, Inc. Inglewood Transit Connector EIR Operating Systems Conceptual Planning EIR Project Definition DRAFT - June 2020

standby and maintenance trains to ensure that the number of trains required for operations is always available.

Operating Fleet: The proposed Project is designed to serve the most frequent, largest event, which is considered to be an NFL game at LASED. The fleet size and line capacity analysis therefore sized the operating fleet so that the system can fully serve the 8,910 pphpd demand for NFL events. To serve the 8,910 pphpd ridership demand, a fleet of 5 trains, operating at a 2.5 minute headway is required. A maximum APM train length of 200 feet is required; this results in a generic vehicle 4-car train.

Spare Fleet: For the proposed Project, only one APM train is assumed to be used for "hot" standby or maintenance.

For normal weekday and weekend service, the 4-car self-propelled APM trains may be de-coupled into smaller 1- or 2-car trains to provide service that is more optimized to the time -specific and lower projected demands. Splitting one 4-car train into two 2-car trains and operating a headway of 6.3 min provides a reasonably good level of service for both commuter and daily service and optimizes the utilization of the fleet with respect to the lower demand. Large monorails are more difficult to de-couple so would likely operate the full 4-car train length for normal weekday/weekend operations.

The headways of the operating fleet to serve the projected number of passengers are shown in **Table 3.0-3**. For purposes of defining the train, a generic vehicle dimension has been used with a maximum train length for a 4-car train of approximately 200 feet. Vehicle/car/train capacities are based on a passenger space allocation of 2.7 SF per passenger; this is consistent with the passenger space standards applied to urban transit systems.

Table 3.0-3
Peak Period Ridership Headway Fleet Capacity

Peak Period	Projected Ridership (pphpd)	Headway	Fleet	Capacity
Normal Weekday	441	6.3 minutes	2 x 2-car trains or 1 x 4-car trains	1,850 to 1,950
NFL Event	8,910	2.5 minutes	5 x 4-car trains	9,300 to 9,700
Three-Event Scenario	9,600	2.1 minutes	6 x 4-car trains	11,100 to 11,500

_____

Source: Lea+Elliott, Inc. Inglewood Transit Connector EIR Operating Systems Conceptual Planning EIR Project Definition DRAFT -June 2020. Table 5-2.

The proposed Project has the ability to provide even more additional capacity, should this be necessary in the future to accommodate changes in demand levels, event sizes, event schedules, etc. This reserve capacity can be tapped into through the introduction of additional trains stored at the MSF as noted in **Table 3.0-3.** The stations are sized to accommodate the maximum length trains and, for this reason, no modifications to the station configuration are required if the reserve capacity is utilized.

Operations

The APM trains would typically operate daily for commuters, activity center visitors and employees 7 days per week for 18 hours per day, from 6:00 AM to 11:59 PM (midnight). The proposed Project would typically be closed with no trains operating from 12 AM to 5:59 AM, for 6 hours per day; during this time, maintenance activity would occur. Occasionally, as events at the venues along the proposed Project may occur past midnight, the APM trains may operate for an extended period.

As event attendees travel from their event center to and from the nearest station, they are would be metered and distributed at various points, including. through walking distances to the stations from venue locations, ticket purchase areas at each Station, passage through fare gates and passage through designated exists. As noted above, riders were assumed to arrive in a fairly consistent rate throughout the hour. At the start of service, the Central Control Operator (CCO) will issue a command to initiate the required operations. The Automated Train Control (ATC) system will then automatically dispatch the necessary number of trains to the mainline from the MSF. The ATC system will be designed so that the station dwell times are adjusted until the trains are equally spaced at the required headway. To adjust the operating fleet for special event service, the CCO will issue commands to inject trains onto the mainline guideway. For removal of trains from the system, maintenance personnel will be staged at one or more stations to ensure that all passengers have deboarded the trains prior to the trains going out of service.

Total travel time from one end to the other of the proposed Project would be approximately 6.8 minutes. **Table 3.0-4: Forecasted Northbound Station-to-Station In-Vehicle APM Train Travel Times** shows travel times between stations. These travel times include 40 second dwells (stops) at each station. Top APM train speed of 50 miles per hour (mph) is achievable but the actual operational speed will be limited to a maximum of 45 mph for passenger comfort and will be further governed by the speed restrictions imposed by the City as a condition of operation.

Table 3.0-4
Forecasted Northbound Station-to-Station In-Vehicle APM Train Travel Times (minutes)

Station	Market Street/Florence Avenue Station	Prairie Avenue / Pincay Drive Station	Prairie Avenue / Hardy Street Station
Market Street/Florence Avenue	N/A	4.7	6.8
Prairie Avenue/Pincay Drive	3.7	N/A	2.1
Prairie Avenue/Hardy Street	5.7	2.0	N/A

Source: Lea+Elliott Inc. Inglewood Transit Connector EIR Operating Systems Conceptual Planning EIR Project Definition DRAFT -. June 2020. Table 5-1

3.5.2 APM System Configuration and Alignment

Along its length, the elevated guideway structure would have a minimum clearance of 16 feet 6 inches feet above all roadways. The alignment elevation is dictated by the elevation of the grade (that varies along the alignment) and the station platform elevations (that must be situated above the mezzanine level which provides connectivity to touch down points on either side of the roadway); the alignment elevation between stations is then adjusted to ensure that the minimum roadway clearance is maintained while simultaneously lowering the guideway elevation to the extent feasible. The dual lane guideway would include switches to allow trains to crossover to the other track to be positioned to begin return trips at the end-of-line stations. Additionally, switches would be provided to allow a train to be guided from one track to another in the event of an emergency, mechanical failure, or other event and enable sectional track bypass for failure management. The exact switch configuration and whether the train switches tracks before or after entering the end of line station will be optimized through the design process depending on the selected technology.

For the length of the alignment, the proposed Project would consist of an elevated guideway with dual tracks for train travel in both directions. The train tracks are spaced as close together as possible with tracks diverging at approaches to/from stations and at stations. The elevated guideway would be supported by single or double column/bents (depending on the train track separations and the guideway location relative to potential column placements). While the final column locations and designs will be finalized by the selected DBFOM contractor, in consultation with the City, the alignment has been optimized to minimize the number of columns and potential double column/bents to the extent feasible. This approach optimizes the construction costs while simultaneously reducing the visual impact of the guideway.

To minimize the overall footprint of the proposed Project, and therefore its impact on the adjacent neighborhoods, the crossovers at the end stations, Market Street/Florence Avenue station on the

northern end and Prairie Avenue/Hardy Street station on the southern end, are located at the entrance to each of the stations.

The alignment of the guideway and station locations is shown in **Figures 3.0a** through **3.0-4g**.

Market Street/Florence Avenue Segment

The Market Street/Florence Avenue segment is approximately .35 miles in length. The proposed Project would connect to the Metro Crenshaw/LAX Line Downtown Inglewood station at the northern end of this segment. The guideway alignment is elevated and travels from the southeast corner of Market Street/Florence Avenue southwest towards the corner of Market Street/Regent Street where it runs along the center of Market Street until it turns east on Manchester Boulevard.

The guideway would begin at the Market Street/Florence Avenue station, situated diagonally over the current location of the retail commercial center on the northeast corner of Market Street and Regent Street, between the intersections of Florence Avenue/Locust Street and Market Street/Regent Street. The existing parcels to be used by the proposed Project are currently zoned as Transit Oriented Development Mixed Use 1 (MU-1); required actions relating to acquisitions that would allow for the proposed Project are further described in ***Section 3.6: Property Acquisitions*** in this section.

Exiting the Market Street/Florence Avenue station, the guideway would continue to extend south in the center of Market Street and within the public right-of-way, as shown in **Figure 3.0-4a.**

As shown in **Figure 3.0-4b**, at the northeast corner of the Market Street and Manchester Boulevard intersection, the guideway would partially extend beyond the public right-of-way and into the property at 150 S. Market Street (AIN 4021-010-015). This parcel is currently zoned in the Downtown Transit Oriented Specific Plan[9] as Historic Core and occupied by a 2-story commercial building (World Hat and Boot Mart). Acquisition of this parcel would be required to implement the Project. Specifically, this parcel would accommodate the guideway and public parking as described above.

Manchester Boulevard Segment

The Manchester Avenue segment of the guideway is approximately .50 miles in length. This segment extends from the intersection of Market Street/Manchester Avenue to the west, and the intersection of Prairie Avenue/Manchester Avenue to the east as shown in **Figure 3.0-4c** and **3.04d**. At the intersection

9 City of Inglewood, *New Downtown and Fairview Heights Transit Oriented Development Plan and Design Guidelines*, November 1, 2016.

of Prairie Avenue/Manchester Avenue, the guideway will turn south towards The Forum, LASED at Hollywood Park/SoFi Stadium, and the IBEC Project.

The MSF is located on this portion of the alignment to the southwest of Manchester Boulevard and is accessed by the APM trains from the elevated guideway (see **Figure 3.0-4c**). The MSF is located at the southeast corner of Hillcrest Boulevard/Manchester Avenue bounded by Hillcrest Boulevard, Nutwood Street, Spruce Avenue, and Manchester Avenue. The MSF houses functional spaces required for the operation and maintenance.

The proposed MSF facility will be located on the parcel containing an existing retail commercial center at 500 E. Manchester Boulevard. The guideway would include a side (tertiary) track to access the facility. Additional track switches would be needed to allow for the access of trains from the guideway to and from the MSF; these switches would be located on the east side of the MSF near Manchester Boulevard's intersections with Hillcrest Boulevard and Spruce Avenue. As the guideway continues from the MSF along Manchester Boulevard, at the southeastern corner of Manchester Boulevard and Spruce Avenue, the edge of the guideway could partially extend beyond the public right-of-way and into portions of the parking lot of the 1-story automobile supply and repair business, currently zoned C-2. This would necessitate an easement or an acquisition of a portion of this property at the northwestern corner as further described in ***Section 3.6***: **Property Acquisitions** in this section.

At the southwestern corner of the Manchester Boulevard and Prairie Avenue intersection, the edge of the guideway would partially extend beyond the public right-of-way and into the parking lot of the 1-story commercial property at 401 Prairie Avenue, currently zoned C-2 (see **Figure 3.0-4d**). This would necessitate an easement or an acquisition of a portion of this property at the northeastern corner as further described in ***Section 3.6***: **Property Acquisitions** in this section.

Prairie Avenue Segment

The Prairie Avenue segment is approximately .75 miles in length mile-long connection beginning at the intersection of Prairie Avenue and Manchester Boulevard and provides access to the Forum, LASED including SoFi Stadium, and the IBEC. This segment extends from the intersection of Prairie Avenue/Manchester Avenue to the north, to the intersection of Prairie Avenue/Hardy Street to the south as shown in **Figure 3.0-4e** through **3.04g**. The guideway would extend south along Prairie Avenue and cross the intersections of Prairie Avenue with Nutwood Street, Kelso Street/Pincay Drive, La Palma Drive, Buckthorn Street, and Arbor Vitae Street, before ending just north of Hardy Street. There are two center

platform stations located at Prairie Avenue and Pincay Drive, and Prairie Avenue and Hardy Street (both located over the public right-of-way).

South of the intersections of Prairie Avenue/Manchester Boulevard and Prairie Avenue/Pincay Drive, the guideway would pass Nutwood Street. The guideway would approach the Prairie Avenue/Pincay Drive station with dual tracks straddling the center platform station over the Prairie Avenue right-of-way and include crossover rail switches located on the northern approach of the station (see **Figure 3.0-4e**). The Prairie Avenue/Pincay Drive station would be located above the intersection of Prairie Avenue and Pincay Drive, largely within the right-of-way of the existing roadway. providing access to The Forum. The elevated guideway would be located primarily on the western side of Prairie Avenue except for areas on approach and departure from the. One passenger exit will be located on the southwest corner of The Forum property and the other passenger exit will be located on the northwest corner of the LASED property.

Upon exiting the Prairie Avenue/Pincay Drive station and continuing south, the elevated guideway would continue along the Prairie Avenue right-of-way until both tracks gradually transition together along the western side of Prairie Avenue near La Palma Drive and continue in this configuration until just south of Arbor Vitae Street see **Figure 3.0-4f**), where the tracks diverge to enter into the Prairie Avenue/Hardy Street station (see **Figure 3.0-4g**). The guideway would terminate at Hardy Street and the station would be located just north of the Prairie Avenue and Hardy Street intersection.

Columns and Structures

Over the length of the alignment, the Project has been configured to minimize impacts on existing facilities, roadways and to create an alignment envelope that would minimize the need for columns and double column/straddle bent support systems. The final column locations will ultimately be defined by the selected contractor as part of the final design process in consultation with the City. The columns, for the most part, will be required to be located within the public right-of-way, either within sidewalks or parking lanes.

Generally, support columns for the guideway would be single columns ranging from 6 feet to 9 feet in diameter when centered under the supported guideway to approximately 6 feet by 12 feet oblong columns when located off-center from the guideway. Column foundation depths would range from to 60 to 100 feet.

Market Street/Florence Avenue Segment

This segment includes one center platform station on private property (to be acquired by the City) at the southeast corner of Market Street/Florence Avenue; the station is connected to the Metro Crenshaw/LAX Line Downtown Inglewood station via an easily accessible passenger bridge. This passenger bridge will

connect passengers from the at-grade plaza at the Metro station to the mezzanine level of the proposed APM Market Street/Florence Avenue station to avoid the need for passengers to crossing Florence Avenue at-grade.

The Market Street/Florence Avenue station would be supported by straddle bent columns from the northern terminus to just north of Regent Street. Here, the dual lane tracks are separated to accommodate the station's center platform and turn-back switches that facilitate in-bound trains to switch to the other track for its outbound journey. As the guideway approaches Regent Street, the dual lane tracks converge and are supported by single columns until Manchester Avenue. From Manchester Avenue, the guideway turns eastward towards Prairie Avenue. The columns would be primarily located in the existing median area along Market Street between Regent Street to Manchester Avenue.

Manchester Boulevard Segment

As the guideway turns east onto Manchester Boulevard, the guideway would transition from single columns to straddle bents to support the turn onto Manchester Boulevard. The straddle bents will span across the northern and eastern portions of the intersection of Market Street and Manchester Boulevard.

The guideway along Manchester Boulevard will be supported by straddle bents for the most part. Columns will be placed in sidewalks and/or parking lanes so as to not reduce the existing roadway capacity of Manchester Boulevard.

Prairie Avenue Segment

Straddle bents will support the guideway as it proceeds south onto Prairie Avenue and past Nutwood Street, the Prairie Avenue/Pincay Drive station, and Pincay Drive. Just past the Pincay Drive intersection, as the guideways converge, there are opportunities to have single columns located on the western side of Prairie to support the guideway. Straddle bents would become necessary to support the guideway as it begins diverging on its approach to the Prairie Ave/Hardy Street station and to support the station structure.

Maintenance and Emergency Access

A continuous walkway would be provided along the entire length of the guideway to provide emergency egress for evacuating passengers and safe access for operations and maintenance personnel to access guideway and wayside equipment. For the proposed Project, the walkway is assumed to be between the tracks, providing access into the center platform stations.

Maintenance walkway considerations and requirements will comply with the applicable requirements that generally include the following:

- The walkway must be continuous through crossovers/switches or other elements that may act as barriers.
- The walkway should be located at or below the vehicle floor level under both normal and worst-case vehicle suspension failure conditions. It is desirable to locate the emergency walkway not more than 12 inches below the vehicle floor level. The walkway must not be more than 40 inches below the vehicle floor level under any circumstances.
- Walkways without a railing should be at least 44-inches wide and walkways with a railing should be at least 30-inches wide.
- The walkway should provide a clear cross-sectional envelope at least 30 inches wide to a height of 6 feet-8 inches above the walkway surface.
- Emergency walkway lighting is required along the entire walkway and egress route and will normally be turned on only when passengers are required to evacuate a train or during maintenance activities.

3.5.3 Stations

The proposed Project includes three center platform stations located at Market Street/Florence Avenue, Prairie Avenue/Pincay Drive, and Prairie Avenue/Hardy Street. The Market Street/Florence Avenue station provides connections to the Metro Crenshaw/LAX Line and Downtown Inglewood. The Prairie Avenue/Pincay Drive station provides connections to the Forum, LASED including SoFi Stadium, while the Prairie Avenue/Hardy Street station provides connections to LASED including SoFi Stadium and the IBEC.

Each station is designed in three levels including the ground, mezzanine, and platform levels. From the ground level, each station includes vertical circulation (stairs/escalators/elevators) from grade at existing sidewalks and passenger areas adjacent to the stations to the mezzanine and platform levels of the station. The mezzanine level provides connections for passengers over the active roadways below the stations and avoids at-grade passenger crossings. The Market Street/Florence Avenue Station will include an elevated passenger walkway connecting to the Metro Crenshaw/LAX Line Downtown Inglewood station. **Figure 3.0-5: Typical Station Design** shows the configuration that would be used for the stations; the typical design would be modified as needed to address site specific conditions.

Station design capacity would be established by passenger demand volumes under typical peak conditions, service disruptions, and emergency evacuation situations. Queuing and circulation requirements would be determined using the number of peak-hour passengers boarding and deboarding the APM trains defined by the long-range planning horizon. Like all public elements of the Project, stations would be required to be fully accessible to passengers with disabilities. The station configurations would be refined as necessary to reflect the designs of the major venues the system would serve, accommodate

the activity generator facility designs passenger access/egress concepts, and utility alignments, as well as right-of-way constraints.

Center platform configurations generally result in a smaller footprint and are proposed for the stations. These platforms would be located between guideways and serve as both boarding and deboarding platforms for passengers traveling in either direction.

Vertical circulation would be provided at either or both ends of station platforms, or within the length of the platform. A mezzanine level is anticipated under the station platform to connect to the street level through passenger walkways.

Market Street/Florence Avenue Station

The Market Street/Florence Avenue Station at the southeast corner of Market Street/Florence Avenue (see **Figure 3.0-4a**) includes one center platform. Approximate dimensions of the station are identified in **Table 4.0-3.**

The Market Street/Florence Avenue station would include ground, mezzanine, guideway platform levels and a station canopy. The ground level would provide passenger access to the station entrances, where stairs, escalators and elevators would connect the ground level to/from the mezzanine level. Access to/from the mezzanine level to/from the station platform would be provided through staircases, escalators, and elevators. The platform level would consist of an area for passenger boarding and deboarding the APM trains.

An elevated passenger walkway would extend northwest across Florence Avenue to connect passengers to/from the Metro Crenshaw/LAX line Downtown Inglewood station. All station access points would include a combination of escalators, stairs, and elevators.

Prairie Avenue/Pincay Drive Station

The Prairie Avenue/Pincay Drive station located southwest of the Forum would be above grade and largely located within the public right-of-way on the intersection of Prairie Avenue and Pincay Drive, as shown in **Figure 3.0-4e**. Approximate dimensions of the station are identified in **Table 4.0-3.**

The station will include two station access points to the east along Prairie Avenue, with a north access leading to the Forum and a south access leading to the LASED including SoFi Stadium. Exact placement of the access points will be determined in coordination with the owners/operators of these and other facilities during the design process to ensure optimum connectivity and integration. The station would include ground, mezzanine, guideway platform levels and station canopy. The ground level would provide

passenger access to the station entrances, and the mezzanine level with two access points to the west of the station. All station access points would include a combination of escalators, stairs, and elevators.

Prairie Avenue/Hardy Street Station

The Prairie Avenue/Hardy Street station would be above grade and located within the public right-of-way just north of the intersection of Prairie Avenue and Hardy Street, as shown in **Figure 3.0-4g**. Approximate dimensions of the station are identified in **Table 4.0-3.**

The station would include ground, mezzanine, guideway platform levels and station canopy. The ground level would provide passenger access to the station entrances. Passenger access to the mezzanine level would be provided through a walkway extension to the north and two access points to the west of the station. All station access points would include a combination of escalators, stairs, and elevators.

Vertical Circulation at the Stations

The stations will provide vertical access to the various station levels (Platform, mezzanine, and street level). The platform level where the APM train will access the stations will be above the mezzanine and street levels. The mezzanine level will allow APM riders to reach the street level and access passenger walkways to connect to other facilities such as the Metro Crenshaw/LAX Line Downtown Inglewood Station or areas beyond the normal street level landing areas.

Vertical circulation to the platform may be at the ends or along the platform. The configurations with access at the ends of the platform are referred to as “single-ended” and “double-ended” if they provide access at one end or both ends, respectively. Several factors will determine where vertical circulation is located on the platforms, including the station orientation in relation to the adjacent facility, concentration of expected passenger demand, physical and geometric constraints, and the orientation of the station relative to adjacent facilities, such as the Metro Crenshaw/LAX Line, the Forum, the SoFi Stadium at LASED, and the IBEC.

The concentration of passenger demand will also influence the size and location of vertical circulation. Vertical circulation for each station will address the concentration of passenger demands to minimize congestion and long passenger queues. To the degree feasible, the passenger demand will be evenly distributed throughout the station.

Design of the vertical circulation components will also address mobility requirements of passengers (strollers, walkers, wheelchairs, mobility concerns, and all requirements of the Americans with Disabilities

Act (ADA).[10] From a safety point of view, adequate passenger egress capacity will be provided to ensure that the passengers alighting from the APM trains to the platform can be dissipated through the available vertical circulation prior to the next APM train arrival. Consideration will be given to the fact that escalators and elevators can be unavailable for use due to either unforeseen failures or preventative maintenance.

Based on analysis of passenger demands, each 40 foot platform will likely include 2 escalators for boarding passengers and 3 escalators for deboarding passengers, 2 elevators for boarding passengers for deboarding passengers, and 6 foot wide stairs. Exact requirements will be established during the design phase of the project.

Transit station design will comply with all applicable codes. In particular, emergency egress codes such as NFPA Standard 130,[11] as applicable. Building codes/standards and fire codes of the County of Los Angeles Fire Department will be considered to establish the capacity requirements for vertical circulation and consulted to obtain the methodology for calculating the parameters that determine sizing of the vertical circulation elements for emergency conditions. One key aspect of such calculations is that the vertical circulation systems may be required to cease operation under certain emergency scenarios, and the escalators may then be treated as fixed stairs within those circumstances. NFPA 130 and local building codes sometimes conflict; as such, any conflicts will be resolved during the design review phase in conjunction with the requirements of the Los Angeles County Fire Department.

3.5.4 Maintenance and Storage Facility (MSF)

The MSF Facility would be used for regular and preventive maintenance of the APM trains and operating equipment, as well as space for storage of the vehicle fleet. As shown in **Figure 3.0-6: MSF Site Plan**, the 97,400 square foot MSF is proposed on an approximately 5.5-acre site at 500 E. Manchester Boulevard located between Hillcrest Boulevard and Spruce Avenue currently developed with a retail commercial center.

As shown in **Figure 3.0-7: MSF Plan and Section Views**, the MSF would be elevated from ground level, with double height clearance over the maintenance tracks, and a largely unenclosed ground floor. The maintenance level for APM train cars would be located on the second floor to match the guideway track elevation. The maintenance level will contain mezzanine administrative office space. The ground level

10 Code of Federal Regulations (CFR) at 28 CFR parts 35 (title II) and 36 (title III), American with Disabilities Act.

11 *National Fire Protection Association (NFPA)*, Standard 130 - Standard for Fixed Guideway Transit and Passenger Rail Systems. 2020. https://www.nfpa.org/codes-and-standards/all-codes-and-standards/list-of-codes-and-standards/detail?code=130

would include multiple rows of columns and support beams for structural support. The approximate dimensions of the MSF are shown on **Table 4.0-3.**

The ground floor would consist of a generally unenclosed space containing parking for employees and visitors to the MSF, loading dock and circulation area for large trucks, access driveways, traction power substation (~30 feet by 100 feet), facility support rooms (mechanical, electrical, and plumbing support services), and freight elevator and other vertical circulation cores to higher levels of the structure.

The maintenance level on the second floor would accommodate up to six train docks, each the length of the MSF, split into three separate areas; this level would provide sufficient space for maintenance shop activities and inventory and storage. The northwestern side would house one train dock to be used for APM train exterior/interior washing, including a collection system for wastewater and fluids from the train washing system. Towards the center area of the MSF would consist of two train docks for light maintenance of the trains. Finally, near the southeastern side of the MSF would include two more train docks to be used for heavy vehicle maintenance. The heavy maintenance docks would be located on top of a solid platform structure to capture and contain any mechanical fluids or components during maintenance activities. The space occupying the most southeastern side of the MSF would be used for inventory, equipment storage, mechanical/electrical shops, and employee facilities.

The mezzanine office space would be located above the inventory and storage area on the second floor. This area would house the operations control center where automated train operations are monitored and controlled. In addition, this level would include office space, conference room(s), employee locker and break room(s), restrooms, and a technician workspace.

The MSF Site will also include public parking on the remainder of the site. Approximately 450 public parking spaces would be provided in a surface parking lot located adjacent to the MSF.

Vehicle and passenger access to the MSF would be provided via controlled gates, as well as paved interior circulation roads for employees, service vehicles, and delivery vehicles. Security measures for the MSF would include secured perimeter fencing, automated gates, electronic security card systems, intercoms, security cameras, and exterior lighting.

The MSF will be designed consistent with the ITC Design Guidelines, whereby massing and height will be minimized, rooftop equipment will be fully screened, color palette will be generally uniform and neutral in tone, transparent glazing shall be provided to maximize daylight to the extent feasible. Additionally, lighting will be placed to minimize spillover to adjacent properties and building entrances and pedestrian paths will be clearly lit.

3.5.5 Traction Power Substations

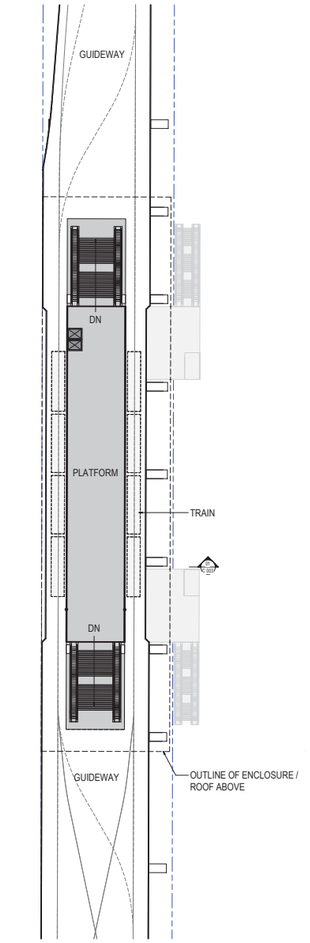
Propulsion power which includes the power to run the train on the guideway and power for auxiliary and housekeeping needs would we provided by two Traction Power Sub-Stations (TPSSs) located along the alignment. As shown in **Figure 3.0-8: Potential Locations for Traction Power Substations**, the TPSSs would be located at the MSF site and at the City's Civic Center site on Prairie Avenue adjacent to the guideway at the City's Civic Center site on Prairie Avenue and connect to existing electrical Southern California Edison (SCE) trunk lines.

The estimated space requirements for each TPSS is approximately 3,000 SF and with 14 feet of clearance above the finished floor (see **Figure 3.0-9: Typical TPSS Layout**). Each TPSS includes equipment to transform the medium- to high-voltage power feed provided from the power companies to the typically required 750-volt direct current (VDC) needed to power the vehicles and typically and power for housekeeping and other ancillary equipment.

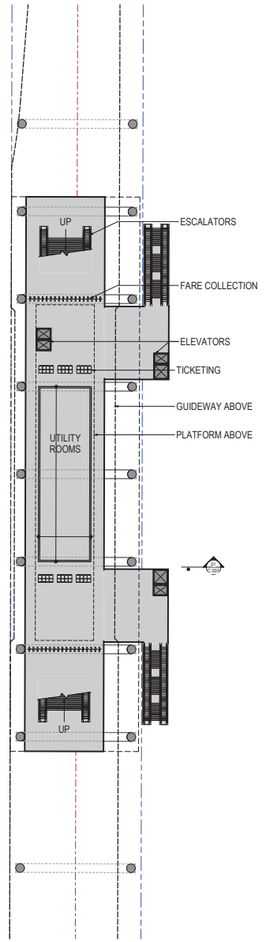
A key element in a TPSS is the transformer/rectifier unit, which needs to be sized to accommodate the power requirements for operating multiple trains simultaneously, in addition to the auxiliary and housekeeping power requirements for the MSF and stations. Each TPSS would include equipment to transform the medium- to high-voltage power feed provided from SCE to the required downstream distribution needed to power the vehicles, housekeeping power and power for other ancillary equipment.

Based on a distribution study completed by the Southern California Edison Company (SCE), upgrades to the existing distribution system are required to accommodate the maximum power load for the Project. These upgrades consisting of 1,500 feet of new civil work/duct banks, 1,860 feet of new 1000 jacketed concentric neutral (JCN) cable, 1,700 feet of upgrading/re-cabling of the existing SCE primary cable to 1000 JCN, and two new gas switches, will be constructed as part of the Project.

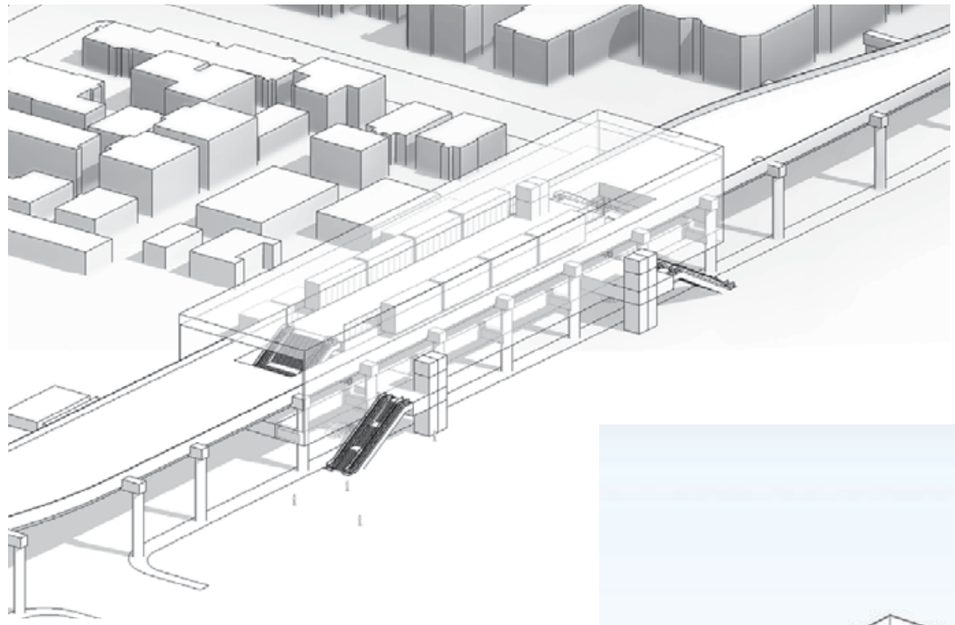
To assure the ability to allow APM trains to reach the nearest stations to offload riders in the event of loss of electrical supply, each TPSS will be equipped with backup power generators. The backup generators would be capable of supplying power to the APM trains for either 100 percent or 50 percent electrical capacity for a limited time to allow trains to complete their route so that riders can disembark at stations.



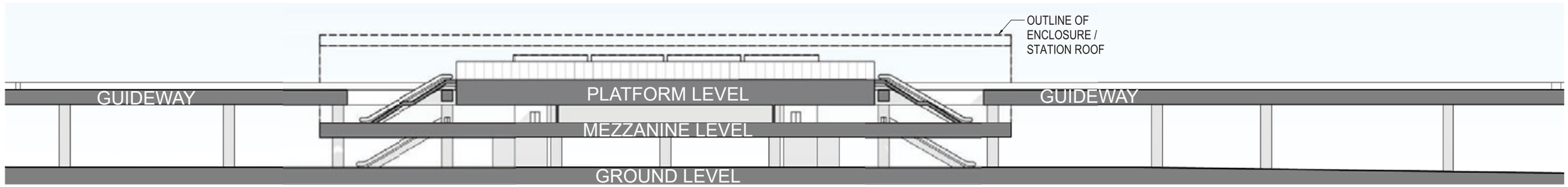
PLATFORM LEVEL



MEZZANINE LEVEL







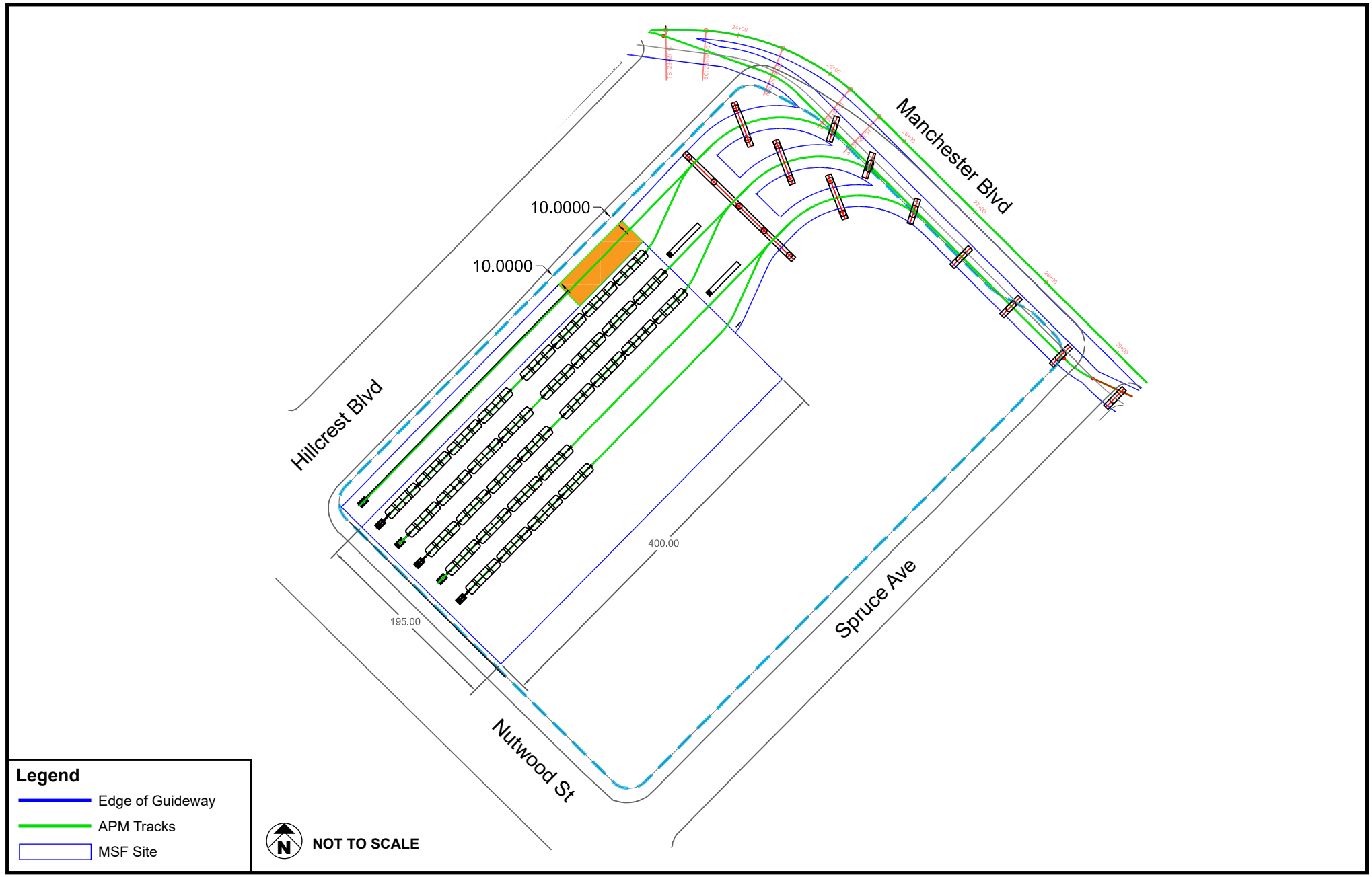
LONGITUDINAL SECTION

SOURCE: SOM - 2020; Meridian Consultants - 2020

Illustrative and subject to adjustments as part of finalization during final design

FIGURE **3.0-5**

Typical Station Design



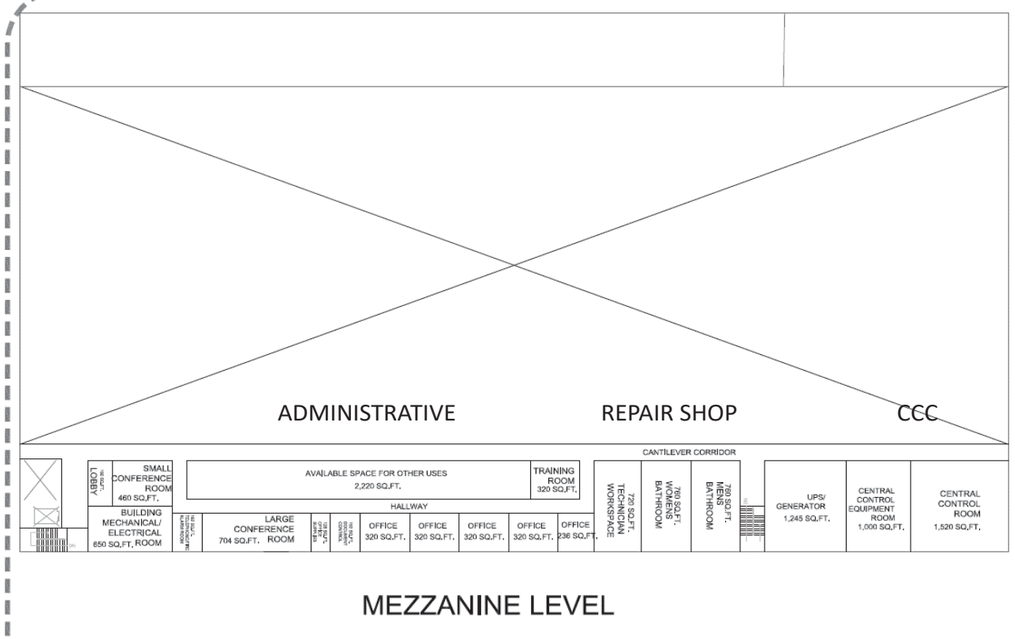
SOURCE: Lee+Elliott - 2020; Meridian Consultants - 2020

Illustrative and subject to adjustments as part of finalization during final design

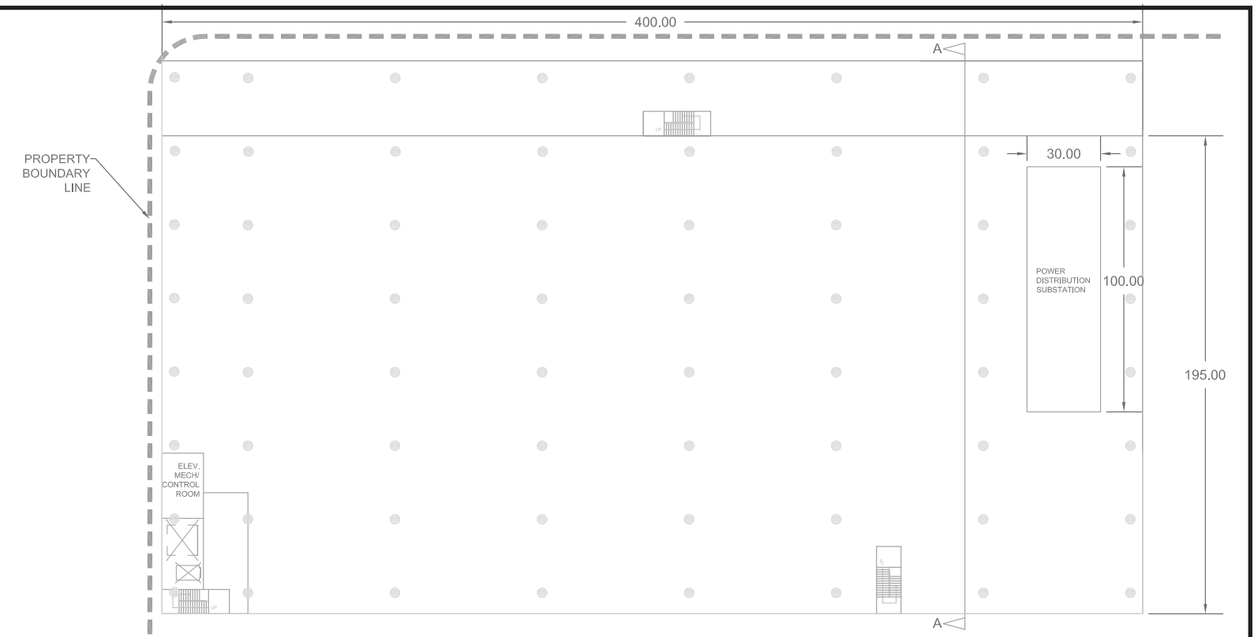
FIGURE **3.0-6**

MSF Site Plan

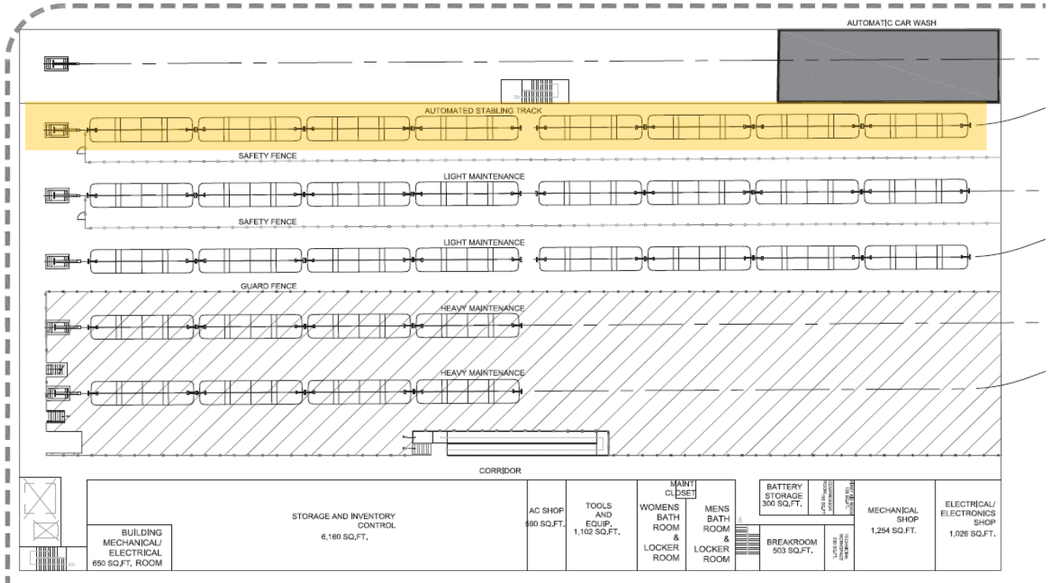
251-003-20



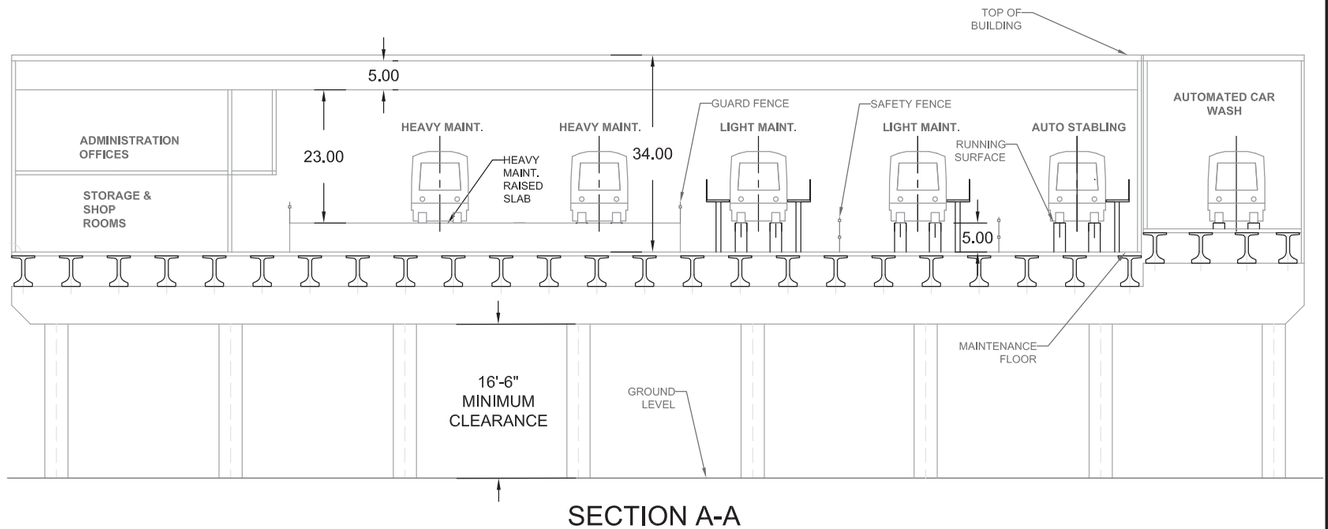
MEZZANINE LEVEL



GROUND LEVEL



MAINTENANCE LEVEL



SECTION A-A

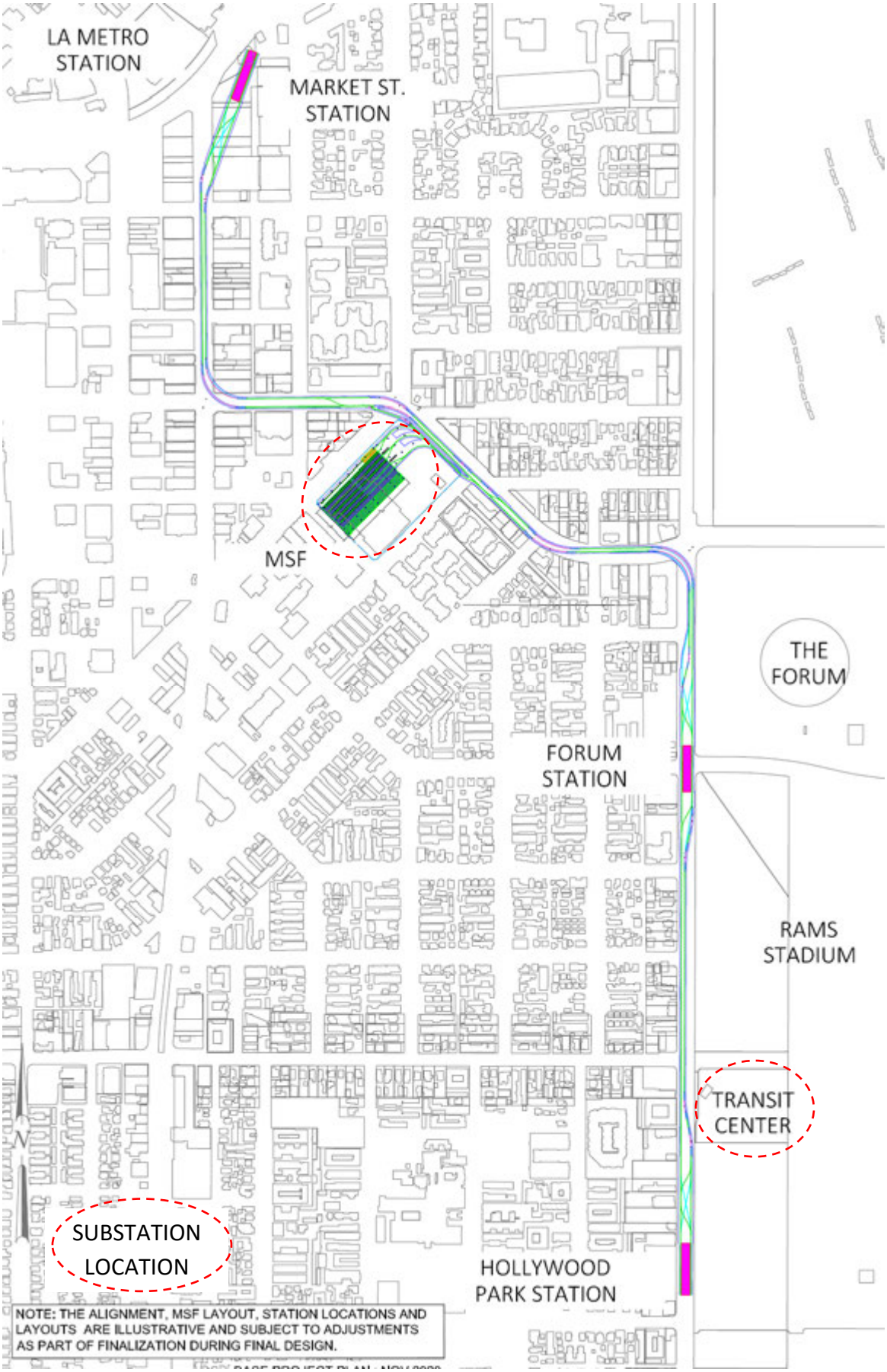
NOT TO SCALE

SOURCE: Lee+Elliott - 2020, Meridian Consultants - 2020

Illustrative and subject to adjustments as part of finalization during final design

FIGURE **3.0-7**

MSF Plan and Section Views



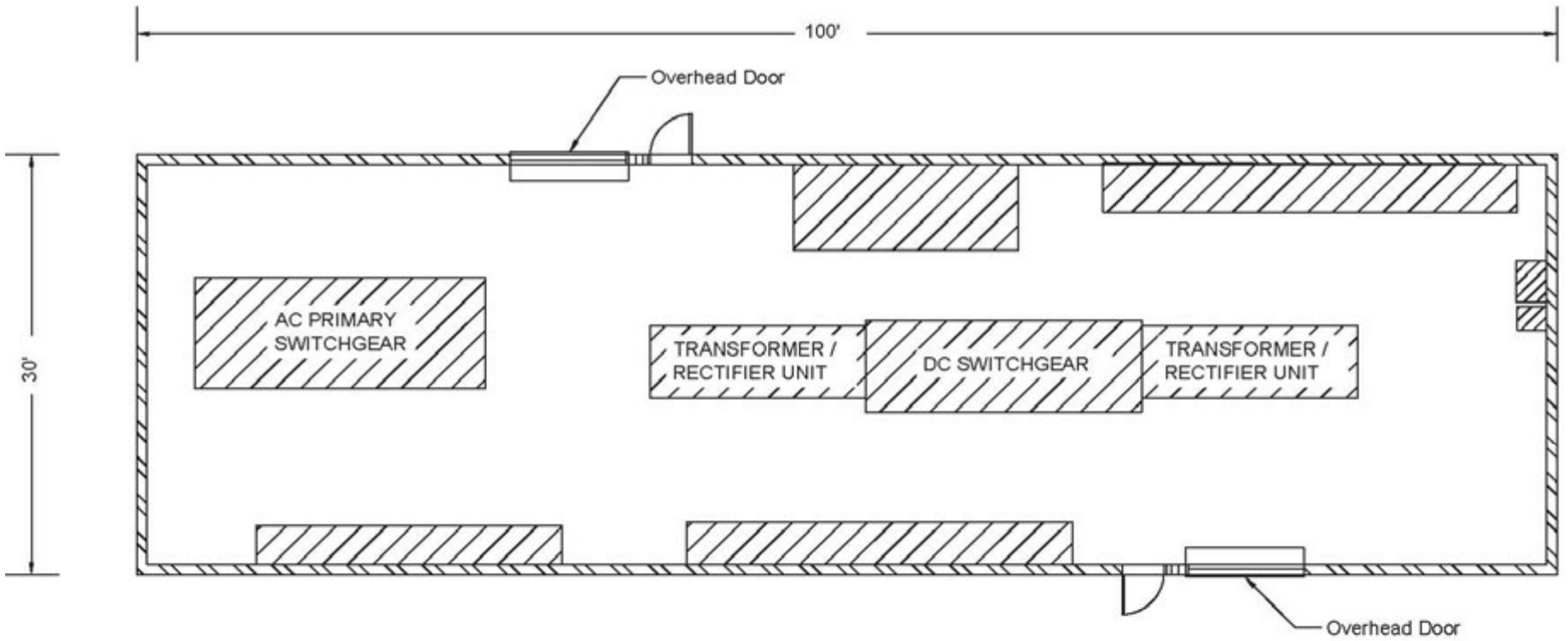
SOURCE: Lee+Elliott, Inc. - DRAFT November 2020

Illustrative and subject to adjustments as part of finalization during final design

FIGURE **3.0-8**

Potential Locations for Traction Power Substations

208-001-18



NOTES:

1- DUCT BANKS/CONDUIT STUB-UPS REQUIRED FOR AC AND DC SWITCHGEAR. COORDINATION REQUIRED BETWEEN FF CONTRACTOR AND APM CONTRACTOR.
2- 14' MINIMUM CLEARANCE (FLOOR TO CEILING).

LEGEND:

APM CONTRACTOR FURNISHED EQUIPMENT

SOURCE: Lee+Elliott - 2020

Illustrative and subject to adjustments as part of finalization during final design

FIGURE **3.0-9**

Typical TPSS Layout

251-003-20

3.5.6 Roadway Improvements

To achieve the City's goal of maintaining existing roadway capacity while accommodating the components of the Project, including the grade-separated guideway with support columns in the center median, or along sidewalks or parking lanes, and three stations on portions of Market Street, Manchester Boulevard and Prairie Avenue, several roadway improvements are proposed.

Restriping and Lane Modifications

A brief description of the existing and proposed characteristics of these roadway segments including number of lanes, intersection geometry, traffic control, on-street parking, sidewalks and crosswalks, and speed limits is provided. Roadway striping and cross-sections are included in **Figures 3.0-10** to **3.0-24: Striping Plans**, and **Figures 3.0-25** to **3.0-32: Cross-sections**.

Market Street between Florence Avenue and Manchester Boulevard

Market Street between Florence Avenue and Manchester Boulevard will include the same number of lanes as existing conditions (one lane in either direction). No change to roadway throughput or capacity is proposed as part of the proposed Project. The speed limit along Market Street will remain at 25 mph, similar to existing conditions.

Lane configurations and traffic control at intersections will mostly remain similar to existing conditions at the intersections of Market Street/Florence Avenue and Market Street/Manchester Boulevard, resulting in very little to no changes to intersection capacities. Changes to intersection lane configurations due to the proposed Project would occur at the intersections of Market Street/Regent Street (removal of northbound left-turn lane) and Market Street/Queen Street (removal of northbound and southbound left-turn lanes). No changes to intersection traffic control are proposed at these intersections. A brief description of the resulting lane configurations at the intersections along this stretch of Market Street with the proposed Project is summarized below.

- **Intersection of Market Street/Florence Avenue** – There would be no changes to the lane configurations and traffic control due to the proposed Project at this signalized intersection, compared to existing conditions. Similar to existing conditions, the northbound approach would provide a left-turn lane and a right-turn lane. The eastbound approach would provide two through lanes and a shared through/right-turn lane, while the westbound approach would provide a left-turn lane and two throughlanes.
- **Intersection of Market Street/Regent Street** – The proposed Project would result in the removal of the northbound left-turn lane at this signalized intersection compared to existing conditions. The northbound approach would provide a shared left-/through/right-turn lane. The adjacent D3 (Market Gateway) Project would modify the southbound approach by removing the right-turn lane, resulting

in a shared left-/through/right-turn lane. The proposed Project would not change the southbound, eastbound, and westbound approaches. The eastbound and westbound approaches would both provide a left-turn lane and a shared through/right-turn lane. No change to traffic control (signal) at this intersection are proposed with the proposed Project compared to existing conditions. Given the low traffic volumes at this intersection, this intersection would continue to operate satisfactorily.

- **Intersection of Market Street/Queen Street** – As a result of the proposed Project, the northbound and southbound approaches would provide a shared left-/through/right-turn lane, removing the separate left-turn lanes, compared to existing conditions. The southbound approach would provide a shared left-turn/through lane and a separate right-turn lane. Given the low traffic volumes at this intersection, this intersection would continue to operate satisfactorily. The proposed Project would not change the eastbound and westbound approaches. The eastbound and westbound approaches would both provide a shared left-/through/right-turn lane. No change to traffic control (signal) at this intersection are proposed with the proposed Project compared to existing conditions.
- **Intersection of Market Street/Manchester Boulevard** - There would be no changes to the lane configurations or traffic control due to the proposed Project at this signalized intersection compared to existing conditions. The northbound and southbound approaches would provide a left-turn lane and a shared through/right-turn lane. The eastbound and westbound approaches would both provide a left-turn lane, one through lane and a shared through/right-turn lane.

Manchester Boulevard between west of Market Street and Prairie Avenue

Manchester Boulevard between Market Street and Prairie Avenue will include the same number of lanes as existing conditions, i.e., two lanes in either direction with turn lanes at intersections between Market Street and Hillcrest Boulevard; and two lanes/three lanes in the westbound/eastbound directions, respectively, with turn lanes at intersections between Hillcrest Boulevard and Prairie Avenue. No change to roadway capacity or traffic control is proposed as part of the proposed Project. The speed limit along Manchester Boulevard will remain at 35 mph, similar to existing conditions.

Lane configurations at intersections will mostly remain similar to existing conditions at all locations within that stretch, resulting in no changes to intersection capacities. Additionally, no reductions in turn-lane storage lengths are proposed at any of the intersections within this stretch, as part of the proposed Project. Minor modifications to lane configurations at the Manchester Boulevard/Prairie Avenue intersection may be required or desired based on prevailing demands at the time of construction of the proposed Project. This could be achieved by restriping at the time of implementation of the Project. A brief description of the resulting lane configurations at the intersections along this stretch of Manchester Boulevard as a result of the proposed Project is summarized below.

- **Market Street/Manchester Boulevard** - There would be no changes to the lane configurations and traffic control (signal) due to the proposed Project at this signalized intersection compared to existing

conditions. The northbound and southbound approaches would provide a left-turn lane and a shared through/right-turn lane. The eastbound and westbound approaches would provide a left-turn lane, one through lane and a shared through/right-turn lane.

- **Intersection of Locust Street/Manchester Boulevard** - There would be no changes to the lane configurations and traffic control (signal) due to the Project at this signalized intersection compared to existing conditions. The northbound and southbound approaches would provide a shared left/through/right-turn lane. The eastbound and westbound approaches would provide a left-turn lane, one through lane and a shared through/right- turn lane.
- **Intersection of Hillcrest Boulevard/Manchester Boulevard** - There would be no changes to the lane configurations and traffic control (signal) due to the proposed Project at this signalized intersection compared to existing conditions. The northbound and southbound approaches would provide a left turn lane, a through lane and a right-turn lane. The eastbound and westbound approaches would provide a left-turn lane, one through lane and a shared through/right-turn lane.
- **Intersection of Spruce Avenue/Manchester Boulevard** - There would be no changes to the lane configurations and traffic control (signal) due to the Project at this signalized intersection compared to existing conditions. The northbound approach would provide a shared left/through/right-turn lane. The southbound approach is a driveway and would provide a right-turn lane only. The eastbound approach would provide a left-turn lane, two through lanes and a separate right-turn lane (in the evening peak period, on-street parking restriction allows this right turn lane to function as a shared through/right-turn lane along eastbound Manchester at this intersection). The westbound approach would provide a left- turn lane, one through lane and a shared through/right-turn lane.
- **Intersection of Tamarack Avenue/Manchester Boulevard** - There would be no changes to the lane configurations or traffic control (stop-sign at Tamarack Avenue northbound approach) due to the proposed Project at this unsignalized intersection compared to existing conditions. The northbound approach would provide a shared left-/right-turn lane. The eastbound approach would provide two through lanes and a separate right-turn lane (except in the evening peak period, when on-street parking restriction allows this right turn lane to function as a shared through/right-turn lane along eastbound Manchester at this intersection). The westbound approach would provide a left-turn lane and two through lanes.
- **Intersection of Osage Avenue/Manchester Boulevard** - There would be no changes to the lane configurations and traffic control (stop-signs at Osage Avenue northbound and southbound approaches) due to the proposed Project at this unsignalized intersection compared to existing conditions. The northbound and southbound approaches would provide a shared left-/through/right-turn lane. The westbound approach would provide a left-turn lane, one through lane and a shared through/right-turn lane. The eastbound approach would provide a left-turn lane, one through lane and a shared through/right-turn lane during the morning peak hours and off-peak hours. During the evening peak hours, with on-street parking restrictions, the eastbound approach would provide a left-turn lane, two through lanes and a shared through/right-turn lane.

- **Intersection of Prairie Avenue/Manchester Boulevard** - There would be no changes to the lane configurations and traffic control (signal) due to the proposed Project at this signalized intersection compared to existing conditions. The northbound approach would provide a left-turn lane, two through lanes and a separate right-turn lane. The southbound approach would provide a left-turn lane, two through lanes and a shared through/right-turn lane. The eastbound approach would provide a left-turn lane, two through lanes and a shared through/right-turn lane. The westbound approach would provide a left-turn lane, two through lanes and a separate right-lane.

Prairie Avenue between Manchester Boulevard and south of Hardy Street

Prairie Avenue between Manchester Boulevard and Hardy Street will include the same number of lanes as existing conditions (three lanes in either direction with a central turn lane including the turn lanes at intersections). No change to roadway capacity is proposed as part of the proposed Project. The speed limit along Prairie Avenue will remain at 40 mph, similar to existing conditions. No on-street parking will be allowed along Prairie Avenue within this stretch similar to existing conditions.

Prairie Avenue will be partially relocated up to 30 feet to the east to maintain the existing capacity, minimum sidewalk widths and to accommodate the columns for the guideway, which are proposed in the existing sidewalk area (on the west side of Prairie), and in sidewalk areas on the east side of the partially relocated Prairie Avenue, and station features.

Lane configurations and traffic control at intersections will mostly remain similar to existing conditions at all locations within that stretch, resulting in no changes to intersection capacities. Additionally, no reductions in storage lengths are proposed at the intersection turn lanes as part of the proposed Project. Minor modifications to lane configurations at the Manchester Boulevard Prairie Avenue intersection may be required or desired, based on prevailing traffic demands at the time of implementation of the Project. A brief description of the resulting lane configurations at the intersections along this stretch of Prairie Avenue due to the proposed Project is summarized below.

- **Intersection of Prairie Avenue/Manchester Boulevard** - There would be no changes to the lane configurations and traffic control (signal) due to the proposed Project at this signalized intersection, compared to existing conditions. The northbound approach would provide a left-turn lane, two through lanes and a separate right-turn lane. The southbound approach would provide a left-turn lane, two through lanes and a shared through/right-turn lane. The eastbound approach would provide a left-turn lane, two through lanes and a shared through/right-turn lane. The westbound approach would provide a left-turn lane, two through lanes and a separate right-turn lane.
- **Intersection of Prairie Avenue/Nutwood Street** - There would be no changes to the lane configurations and traffic control (stop-sign control at the eastbound Nutwood Street approach) due to the proposed Project at this unsignalized 'T' intersection. The northbound approach would provide

a left-turn lane (central turn lane), three through lanes. The southbound approach would provide two through lanes and a shared through/right-turn lane. The eastbound approach would provide a shared left-/right-turn lane.

- **Intersection of Prairie Avenue/Kelso Street-Pincay Drive** - There would be no changes to the lane configurations and traffic control (signal) due to the proposed Project at this signalized intersection, compared to existing conditions. The northbound approach would provide a left-turn lane, three through lanes and a separate right-turn lane. The southbound approach would provide a left-turn lane, two through lanes and a shared through/right-turn lane. The eastbound approach would provide a left-turn lane and a shared through/right- turn lane. The westbound approach would provide a left-turn lane, one through lane and a separate right-turn lane.
- **Intersection of Prairie Avenue/La Palma Drive-Stadium Driveway** - There would be no changes to the lane configurations and traffic control (stop-signs at the La Palma Drive- Stadium Driveway approaches) due to the proposed Project at this unsignalized intersection, compared to existing conditions. The northbound and southbound approaches would provide a left-turn lane, two through lanes and a shared through/right-turn lane. The eastbound approach would provide a shared left-/right-turn lane. The westbound approach would provide a right-turn lane.
- **Intersection of Prairie Avenue/Buckthorn Street-Touchdown Drive** - There would be no changes to the lane configurations and traffic control (signal) due to the proposed Project at this signalized intersection, compared to existing conditions. The northbound approach would provide a left-turn lane, three through lanes and a separate right-turn lane. The southbound approach would provide a left-turn lane, two through lanes and a shared through/right-turn lane. The eastbound approach would provide a left-turn lane and a shared through/right-turn lane. The westbound approach would provide a left-turn lane, one through lane and a separate right-turn lane.
- **Intersection of Prairie Avenue/Arbor Vitae Street** - There would be no changes to the lane configurations and traffic control (signal) due to the proposed Project at this signalized intersection, compared to existing conditions. The northbound approach would provide a left-turn lane, three through lanes and a separate right-turn lane. The southbound approach would provide a left-turn lane, two through lanes and a shared through/right-turn lane. The eastbound approach would provide a left-turn lane and a shared through/right-turn lane. The westbound approach would provide a left-turn lane, one through lane and a separate right-turn lane.
- **Intersection of Prairie Avenue/Victory Street** - There would be no changes to the lane configurations and traffic control (stop sign at Victory Street westbound approach) due to the proposed Project at this unsignalized 'T' intersection, compared to existing conditions. The northbound approach would provide two through lanes and a shared through/right-turn lane. The southbound approach would provide three through lanes. The westbound approach would provide a right-turn lane.
- **Intersection of Prairie Avenue/Hardy Street** - There would be no changes to the lane configurations and traffic control (signal) due to the proposed Project at this signalized intersection, compared to existing conditions. The northbound approach would provide a left-turn lane, three through lanes and

a separate right-turn lane. The southbound approach would provide a left-turn lane, two through lanes and a shared through/right-turn lane. The eastbound approach would provide a left-turn lane and a shared through/right-turn lane. The westbound approach would provide a left-turn lane, a shared left-turn/through lane and a separate right-turn lane.

Parking

Market Street Segment

Pick-up and drop-off areas would be provided along the west side of Locust Street south of Florence Avenue, as well as along the north-side of Regent Street between Locust Street and Market Street. A reduction in on-street parking spaces of approximately 13 spaces along Regent Street and 17 spaces along Locust Street would occur due to the Pick-up/Drop-off areas and the surface parking lot driveways proposed as part of the proposed Project.

A surface parking lot with approximately 650 parking spaces at the adjacent Florence Avenue and Market Street Station site, would be provided after construction of the Project is completed. This site will be used for construction staging. This public parking at Florence and Market Street is proposed to accommodate anticipated public parking demands, especially on event days, for those desiring to access the event venues and mixed-use areas at the Forum, the LASED and IBEC areas. While the ITC is designed to increase transit ridership along the Metro Rail system, the City anticipates that parking would attract patrons to the downtown Inglewood area along Market Street. Moreover, this surface parking lot at the Station site would provide the replacement parking spaces for the reduced parking along Locust Street and Regent Street where Pick-up/Drop-off areas are proposed.

There are currently 104 on-street parking spaces along Market Street between Florence Avenue and Manchester Boulevard. The proposed Project would reduce an additional 32 on-street parking spaces along Market Street between Florence Avenue and Manchester Boulevard. These spaces will be replaced in the 650 space public parking lot at the Florence Avenue and Market Street Station site.

An additional off-street surface parking lot will also be provided at the northeast corner of Market Street and Manchester Boulevard. This surface parking lot is anticipated to provide approximately 55 public parking spaces, replacing 6 existing spaces, and obtaining access off of the alley east of the site.

Conceptual roadway striping plans for the Locust Street segment between Florence Avenue and Regent Street and for the Regent Street segment between Market Street and Locust Street indicating the Pick-up/Drop-off areas and conceptual parking layout plans at the surface parking lots at the Market Street / Florence Avenue Station site are provided in **Figure 3.0-33: Market Street/Florence Avenue Station Proposed Parking Plan** and **Figure 3.0-34: 150 S. Market Street Proposed Parking Plan**.

Manchester Boulevard Segment

There are currently 84 on-street parking spaces along Manchester Boulevard within this segment. The proposed Project would result in reduction of approximately 47 metered on-street parking spaces. These spaces will be replaced in the in the 450 space public parking lot proposed at the MSF site located at the southeast corner of the intersection of Manchester Boulevard/Hillcrest Boulevard.

Conceptual roadway striping plans for MSF site are provided in **Figure 3.0-35: MSF Site Proposed Parking Plan**.

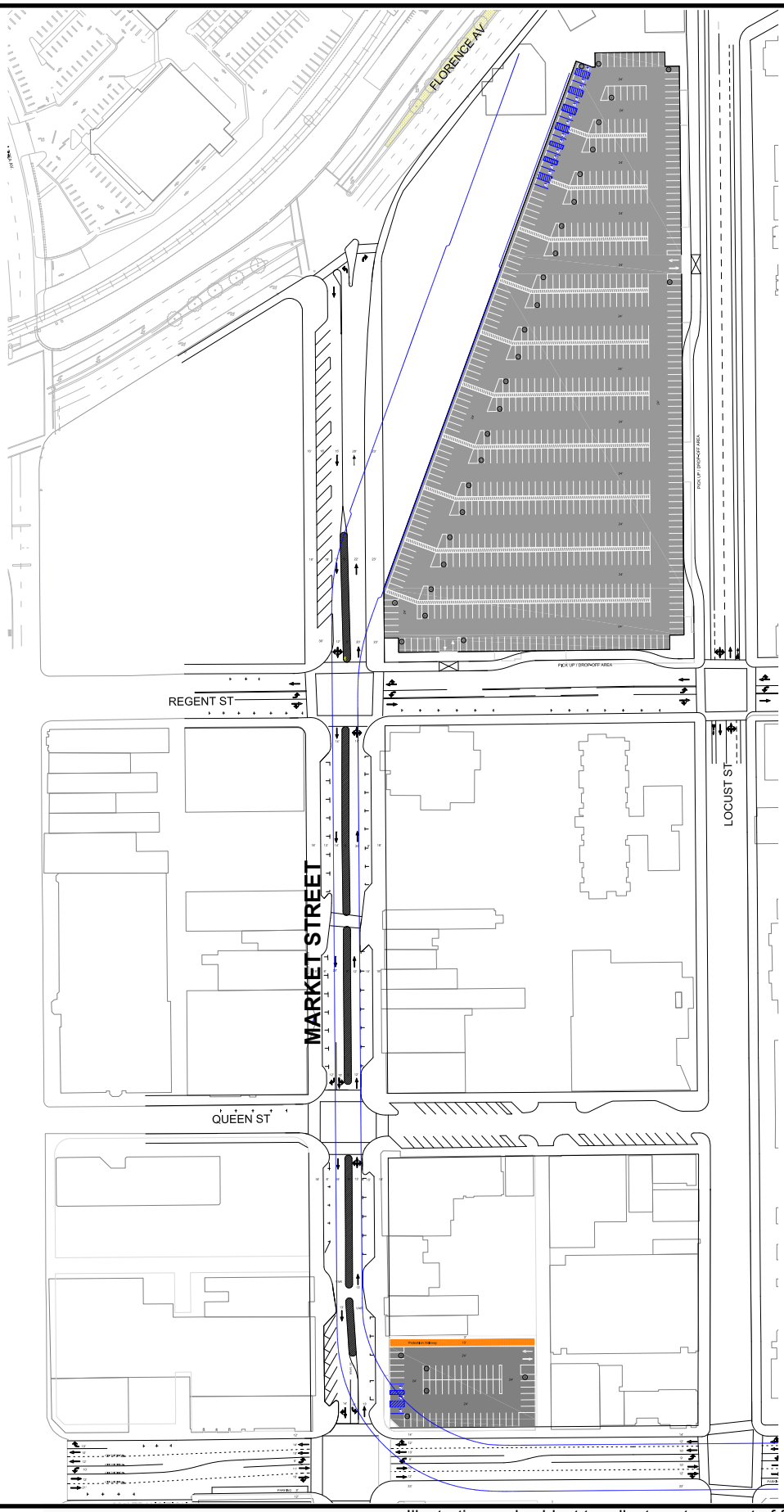
Sidewalks

Sidewalks on both sides of the various street segments will be provided by the proposed Project consistent with the requirements of the ADA [12] along Market Street between Florence Avenue and Manchester Boulevard; Manchester Boulevard between Market Street and Prairie Avenue; and Prairie Avenue between Manchester Boulevard and Hardy Street. Temporary and/or permanent easements may be required for these sidewalks. Similar to existing conditions, crosswalks will be provided by the proposed Project at all intersections.

3.5.7 Utility Improvements, Upgrades, and Relocations

The proposed Project would require utility systems improvements and upgrades. Based upon preliminary review, it appears that most, if not all utilities within the Project footprint can be avoided and no major utilities will require relocation. However, the location of utilities is based on a review of existing documentation and the exact locations have not been field verified. It is, therefore, possible that relocations would be necessary to accommodate and serve the various Project components. The design and construction of the elevated-guideway structures, stations, and support facilities would strive to avoid existing utility and other infrastructure to the extent possible. In addition to surface improvements, some utility infrastructure that cannot be avoided may need to be relocated to accommodate the guideway columns and foundations. Any affected utility infrastructure will be relocated and replaced as needed.

12 42 United States Code, Section 12101.

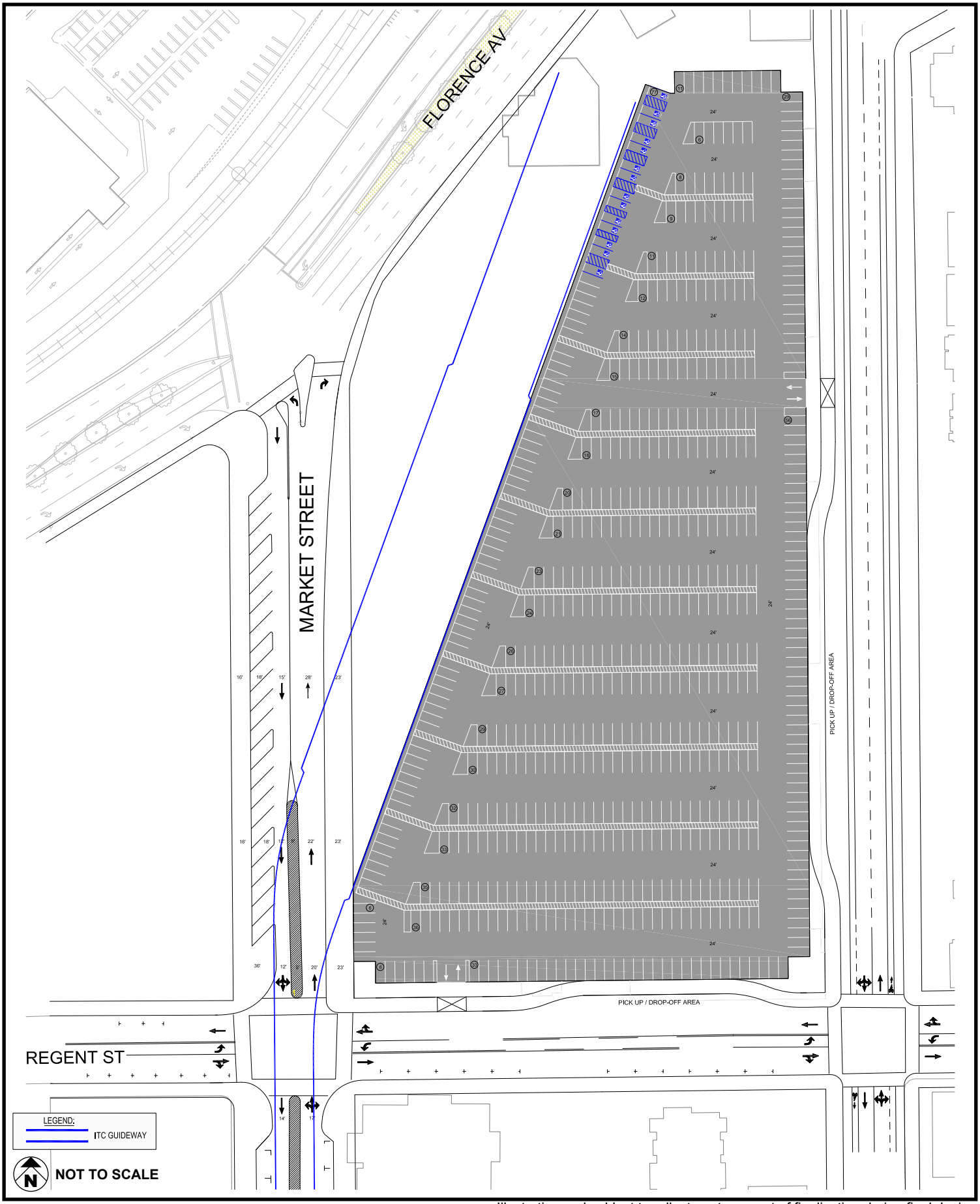


SOURCE: Raju Associates - 2020

Illustrative and subject to adjustments as part of finalization during final design

FIGURE **3.0-10**

Market Street Striping Plan Overview



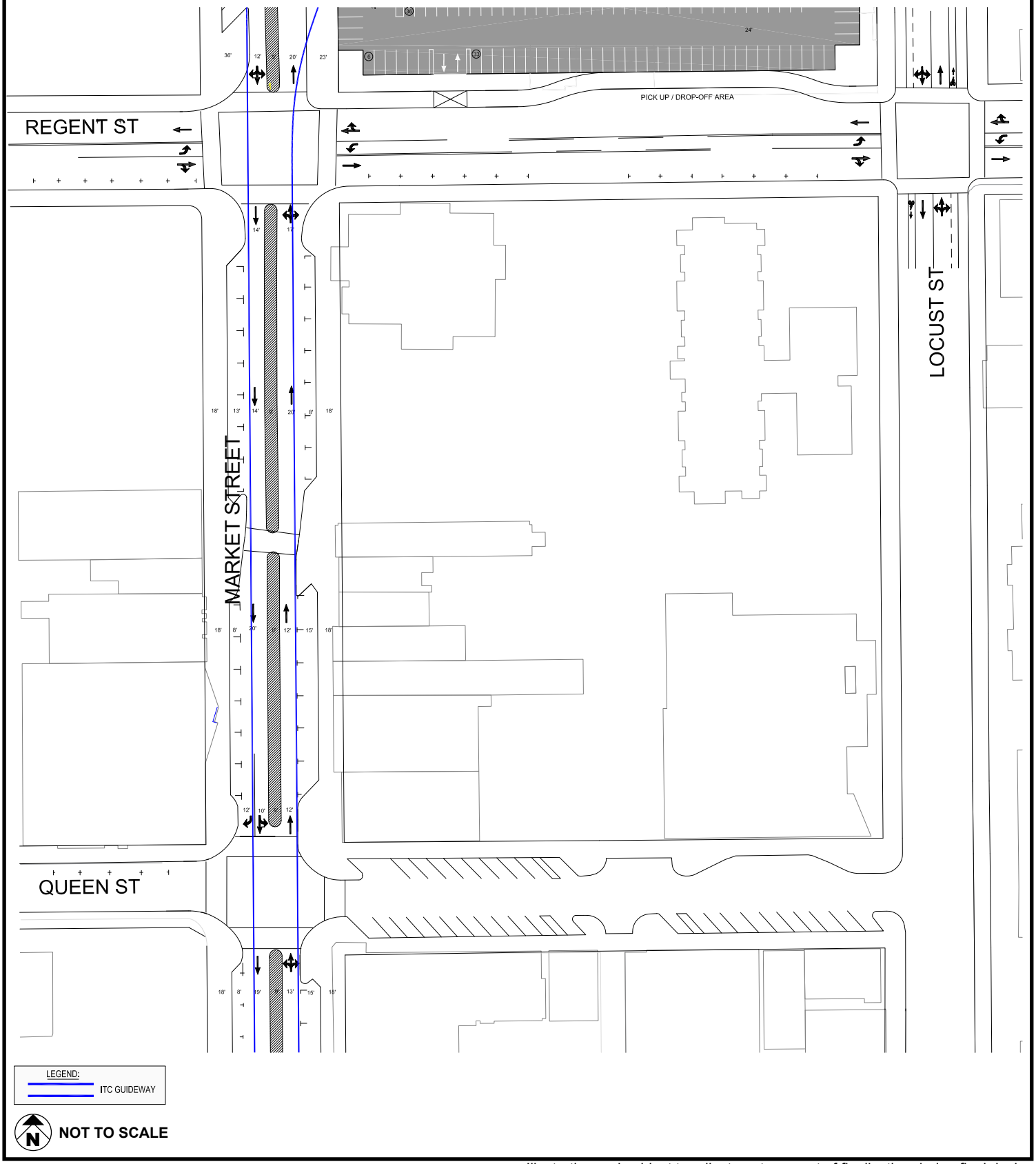
SOURCE: Raju Associates - 2020

Illustrative and subject to adjustments as part of finalization during final design

FIGURE **3.0-11**

Market Street Striping Plan Florence Avenue to Regent Street

251-003-20



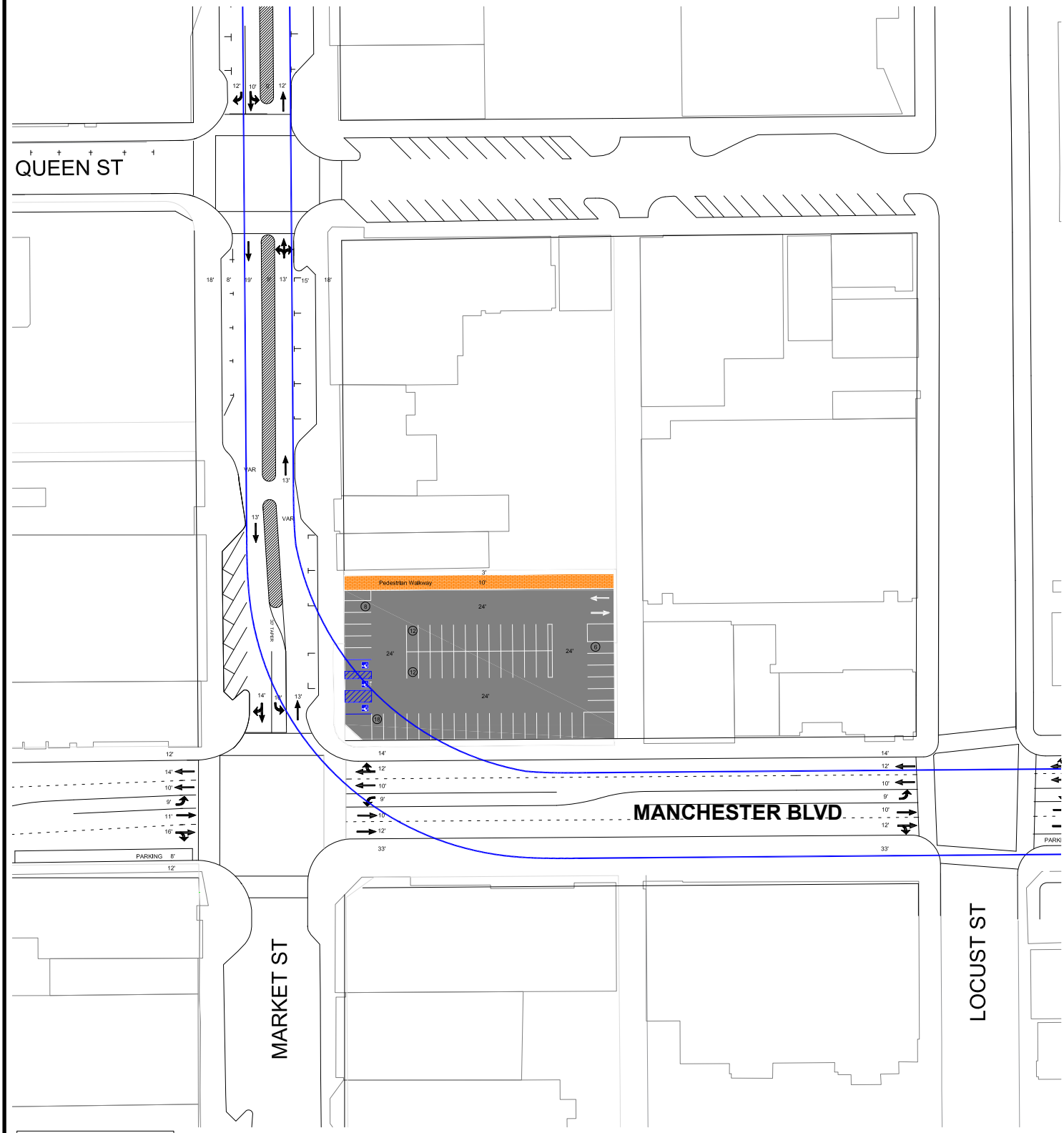
SOURCE: Raju Associates - 2020

Illustrative and subject to adjustments as part of finalization during final design

FIGURE **3.0-12**

Market Street Striping Plan Regent Street to Queen Street

251-003-20



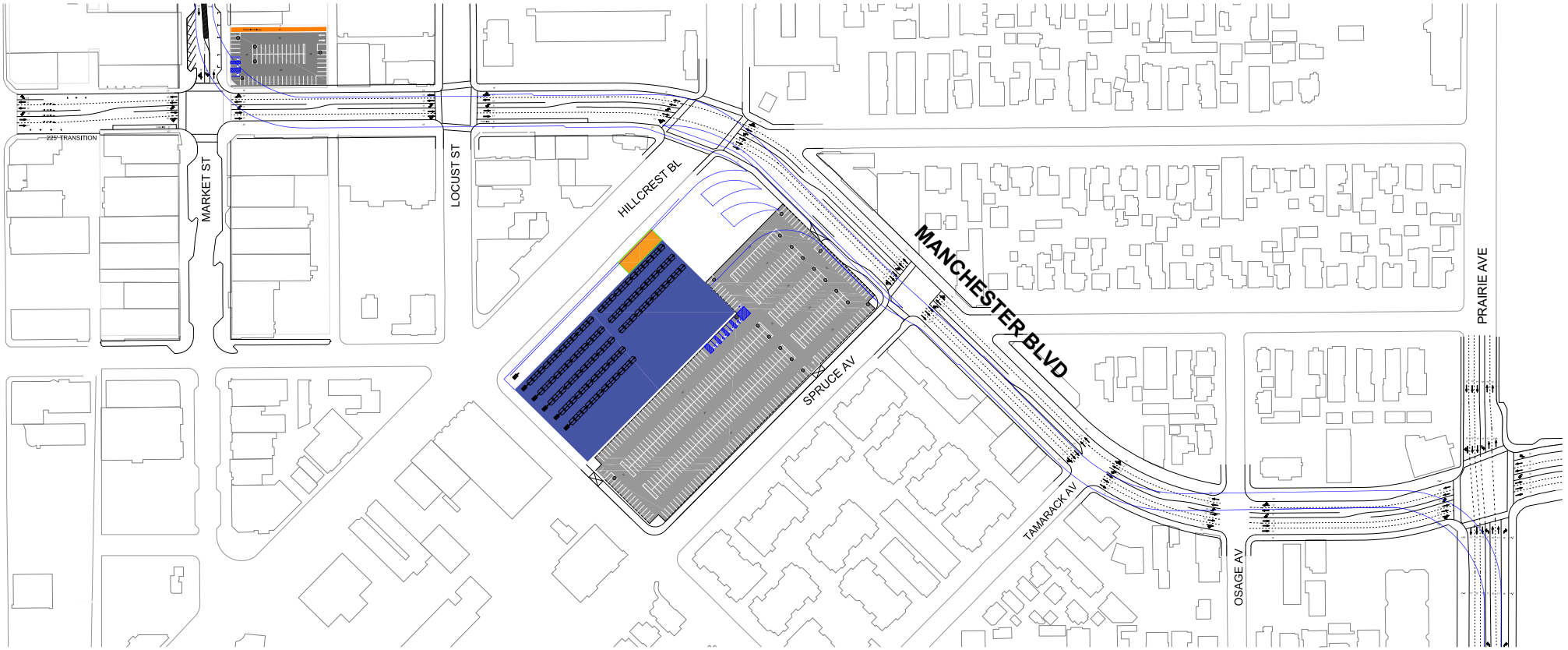
SOURCE: Raju Associates - 2020

Illustrative and subject to adjustments as part of finalization during final design

FIGURE **3.0-13**

Market Street Striping Plan Queen Street to Manchester Boulevard

251-003-20



LEGEND:
ITC GUIDEWAY
MSF ITEMS
N
NOT TO SCALE

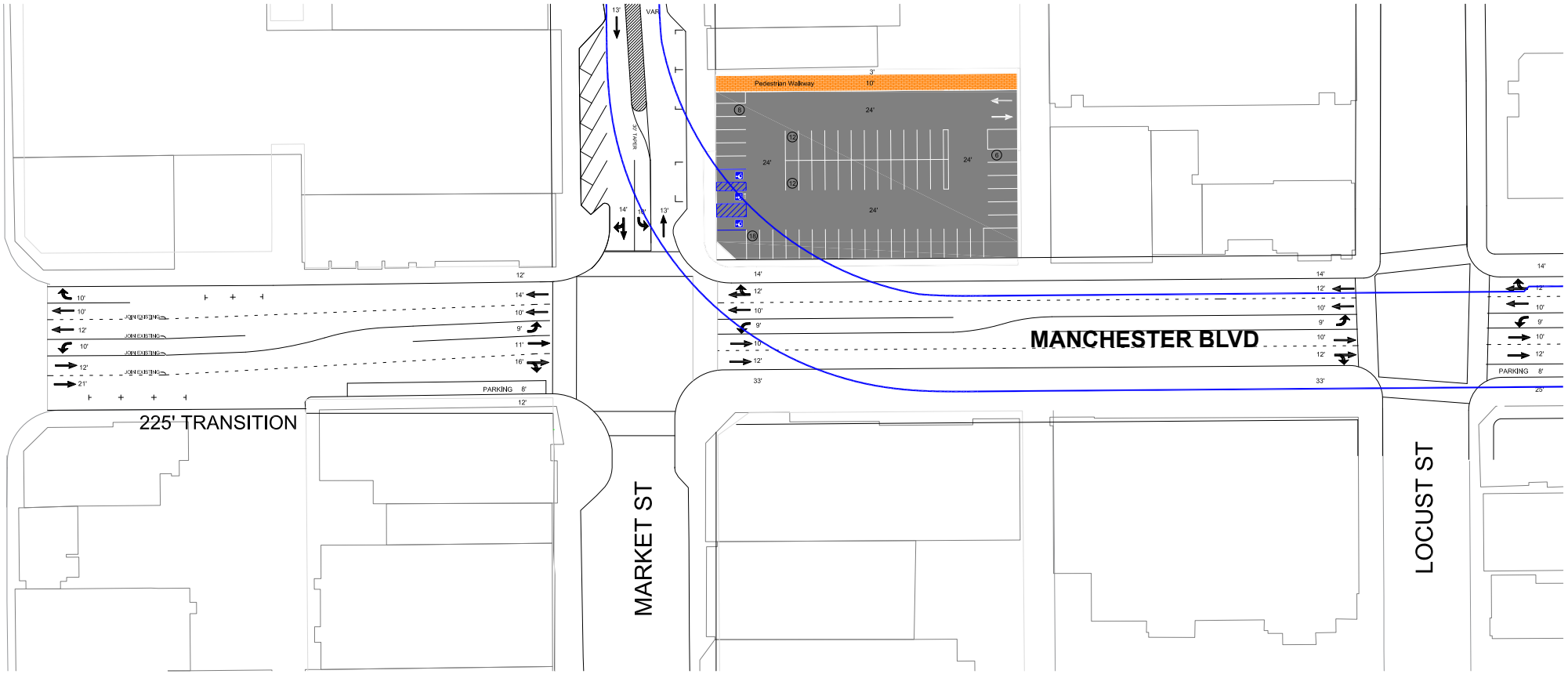
SOURCE: Raju Associates - 2020

Illustrative and subject to adjustments as part of finalization during final design

FIGURE **3.0-14**

Manchester Boulevard Striping Plan Overview

251-003-20



LEGEND:
ITC GUIDEWAY

NOT TO SCALE

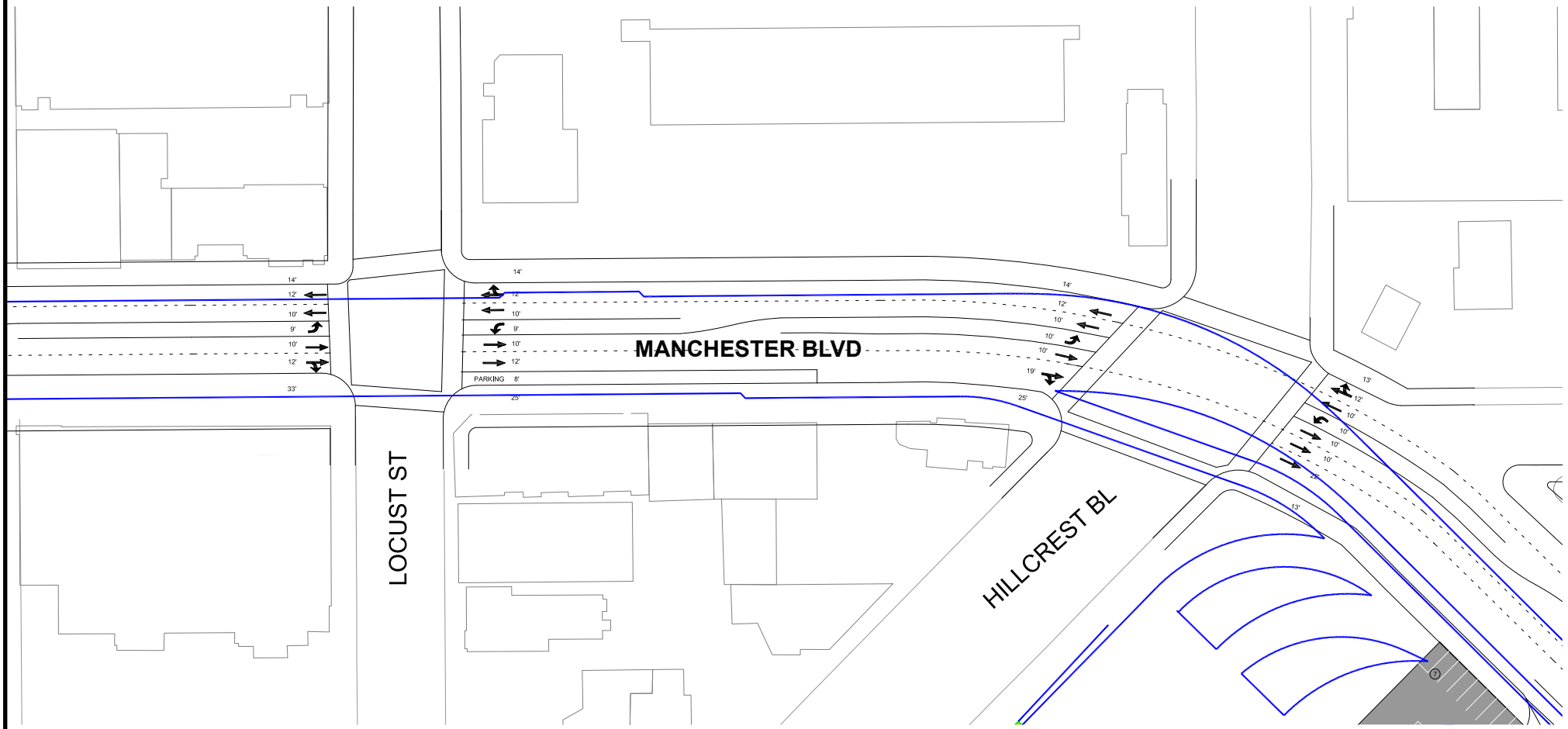
SOURCE: Raju Associates - 2020

Illustrative and subject to adjustments as part of finalization during final design

FIGURE **3.0-15**

Manchester Boulevard Striping Plan Market Street to Locust Street

251-003-20



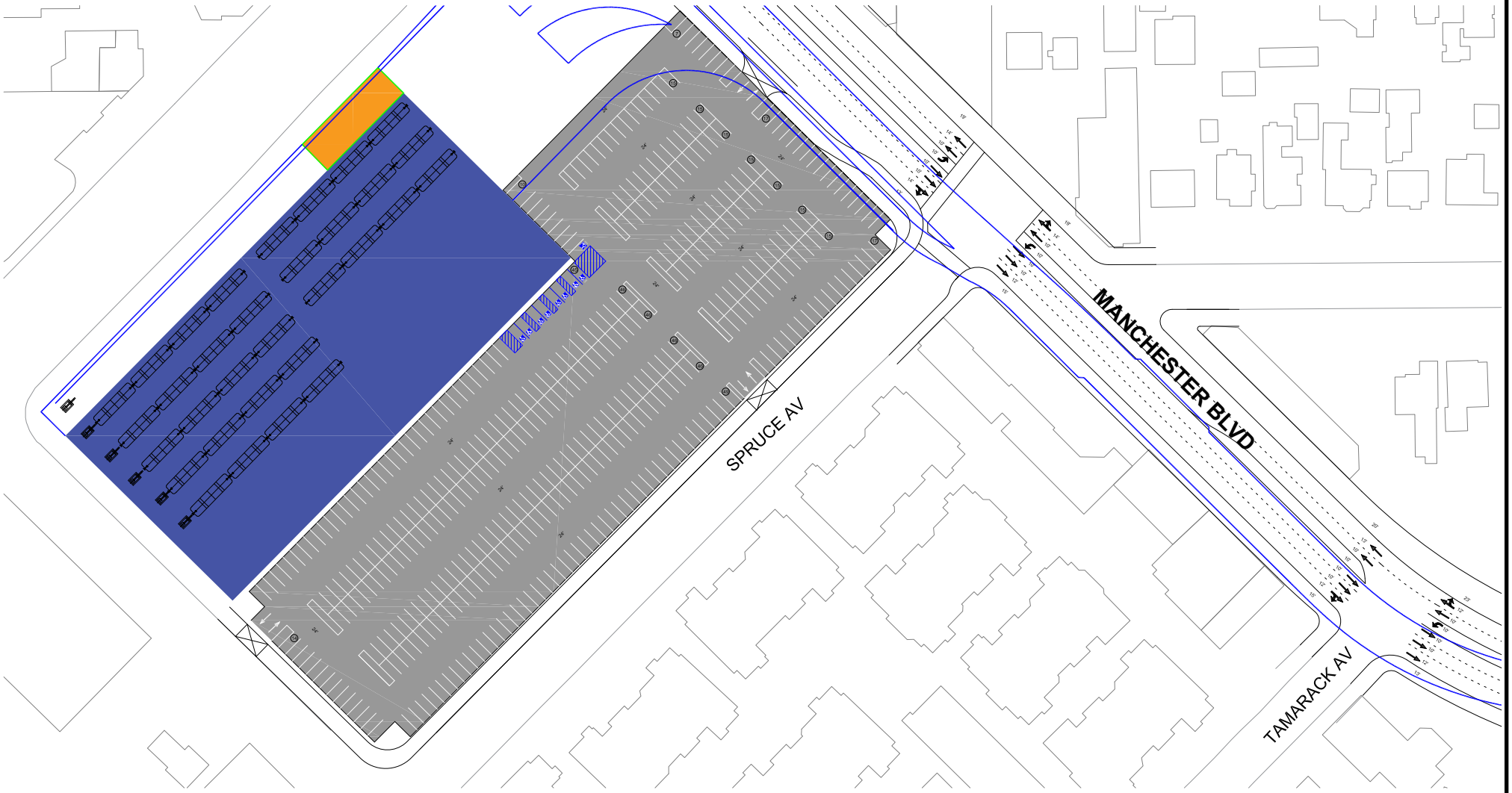
SOURCE: Raju Associates - 2020

Illustrative and subject to adjustments as part of finalization during final design

FIGURE **3.0-16**

Manchester Boulevard Striping Plan Locust Street to Hillcrest Boulevard

251-003-20



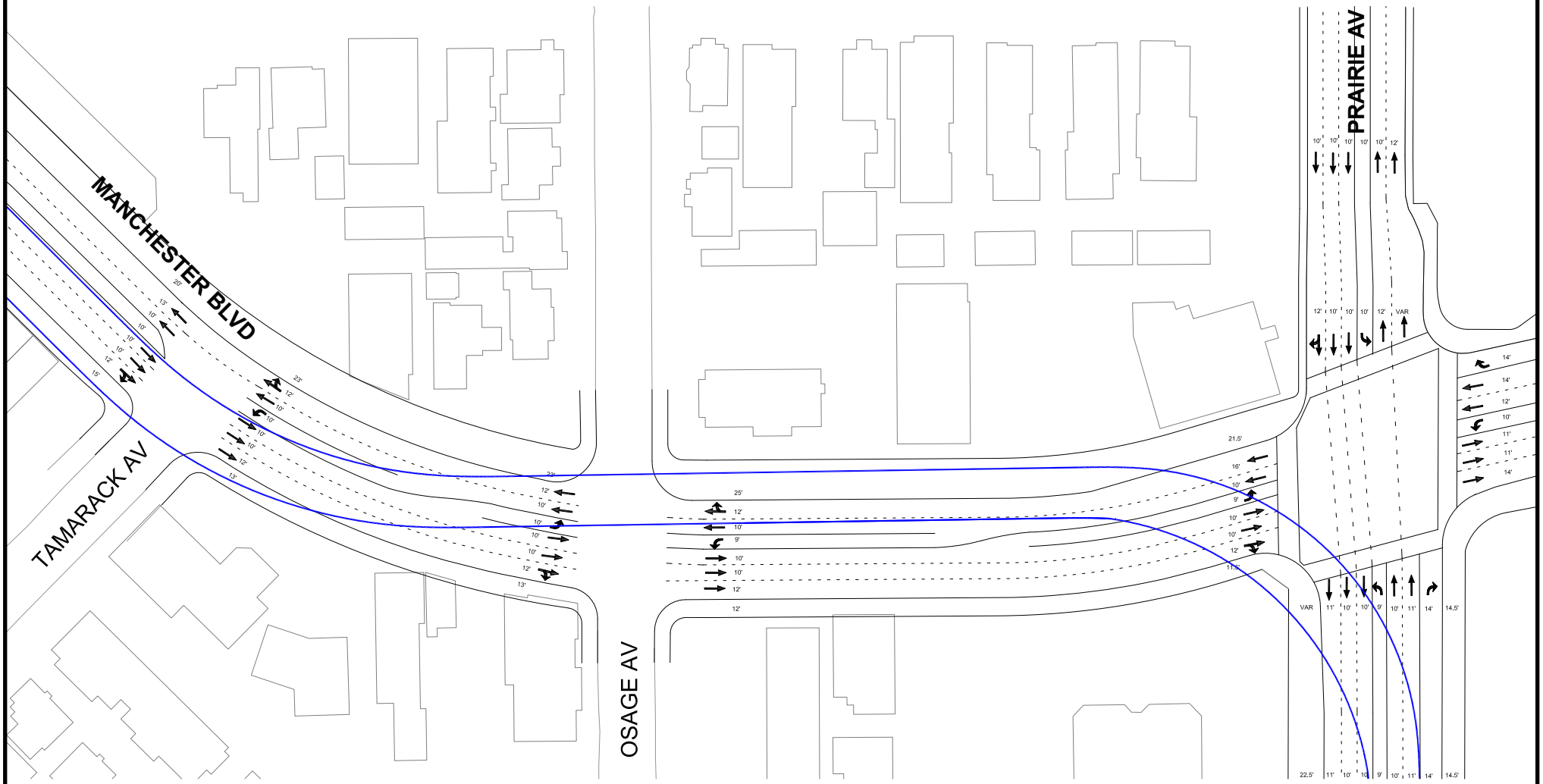
SOURCE: Raju Associates - 2020

Illustrative and subject to adjustments as part of finalization during final design

FIGURE **3.0-17**

Manchester Boulevard Striping Plan Spruce Avenue to Tamarack Avenue

251-003-20



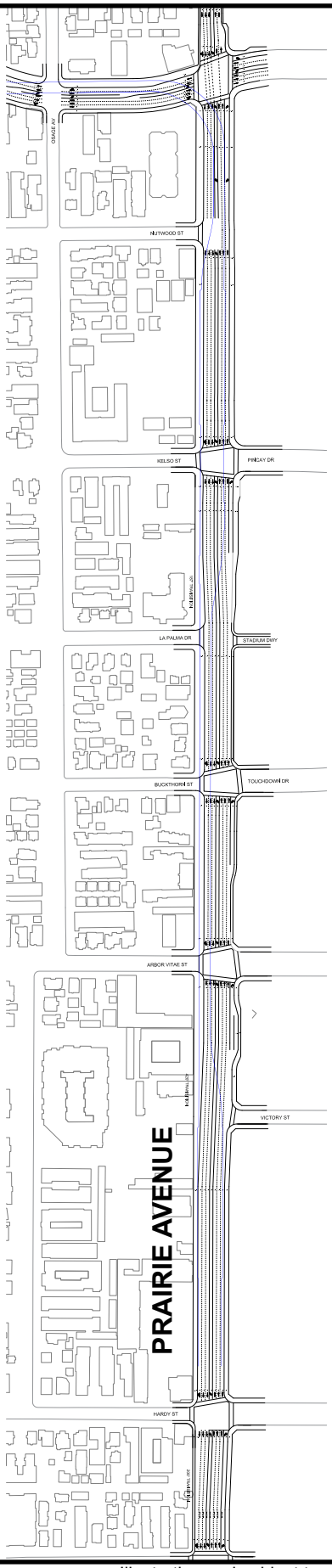
SOURCE: Raju Associates - 2020

Illustrative and subject to adjustments as part of finalization during final design

FIGURE **3.0-18**

Manchester Boulevard Striping Plan Tamarack Avenue to Prairie Avenue

251-003-20



LEGEND:

ITC GUIDEWAY

N

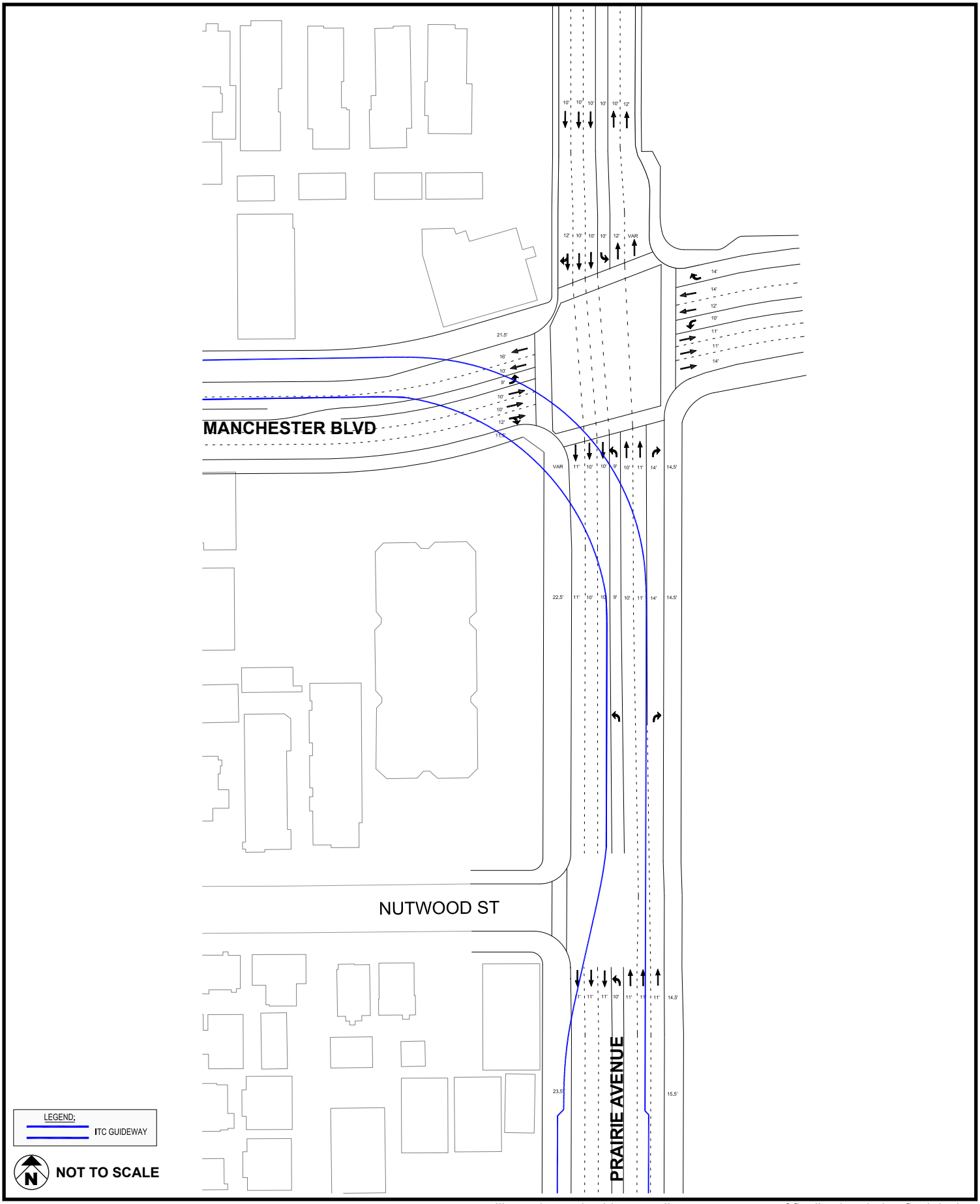
NOT TO SCALE

SOURCE: Raju Associates - 2020

Illustrative and subject to adjustments as part of finalization during final design

FIGURE **3.0-19**

Prairie Avenue Striping Plan Overview



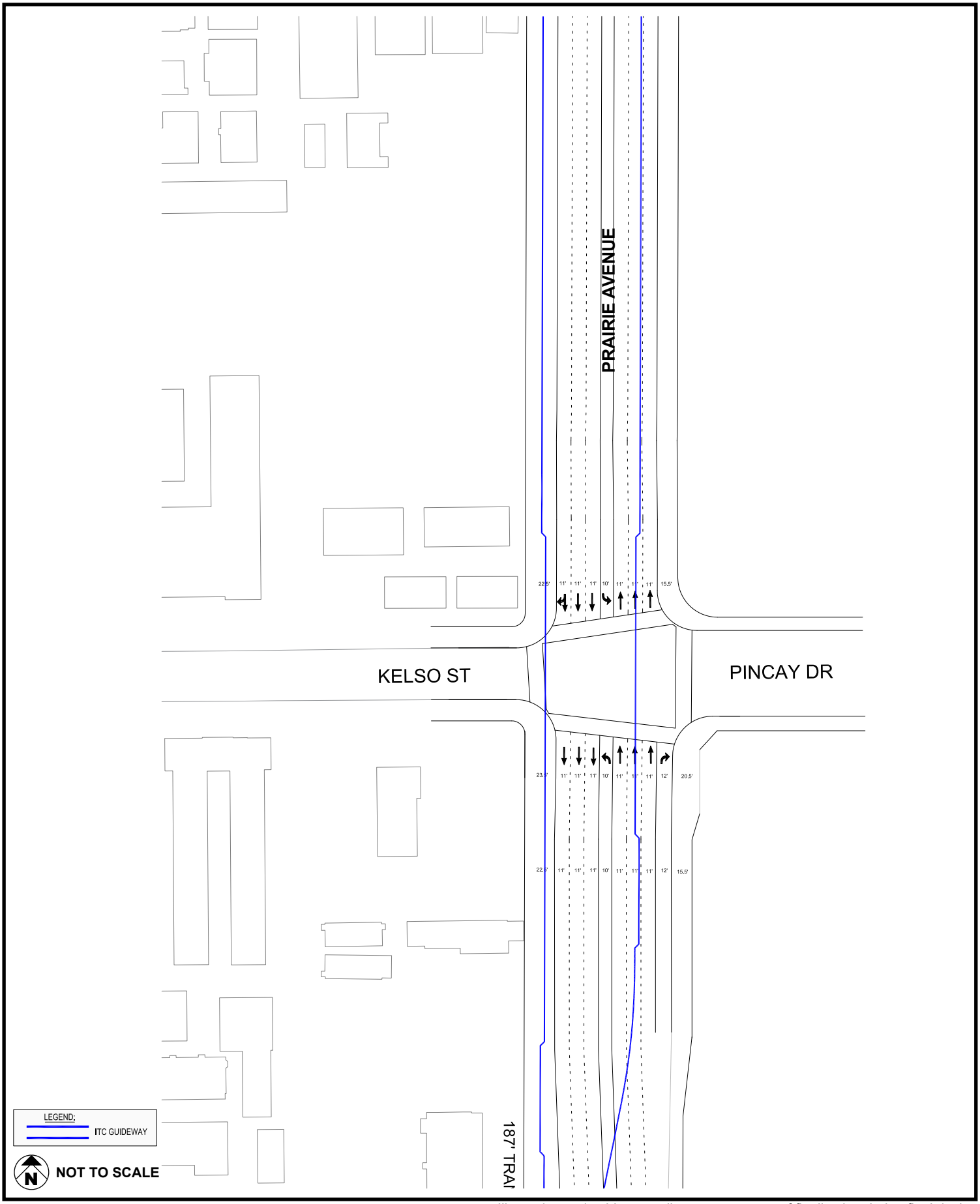
SOURCE: Raju Associates - 2020

Illustrative and subject to adjustments as part of finalization during final design

FIGURE **3.0-20**

Prairie Avenue Striping Plan Manchester Boulevard to Nutwood Street

251-003-20



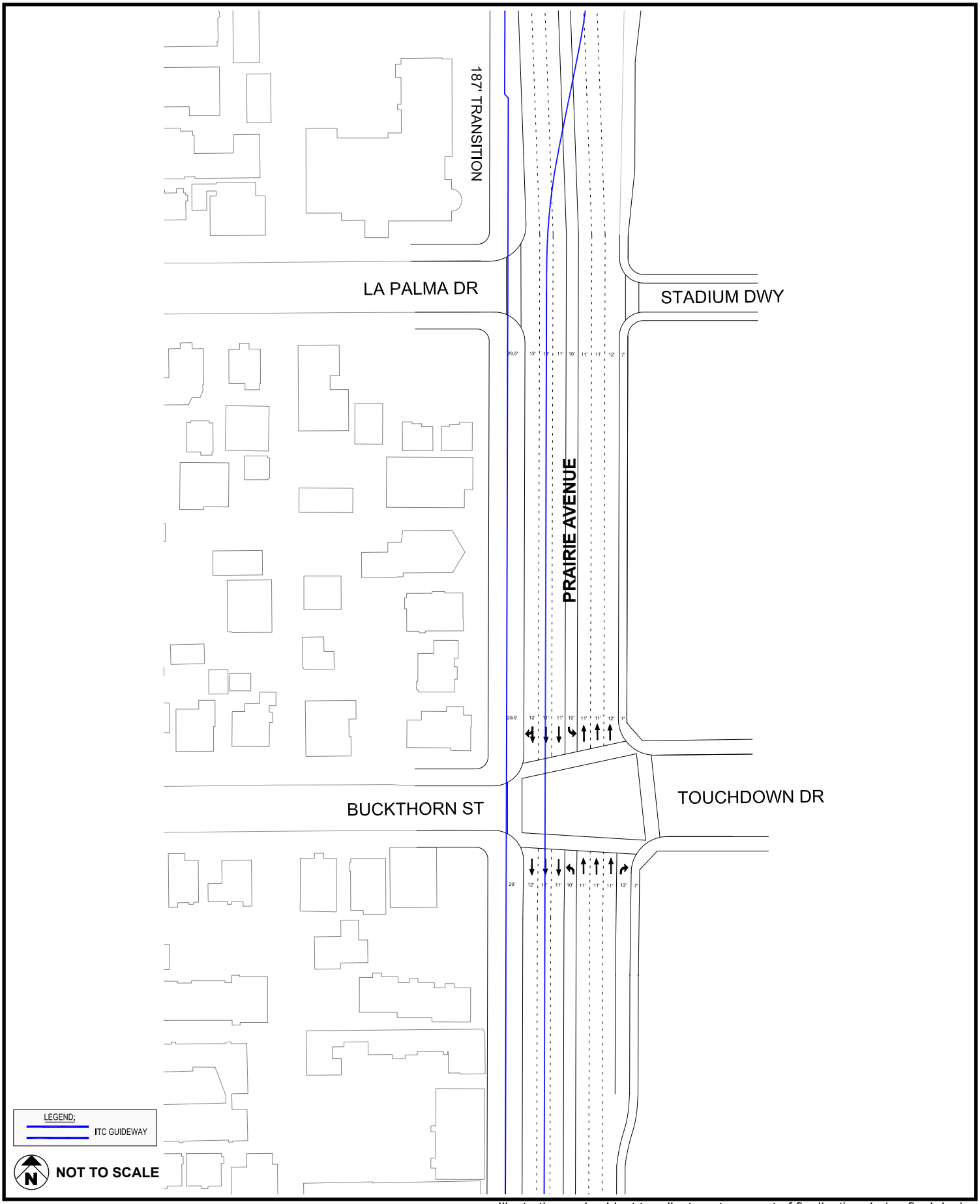
SOURCE: Raju Associates - 2020

Illustrative and subject to adjustments as part of finalization during final design

FIGURE **3.0-21**

Prairie Avenue Striping Plan Nutwood Street to Kelso Street

251-003-20



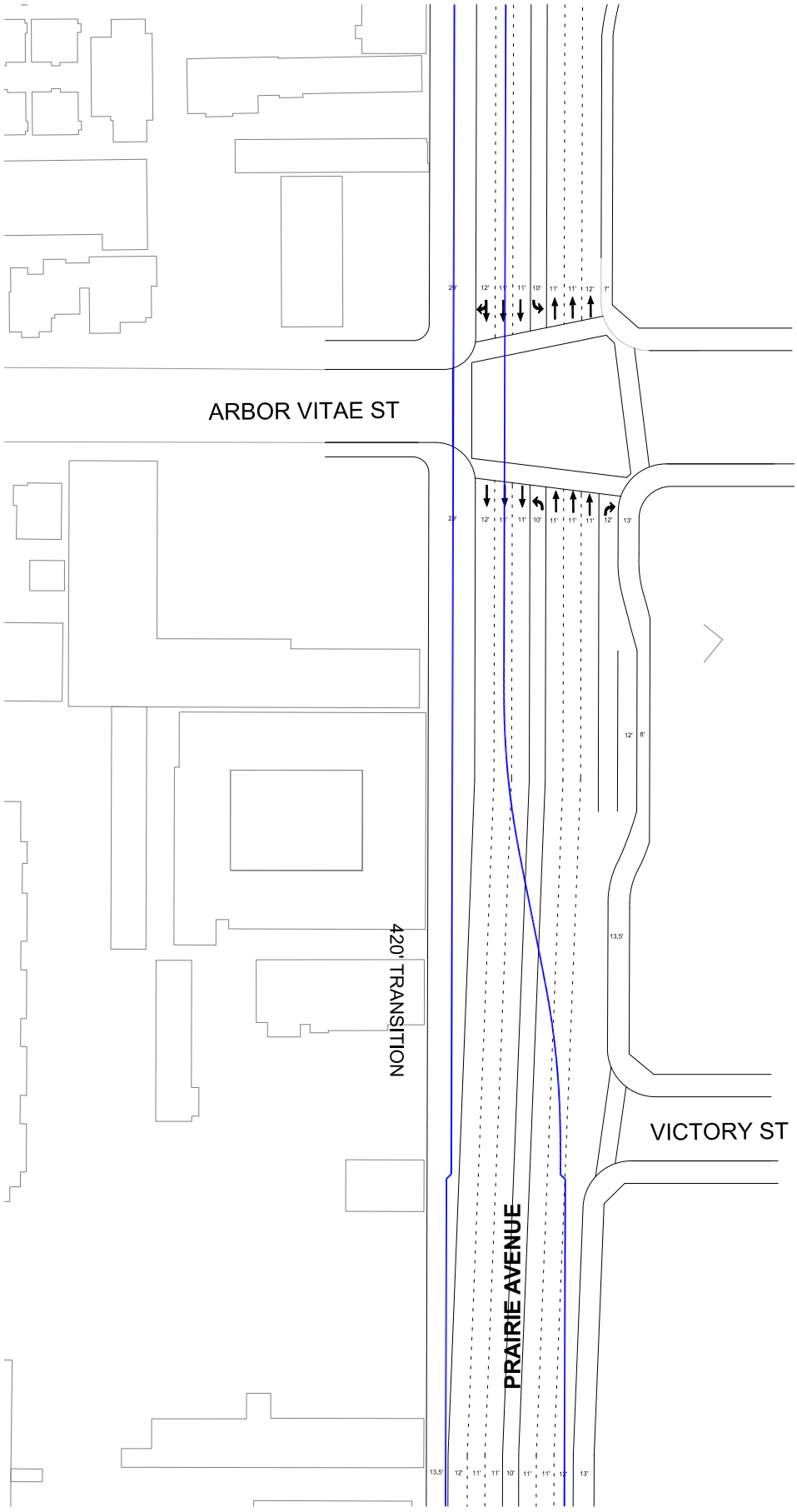
SOURCE: Raju Associates - 2020

Illustrative and subject to adjustments as part of finalization during final design

FIGURE **3.0-22**

Prairie Avenue Striping Plan La Palma Drive to Buckthorn Street

251-003-20



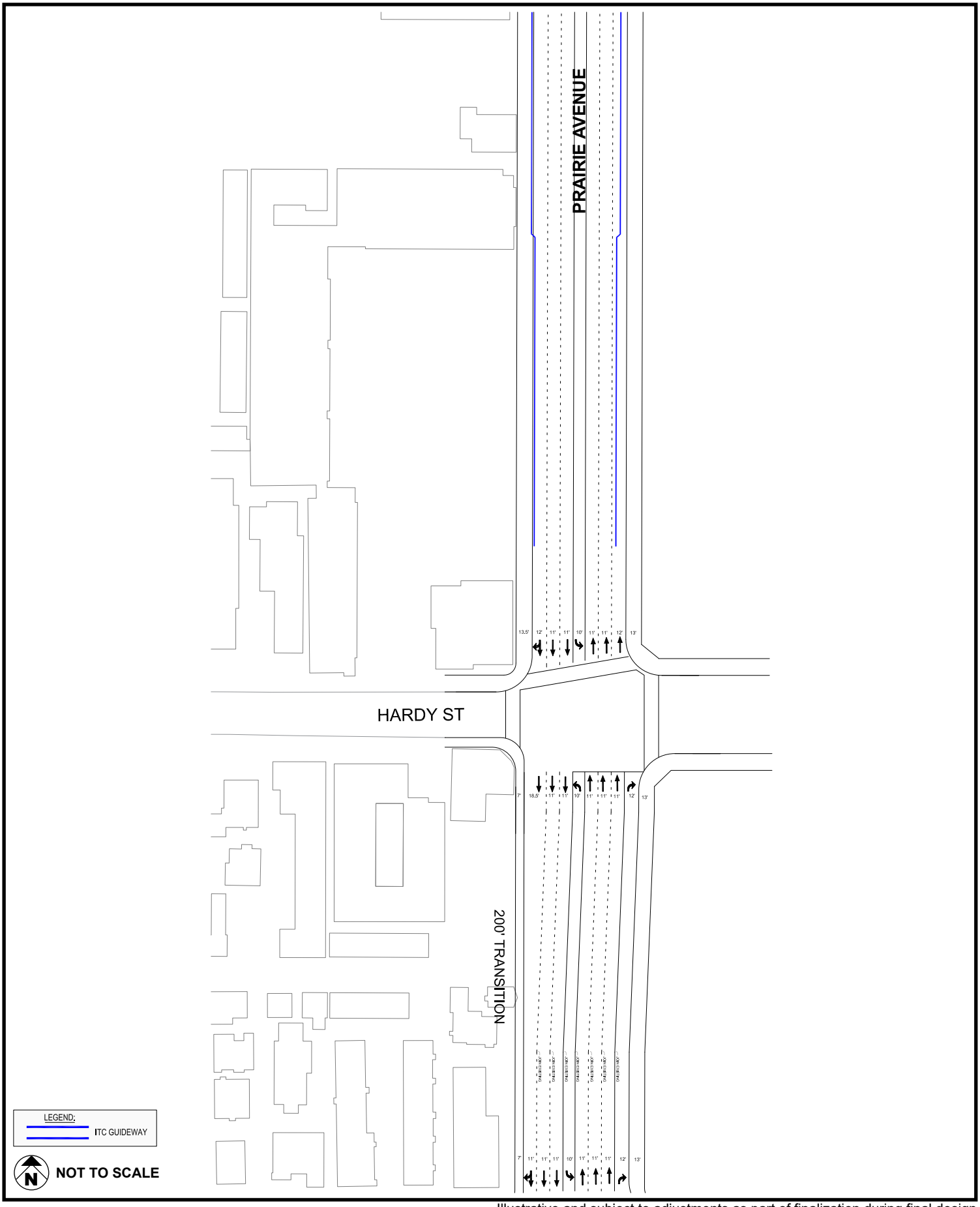
SOURCE: Raju Associates - 2020

Illustrative and subject to adjustments as part of finalization during final design

FIGURE **3.0-23**

Prairie Avenue Striping Plan Arbor Vitae Street to Victory Street

251-003-20



SOURCE: Raju Associates - 2020

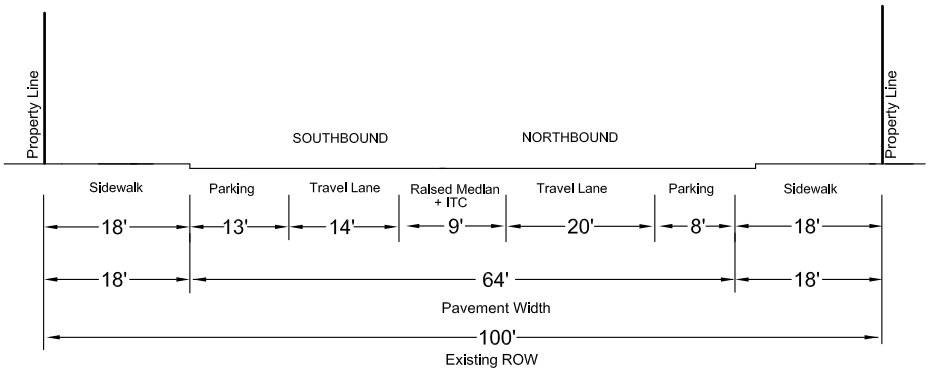
Illustrative and subject to adjustments as part of finalization during final design

FIGURE **3.0-24**

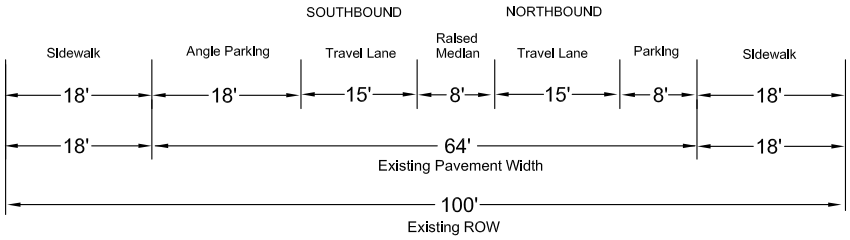
Prairie Avenue Striping Plan Arbor Vitae Street to Hardy Street

251-003-20

MARKET STREET, LOOKING NORTH
BETWEEN REGENT ST & QUEEN ST

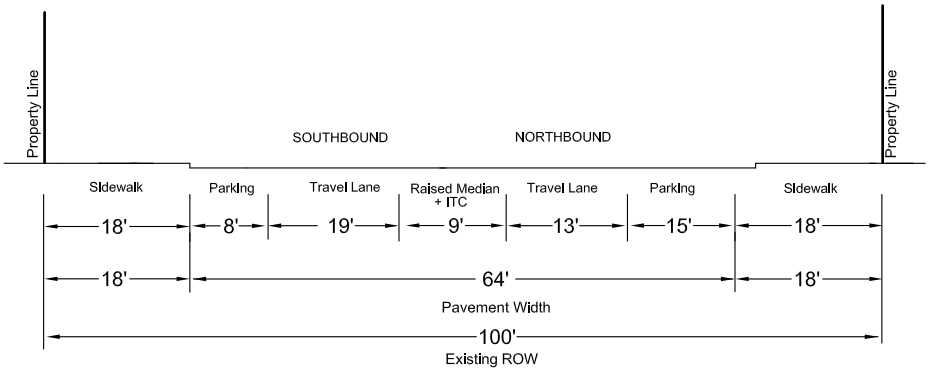


PROPOSED TYPICAL ROADWAY SECTION WITH ITC PROJECT

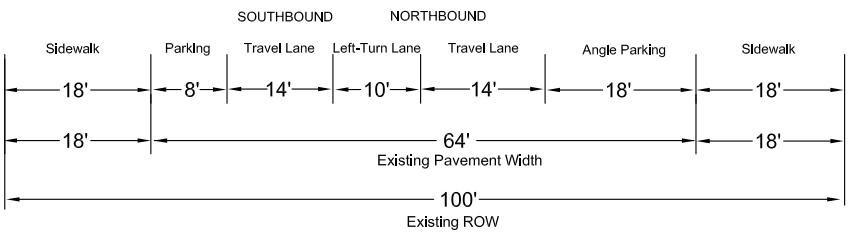


EXISTING TYPICAL ROADWAY SECTION

MARKET STREET, LOOKING NORTH
BETWEEN QUEEN ST & MANCHESTER BL



PROPOSED TYPICAL ROADWAY SECTION WITH ITC PROJECT



EXISTING TYPICAL ROADWAY SECTION

N **NOT TO SCALE**

SOURCE: Raju Associates - 2020

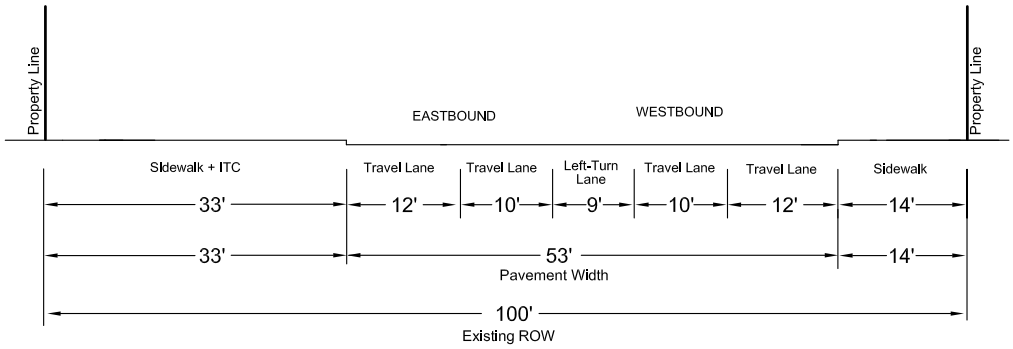
Illustrative and subject to adjustments as part of finalization during final design

FIGURE **3.0-25**

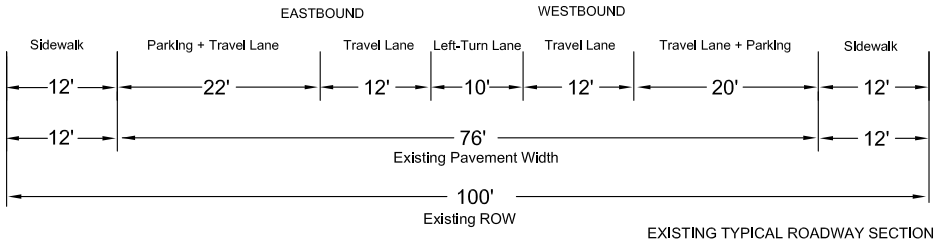
Market Street Typical Cross-sections

251-003-20

MANCHESTER BOULEVARD, LOOKING WEST BETWEEN MARKET ST & LOCUST AV

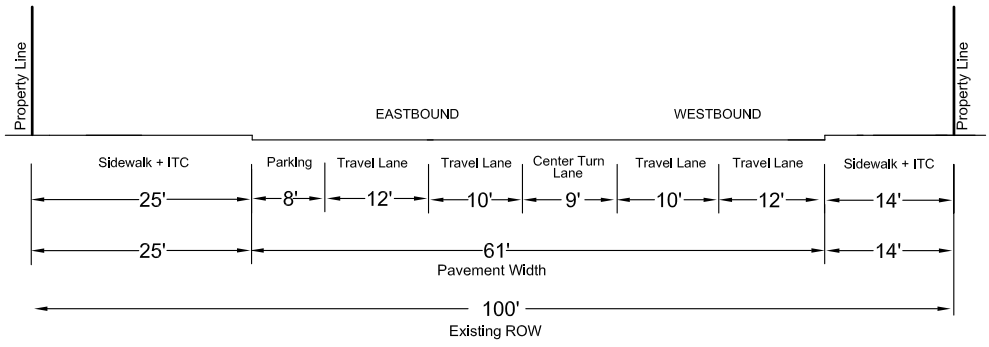


PROPOSED TYPICAL ROADWAY SECTION WITH ITC PROJECT

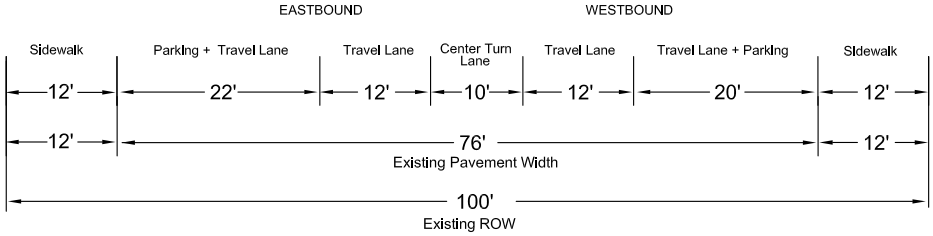


EXISTING TYPICAL ROADWAY SECTION

MANCHESTER BOULEVARD, LOOKING WEST BETWEEN LOCUST AV & HILLCREST BL



PROPOSED TYPICAL ROADWAY SECTION WITH ITC PROJECT



EXISTING TYPICAL ROADWAY SECTION

NOT TO SCALE

SOURCE: Raju Associates - 2020

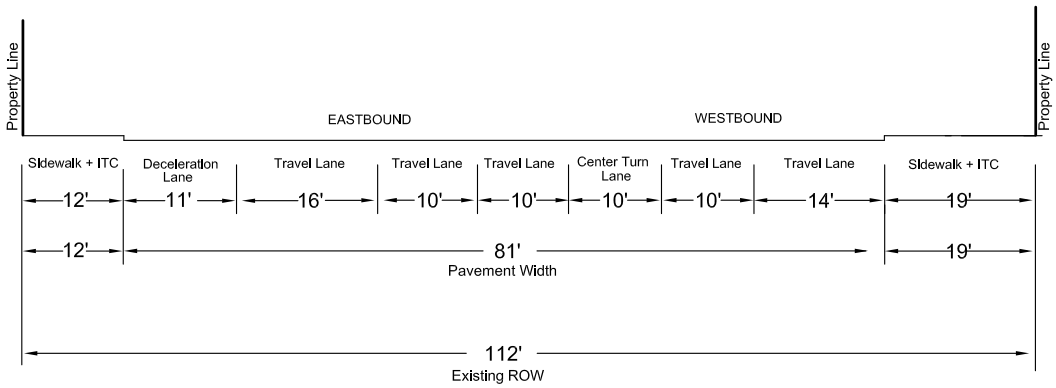
Illustrative and subject to adjustments as part of finalization during final design

FIGURE **3.0-26**

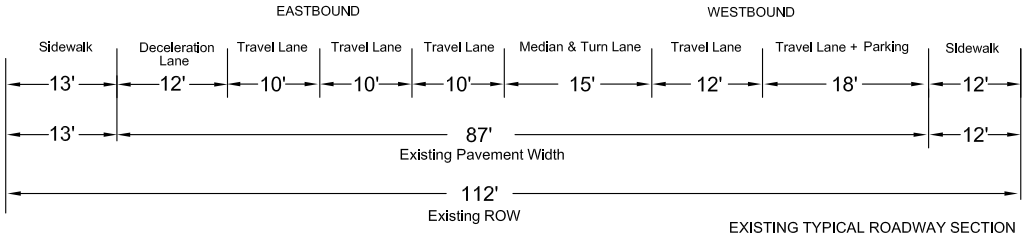
Market Street to Hillcrest Boulevard

251-003-20

MANCHESTER BOULEVARD, LOOKING WEST
BETWEEN HILLCREST BL & SPRUCE AV

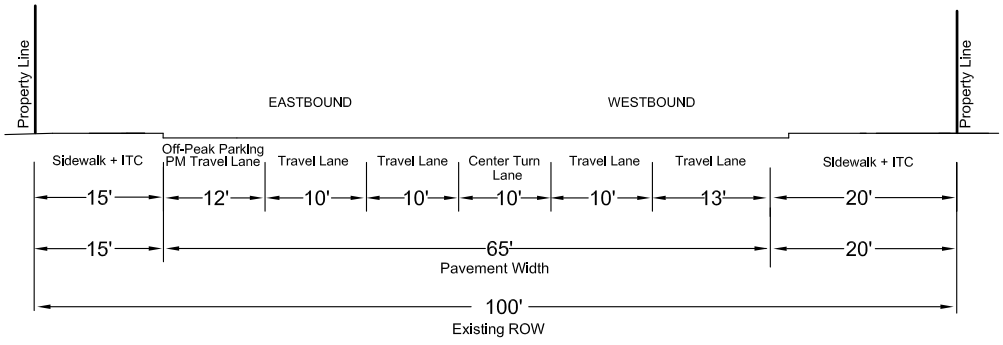


PROPOSED TYPICAL ROADWAY SECTION WITH ITC PROJECT

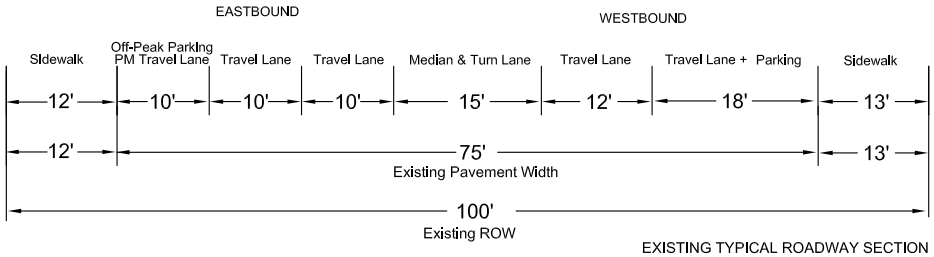


EXISTING TYPICAL ROADWAY SECTION

MANCHESTER BOULEVARD, LOOKING WEST
BETWEEN SPRUCE AV & TAMARACK AV



PROPOSED TYPICAL ROADWAY SECTION WITH ITC PROJECT



EXISTING TYPICAL ROADWAY SECTION

NOT TO SCALE

SOURCE: Raju Associates - 2020

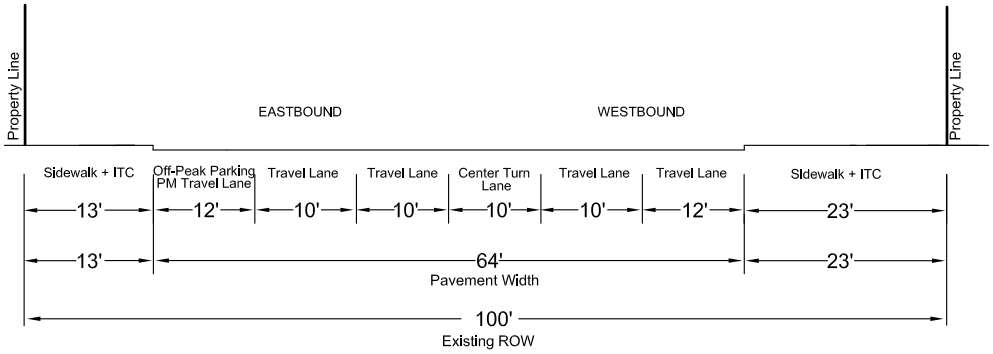
Illustrative and subject to adjustments as part of finalization during final design

FIGURE **3.0-27**

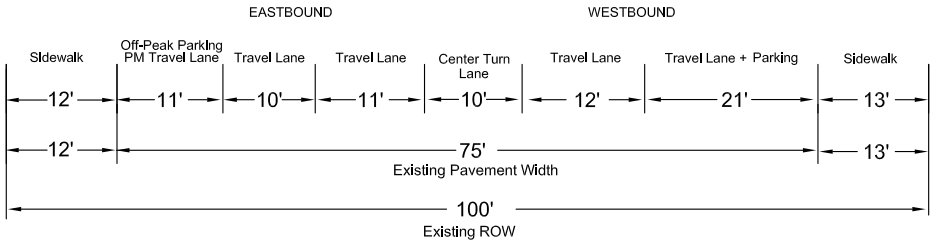
Hillcrest Boulevard to Tamarack Avenue

251-003-20

MANCHESTER BOULEVARD, LOOKING WEST
BETWEEN TAMARACK AV & OSAGE AV

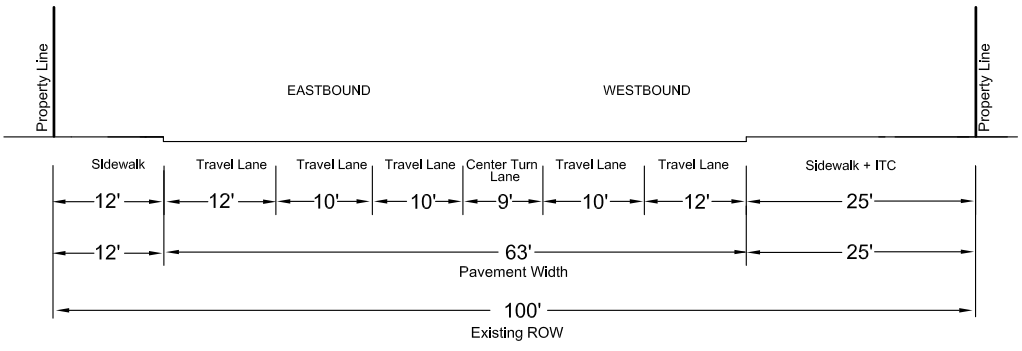


PROPOSED TYPICAL ROADWAY SECTION WITH ITC PROJECT

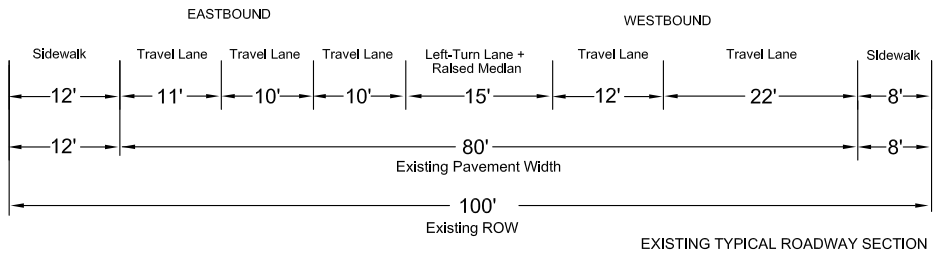


EXISTING TYPICAL ROADWAY SECTION

MANCHESTER BOULEVARD, LOOKING WEST
BETWEEN OSAGE AV & PRAIRIE AV



PROPOSED TYPICAL ROADWAY SECTION WITH ITC PROJECT



EXISTING TYPICAL ROADWAY SECTION

NOT TO SCALE

SOURCE: Raju Associates - 2020

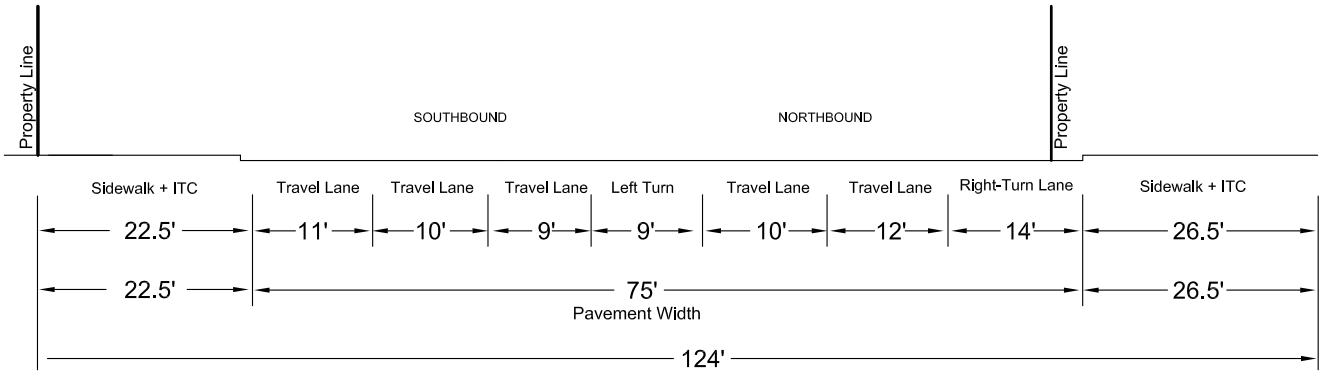
Illustrative and subject to adjustments as part of finalization during final design

FIGURE **3.0-28**

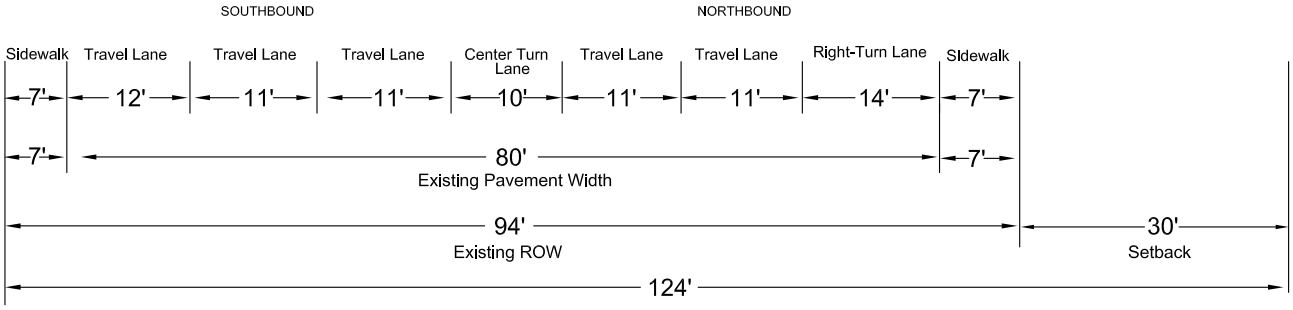
Tamarack Avenue to Prairie Avenue

251-003-20

PRAIRIE AVENUE, LOOKING NORTH
BETWEEN MANCHESTER BL & NUTWOOD ST

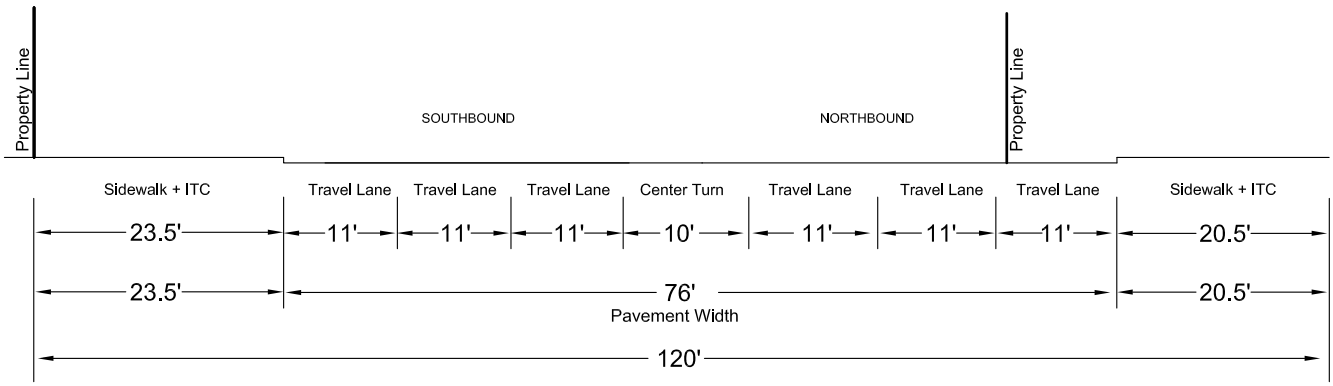


PROPOSED TYPICAL ROADWAY SECTION WITH ITC PROJECT

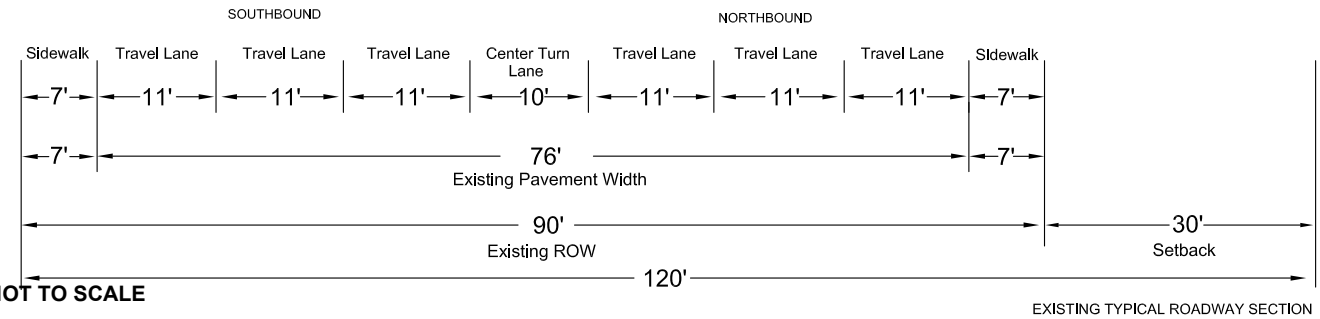


EXISTING TYPICAL ROADWAY SECTION

PRAIRIE AVENUE, LOOKING NORTH
BETWEEN NUTWOOD ST & KELSO ST/PINCAY DR



PROPOSED TYPICAL ROADWAY SECTION WITH ITC PROJECT



EXISTING TYPICAL ROADWAY SECTION

N **NOT TO SCALE**

SOURCE: Raju Associates - 2020

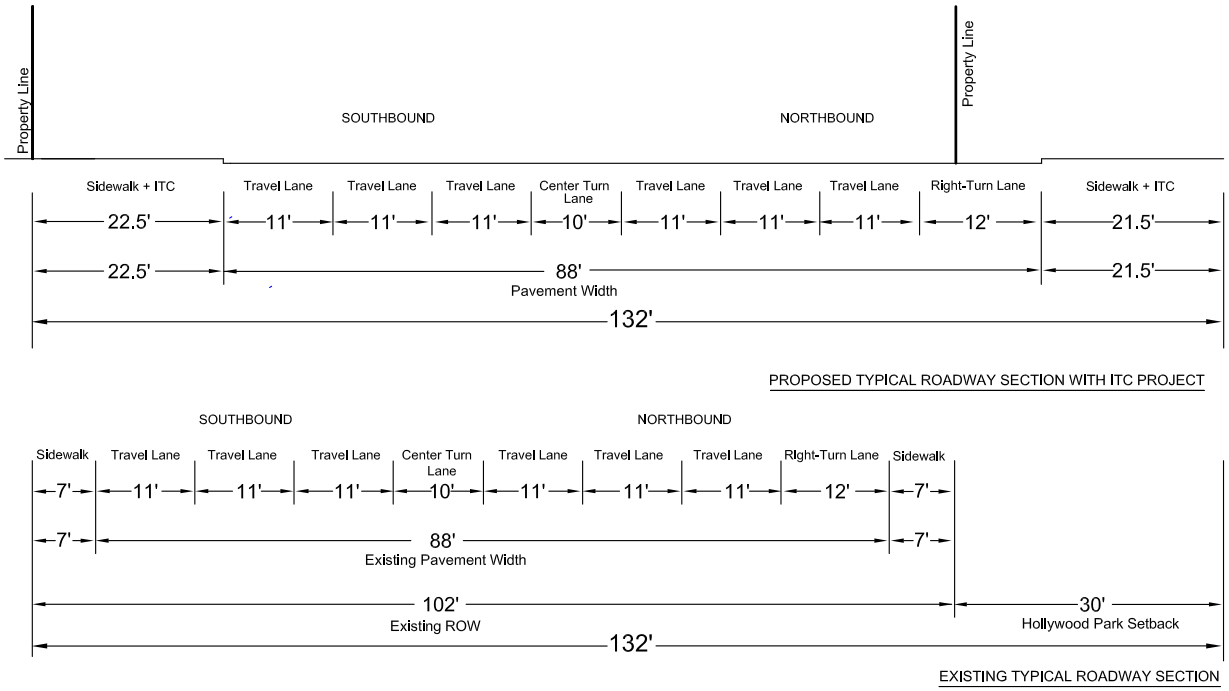
Illustrative and subject to adjustments as part of finalization during final design

FIGURE **3.0-29**

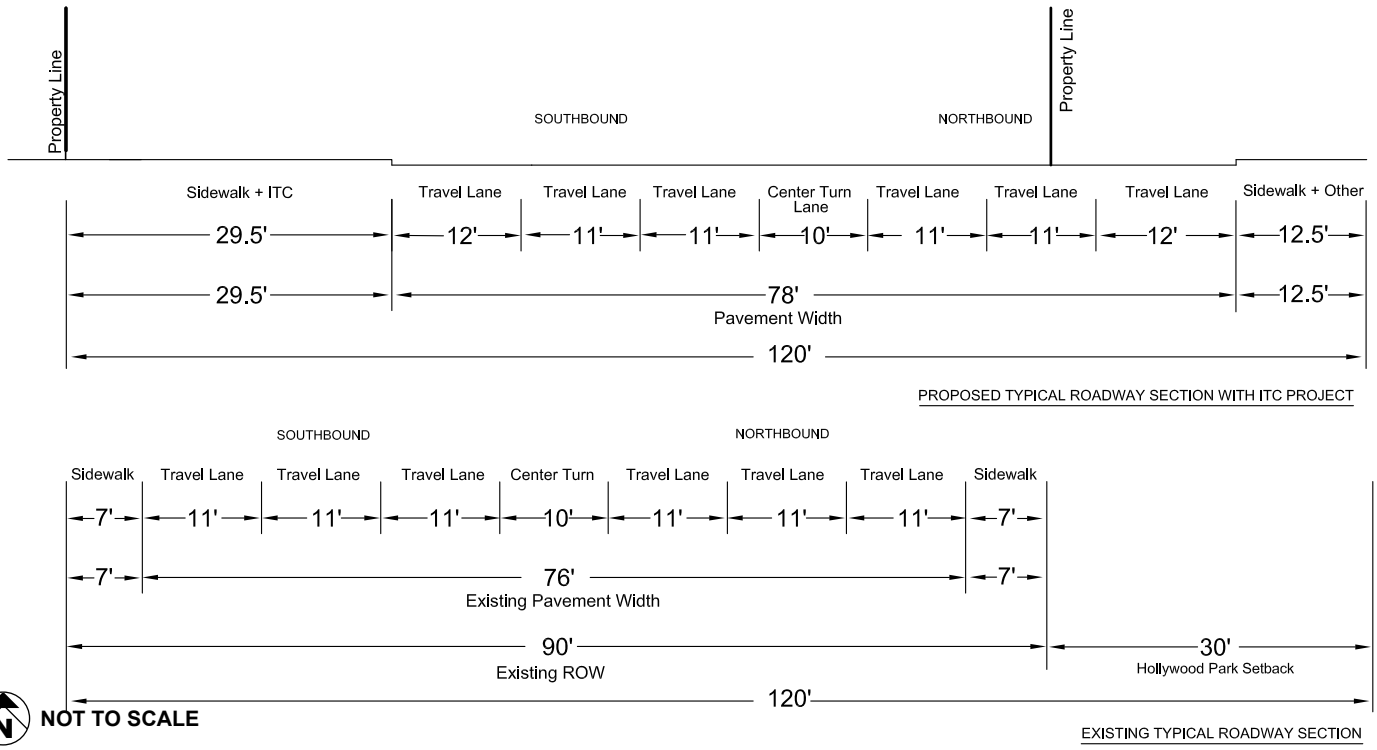
Manchester Boulevard to Pincay Drive/Kelso Street

251-003-20

PRAIRIE AVENUE, LOOKING NORTH
BETWEEN KELSO ST/PINCAY DR & LA PALMA DR



PRAIRIE AVENUE, LOOKING NORTH
BETWEEN LA PALMA DR & BUCKTHORN ST/TOUCHDOWN DR



N **NOT TO SCALE**

SOURCE: Raju Associates - 2020

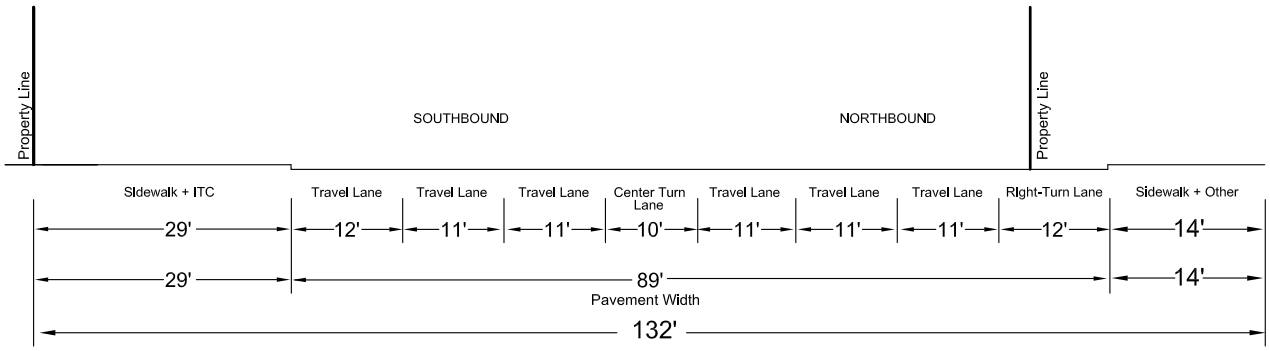
Illustrative and subject to adjustments as part of finalization during final design

FIGURE **3.0-30**

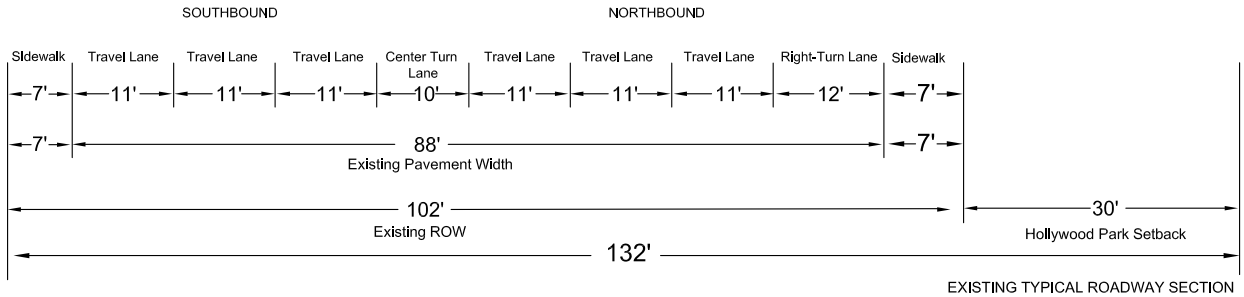
Prairie Avenue Typical Cross-sections –Pincay/Kelso to Buckthorn/Touchdown

251-003-20

PRAIRIE AVENUE, LOOKING NORTH
BETWEEN BUCKTHORN ST/TOUCHDOWN DR & ARBOR VITAE ST

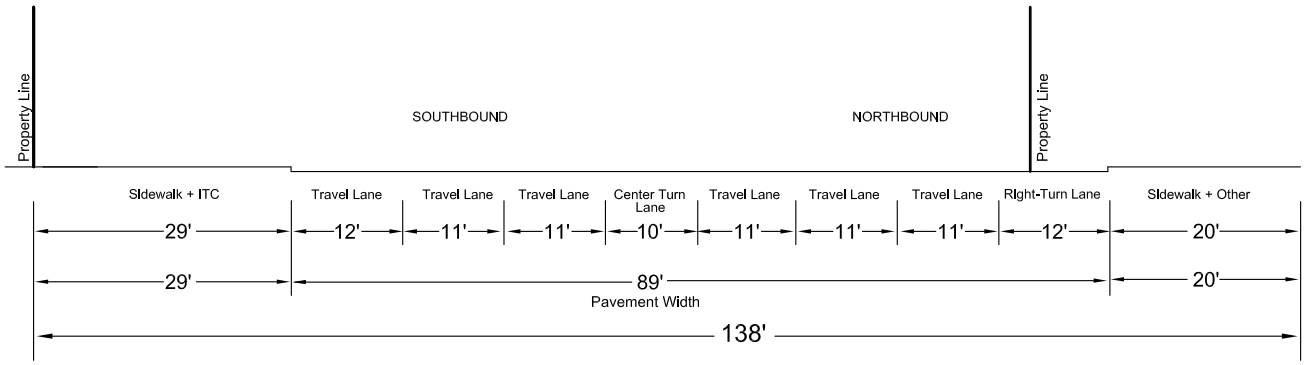


PROPOSED TYPICAL ROADWAY SECTION WITH ITC PROJECT

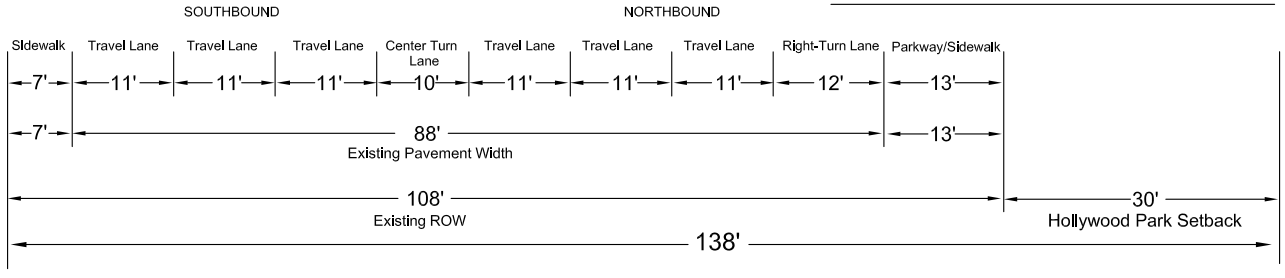


EXISTING TYPICAL ROADWAY SECTION

PRAIRIE AVENUE, LOOKING NORTH
BETWEEN ARBOR VITAE ST & VICTORY ST



PROPOSED TYPICAL ROADWAY SECTION WITH ITC PROJECT



EXISTING TYPICAL ROADWAY SECTION

NOT TO SCALE

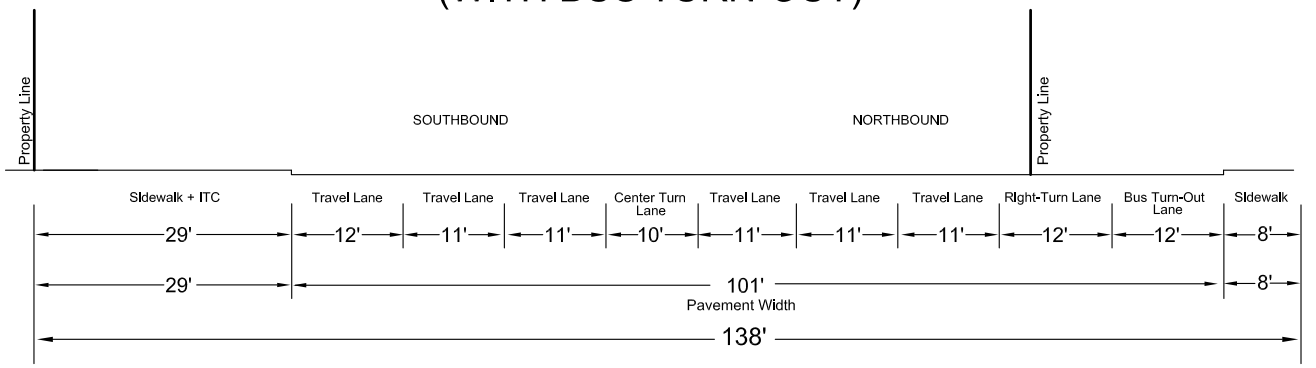
SOURCE: Raju Associates - 2020

Illustrative and subject to adjustments as part of finalization during final design

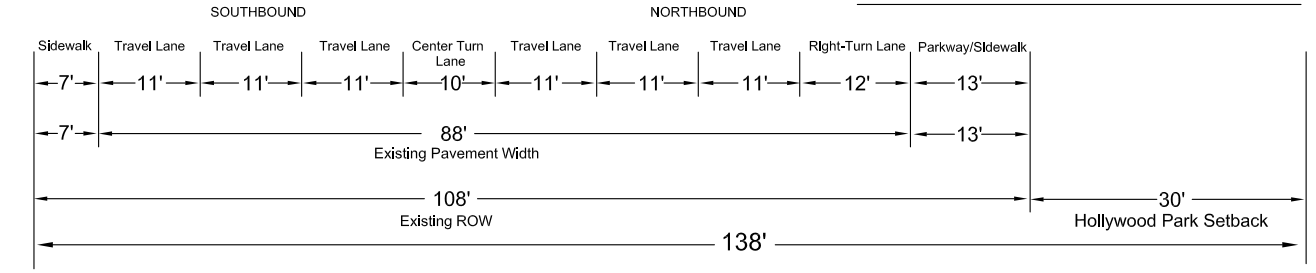
FIGURE **3.0-31**

Prairie Avenue Typical Cross-sections – Buckthorn/Touchdown to Victory

PRAIRIE AVENUE, LOOKING NORTH
BETWEEN ARBOR VITAE ST & VICTORY ST
(WITH BUS TURN-OUT)

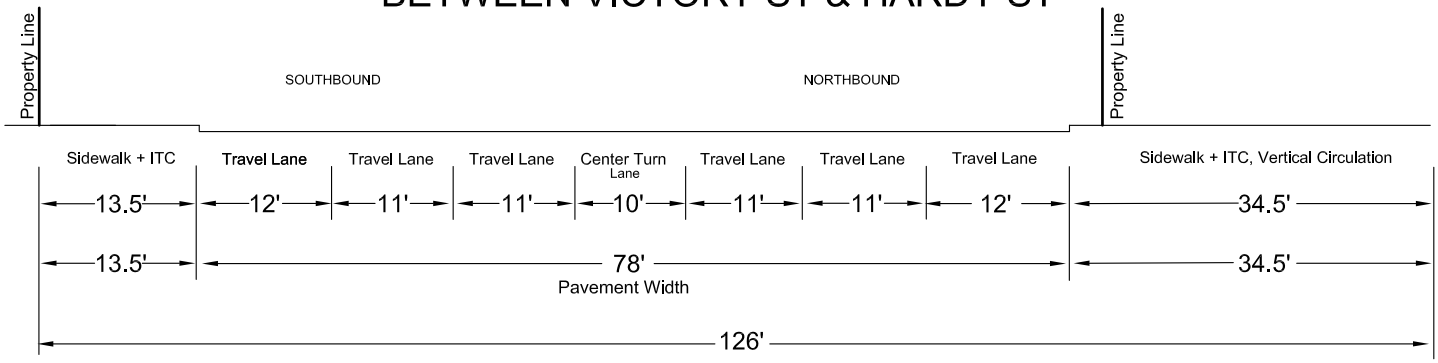


PROPOSED TYPICAL ROADWAY SECTION WITH ITC PROJECT

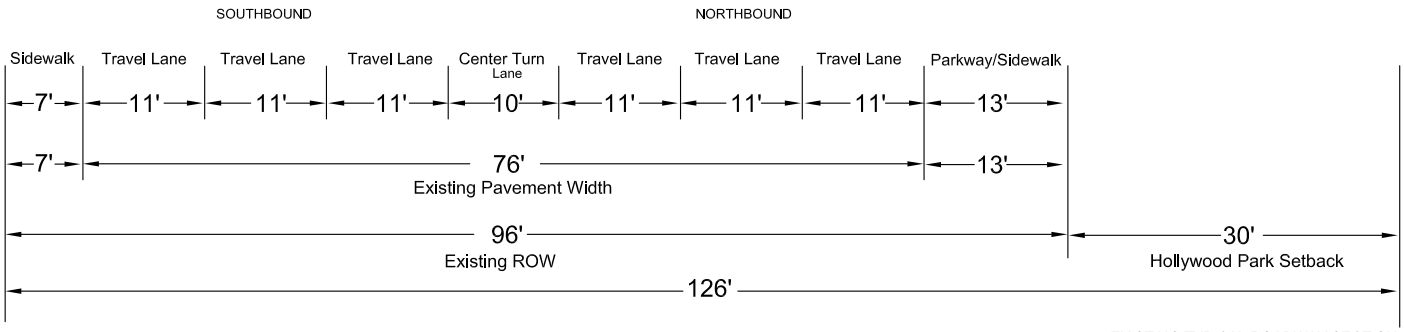


EXISTING TYPICAL ROADWAY SECTION

PRAIRIE AVENUE, LOOKING NORTH
BETWEEN VICTORY ST & HARDY ST



PROPOSED TYPICAL ROADWAY SECTION WITH ITC PROJECT



EXISTING TYPICAL ROADWAY SECTION

NOT TO SCALE

SOURCE: Raju Associates - 2020

Illustrative and subject to adjustments as part of finalization during final design

FIGURE **3.0-32**

Prairie Avenue Typical Cross-sections –Victory to Hardy

251-003-20



NOT TO SCALE

LEGEND:
ITC GUIDEWAY

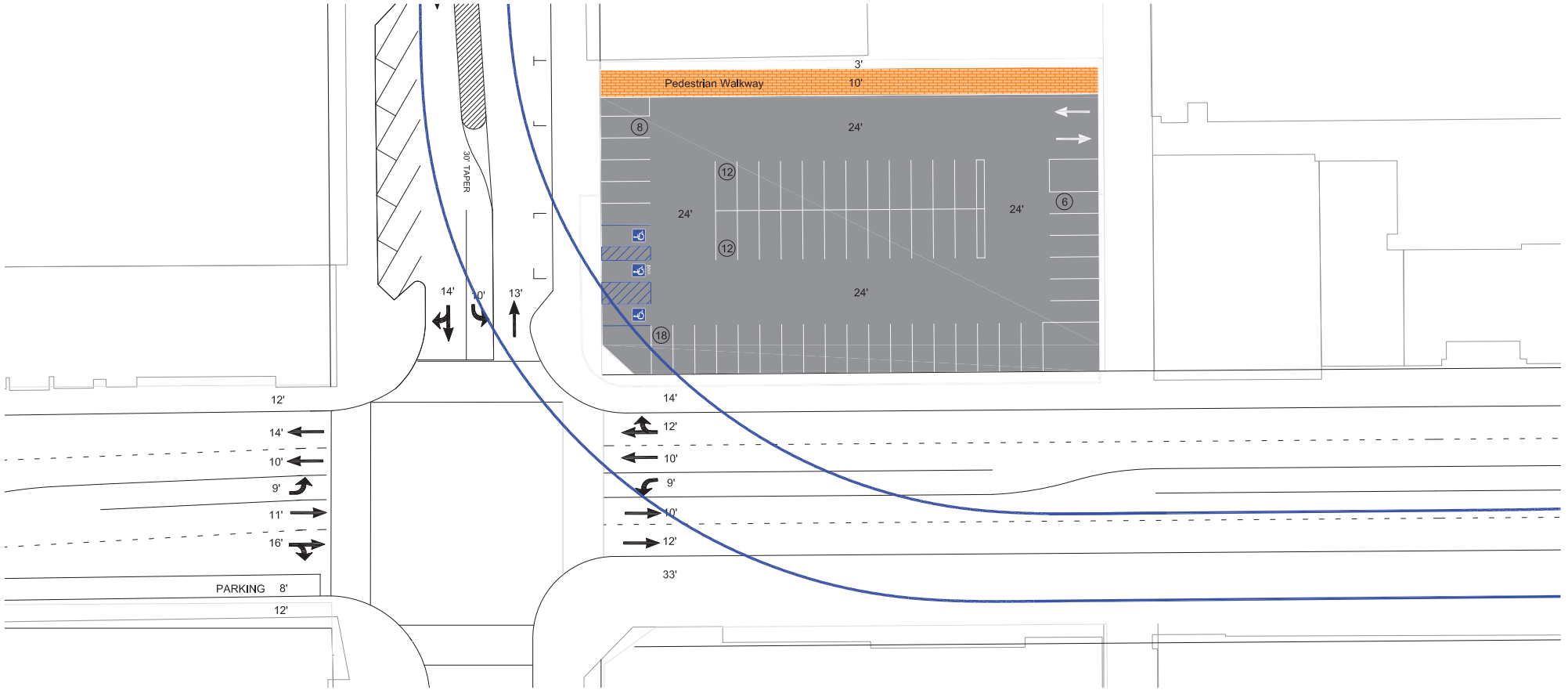
SOURCE: Raju Associates - 2020

Illustrative and subject to adjustments as part of finalization during final design

FIGURE **3.0-33**

Market Street/Florence Avenue Station Proposed Parking Plan

251-003-20



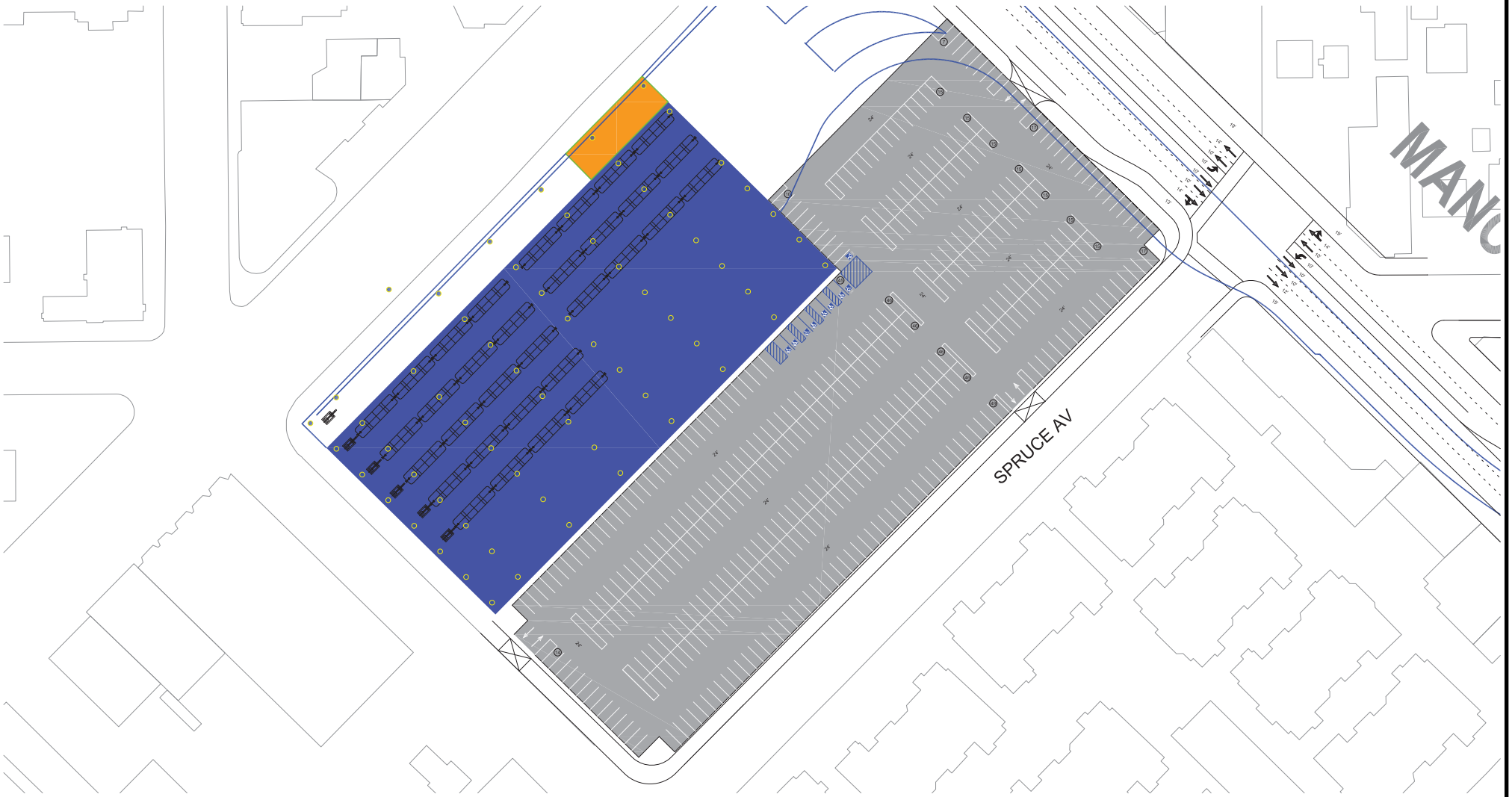
SOURCE: Raju Associates - 2020

Illustrative and subject to adjustments as part of finalization during final design

FIGURE **3.0-34**

150 S. Market Street Proposed Parking Plan

251-003-20



SOURCE: Raju Associates - 2020

Illustrative and subject to adjustments as part of finalization during final design

FIGURE **3.0-35**

MSF Site Proposed Parking Plan

251-003-20

There are various types of utility infrastructure underlying Market Street, Manchester Boulevard, and Prairie Avenue along the alignment. A number of utility entities maintain the operation of water, sewer, power, cable, and phone services in the corridor. Potable water in the City is supplied by the City, Golden State Water Company, and Cal-America Water Company. Water pipes are located along Market Street, Manchester Boulevard, and Prairie Avenue. The City of Los Angeles Department of Water and Power (LADWP) and the West Basin Municipal Water District (WBMWD) also have water pipelines (60-inch and 36-inch) along Prairie Avenue.

The main lines of the storm drain system in the City are jointly maintained by the Los Angeles County Flood Control District and the City.

The existing sewer system in the City is owned by both the City and the County of Los Angeles Department of Public Works. Electrical power is supplied by SCE and natural gas is provided by the Southern California Gas Company (SoCalGas). Market Street, Manchester Boulevard, and Prairie Avenue are well covered with a natural gas facility network; the existing gas lines range in size from 1 to 8 inches. Telecommunications and fiber optic facilities are within the project vicinity owned by AT&T, Spectrum, Metfibnet, Crown & Castle, Tesoro, MCI, and Level 3 Communications. LACMTA owns communications and fiber optics that serve the Metro Crenshaw/LAX Line.

Potential utility constraints include an existing 36-inch WBMWD recycled water line identified at the Market/Manchester Alignment street centerline and several utilities within 15 feet of the alignment along Prairie Avenue. In addition, a 60-inch LADWP main pipe and 33-inch storm drain are located on the east side of Prairie Avenue, approximately 20 to 40 feet from the centerline. The proposed Project would avoid these 36-inch, 60-inch, and 33-inch water utilities, if feasible.

Underground electrical lines, including vaults, are present along or adjacent to sidewalks. Based on a distribution study completed by the Southern California Edison Company (SCE), upgrades to the existing distribution system are required to accommodate the maximum power load for the Project. These upgrades consisting of 1,500 feet of new civil work/duct banks, 1,860 feet of new 1000 JCN cable, 1,700 feet of upgrading/re-cabling of the existing SCE primary cable to 1000 JCN, and two new gas switches, will be constructed as part of the Project.

Nongravity-flow utilities, including water service lines, may be lowered in lieu of horizontal relocation. Utility crossings, including electrical and storm drain lines, are found at street intersections.

Existing utilities along the northern portion of the alignment pose minimal obstacles for placement of guideway columns. However, due to the span of utilities tie-ins and crossings along Manchester Boulevard at Hillcrest Boulevard, Spruce Avenue, Manchester Drive, and Manchester Terrace, placement of

guideway columns on this alignment would be engineered to avoid relocation of gravity-flow utilities, including sewer and storm drains. As noted, the proposed Project along the Market/Manchester alignment would be designed so that utilities are avoided as feasible, and therefore do not pose a major impediment.

Final utility impact determinations and the overall extent of these impacts will be re-evaluated following on-site potholing and utility survey activities to confirm both horizontal and vertical placements. In coordination with applicable utility purveyors and other stakeholders, final project design and construction parameters will be determined to minimize overall impacts.

3.5.8 Design Guidelines

The Inglewood Transit Connector Design Guidelines (ITC Design Guidelines) (see **Appendix 3.0.3**) establish the City's comprehensive vision for the transit experience for City residents and patrons of downtown Inglewood and the surrounding entertainment and business venues. The Design Guidelines were prepared to ensure that development of the ITC, its stations and facilities, and the integration of these facilities at street level are executed in a way that complements and enhances the City's downtown visual and design quality. The Design Guidelines are intended to integrate the design of new and existing facilities and to create a passenger experience that reflects the City's history and architecture, while providing design guidance for construction of the ITC system.

The Design Guidelines apply to all components of the ITC system including the APM guideway, stations, support facilities such as the maintenance and storage facility (MSF) and transit power system, parking facilities, and the transit plaza interface with the Metro Crenshaw/LAX Line; as well as to the affected public realm: streetscapes (e.g.,, landscape and hardscape areas) which require alteration in order to deliver the ITC system.

The overall purpose of the Design Guidelines is to provide a framework to enhance both the visual quality of the environment in and around downtown Inglewood in a way that is consistent with the existing area conditions and future development projects, as well as provide criteria for sustainability. The Design Guidelines encourage the development of more sustainable and user-friendly spaces with a focus on unified, high-quality architecture and urban design, and a seamless interaction between APM passengers, light rail system passengers, and automobile drivers, with an emphasis on the passenger experience.

The public realm guidelines govern streetscapes and ground level areas including landscape and interface with roadways. They establish the overall aesthetic vision for revitalized streets and public spaces along the ITC area and the visual and functional criteria for the development of existing and future projects

on the properties adjoining the public realm along the ITC. These guidelines are to be applied in conjunction with existing land use plans, specific plans, and the City's urban design guidelines.

3.5.9 Sustainability Features

The City has developed sustainability guidelines included in the ITC Design Guidelines that define a list of green measures to be incorporated into the design, construction, and operations of the ITC facilities. The ITC project will be designed and constructed to achieve Silver Award Certification under the Envision™ Sustainable Infrastructure Rating System.

Individual measures are identified in the areas of site design, energy efficiency, water efficiency, material conservation, and environmental quality. These measures illustrate the City's sustainability considerations including, but not limited to, the measures necessary to meet the certifications referenced above. These guidelines apply to the APM guideway and stations, passenger walkways, parking areas, and all other components of the ITC.

Buildings included as part of the Project will incorporate vegetated open space area equal to 30 percent of the total project area. Projects must meet County of Los Angeles and City of Inglewood Low Impact Design (LID) requirements to treat stormwater. Preferential parking for green vehicles and provisions to accommodate electric charging stations for 10 percent of all parking spaces are included as are design treatments to reduce the heat island effect.

Energy efficiency guidelines are included that require Project elements to be 15 percent more energy efficient than applicable California Energy Efficiency Standards. For energy-using equipment not governed by California Energy Efficiency Standards, best available energy efficient technologies are to be used. The energy efficiency guidelines address lighting, incorporation of solar collectors into facilities where feasible, establishing energy budgets for each building that will be no greater than 85 percent of applicable Title 24 standards, and other aspects of facility designs.

Water efficiency and conservation opportunities are identified to reduce or eliminate potable use in landscape, and for car and train washing.

Material conservation and resource efficiency guidelines are included to reduce the environmental impact from the use of construction materials by minimizing use of virgin materials, increasing use of recycled materials, using rapidly renewable materials, using local materials, using durable materials, and looking for opportunities to reuse materials.

3.5.10 Construction Commitment Program

As part of the Project, the City of Inglewood has developed a Construction Commitment Program to pro-actively address the effects of the construction of the APM project on the community. This program, provided in Appendix 3.0.5, addresses:

- Construction staging and traffic control requirements
- Maintaining access to parking, businesses, and passenger facilities
- Noise and vibration reduction measures
- Air quality emission reduction measures
- Tree removal and replacement procedures
- Visual effects during construction

To address the effects of the construction activities on traffic conditions, the City will establish a Project Task Force for the ITC Project that would review worksite traffic control plans and other traffic management plans developed by the Project contractor(s) for the Project to ensure these plans address:

- Assessing traffic conditions to determine the need for additional traffic signals, signs, lane restriping, signal modifications, etc.
- Establishing detour routes after assessing the effect on passenger, bicycle and vehicle traffic and businesses
- Maintenance of adequate access for businesses and residents
- Coordination of any temporary street closures and restricted access with all special events
- Notification of the public through signs and web-based media
- Coordination with residential and commercial neighbors on scheduled construction activities
- Working with City of Inglewood police and LA County fire personnel regarding maintenance of emergency access and response times
- Monitoring and coordination of deliveries

All haul routes and activities will need to be reviewed and approved with truck deliveries of bulk materials and hauling of soil scheduled during off-peak hours to the extent feasible and on designated routes including freeways and nonresidential streets.

Parking, staging, or queuing of Project-related vehicles, including workers' vehicles, trucks, and heavy vehicles, shall be prohibited on City streets at all times except in defined workspace areas defined in an approved Worksite Traffic Control Plan. Construction Staging or Worksite Traffic Control Plans will also be

required to include a parking management plan to ensure on-street and other publicly available parking remains available.

Construction noise reduction measures in this Program require the use of construction equipment that generates the least amount of noise, use of temporary noise barriers, and restrictions on the use of heavy equipment that create vibration near sensitive uses and buildings. Contact information for a Community Affairs Liaison will be posted throughout the construction area. This liaison shall respond to any noise complaints within 24 hours.

The air emissions reduction measures require use of the best commercially available equipment meeting the highest standard for minimizing air emissions and the use of electric powered equipment or equipment not powered by diesel engines where possible.

A soils management plan will be prepared to address the handling of potentially contaminated soil, if any, encountered during construction to ensure the material is handled in a manner that avoids effects on the community.

All lighting needed to support construction activities will be required to meet defined standards to avoid impacts to adjacent uses and all stockpile area will be required to be in the least visible areas as approved by the City.

Removal of trees and other landscaping will be minimized and any trees removed will be replaced within 6 months of work being completed in affected areas.

The Construction Commitment Program also includes business and community support programs, including advertising support for businesses, advance notice of construction activities that may affect businesses or the community, and access to a Project Public Liaison to address any concerns related to construction. These programs will include:

- Business outreach and support programs for the purpose of assisting those businesses financially affected by the construction;
- Planning and scheduling construction activities to minimize effects on community gatherings, special celebrations, or other similar events;
- Public information campaigns conducted to encourage patronage of businesses during the construction period; and
- Implementation of educational safety awareness program at schools adjacent to construction activity along the proposed Project to provide information to students and parents.

3.6 PROPERTY ACQUISITIONS

The proposed Project would require a number of full and partial property and air rights acquisitions and easements or leases for construction and operation of the guideway, stations, MSF, and other support facilities included in the Project as identified in **Table 3.0-5: Anticipated Project Acquisitions**.

3.6.1 Guideway

At the northeast corner of the Market Street and Manchester Boulevard intersection, the guideway would partially extend beyond the public right-of-way and into the property at 150 S. Market Street which currently is occupied by a 2-story commercial building (see **Table 3.0-5**). Additionally, an approximately 55-space surface public parking lot will be developed at this location as part of the proposed Project. As a result, acquisition, and demolition of this property will is necessary to implement the proposed Project.

At the southeast corner of Manchester Boulevard and E. Spruce Avenue, the APM Guideway would potentially partially extend beyond the public right-of-way and into the automobile service and repair commercial property at 600 E. Manchester Boulevard, requiring an aerial easement or partial acquisition. Additionally, the guideway would partially extend beyond the right-of-way at the southwest corner of the Manchester Boulevard and Prairie Avenue intersection and into the property at 401 S. Prairie Avenue. This property is currently zoned C-2 General Commercial and occupied by a commercial office building. Column may occupy a portion of the property, which would require an easement or partial acquisition.

The proposed Project also requires a relocation of Prairie Avenue towards the east; this relocation is necessary to maintain the existing roadway capacity of Prairie Avenue while accommodating the columns to support the guideway and station and vertical circulation from the station to the street level. This relocation requires the public right-of-way for Prairie Avenue to be expanded by approximately 30 feet to the east of its current location within the setback area of properties along Prairie Avenue, including the Forum property at 3900 W. Manchester Boulevard and property within the Hollywood Park Specific Plan area on the east side of Prairie Avenue south of Arbor Vitae Street, requiring an easement or partial acquisition.

Table 3.0-5
Anticipated Project Acquisitions

APN #	Property Address	Existing Use/Primary Business	Anticipated Acquisition Type	Project Needs
4015-027-030	310 E. Florence Ave	Restaurant - Antojitos Martin (Snack & Juice Bar)	Full Acquisition	Market Street/Florence Avenue Station, vertical circulation, guideway, columns, construction staging, and future parking
4015-027-031	300 E. Florence Ave	Restaurant- Fiesta Martin Bar and Grill	Full Acquisition	Market Street/Florence Avenue Station, vertical circulation, guideway, columns, construction staging, and future parking
4015-027-032	254 N. Market St	Restaurant- House of Tacos	Full Acquisition	Market Street/Florence Avenue Station, vertical circulation, guideway, columns, construction staging, and future parking
4015-027-033	250 N. Market St	O'Reilly Auto Parts	Full Acquisition	Market Street/Florence Avenue Station, vertical circulation, guideway, columns, construction staging, and future parking
4015-027-035	236 N. Market St	Parking Lot	Full Acquisition	Market Street/Florence Avenue Station, vertical circulation, guideway, columns, construction staging, and future parking
4015-027-020	234 N. Market St	Parking Lot	Full Acquisition	Market Street/Florence Avenue Station, vertical circulation, guideway, columns, construction staging, and future parking
4015-027-042	Address Not Available	Parking Lot	Full Acquisition	Market Street/Florence Avenue Station, vertical circulation, guideway, columns, construction staging, and future parking
4015-027-022	226 N. Market St	Parking Lot	Full Acquisition	Market Street/Florence Avenue Station, vertical circulation, guideway, columns, construction staging, and future parking
4015-027-052	Address Not Available	Parking Lot	Full Acquisition	Market Street/Florence Avenue Station, vertical circulation, guideway, columns, construction staging, and future parking
4015-027-051	200 N. Market St	No Existing Business; Abandoned Building	Full Acquisition	Market Street/Florence Avenue Station, vertical circulation, guideway, columns, construction staging, and future parking
4015-027-038	240 N. Market St	Small Businesses – Silk Nails, Universal College of Beauty, Advance America, Optometric Center, Beauty Supply	Full Acquisition	Market Street/Florence Avenue Station, vertical circulation, guideway, columns, construction staging, and future parking
4015-027-040	230 N. Market St	Clothing Store - DD's Discounts Store	Full Acquisition	Market Street/Florence Avenue Station, vertical circulation, guideway, columns, construction staging, and future parking
4015-027-041	224 N. Market St	GMD Store (general department store)	Full Acquisition	Market Street/Florence Avenue Station, vertical circulation, guideway, columns, construction staging, and future parking
4015-027-049	222 N. Market St	CVS Pharmacy	Full Acquisition	Market Street/Florence Avenue Station, vertical circulation, guideway, columns, construction staging, and future parking
4015-027-050	210 N. Market St	Westchester Dental Care, Randy's Donuts To-Go	Full Acquisition	Market Street/Florence Avenue Station, vertical circulation, guideway, columns, construction staging, and future parking

APN #	Property Address	Existing Use/Primary Business	Anticipated Acquisition Type	Project Needs
4021-010-015	150 S. Market St.	World Hat and Boot Mart / Commercial	Full acquisition	Guideway, columns, construction staging, and future parking
4021-024-015	500 E. Manchester Blvd.	Retail Commercial Center with Gas Station. Starbucks, Chase Bank Branch Planet Fitness located inside retail commercial site	Full Acquisition	Maintenance and Storage Facility, guideway, traction power substation columns, construction staging, and future parking
4021-028-237	600 E. Manchester Blvd.	Various Auto Repair Shops / Commercial	Aerial easement or partial acquisition	Guideway
4021-036-049	401 S. Prairie Ave.	Commercial Office	Easements or partial acquisition	Guideway and columns
4025-001-002	3900 W. Manchester Blvd.	The Forum (parking) / Commercial Recreation	Easements or partial acquisition	Prairie Avenue/Pincay Drive Station, vertical circulation, columns, roadway, and sidewalks
4025-011-064	600 S. Prairie Ave.	Parking Lot	Easement or partial acquisition	Prairie Avenue/Pincay Drive Station, vertical circulation, columns, roadway, and sidewalks
4025-011-065	600 S. Prairie Ave.	Parking Lot	Easement or partial acquisition	Prairie Avenue/Pincay Drive Station, vertical circulation, columns, roadway, and sidewalks
4025-011-086	Address Not Available	Parking Lot / Temporary Trailers	Easement or partial acquisition	Prairie Avenue/Hardy Street Station, vertical circulation, columns, roadway, and sidewalks

3.6.2 Stations

The Market Street/Florence Avenue station, along with the accompanying surface parking lot and multimodal pick-up and drop-off area, would be above grade over an existing commercial property, in between Florence Avenue and Regent Street. As shown in **Table 3.0-5**, 15 parcels would be acquired to accommodate the Market Street/Florence Avenue Station and the accompanying parking area. Passenger access points to connect the station to the Downtown Inglewood station of the Crenshaw/LAX line would extend outside the right-of-way and land in the adjacent properties. Encroachment easement for columns and passenger access points may be required.

The Prairie Avenue/Pincay Drive station located near The Forum would be above grade and largely located within the public right-of-way on the intersection of Prairie Avenue and Pincay Drive. Passenger access point landings would extend outside the right-of-way and into the adjacent property. Encroachment easement for columns and passenger access points may be required.

The Prairie Avenue/Hardy Street station would be above grade and largely located within the public right-of-way at Prairie Avenue's intersection with Hardy Street. Passenger access point landings would extend outside the right-of-way and into the adjacent property. Encroachment easement for columns and passenger access points may be required.

3.6.3 Parking

As described above, the proposed Project includes providing additional public parking in along locations along the ITC alignment. These parking areas will be used as staging areas during construction but will ultimately provide public parking needed to support use of the ITC Project and the revitalization of Downtown Inglewood, and also replace public parking on streets that will be removed to implement the ITC Project.

Approximately 650 parking spaces would be provided in a surface parking lot at the Market Street/Florence Avenue Station. Approximately 50 public parking spaces would be provided in a surface parking lot at 150 S. Market Street. Approximately 450 additional public parking spaces would be provided in a surface parking lot at the MSF Facility site at 500 E. Manchester Boulevard. Acquisition of these sites is proposed to provide public parking at these locations

3.6.4 Maintenance and Storage Facility

The MSF and adjacent surface public parking lot would occupy the parcel at 500 and 510 E. Manchester Boulevard, which is currently developed with a retail commercial center. Acquisition of this parcel and demolition of structures by the City would be necessary to implement the proposed Project.

3.6.5 Potential Permanent and Temporary Easements and Other Property Acquisitions

In addition to the properties listed in **Table 3.0-5**, potential permanent and/or temporary easements may be necessary for properties located immediately adjacent to existing street right of way to accommodate the following project improvement conditions:

- Grading repairs and adjustments due to roadway, sidewalk, and hardscape improvements.
- Access to construct guideway, columns, station, and roadway improvements.
- Utility service line reconfiguration necessary from utility mainline relocation/modifications.

3.7 CONSTRUCTION

Construction is planned to occur in four phases over an approximate five-year period between 2022 and 2026. The analysis of the potential impacts that would result from the construction of the Project is based on the definition of the phases of construction as defined in the Inglewood Transit Connector (ITC): Construction Scenarios for the Environmental Impact Report, June 2020 provided in **Appendix 3.0.4** to this Draft EIR. To meet the schedule objectives, multiple phases could occur concurrently. Construction of the proposed Project is contingent on Project approvals; it is anticipated that the Inglewood City Council will consider the Project for approval in 2021. The general sequence of construction developed for analysis in this Draft EIR represents the best available information at the time of review. The following is a summary of the planned phases of the construction of the Project.

Due to the constraints of the area available for construction of the Project, primarily along Prairie Avenue and Manchester Boulevard, just-in-time deliveries of construction materials would be required during off-peak hours and/or night hours. Additionally, construction of the APM guideway, columns and station components that could impact Prairie Avenue and Manchester Boulevard would be primarily constructed during the off-peak hours and night hours in order to minimize impacts to daily commuter traffic and potential event traffic.

3.7.1 Construction Phasing

The construction phasing as described below represents a conservative set of assumptions for analysis of the maximum potential impacts from construction of the Project. It is likely that these construction phases will overlap to provide the most efficient construction schedule once a contractor is selected for the delivery of the project. The construction phasing described below will likely be refined as design and implementation of the Project progresses and a contractor is selected.

Phase 1

The first phase of construction would occur in 2022 and 2023. Phase 1 would include demolition of buildings and site improvements on properties acquired for construction of the Project and the beginning of construction of the MSF. The properties where existing buildings and site improvements will be demolished include at the existing retail commercial center at Market Street and Regent Street, the commercial buildings located at 500 and 501 E. Manchester Avenue (retail commercial site and gas station buildings), and the commercial building at 150 S. Market Street on the northeast corner of Manchester and Market Street.

Phase 1 would include utility relocations, if required, construction of cast-in-place (CIP) columns and slabs, and foundations for the initial construction of the MSF facility. Additional work in the area will occur in Phase 4 for the completion of the aerial construction of the elevated guideway and the Prairie Avenue/Hardy Street Station.

After demolition, the remaining asphalt flatwork areas at 500 E. Manchester (retail commercial site), the commercial plaza at Market Street and Regent Street and the commercial building at 150 S. Market Street will provide suitable space for construction staging, including but not limited to, space for equipment storage, material staging and storage, contractor jobsite trailers, and on-site parking for construction staff throughout the entire project duration.

Phase 1 of construction would include the following:

- This stage of construction would focus on the demolition of buildings and site improvements on property acquired for the Project. As noted above, portions of the areas to be demolished will be used for construction staging.
- Utility locations for protection in place, possible utility relocations, and new utility installation for utilities such as: electrical, water lines, gas lines, storm drains, sewer lines, temporary traffic signals and streetlights.
- Removal and disposal of existing sidewalks, roadways, landscape, and medians as needed, including the installation of new or temporary pavement and asphalt for road work and sidewalks.
- The installation of the TPSSs electrical equipment and subsystems will occur at the City's Civic Center site on Prairie Avenue and at the MSF site.

Phase 2

Phase 2 of construction would occur for the guideway along Prairie Avenue from Hardy Street to Manchester Boulevard and the Prairie Avenue/Hardy Street and Prairie Avenue/Pincay Drive Stations and the MSF. This phase of construction would occur in 2023 through 2025.

Phase 2 would include activities to enable the construction sequence of the guideway along Prairie Avenue from the Hardy Street intersection to Manchester Boulevard including the demolition of sidewalks, roadways and landscaping as needed, utility relocations, if necessary, foundations, CIP columns, straddle bents and the precast trapezoidal troughs and girders, and the construction of the MSF. Additional work in the area will commence in Phase 4 for the installation, testing and commissioning for APM trains, and the completion of the Prairie Avenue/Pincay Drive Station.

Phase 2 of construction would include the following:

- Removal of existing sidewalks, roadways, landscaping, and demolition of other improvements as needed along the guideway alignment. This work includes new or temporary pavement and asphalt for road work and sidewalks.
- Utility work including potential relocations, protection in place where feasible, and new utility installations including but not limited to electrical, water, gas, storm drains, sewer lines, temporary traffic signals and streetlights.
- Completion of the MSF building shell, roofing structure, and second level platform for the storage and testing of trains.
- The installation of a K-Rail system on the west side of Prairie Avenue to delineate the construction area. The K-Rail system will be installed approximately twenty-two feet into the public ROW from the westerly face of curb on Prairie Avenue, excluding sidewalks, from Hardy Street to Manchester Boulevard and maintained until construction in this area is completed. The area within the K-Rail system will be used for the mobilization of equipment, drilling, crane operations and concrete pump outriggers for the excavation and installation of concrete foundations, concrete piles, single and double concrete columns, beam girders and cantilevered bents for the aerial construction. The construction area within the K-Rail barriers would include the locations of several foundation structures and columns.
- After construction activities on the west side of Prairie Avenue are completed, construction of the east side of Prairie Avenue would begin. The K-rail system would be installed to delineate the construction area on the east side of Prairie Avenue. The K-Rail system will be installed approximately fifteen-feet into the public ROW starting from the easterly face of curb, excluding sidewalk, from Hardy Street to Manchester Boulevard. If needed, a temporary easement or utility setback may be utilized to secure staging areas. The area within the K-Rail system will be used for the installation of foundations, CIP columns, single and double concrete columns, beam girders and cantilevered bents for the aerial construction. The construction area within the K-Rail barriers would include the locations of several foundation structures and columns.
- Installation of prefabricated building(s) for the electrical equipment and subsystems at each of the two TPSS sites. The TPSS at the City's Civic Center site on Prairie Avenue may be below grade requiring excavation and installation of below ground support structures.

- Aerial construction of the guideway formwork with precast trapezoidal troughs and steel girders, and completion of stations and mezzanines with vertical circulation elements. This work would include temporary closures during the following activities for safety measures as follows:
  - During the formwork phase, traffic would not be allowed to pass underneath the structure.
  - During formwork and concrete placement of the cast-in-place trapezoidal box trough and/or the uses of precast/prestressed "I" steel girders and platforms. Temporary lane closures would be necessary.
  - The staging and holding area for the delivery of girders and beams will be located in the MSF staging area; delivery to the construction area will occur when required.

Phase 3

Phase 3 would include activities to enable construction of the APM along Manchester Boulevard from Prairie Avenue to Market Street, Market Street from Manchester Boulevard to Florence Avenue and would include construction of the Market Street/Florence Station, and the elevated passenger walkway to the Metro Crenshaw/LAX Line Downtown Inglewood Station. This phase of construction would occur in 2024 through 2026.

Phase 3 work will include construction of an above-ground passenger access walkway from the Market Street/Florence Avenue Station to the Metro Crenshaw/LAX Line Downtown Inglewood Station, property acquisitions, building demolition, utility relocation (if necessary), foundations, CIP columns, straddle bents and the precast trapezoidal troughs and girders. Phase 3 also includes the completion of site improvements for the MSF.

Phase 3 of construction would include the following:

- Utility work including potential relocations, protection in place where feasible, and new utility installations including but not limited to electrical, water, gas, storm drains, sewer lines, temporary traffic signals and streetlights.
- Removal of existing sidewalks, roadways, landscaping, and demolition as needed. This work includes new or temporary pavement and asphalt for road work and sidewalks.
- The installation of a K-Rail system on the south side of Manchester Boulevard to delineate the construction area. The K-Rail system will be installed approximately twenty-two feet into the public ROW from southerly face of curb, excluding sidewalks, along Manchester Boulevard from Prairie Avenue to Market Street and maintained until construction in this area is completed. The area within the K-Rail system will be used for the mobilization of equipment, drilling, crane operations and concrete pump outriggers for the excavation and installation of concrete foundations, concrete piles, single and double concrete columns, beam girders and cantilevered bents for the aerial construction.

The construction area within the K-Rail barriers would include the locations of several foundation structures and columns. After construction activities on the south side of Manchester Boulevard are completed, construction of the north side of Manchester Boulevard would begin. The K-rail system would be installed to delineate the construction area on the north side of Manchester Boulevard. The K-rail system would be installed to delineate the construction area on the east side of Prairie Avenue. The K-Rail system will be installed approximately twenty-two feet of public ROW starting from the northerly face of curb, excluding sidewalks, from Prairie Avenue to Market Street. The area within the K-Rail system will be used for the mobilization of equipment, drilling, crane operations and concrete pump outriggers for the excavation and installation of concrete foundations, concrete piles, single and double concrete columns, beam girders and cantilevered bents for the aerial construction. The twenty-two-foot staging area would span several foundations and columns to minimize the construction area into phased construction staging sections along Manchester Boulevard. To minimize traffic impacts, in the event that partial or full lane closures of Manchester Boulevard and/or Market Street are necessary for a longer duration, lane reversals (or contra-flow) will be implemented to facilitate the peak hour traffic direction.

- Installation of the TPSS prefabricated building for the electrical equipment and subsystems.
- Completion of the MSF facility.
- Aerial construction of the guideway formwork with precast trapezoidal troughs and girders, and completion of stations and mezzanines with vertical circulation elements. This work would include temporary closures during the following activities for safety measures:
  - During the formwork phase, traffic would not be allowed to pass underneath the structure.
  - During formwork and concrete placement of the cast-in-place trapezoidal box trough and/or the uses of precast/prestressed “I” steel girders and platforms. Temporary lane closures would be necessary.
  - The staging and holding area for the delivery of girders and beams will be located in the MSF staging area; delivery to the construction area will occur when required
- The installation of two rows of K-Rail systems along Market Street to delineate the construction area. The K-Rail system will be installed approximately twenty-five feet into the public ROW in the center of Market Street, from Manchester Boulevard to Florence Avenue. The area within the K-Rail system will be used for the mobilization of equipment, drilling, crane operations and concrete pump outriggers for the excavation and installation of concrete foundations, concrete piles, single and double concrete columns, beam girders and for supports directly under the guideway.
- Aerial construction of the guideway formwork with precast trapezoidal troughs and steel girders, and completion of stations and mezzanines with vertical circulation elements. This work would include temporary closure of Market Street during the following activities for safety measures:
  - During the formwork phase, traffic would not be allowed to pass underneath the structure.

- During formwork and concrete placement of the cast-in-place trapezoidal box trough and/or the uses of precast/prestressed "I" steel girders and platforms. Temporary lane closures would be necessary.
- The staging and holding area for the delivery of girders and beams will be located in the MSF staging area and at the Market Street/Florence Avenue Station site after demolition of the commercial shopping center at Market Street and Regent Street.

Phase 4

Phase 4 of construction would occur for the guideway along the entire length of the alignment and primarily incudes installation of the operating systems, and testing and commissioning of the APM trains. This phase of construction would occur in 2022 through 2026; with the primary construction activities occurring in 2025 and 2026 and some installation of equipment starting towards the end of Phase 1 construction when sufficient aerial structure is available for the installation of the equipment.

Phase 4 would include completion of the aerial guideway construction elements including the installation of the operation and control systems, track work, station platform equipment and systems, completion of the TPSSs, testing and commissioning of the APM trains, completion of all surface construction activities including electrical, mechanical and utilities energizations, and all surface parking lots. Phase 4 will also include final roadway improvements and modifications, and re-striping of streets as required.

This work will involve periodic temporary lane closures and/or short-term installation of K-rail systems as needed to allow access to the aerial construction platforms, installation of equipment, completion of platforms, stations and electrical systems and completing roadway improvements and modifications.

3.7.2 Construction Sequence

The construction phases mentioned previously each consist of tasks to occur in the pre-construction, surface construction, aerial construction, and light construction sequences of construction. These associated activities and tasks are described as follows.

Pre-Construction

Pre-construction activities would consist of assembling/drawing design packages; commencing off-site manufacturing; commencing acquisitions; relocating, modifying, or protecting in place utility lines, as needed; identifying traffic lights and signals to be relocated during construction, including preparing temporary signals and street lighting; commencing survey requirements; conducting confirmation geotechnical investigations focusing on geological, groundwater, seismic, and environmental conditions; developing a traffic control plan and determining detours and haul routes; erecting safety devices and

noise berries; identifying staging and employee parking areas for each construction phase; and mobilizing construction equipment within designated staging areas.

Surface Construction

Surface construction activities would include demolition of existing buildings where proposed, demolition of sidewalk and streets; clearing and grubbing including removal of landscaping as needed for each phase; and construction of foundations, cast-in-place (CIP) columns, and straddle bents in preparation for aerial construction. Additionally, surface construction activities would include utility improvements and installations, as needed; relocation and installation of streetlights and traffic signals; building demolition; roadway resurfacing, improvements, and striping; and commencing site improvements for the MSF, TPSSs, and adjoining guideways for each phase.

The following surface construction activities will occur:

- Removal of existing asphalt surface and concrete sidewalks, center medians, and utility removal and/or relocation.
- Inspections to define demolition activities for existing building structures, facilities and utilities including open hardscapes and landscapes impacted by surface and aerial construction.
- Demolition of existing commercial buildings and site improvements on the site of the Market Street/Florence Avenue Station and MSF, which will yield approximately 40,308 cubic yards (CY) of debris generating approximately 1,343 truck haul trips. As part of the demolition process, underground storage tanks associated with the existing gas station on the MSF site will be removed and any activities to remove or remediate any contaminated soil will be completed.
- Construction of the foundations, poured-in-place columns, and straddle bent plate columns for the guideway. The horizontal guideway would be lifted and connected into place atop the cast-in-place pile cap columns, and the top deck would be formed and poured. Each vertical support column would be supported by the reinforced concrete shaft pile caps approximately 6-feet by 12-feet or 6-feet by 9 feet in diameter and vary from 60 to 100 feet deep and based on geotechnical conditions and guideway characteristic.
- Each foundation and pile cap would yield spoils to be trucked away and disposed of according to the geotechnical and environmental services report. The estimated volume to be excavated would total approximately 124,474 CY.
- On the properties proposed for acquisition and easement areas, including the Retail Plaza and the gas station properties, this Draft EIR assumes the export of approximately 7,884 cubic yards (CY) of soil will be required which will generate approximately 328 more truck haul trips.
- Assuming the use of bottom dump trucks with 24 CY capacity for exporting soils, 5,515 truck trips would be required. Staging of the trucks would occur on the north side of Manchester east of Prairie

with spaced intervals scheduling for in-time loading. Approximately 260 trucks on any given day would enter the construction zone areas inside the K-rails and exit the areas per the noted truck haul routes. The majority of the hauling will occur during the night shift to ease traffic congestion and would use designated truck routes.

- Street sweepers would be employed for controlling dust and for keeping the streets clean. Flag persons would be present controlling the flow of traffic during the exporting activity.
- Contaminated soils would be separated as soon as they are identified before excavation and would be separated into temporary stockpiles. The soils would be handled, transported, and disposed of in accordance with all applicable regulations.
- The following repair and/or construction elements would be performed, as needed: concrete sidewalks, gutter, curbs, driveways, asphalt improvements, striping, replacement of traffic and passenger signage, parking meters, placement of traffic and passenger signals, street lighting, hardscape, and landscape.

Aerial Construction

Aerial construction consists of the above grade concrete structures and support for the elevated guideway and the above-grade stations platforms. It is assumed that the aerial segments would be constructed as precast trapezoidal troughs and/or using the alternative of precast prestressed concrete "I" girder placed on CIP concrete columns, with post-tensioning strands for the guideway. The station platforms consist of three levels, with ground access leading to a mezzanine level and a platform level. The station would consist of structural concrete slabs with edge girders and post-tension concrete, a steel roof structure, and elevators/escalators to enclosed stations.

Light Construction

Light construction activities would consist of the interior and exterior finishes for the MSF building; the stations; train systems installation and testing; train control systems; communication systems; completion of electrical and mechanical systems; and minor roadway improvements.

Construction Hours

Construction activity would occur 24-hours a day seven days a week with primarily heavy construction activities (those involving large equipment use on site) would occur over a 16 hour/day schedule with two shifts, either a morning shift from approximately 7:00 AM to 3:00 PM and an evening shift from approx. 3:00 PM to 11:00 PM, or a morning shift from approximately 7:00 AM to 3:00 PM and a night shift from approximately 11:00 PM to 7:00 AM. The night shift would be used for material deliveries, export of soil and debris and other light construction activities. However, certain heavy construction activities that necessitate temporary road closures could occur at night-time to minimize traffic impacts.

Due to site constraints, primarily along Prairie Avenue and Manchester Boulevard, just-in-time deliveries of construction materials would be required during off-peak hours and/or night hours. Additionally, construction of the elevated guideway, columns and station components that could impact Prairie Avenue and Manchester Boulevard would be primarily constructed during the off-peak hours and night hours to minimize impacts to daily commuter traffic and potential event traffic.

Delivery of construction materials would occur during the night shift, as would most temporary lane closures. Construction activities during the day shift would primarily consist of work that could proceed without requiring lane closures or significant disruption to daily commuter traffic and potential event traffic along Prairie Avenue and Manchester Boulevard. Additionally, it can be anticipated that some minor activity would occur during periods in between construction shifts for logistics, moving equipment, etc.

Pursuant to the Inglewood Municipal Code,[13] any construction between the hours of 8:00 PM and 7:00 AM will require the approval of a permit from the Permits and License Committee of the City.

3.7.3 Construction Equipment

Off-Road On-Site Equipment

Off-road construction equipment would include impact pile drivers, auger drill rigs, excavators, backhoes, loaders, cranes, drill rig trucks, compactors, and other heavy-duty construction equipment that is not licensed for travel on public highways. Off-road equipment is inventoried based on equipment type, model, and horsepower rating.

On-Road On-Site Equipment

On-road on-site equipment would include shuttle vans transporting construction employees to and from the site(s), on-site pick-up trucks, crew vans, water trucks, dump trucks, haul trucks, street sweepers, and other on road-road vehicles licensed to travel on public roadways.

On-Road Off-Site Equipment

On-road off-site vehicles would include personal vehicles for construction employees to come and go to work, and delivery vehicles for materials and equipment.

3.7.4 Workforce Estimates

The proposed manpower workforce estimate is based on the phases of construction, which can overlap in any calendar year. Including all contractor staff and specialty on-site professionals, the approximate

13 City, Municipal Code, Section 5-41, Construction of Building and Projects Noise Regulated.

manpower required would be 105 to 140 persons for Phase 1, 165 to 189 persons for Phase 2, 210 to 238 persons for Phase 3, and 88 to 123 persons for Phase 4.

3.7.5 Construction Staging Areas and Employee Contractor Parking

To the extent possible, construction laydown, staging areas, and employee contractor parking for the proposed Project would be located within the alignment for the proposed facilities. Proposed staging areas are shown in **Figure 3.0-36: Proposed Construction Staging Areas and Haul Routes**. The potential staging areas include the sites for the Florence/Market Street Station, the MSF site, and the City's Civic Center Site at Prairie Avenue, as well as the property at 150 S. Market Street proposed for acquisition as part of the Project. Further, City-owned lots near the northeast corner of the Market Street and Manchester Boulevard, and others near the proposed Project could be used for construction employee parking.

For the MSF site, the portion of the site outside the active MSF and TPSS construction footprint would be used for construction staging, materials storage, concrete batch plants, jobsite trailers, and limited contractor parking for the entire construction duration. Additionally, equipment and materials storage would also take place in the linear staging areas in the form of one lane of roadway along the length of alignment separated by K-rail.

At each construction staging area, the City would implement, as necessary, security and screen fencing, surveillance cameras, security personnel, and the locking and securing of equipment. Additionally, the proposed Project would incorporate various temporary construction fencing features to screen much of the construction activities along major public approach and perimeter roadways. Construction employees would be shuttled between construction sites and construction employee parking areas within 1 mile of the proposed Project as needed.

3.7.6 Haul Routes

Designated delivery and haul routes would be established for the proposed Project consistent with the City's General Plan roadway designations and the haul routes currently used for local projects. As described above, all haul routes would be reviewed and approved by the City as part of the Construction Commitment Program. As shown in **Proposed Construction Staging Areas and Haul Routes**, the primary delivery and haul routes proposed during construction of the proposed Project would utilize Florence Avenue, Manchester Boulevard, Prairie Avenue, and Century Boulevard, which have been designated by the City as appropriate for heavy truck use.[14] For materials delivered to and stored at designated

14 City of Inglewood Municipal Code, Section 3-95, Truck Routes Established. https://www.qcode.us/codes/inglewood/view.php?topic=3-3-3_85&frames=on.

construction staging areas, the contractor haul routes to and from the proposed Project would be generally on public streets. These routes would convey materials to and from regional routes, including the I-405 (Glen Anderson Freeway) and I-405 (San Diego Freeway).

It is anticipated that the haul routes closest to the respective work and staging areas of the Project alignment will be used. Excavated dirt materials may be hauled at night, where possible, due to the congested freeways and surface streets around or near the excavation site during daytime hours. An excavation plan would be prepared that defines haul routes, dust control, sweeping, and the location(s) for final disposal.

3.8 ENTITLEMENTS

The proposed Project includes an amendment to the City's General Plan and an amendment to Chapter 12, Planning and Zoning, of the Inglewood Municipal Code (IMC) to create an overlay zone to allow the construction and operation of the proposed Project. The proposed Project would also include the reconfiguration of existing parcels through the approval of lot line adjustments, parcel maps, or tract maps.

3.8.1 General Plan Amendment

The City's General Plan consists of the elements required by State law, including the Land Use, Circulation, Safety, Noise, Housing, Open Space, and Conservation Elements. The City adopted an Economic Justice Element of the General Plan in June 2020.[15] The proposed Project would include amendments to the Land Use, Circulation, and Safety Elements as described below.

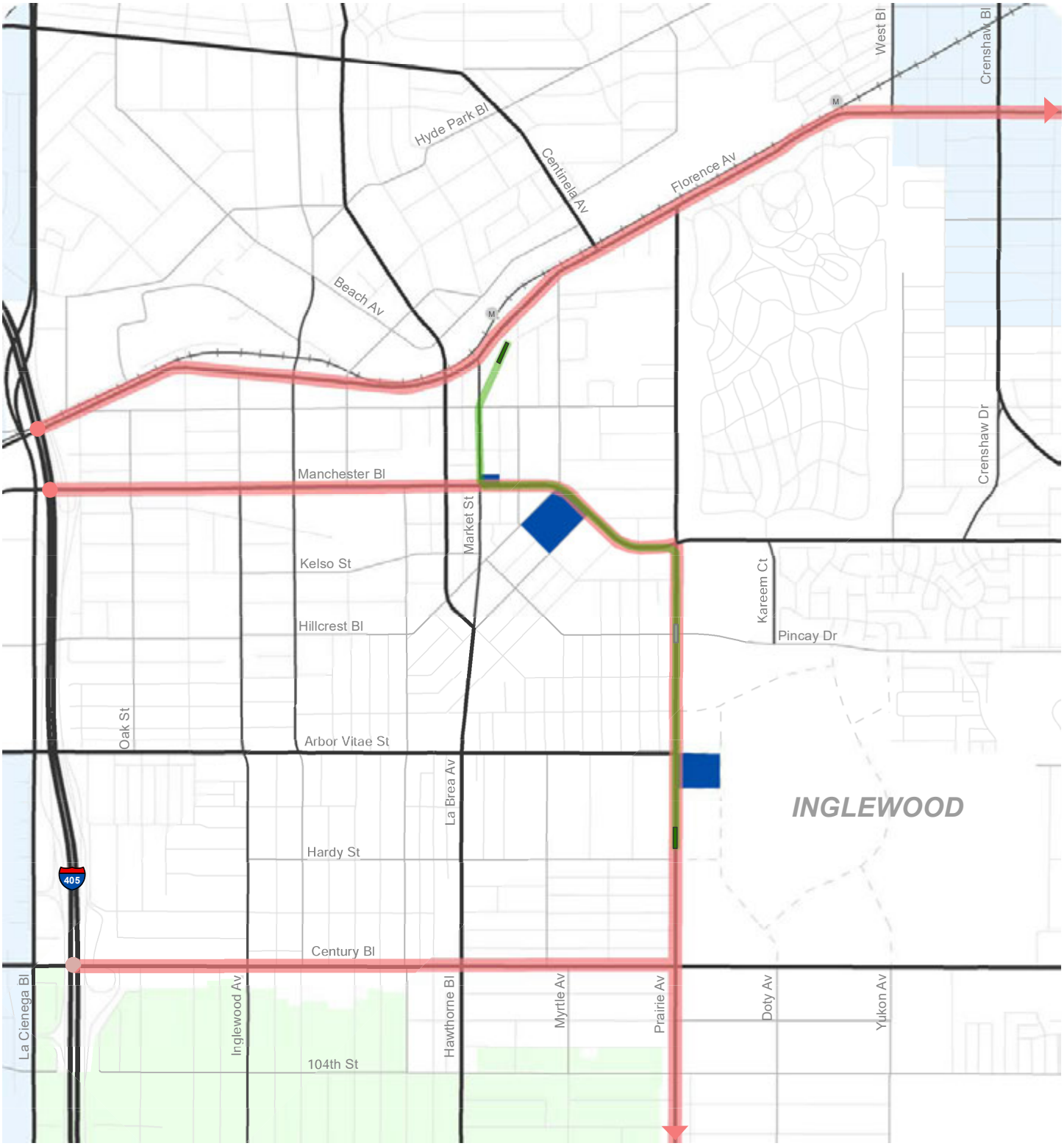
Land Use Element

The City General Plan Land Use Element, inclusive of amendments through 2016, addresses key issues involving the use of land in the City; provides a framework of goals and objectives for decision makers as they consider the long-term commitment of land resources; and analyzes population and land use requirements into the future.[16]

The amendment to the General Plan Land Use Element would include changes to the text and diagrams related to the three components as described below.

15 City of Inglewood, General Plan, Environmental Justice Element, Adopted June 2020.

16 City of Inglewood, *General Plan*, "Land Use Element" (adopted 1980, amended 1986, 2009, and 2016), accessed March 2019, https://www.cityofinglewood.org/DocumentCenter/View/132/Land-Use-Element-1980-Amended-1986-2009-2016-PDF



SOURCE: Raju Associates - 2020

Illustrative and subject to adjustments as part of finalization during final design

FIGURE **3.0-36**

Construction Haul / Delivery Routes and Staging Areas

251-003-20

First, the Goals and Objectives section would be modified to incorporate the ITC Project into the subsections addressing Circulation and the Downtown Transit Oriented District. The modified objectives address integration of the APM system into the existing historic core area around Market Street, connecting the Downtown Inglewood Metro Rail station to the LASED including SoFi Stadium, the Forum, and the IBEC with the ITC Project, and supporting the City's goal to promote adequate public transportation within the City and the region by adding the ITC Project.

Second, a description of the proposed ITC Project would be added to the "Passenger Train Service" subsection under the "Development Factors- Transportation Network" section. The subsection provides a list of passenger train services available in the City of Inglewood.

Third, the "Downtown Transit Oriented District" subsection in the "Future Land Uses" chapter would be amended to identify the proposed Transportation Corridor Overlay Zone (TC Overlay Zone) as one of the overlay zones in Downtown Inglewood. The TC Overlay Zone would supersede all other overlay zones, including the concept plans and zoning and design guidelines outlined by the Downtown TOD Plan.

Circulation Element

The amendment to the General Plan Circulation Element[17] would include changes to text and diagrams related to the five components described below.

First, Market Street, between Florence Avenue to the north and La Brea Avenue to the south, will be revised from its current configuration to have one lane of traffic in each direction between Regent Street and Manchester Boulevard with a center island; currently this section of Market Street has 2 lanes in each direction with a center turn lane. The Circulation Element currently classifies Market Street as a Minor Arterial street. Minor Arterial streets contain two lanes of traffic in each direction.; this section of market Street will be reclassified as a Collector street; Collector streets have one lane of traffic in each direction.

The Circulation Element identifies typical street sections for common right-of-way widths and sections of streets planned for widening. The second component of the proposed amendment includes defining the maximum right of way for Prairie Avenue, between Manchester Boulevard to the north and Hardy Street to the south, as 132 feet.

Third, a description of the proposed Project, including its connection to the Metro Crenshaw/LAX Line, would be added to the description of light rail facilities in the City.

17 City of Inglewood, *General Plan,* "Circulation Element" (1992), accessed March 2019, https://www.cityofinglewood.org/DocumentCenter/View/128/Circulation-Element-1992-PDF.

Fourth, changes to the descriptions of the street environment, parkways, medians, and on-street parking on Market Street, Manchester Boulevard, and Prairie Avenue that would be affected by the Project would be made.

Fifth, because insufficient right-of-way is available on Prairie Avenue between Manchester Boulevard and Century Boulevard to accommodate bicycle lane, modification of the Bike Route Plan is proposed to increase the multimodal options and connections for residents and employees along this section of Prairie Avenue.

Safety Element

The Safety Element[18] would be amended to include descriptions of the proposed Project components including the guideway, stations MSF and TPSSs. Specifically, the proposed Project will be added to the element as a Critical Facility. The description of transportation routes would be updated to incorporate the presence of proposed Project components along its alignment.

3.8.2 Municipal Code Amendment

An amendment to Chapter 12, Planning and Zoning, of the IMC is proposed to create a Transportation Corridor Overlay Zone (TC Overlay Zone) that would apply to the proposed Project. A Zone Change and a Zoning Code Amendment are both required to establish the TC Overlay Zone. The TC Overlay Zone would modify the underlying zones to allow the development and operation of the proposed Project and all components on the properties in the underlying zones that overlap with the Project route The TC Overlay Zone would define the uses permitted in this overlay zone area and applicable supplemental development standards for the ITC facilities, and the City's design review process for the ITC Project.

The permitted uses for the TC Overlay Zone would be modeled upon, and expand upon, those contained in the City's existing Transportation Corridor (T-C) Zone described in Section 12-38.50[19] of the IMC, which provides the zoning framework for the Metro Crenshaw/LAX Line within the City, with adjustments made to accommodate the elements necessary for an above-grade guideway, the MSF, the TPSSs, the multilevel stations, vertical circulation elements and connecting walkways and bridges, and all of the related supporting facilities and infrastructure. The proposed T-C-O Zone would allow the following as permitted uses (the TC Overlay Zone Uses):

18 City of Inglewood, *General Plan,* "Circulation Element" (1992), accessed March 2019, https://www.cityofinglewood.org/DocumentCenter/View/128/Circulation-Element-1992-PDF.

1. The construction, operation and maintenance of any at-grade or elevated fixed guideway transportation system, including, without limitation, light rail (which may consist of an automated people mover system, automated guideway transit, monorail, and/or any other comparable system that may be steel-wheel/steel rail, rubber tired or magnetically levitated, supported on rail(s) from below, straddling, or suspended from overhead beam(s) from above), trolley, busway (including rapid transit), and/or comparable transit or transportation system, including public and private rights-of-way, easements, underground utilities, tracks, spurs, guideways, footings, support columns, support beams, and any appurtenant facilities, improvements, and equipment, including stations (which may be at-grade or elevated and comprise of one or multiple levels), maintenance facilities, storage facilities, operations control centers, related administrative and office facilities, restrooms, vertical and horizontal circulation elements (such as stairs, escalators, elevators, and passenger bridges and walkways), plazas or similar open space areas, platforms, signals, utility and storage areas, power distribution elements, electrical or traction power substations, rolling stock, and the like, that are necessary and related to the operation, maintenance and security of the transportation system.
2. Parking facilities (surface, subsurface, or structured) for transportation facilities (including such facilities' employees and users) or for use by adjacent businesses or public facilities.
3. Mobility hubs (which may be co-located with parking facilities) and multimodal pick-up and drop-off facilities.
4. In conjunction with the uses permitted in subsections (1) - (3) of this Section, property in the TC Overlay Zone may be landscaped and otherwise improved with ornamental fencing, ornamental lighting, directional and informational signage, public information and communications signage systems and all related facilities, fiberoptics, emergency lighting, security systems, rest areas and seating, café or food service carts, service kiosks or structures, retail, and other similar streetscape improvements, public amenities or other uses typically found in public transit stations.
5. Station sites and maintenance or storage facility sites in the TC Overlay Zone may be jointly developed with station facilities and commercial, residential, public facility, or mixed uses.
6. As interim uses only during periods of construction, construction staging and laydown (including storage of all equipment and materials), fencing, construction-related office, and employee space (which may include restrooms and a canteen and/or food vendor area), interim parking, and ancillary temporary structures and any other temporary use approved by the Director of Public Works as reasonably related to any of the foregoing temporary or permanent uses or otherwise in the public interest.

The TC Overlay Zone would also define development standards applicable to these permitted uses including the following:

- A height limit of 110 feet for station sites, 75 feet for the MSF site, and 75 feet for all other improvements, structures, and elements of the propose Project, which include the guideway. These are height limits calculated above finished grade.
- No minimum setbacks (0' setback).
- No minimum street frontage requirements.
- Parking and public art requirements as specified in the ITC Design Guidelines.

Additionally, development of the TC Overlay Zone Uses within the TC Overlay Zone will be subject to the ITC Design Guidelines.

The TC Overlay Zone would specify that where the zone is overlaid on a property, or portions thereof, any such area used to satisfy a minimum setback requirement in the underlying zone will still continue to be treated as a legal setback area and shall continue to be counted within any density calculations under the underlying zone, regardless of whether such area is developed with the TC Overlay Zone Uses or dedicated as a public right-of-way.

The TC Overlay Zone boundaries would be coterminous with the proposed Project footprint and would also extend up to the greater of (x) 30 feet on each side of the guideway and (y) 10 feet on each side of the public right-of-way, in each case along the entire alignment of the guideway.

3.8.3 Subdivision Actions, including Lot Line Adjustments, Parcel Maps, and Tract Maps

The proposed Project would require changes to the configuration and use of existing parcels owned by the City or proposed to be acquired by the City where construction of the proposed Project is proposed. Reconfiguration of existing parcels will occur as necessary either through lot line adjustments or through review and approval of a parcel or tract map.

3.9 REQUIRED APPROVALS AND ACTIONS

The proposed Project would require a number of actions and reviews by the City, acting as Lead Agency, and other local, regional, and state agencies acting as Responsible Agencies as described below.

3.9.1 Lead Agency–City

Pursuant to Section 15051 of the State CEQA Guidelines, the City is acting as Lead Agency for the environmental review of the proposed Project. As such, it has responsibility for the approval of the Project and a number of other related actions:

- Certification of the Final EIR for the Inglewood Transit Connector Project and adoption of the Mitigation Monitoring and Reporting Plan, CEQA Findings of Fact, and, if necessary, a Statement of Overriding Considerations;
- Approval of the proposed General Plan Amendment, consisting of changes to the City General Plan Land Use Element, Circulation Element, and Safety Element.
- Approval of an amendment to Chapter 12 (Planning and Zoning) of the Inglewood Municipal Code to add the Transportation Corridor Overlay (T-C-O) Zone.
- Preparation of a Project-specific Stormwater Management Plan or Standard Urban Stormwater Mitigation Plan for approval;
- Approvals of lot line adjustment(s), parcel map(s), and tract map(s) as needed;
- Approval of agreements and/or resolutions necessary to acquire the property necessary for construction and operation of the Project, in fee simple or through easements, licenses, air rights, leases, or other means of access, including through eminent domain; [confirm that eminent domain counsel has approved.]
- Approval of the ITC Design Guidelines
- Approval of a contract or contracts for the design, finance, construction, and operation of the proposed Project.
- Approvals for federal, State, or local financing plans or grants; and

In addition to the above, ministerial approvals may be required as follows:

- Grading permits, building permits, haul route approval, and other permits issued by the Department of Building and Safety for the Project and any associated Department of Public Works permits (including encroachment permits) for infrastructure improvements;
- Tree removal permits; and
- Noise permit for Construction and Building Hours extension.

3.9.2 Responsible Agencies

The following State, regional, and other agencies have jurisdiction or review authority over components included in the proposed Project:

- SCAQMD would review permits for equipment regulated by SCAQMD;
- County of Los Angeles (as the City's contractor) Fire Department approval;
- Permits or approvals required from the Los Angeles Regional Water Quality Control Board (LARWQCB), which may include but are not be limited to: (1) General Construction Stormwater Permit; (2) Standard Urban Stormwater Mitigation Plan; (3) Industrial Stormwater General permit; and (4) Submittal of a Recycled Water Report to the LARWQCB for the use of recycled water as a dust control measure for construction;
- The Los Angeles County Sanitation District has authority for a Sewer Main Re-Alignment Permit, if applicable;
- The Los Angeles County Flood Control District has authority for a Storm Drain Realignment/Connection Permit, if applicable;
- California State Transportation Agency (CalSTA) for oversight and compliance for the Transit and Intercity Rail Capital Program (TIRCP) grant;
- The Southern California Edison Company for any changes to the electrical distribution and service system; and
- Other federal, State, or local approvals, permits, or actions that may be deemed necessary for the Project.

4.0 ENVIRONMENTAL IMPACT ANALYSIS

4.0.1 INTRODUCTION

This EIR evaluates the physical environmental effects that would potentially occur from implementation of the proposed Project. The structure of the technical sections included in this section is discussed below, and definitions of key terms that are used throughout this EIR are provided. Comments that were received during the scoping period are summarized herein as well. In addition, this section includes a description of certain possible environmental impacts that are typically considered under CEQA but are not analyzed in detail in this EIR because it was determined the proposed Project would have no impact. This section also provides a discussion of the Adjusted Baseline Environmental Setting and the identification of other past, present, or reasonably foreseeable projects that are used in the analysis of cumulative impacts throughout this chapter.

4.0.2 DEFINITIONS OF TERMS USED IN THE EIR

This EIR uses a number of terms that have specific meaning under CEQA. Among the most important of the terms used in the EIR are those that refer to the significance of environmental impacts. The following terms describe environmental effects of the proposed Project:

Significance Criteria

A set of criteria used by the lead agency (City of Inglewood) to determine at what level or threshold an impact would be considered significant. Thresholds of significance are identifiable quantitative, qualitative, or performance levels of a particular environmental effect that are supported by substantial evidence.[1] Thresholds of significance used in this EIR include those standards provided by the City, unless otherwise specifically defined.

- **No Impact:** No impact means that the proposed Project would result in no direct or indirect adverse changes (or impacts) to the environment, with respect to the applicable significance criterion. A project impact with a no impact determination would also not contribute to a cumulative impact. Where the proposed Project would not have an impact, the impact statement states this definitively.
- **Less-than-Significant Impact:** A project impact is considered less than significant when the physical change caused by the proposed Project would not exceed the applicable significance criterion.
- **Potentially Significant Impact:** A potentially significant impact is identified where the proposed Project may cause a substantial adverse change in the environment, depending on certain unknown conditions related to the proposed Project or the affected environment. For CEQA purposes, a potentially significant impact is treated as if it were a significant impact. A project impact is considered

1 CEQA Guidelines section 15064.7.

potentially significant if the proposed Project is anticipated to exceed identified standards of significance thereby result in in a substantial adverse change in the physical conditions of the environment. Significant impacts are identified by the evaluation of project-related physical change compared to specified significance criteria.

- A significant impact is defined as "a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance."[2] In instances where potentially significant impacts are identified, the EIR must consider whether mitigation measures (as defined below) or alternatives to the proposed Project would reduce those impacts.
- **Significant and Unavoidable Impact:** A project impact is considered significant and unavoidable if it would result in a substantial adverse physical change in the environment that cannot be feasibly mitigated to a less-than-significant level.
- **Cumulative Impact:** Under CEQA, a cumulative impact refers to "two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts."[3] "A cumulative impact consists of an impact which is created as a result of the combination of the project evaluated in the EIR together with other projects causing related impacts."[4] A project has "cumulatively considerable" environmental effects (i.e., is significant) when "the incremental effects of [the] project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects."[5]

Mitigation Measures

Where a potentially significant impact or significant and unavoidable impact is identified, feasible mitigation measures that could minimize the identified significant adverse impact are required.[6] A mitigation measure is an action that could be taken that would avoid or reduce the magnitude of a significant impact. CEQA Guidelines section 15370 defines mitigation as:

a. Avoiding the impact altogether by not taking a certain action or parts of an action;

b. Minimizing impacts by limiting the degree of magnitude of the action and its implementation;

c. Rectifying the impact by repairing, rehabilitating, or restoring the affected environment;

d. Reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action; and

e. Compensating for the impact by replacing or providing substitute resources or environments, including through permanent protection of such resources in the form of conservation easements.

2 2020 California Environmental Quality Act (CEQA) Statute and Guidelines (CEQA Guidelines) section 15382.
3 CEQA Guidelines section 15355.
4 CEQA Guidelines section 15130(a)(1).
5 CEQA Guidelines sections 15065(a)(3), 15130(a), 15064(h)(1).
6 CEQA Guidelines section 15126.4.

4.0.3 SECTION FORMAT

This section is divided into technical sections (e.g., **Section 4.1: Aesthetics**) that present for each environmental resource issue area the regulatory setting, the physical environmental setting, standards of significance from which impacts are measured, analytical methods, an evaluation of potential impacts to the environment, and, where required, potentially feasible mitigation measures for identified significant impacts. Each section includes an analysis of project-specific and cumulative impacts for each issue area.

The following topic areas are addressed in this section:

- Aesthetics
- Air Quality
- Biological Resources
- Cultural Resources
- Energy Resources
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Land Use and Planning
- Noise and Vibration
- Population, Employment, and Housing
- Transportation and Traffic
- Tribal Cultural Resources
- Utilities

The topical environmental sections each begin with a description of the proposed Project's **regulatory setting** and the **environmental setting** (existing conditions) as it pertains to a particular issue. The environmental setting provides a point of reference for assessing the environmental impacts of the proposed Project.

- The regulatory setting presents relevant information about federal, State, regional, and/or local laws, regulations, plans or policies that pertain to the environmental resources addressed in each section.
- The environmental setting describes existing conditions at the time the NOP was circulated for the proposed Project (July 2018). An **adjusted baseline** is considered in this EIR (see discussion below in *Section 4.5*) to account for nearby development in the Los Angeles Sports and Entertainment District (LAESD), Hollywood Park Specific Plan (HPSP), and Inglewood Basketball and Entertainment Center (IBEC) areas.
- Each technical environmental section includes a discussion of whether there are any inconsistencies between the proposed Project and applicable general plans, specific plans, and regional plans.

Next, each section presents **significance criteria**, which identify the standards used by the City to determine the significance of effects of the proposed Project. CEQA Guidelines state that "a lead agency may consider thresholds of significance previously adopted or recommended by other public agencies or

recommended by experts, provided the decision of the lead agency to adopt such thresholds is supported by substantial evidence."[7]

A **methodology** and **assumptions** description in each section presents the analytical methods and key assumptions used in the evaluation of effects of the proposed Project and is followed by an **impacts** and **mitigation measures** discussion.

The impact and mitigation portion of each section includes one or more impact statements. An explanation of each impact is followed by an analysis of its significance. The impact discussion ends with a concluding statement regarding the significance of the impact. Direct, indirect, short-term, long-term, on-site, and/or off-site impacts are addressed, as appropriate, for the environmental issue area being analyzed. Depending on the significance criteria, the impact analysis may consist of a qualitative discussion, a quantitative analysis, or a combination of both. Detailed technical appendices are also provided for several technical sections, where appropriate, and can be located at the end of the document.

Mitigation measures pertinent to each individual impact, if necessary, appear after the impact discussion section. The magnitude of reduction of an impact and the potential effect of that reduction in magnitude on the significance of the impact is also disclosed. Potential **mitigation measures** for potentially significant impacts are identified as appropriate. The description of mitigation measures concludes with the **level of the significance** of the impact after application of the mitigation measure(s): either implementation of the mitigation measure(s) would reduce the impact to a less- than-significant level, or the impact would remain significant and unavoidable after implementation of all potentially feasible mitigation measures.

An example of the format of each of the is shown below.

Impact 4.X-1: Impact statement (significance conclusion)

Construction and/or Operation

In the impact statement, terminology is used to indicate the level of significance of the impact. If an impact is less than significant, then the impact statement would say that the proposed Project "could" affect a resource. If an impact is potentially significant or

7 CEQA Guidelines section 15064.7.

significant and unavoidable, then the impact statement would say that the proposed Project "would" affect a resource.

A discussion of the proposed Project's impact is provided in paragraph form. A statement level of significance before application of any mitigation measures is provided.

Mitigation Measures

MM XX-X *Mitigation measure presented in italics and numbered to match the impact number.*

Level of Significance After Mitigation

This paragraph describes how the mitigation measure(s) reduces the impact and identifies the residual level of impact.

Cumulative Impacts

A cumulative impact is provided for each section. As previously noted, a cumulative impact consists of an impact which is created as a result of the combination of the project evaluated in the EIR together with other projects causing related impacts." The proposed Project's impacts are evaluated against other related projects that are within the same geographic area that is appliable to the topic (i.e., water service area, air basin, etc.) A project has "cumulatively considerable" environmental effects (i.e., is significant) when "the incremental effects of [the] project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects."

4.0.4 COMMENTS RECEIVED DURING SCOPING

An Original Notice of Preparation (Original NOP) and Original Initial Study (Original IS) was issued July 16, 2018, and mailed to the office of Planning and Research (OPR), trustee or responsible agencies identified for the proposed Project, adjacent cities and counties, relevant Native American tribes, and those requesting such notice. In addition, notices were published in newspapers with circulation in the local area and surrounding region. The City provided a 30-day commenting period from the issuance date of both the Original NOP and Revised NOP to allow State and local agencies, as well as the public, to submit written comments regarding both to the City.

Subsequent to the release of the Original NOP, a Revised NOP and Revised IS were released on September 10, 2020 that considered the potential impacts associated with the current proposed Project which was modified since the release of the Original NOP and Original IS.

As a result of the comments received and refinements and modifications to proposed Project identified in the Original NOP and Original IS, a Revised NOP and IS were re-circulated for public review and comment

on September 10, 2020. Subsequent to the circulation of the Original IS, the State of California Office of Planning and Research (OPR) updated and revised the thresholds contained in the State CEQA Guidelines Appendix G. The Revised IS was updated to address the updated Appendix G checklist that became effective on December 28, 2018.

The Revised NOP and Revised IS reflect the following refinements and modifications made to the proposed Project:

- Changes to proposed Project alignment from an approximately 1.8-miles long with 5 stations to an approximately 1.6-mile long with 3 stations. The revised alignment follows the same route as the original from Market Street and Florence Avenue to Manchester Boulevard to Prairie Avenue terminating at the intersection of Prairie Avenue and Hardy Street.
- Refinements and modifications to the proposed stations as follows:
  - Modify the proposed Project to reduce the total number of stations from the five stations previously considered to the three stations. The original five station locations were at the following:
    - Market Street Station: at the intersection of Market Street and Regent Street on Market Street;
    - Manchester Boulevard Station: between Hillcrest Boulevard and Spruce Avenue on Manchester Avenue adjacent to the proposed Project's maintenance and storage facility (MSF);
    - Forum Station: north of the intersection of Prairie Avenue and Pincay Drive on Prairie Avenue;
    - Hollywood Park Station: between Arbor Vitae Street and Hardy Street on Prairie Avenue adjacent to the City's proposed intermodal transit facility (ITF) located on the southeast corner of Prairie Avenue and E. Arbor Vitae Street; and
    - Century Boulevard Station: at the intersection of Prairie Avenue and Century Boulevard on Prairie Avenue.
  - The new locations for the three stations are located at:
    - Market Street/Florence Avenue Station: at an existing commercial plaza on the southeast corner of the intersection of Market Street and Florence Avenue between Market Street and Locust Street;
    - Prairie Avenue/Arbor Vitae Street Station: at the intersection of Prairie Avenue and Pincay Drive; and
    - Prairie Avenue/Hardy Street Station: at the intersection of Prairie Avenue and Hardy Street.
  - A pedestrian bridge linkage has been added to connect the Market Street/Florence Avenue Station with the Metro Crenshaw line on the northside of Florence Avenue.

- Removal of the Intermodal Transit Facility (ITF) as part of the proposed Project; the City is proceeding with the ITF project separately.
- Reduce the potential number of traction power substations from three to two. One would be co-located with the proposed Project's Maintenance and Storage Facility (MSF) facility and the other would be located on the City's ITF site on Prairie Avenue.

The Revised NOP and accompanying Revised IS was recirculated from September 10, 2020 to October 12, 2020 for public review.

(For copies, see **Appendix 2.0.1a: Recirculated Notice of Preparation (Recirculated NOP)** and **2.0.1b: Original Notice of Preparation**; **Appendix 2.02a: Recirculated Initial Study (IS)** and **2.0.2b: Original Initial Study**; and **Appendix 2.0.3: Summary of Comments Received on the Recirculated and Original NOP and IS Memorandum**).

In response to the Original NOP and the outreach efforts, the City of Inglewood received a total of nine comment letters regarding the proposed Project.

In response to the Original NOP and Original IS, a total of three State agencies, five regional agencies, and one local agency submitted comments on the proposed Project. In addition, 17 written comments were provided during the public scoping meeting held on July 26, 2018. A number of scoping- related comments were also received after the commenting period has closed.

In response to the Revised NOP and Revised IS, a total of two State agencies, four regional agencies, and two local agency submitted comments on the proposed Project. In addition, three written comments were also received from the general public.

The following are the issues and concerns noted in the comments received:

Proposed Project Alignment and Operation

The Original NOP identified a potential option for the proposed Maintenance and Storage Facility site at Kelso School. Representatives of the Inglewood Unified School District (Inglewood USD) raised issues regarding the proposed Project's support facilities, and stated that any acquisition or demolition of the Kelso Elementary School property to implement the proposed Project would have an impact on district facilities. In response to the Revised NOP, which identified a different proposed site for the Maintenance and Storage Facility, Inglewood USD indicated support for the Project and requested analysis of the potential effects of the proposed Project on school facilities.

In regard to public comments, several commenters voiced concerns, suggestions, and inquiries regarding the final alignment and operation of the proposed Project. Commenters suggested a number of

modifications to alignment and support facility alternatives. Suggestions included adding connection to the I-105 freeway; creating an alignment along Locust Street; utilizing a portion of Edward Vincent Junior Park for the maintenance and storage facility (MSF); and incorporating the MSF and Intermodal Transportation Facility (ITF) into the Inglewood Basketball and Entertainment Center (IBEC) due to less interference with traffic, available open space, and optimal access. Further, one commenter noted that more alternatives should be considered to provide more economic development to all of the City, including Market Street.

In terms of operation of the proposed Project, one commenter noted that a station at Market Street and Florence Avenue would be a major benefit to people connecting to other locations and shopping. Another commenter stated that displacing businesses and/or residences should be avoided, and that by removing the Vons shopping center, a source of healthy and organic produce would be eliminated. Other commenters expressed concerns about operation of the proposed Project, including where users would park and whether there would be fares on event and nonevent days. Another commenter would like the proposed Project to be free for seniors and lower income people. One commenter expressed concern regarding financing the proposed Project and questioned whether funding would come from property taxes, sales taxes, or parcel taxes.

Construction Phasing and Impacts

The physical impacts of construction activity were a concern voiced by several public commenters. Comments included concerns that heavy machinery and construction operations would damage or crack adjacent properties; potentially cause loss of rental income due to undesirability of rental properties near an active construction zone; and disturb current tenants.

Inglewood USD representatives stated that any acquisition or demolition of the Kelso Elementary School property to implement the proposed Project would have an impact on district facilities by shutting down the school and requiring the construction of a new school for 523 displaced students. In response to the Revised NOP, which identified a different proposed site for the Maintenance and Storage Facility, Inglewood USD indicated support for the Project and requested analysis of the potential for aesthetics, air quality, hazards and hazardous materials, noise, traffic, vibration, safety, and utility impacts on school facilities.

Mobility Issues

Caltrans recommend the incorporation of multimodal and complete street transportation elements that would actively promote alternatives to car use and better manage existing parking assets. The recommendation aligns with Caltrans' support for transportation and land use that reduces Vehicle Miles traveled (VMT) and Greenhouse Gas (GHG) emissions by shortening trip lengths and achieving a high level

of nonmotorized travel and transit use. Caltrans also support the implementation of pedestrian safety measures such as road diets and other traffic calming measures.

In addition, one public commenter concerned with mobility issues recommended that the proposed Project be free for seniors and low-income people. In addition, one commenter suggested that a zone limited to pedestrians be extended from the proposed Metro Crenshaw/LAX Line station in downtown Inglewood to other areas of the alignment.

Policy, Plan, and Program Consistency

Southern California Association of Governments (SCAG) recommends the incorporation of the proposed Project into the Regional Transportation Plan (RTP)/Sustainable Community Strategy (SCS) project list in order to ensure project access to State or federal funding. SCAG also recommended that the proposed Project recognize and consider RTP/SCS goals.

Public Services

The County of Los Angeles Fire Department (County Fire) is concerned for sufficient ingress/egress access points for the circulation of traffic and emergency response issues. County fire requests alternative route (detour) plans with a tentative schedule of planned closures prior to the beginning of construction. Disruptions to water service shall also be coordinated with County Fire to ensure alternative water sources would be provided.

Transportation Impacts

A number of comment letters were related to the proposed Project's impacts on transportation in the area. Public comments praised the potential ability of the proposed Project to provide easy access from the Los Angeles County Metropolitan Transportation Authority (Metro) system to LAX for both residents and customers near the proposed Project. A primary concern was the potential for increased traffic throughout the City due to construction and any roadway modifications.

Public Utilities Commission stated that the proposed Project may disrupt the heavily used roadway network in the surrounding community and that potential impacts should be identified, discussed, and evaluated for necessary safety improvements and mitigations at each proposed construction stage. This includes considering traffic circulation and queuing, level of service, emergency service response, and Americans with Disabilities Act (ADA) compliance. Further, Public Utilities Commission stated that the automated people mover (APM) trains must comply with California Public Utility Commission (CPUC) rules and regulations, CPUC General Orders, and American Society of Civil Engineers Automated People Mover Standards.

Additionally, one public commenter expressed concern regarding lost pedestrian access along Market Street. Caltrans also touched on this point by stating that the proposed Project should incorporate multimodal and complete streets transportation elements that would actively promote alternatives to car use and better manage existing parking assets, requesting that the City evaluate the proposed Project for access problems, vehicle miles traveled, and service needs that may need to be addressed.

Tribal Resources Impacts

The Native American Heritage Commission (NAHC) recommends lead agencies consult with all California Native American tribes that are traditionally and culturally affiliated with the geographic area of the proposed Project in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. NAHC pointed out that the proposed Project would be required to comply with AB 52 and SB 18.

Utility Impacts

The West Basin Municipal Water District (West Basin) notified the proposed Project that most West Basin recycled water distribution pipelines are located at least 3.5' below ground and within the public right-of-way. If a relocation of the pipelines would be needed, a request should be submitted at least 6 months in advance of the required relocation. Additionally, the Kenneth Hahn Lateral project by West Basin is investigating opportunities to provide recycled water from the existing 36-inch pipeline that ends at the intersection of Prairie Avenue and Florence Avenue, in the City of Inglewood, to Kenneth Hahn State Park, Baldwin Hills area, and into Culver City. The complete Kenneth Hahn Lateral Feasibility Study is available upon request.

The County of Sanitation Districts of Los Angeles County (Sanitation District) is concerned the proposed Project may impact existing and/or proposed Sanitation District facilities (e.g. trunk sewers, recycled waterlines, etc.) over which it would be constructed. Sanitation District facilities are directly under and/or cross directly beneath the proposed Project elevated guideway and stations. The Sanitation District requests the proposed Project to submit project plans and specifications that incorporate the Sanitation District' facilities within the area of the proposed Project. Once the proposed Project plans and specifications are submitted, the Sanitation District can issue a detailed response and provide permit for construction.

The issues raised in these comments are addressed as appropriate in the EIR under the applicable environmental topic.

4.0.5 ADJUSTED BASELINE

The CEQA Guidelines provides that an EIR must include a description of the physical environmental

conditions in the project vicinity.[8] It also allows for a lead agency to define existing conditions by conditions expected when the proposed Project becomes operational, when supported by substantial evidence.

Development Projects

The proposed Project is not expected to be complete and operational until 2026. At this time, the City has approved construction plans or issued building permits for, and construction has commenced on, significant portions of the LASED and HPSP located immediately east of the proposed Project and stations on Prairie Avenue.

These projects provide for substantial development that would occur since the release of the Revised NOP and prior to the start of construction and operation of the proposed Project. As such, the conditions of the existing baseline would be different from when the Revised NOP was released.

Construction and operation of the Adjusted Baseline projects would change the physical conditions that currently exist in the vicinity of the proposed Project for most of the environmental topics addressed in this EIR. Due to the reasonable certainty that the Adjusted Baseline projects would be constructed and in operation prior to construction and operation of the proposed Project, the City has determined that assuming the Adjusted Baseline projects in the baseline provides the most accurate picture of the proposed Project's impacts and that it would be misleading to disregard the Adjusted Baseline projects in the environmental setting.

Accordingly, the changes associated with Adjusted Baseline projects are considered as part of the Adjusted Baseline Environmental Setting, which is the baseline against which the proposed Project's potential impacts are measured. How these changes affect the environmental setting is further described in each topical section under the heading Adjusted Baseline Environmental Setting.

The development from the projects in the Adjusted Baseline is listed in **Table 4.0-1: Adjusted Baseline Projects**.

8 CEQA Guidelines section 15130(b)(1).

Table 4.0-1
Adjusted Baseline Projects

Land Use	Adjusted Baseline Projects	Estimated Operational Date
Hollywood Park Specific Plan (HPSP)		
Retail	518,077 SF	September 2021
Office	466,000 SF	September 2021
Residential	314 units	May 2021
NFL Stadium	70,000 seats (2,772,304 SF)	Summer 2020 – Now Open
Perform. Venue	6,000 seats	Fall 2020
Open Space	11.89 acres	Fall 2020
Civic Use	4 acres	Fall 2020

Roadways

A number of physical improvements are required as mitigations and/or conditions of approval of the Hollywood Park Specific Plan, are related to the City's ongoing Century Boulevard Improvement Plan, or are associated with the Crenshaw/LAX LRT project. These improvements either are under construction, or are approved and funded and scheduled; the improvements would be in place under all adjusted baseline condition scenarios. The full list of improvements is described further in **Section 4.12: Transportation.**

Transit

The Adjusted Baseline conditions transit network would differ considerably from existing conditions due to completion of the Crenshaw/LAX LRT prior to 2024. With this completion and the potential for a future Green Line South Bay extension, Metro is evaluating multiple operating scenarios, which would affect the routing of the trains, number of train cars, and potential peak and off-peak headways. Ridership forecasts for a 2025 condition were used to represent the Adjusted Baseline condition.

Metro is also studying changes to its bus system through the NextGen Bus study, but future changes to bus service are not yet defined and so would be speculative to assume. Therefore, the Adjusted Baseline conditions analysis assumes the existing bus routes that serve the area would remain in operation at opening year of the proposed Project.

Analysis Scenarios

To accommodate the Adjusted Baseline in the environmental analyses. The following scenarios have been included:

- Existing conditions (2018)
- Adjusted Baseline Conditions (2020)

- Proposed Project plus Adjusted Baseline
- Proposed Project (2026) Non-Event weekday conditions
- Proposed Project (2026) with and without weekday NFL game day
- Proposed Project (2045) weekday Non-Event conditions
- Proposed Project (2045) with and without weekday NFL game day

All scenarios are weekday PM events.

4.0.6 CUMULATIVE ASSUMPTIONS

Cumulative Impacts

The CEQA Guidelines[9] require that an EIR discuss cumulative impacts of a project when a project's incremental effect is cumulatively considerable.[10] As defined in the CEQA Guidelines,[11] a cumulative impact consists of an impact that is created as a result of the combination of a project evaluated in the EIR together with other past, present, and reasonably foreseeable projects causing related impacts. CEQA Guidelines section 15130(b) requires that the discussion of cumulative impacts shall "reflect the severity of the impacts and their likelihood of occurrence, but the discussion need not provide as great detail as is provided for the effects attributable to the project alone."

In each topical section of the EIR, an analysis of cumulative impacts follows the project-specific impacts and mitigation measures evaluation. An introductory discussion that identifies the cumulative impact methodology and defines the cumulative context being addressed in each respective analysis (e.g., the South Coast Air Basin, or the City) is included at the beginning of the cumulative impact analysis in each technical section. In some instances, a project-specific impact may be considered less than significant, but its contribution to a larger impact may be determined to be potentially significant when considered in combination with other cumulative development of the surrounding area or in combination with regional growth projections. In some instances, a potentially significant impact may result at the project level, but would not result in a cumulatively considerable contribution to a significant cumulative impact.

Cumulative Project List

The City has identified cumulative projects focused on those projects that were proposed as of August 2020. This time frame coincides with the commencement of the City's environmental review process for the proposed Project. **Figure 4.0-1: Cumulative Projects Map** identifies the locations of these cumulative projects. **Table 4.0-2: Cumulative Projects List** provides a list of all past, present, and reasonably foreseeable projects.

9 CEQA Guidelines section 15130(b)(1).
10 CEQA Guidelines Section 15130.
11 CEQA Guidelines Section 15355.

To understand the proposed Project's contribution to cumulative impacts, the City, in consultation with other surrounding jurisdictions, has assembled a list of other known past, present, and reasonably foreseeable cumulative projects in the vicinity of the proposed Project. Projects on this list consist of development projects within the City or other identified surrounding jurisdictions that have a pending development application, are approved, or are under construction, and transit and related infrastructure improvement projects that have been approved or proposed and under review.

4.0.7 SENSITIVE RECEPTORS

Sensitive receptors include, but are not limited to, hospitals, schools, daycare facilities, elderly housing convalescent facilities, and temporary housing (hotels and motels). These are areas where the occupants are more susceptible to the adverse effects of exposure to toxic chemicals, pesticides, and other pollutants. Certain population groups, such as children, elderly, and acutely and chronically ill persons (especially those with cardio-respiratory diseases), are considered more sensitive to the potential effects of air pollution than others.[12] As a result, certain land uses that are occupied by these population groups, such as residences, schools, playgrounds and childcare center, hospitals, rehabilitation centers, convalescent centers, and retirement homes are considered to be air quality sensitive land uses, i.e., air quality sensitive receptors.

Figure 4.0-2: Project Area Quarter Mile Buffer identifies the area of quarter mile area used to identify the sensitive receptors. Within one quarter mile of the proposed Project including the guideway, stations, MSF and TPSS sites, 61 sensitive receptors have been identified as shown in **Figure 4.0-3a-c: Map of Sensitive Receptors**.

12 South Coast Air Quality Management District, 1993. *CEQA Air Quality Handbook*. November 1993.

Table 4.0-2
Cumulative Projects List

NO.	PROJECT	ADDRESS	PROJECT DESCRIPTION
City of Inglewood			
1	Starbucks Drive-Thru Kiosk	1740 Centinela Avenue	Construct 900 SF Starbucks drive-thru kiosk
2	Commercial Building	721 N. La Brea Avenue	Demolish 1,210 SF and add 1,312 SF to an existing commercial building
3	Condominiums	329 E. Hazel Street	Development of 4-unit Condo with 10 parking spaces per SP-1229
4	Parking Lot Improvement	2616-2878 W. Imperial Highway	Renovation and adding 13,000 SF, façade and parking lot improvement of an existing shopping center
5	Condominiums	501 E. 99th Street	12 new condominiums
6	Apartments	704 N. Market Street	12 new residential apartment units
7	Senior Center	111 N. Locust Street	New Senior Center
8	Condominiums	664 E. Manchester Terrace	Four (4) new residential condominiums
9	Apartments	844 N. Centinela Avenue	Four (4) new residential apartment units
10	Apartments	125 E. Spruce Avenue	Seven (7) new apartment units with semi-subterranean parking
11	Manufacturing/Warehouse w/ Office	234 W. Hyde Park Boulevard	Construct new 140,185 SF manufacturing/warehouse building including 7,500 SF of office space
12	Parking Lot	279 W. Beach Avenue	Development of 190 parking spaces
13	Townhomes	573 1/2 E. Hyde Park Place	Construct three townhomes with 6 enclosed parking spaces
14	Senior Housing	508 S. Eucalyptus Avenue	40-unit senior affordable housing development
15	Residential Project	575 E. Hyde Park Boulevard	Three-unit two-story residential building
16	Office Project	401 W. Arbor Vitae Street	Addition of four new offices in office complex and one new bathroom, demolish existing bathroom and existing office space, and add 4 new parking spaces
17	Townhomes	333 N. Prairie Avenue	310 townhome units at the former Daniel Freeman site
18	Commercial Building	408 E. Warren Lane	New two-story 2,542 SF commercial building
19	Gas Station w/ Mini-Mart	8307 S. La Cienega Boulevard	Construct a new 3,636 SF structure (mini market and retail space) at an existing gas station operation
20	Mixed-Use Project	D3 SITE	243 units; 40,000 SF retail

NO.	PROJECT	ADDRESS	PROJECT DESCRIPTION
		(La Brea Avenue/Florence Avenue)	
21	Centinela Hospital	555 W. Hardy Street	1. West Tower: Upgrades including the remodel of the main building entrance and the south elevation and seismic upgrades in compliance with SB 1953 2. Electrical Upgrade: A campus-wide electrical upgrade that includes construction of a new 5,900 SF repair shop building and 4,200 SF electrical yard with three emergency generators and a 16,000 gallon underground fuel tank for 72 hour emergency power at the northeast corner of the campus on Flower Street 3. Emergency Department: A new 2,400 SF addition and redesigned front entrance to the Emergency Department including new admitting, triage, and waiting areas, and expanding the capacity of the Emergency Department by eight beds (total of 52 beds) 4. Loading and Delivery Areas: Other upgrades that includes the demolition of two building (totaling 6,200 SF), the partial demolition of a 4,670 SF building, addition, or rehabilitation of various buildings and relocation of the delivery and loading areas from the emergency room area to the rear of the campus
22	Hollywood Park Project (note; this project is also part of the Adjusted Baseline)	1050 S. Prairie Avenue	70,240-seat sport stadium; 6,000-seat performance venue; 2,500 du residential; 890,000 SF retail; 780,000 SF office; 300-room hotel; 24.95 acres open space; 4 acres civic site
23	Apartments	417-433 Centinela Avenue	116-unit apartment
24	Residential	3660 W. 107th Street	New 3 du with 6 car garage
25	Congregate Care	614 E. Hyde Park Boulevard	18-bed congregate living facility
26	Apartments	921 N. Edgewood Street	38-unit apartment
27	Townhomes	113-133 Plymouth Street	20-unit townhome development
28	Condominiums	316 Hardy Street	5-unit condominium development
29	Self-Storage Project	705-715 N. Centinela Avenue	81,613 SF, approximately 400-unit, five-story self-storage
30	Retail	101,125,139,140,150 Market Street	40,000 SF retail and 150 parking spaces

NO.	PROJECT	ADDRESS	PROJECT DESCRIPTION
31	Hotel Project	11111 S. Prairie Avenue	120-room hotel
32	Murphy Bowl Project (Clippers arena)	Yukon Avenue/Century Boulevard	18,500-seat venue with associated ancillary uses
33	Imperial/Crenshaw TOD	Imperial Highway/Crenshaw Boulevard	Transit oriented development plan
34	Westchester/Veterans TOD	Florence Avenue/Hindry Avenue	Transit oriented development plan
35	Downtown (Florence/La Brea) TOD (note; although proposed Project includes development of a station at this site with additional surface parking; it does not preclude development of the site as noted in the Downtown TOD)	Florence Avenue/La Brea Avenue	Transit oriented development plan
36	Fairview Heights (Florence/West) TOD	Florence Avenue/West Boulevard	Transit oriented development plan
37	Hollywood Park Phase II	1050 S. Prairie Avenue	Approximately 5,250,000 SF of office
38	Condominium Development	961 E. 68th Street	3-unit detached condominium
39	Multifamily Development	411 E. Hazel Street	18-unit multifamily building
40	Multifamily Development	222 W. Spruce Avenue	10-unit multifamily building
41	Multifamily Development	819 E. La Palma Drive	5-unit multifamily building
42	Condominium Development	417 N. Market Street	Two 6-unit condominium buildings
43	Congregate Living Facility	814 N. Market Street	Construction of a new 12 unit, 5,163 SF congregate health, residential care facility
44	Los Angeles Philharmonic Association - Youth Orchestra Program (YOLA)	101 S. La Brea Avenue	Los Angeles Philharmonic Association - Youth Orchestra Program that would serve students 6 - 18 yrs. Expand the existing structure to a venue that is approximately 25,500 SF. The venue would serve as the home for YOLA performances, special events showcasing guest artists and LA Phil's national education programs, and some other performances. There would be 350-500 students from Monday to Saturday and around 150 on Sundays
45	Apartment Building	3920 W. 108th Street	3-unit apartment building
46	Self-Storage Facility	943-959 W. Hyde Park Boulevard	Five-story self-storage facility (159,498 SF)
47	General Plan Amendment for Rental Car Facility	8911 Aviation Boulevard	General Plan Amendment for rental car facility (173,804 SF)

NO.	PROJECT	ADDRESS	PROJECT DESCRIPTION
48	General Plan Amendment to Incorporate Environmental Justice Element	Citywide	General Plan Amendment to incorporate Environmental Justice Element
49	Hotel	3900 W. Century Boulevard	Hotel renovation 4 units
50	Senior Housing and Pre-school	3320 W. 85th Street	65 unit senior housing and a 4,313 SF pre-school to replace existing church, pre-school (serving 70 students)
51	Multifamily	332 Stepney Street	8-unit multifamily building with 3 affordable housing units
52	Mixed-Use	336 W. Hillcrest Boulevard	62 unit mixed use development
53	Self-Storage Facility	3700 102nd Street	Five-story 79,415 SF self-storage facility
54	Condominiums	423 E. Warren Lane	44 units condos with 5 V.L.I. units
55	Hotel	3820 W. 102nd Street	300 room, fourteen-story hotel with 349 parking spaces
56	Multifamily	715 N. Marlborough Avenue	Conversion of 3 offices into residential units with one affordable unit
57	Apartments	220 E. Hazel Street	7,161 SF, 4 unit apartment building with subterranean parking
58	Commercial Building	970 W. Manchester Boulevard	1,800 SF car/bus wash and above ground fueling station within a car rental site
59	Apartments	1013 E. La Palma Drive	Three-story apartment unit, three unit
60	Apartments	608 E. Queen Street	4-unit apartment building and parking
61	Commercial Building	455 N. Prairie Avenue	6,530 SF, two-story medical office building
62	Commercial Building	335 Glasgow Avenue	Auto rental facility
63	Apartments	1001 N. Welton Way	New 11-unit apartment building
64	Commercial Building	1031 Manchester Boulevard	Construct restaurant with outdoor dining for existing brewery
65	Multifamily	527 E. Hyde Park Boulevard	21-unit, four-story building with two affordable units
66	Fast Food Restaurant	230 W. Arbor Vitae Street	Construction of a new 899 SF fast food restaurant building
67	Multifamily	716 W. Beach Avenue	42,745 SF, 42 unit multifamily apartment (41 affordable units)
68	Townhomes	627 W. Hill Street	8-unit new townhomes
69	Multifamily	3362 Imperial Highway	3-unit three-story triplex
70	Starbucks	4801 Century Boulevard	185 SF addition for drive-thru only Starbucks coffee shop
71	Hotel	4049 Century Boulevard	145-room hotel
72	Multifamily	334 Stepney Street	4-unit condo subdivision

NO.	PROJECT	ADDRESS	PROJECT DESCRIPTION
73	Mixed-Use Project	317 S. La Brea	311 units (32 affordable and 5 live-work units); 22,000 SF commercial/retail; 361 parking spaces
74	Multifamily	11227 S. Prairie Avenue	400 units
City of Los Angeles			
75	Mixed-Use: Residential, Retail & Office	601 S. Ocean Front Walk	Mixed-use: SFDU (joint live/work), 5,254 SF retail and 22,738 SF office
76	Marina Island Mixed-Use: Apartment & Office	5000 S. Beethoven Street	Mixed-Use: 156-unit apartment and 33,484 SF office
77	Office Project	12575 Beatrice Street	250,000 SF office. Existing 23,000 SF office to be removed
78	Mixed-Use: Apartment & Restaurant	3644 S. Overland Avenue	New mixed-use: 92-unit apartment and 1,573 SF restaurant use (110 spaces)
79	Bakery with Retail & Restaurant	320 E. Sunset Avenue	Change of use from 4,675 SF commercial office to 6,000 SF bakery/retail/restaurant (4,737 SF indoor and 1,263 SF indoor and outdoor seating area)
80	Mixed-Use: Condominium & Retail	4363 S. Lincoln Boulevard	Consultation: proposed ten-story, 80 condominium units and 15,100 SF supermarket
81	Hotel	9800 S. Sepulveda Boulevard	Change of use from 118,490 SF office (nine-story building) to 178-room hotel with restaurant and spa ("O" Hotel)
82	Sterling West School	5206 W. Thornburn Street	New 50-student private school (grades 3-12)
83	Ballona Wetlands Ecological Reserve Restoration Project	Ballona Wetlands	Restoration of wetlands/ecological reserve
84	Wrapper Office Building Project	5790 W. Jefferson Boulevard	Construct ten-story 150,761 SF office building
85	Playa Vista Phase I	Jefferson Boulevard b/t Lincoln Boulevard and Centinela Avenue	1. Include 3,246 du, 1,570,000 SF of office use, 25,000 SF of retail use and 65,000 SF of community serving use 2. West site include 400,000 SF office use, 705 du apartment, 80 du condominiums, 80 du senior apartments
86	The Village at Playa Vista (Phase II)	s/o Jefferson Boulevard/Westlawn Avenue	Include 2,600 du, 175,000 SF of office use,150,000 SF of retail use, and 40,000 SF of community serving uses
87	Mixed-Use Apartment, Office, Retail, and Restaurant	10601 Washington Boulevard	126-unit apartment, 23 kSF office, 9 kSF retail, 9 kSF restaurant. Existing 10 kSF office to be removed
88	Mixed-Use Condominium and Retail	3115 S. Sepulveda Boulevard	(Preliminary) 175-unit condominium and 28 kSF retail. Existing 28 kSF discount store to be removed

NO.	PROJECT	ADDRESS	PROJECT DESCRIPTION
89	Condominium	11131 Rose Avenue	227-unit condominium. Existing 89-unit apartment to be removed
90	Hotel & Restaurant Project	305 Ocean Front Walk	24-room hotel and 2 kSF high-turnover restaurant
91	Restaurant & Retail	10612 National Boulevard	1,726 SF coffee shop (Coffee Bean) including 250 SF outdoor seating on existing vacant lot
92	LADPW Maintenance Yard	3233 Thatcher Avenue	Improve/expansion of the existing LADPW maintenance yard plus addition of 30 new employees to site
93	Mixed-Use Apartment, Retail and Restaurant	6719 Pacific Avenue	Mixed-use 35-unit townhomes, 2 kSF specialty retail and 2 kSF restaurant uses
94	Mixed-Use Condominium and Retail	138 Culver Boulevard	Mixed-use with 72-unit condominium, 13 kSF retail space and 1.5 kSF restaurant
95	LMU Master Plan	1 LMU Drive	Increase enrollment capacity to 7,800 students
96	Car Wash	9204 Airport Boulevard	15,380 SF car wash to replace existing car rental facility
97	Residential & Retail	580 Venice Boulevard	(Preliminary) 5-unit residential plus 5.7 kSF retail space
98	Restaurant	1020 W. Venice Boulevard	Proposed House of Pies sit-down restaurant land use (3,895 SF)
99	Mixed-Use: Apartment & Office	4140 S. Glencoe Avenue	New four-story, 67-unit apartment and 3,211 SF office building over 2-level parking garage
100	Mixed-Use: Apartment & Retail	7407 S. La Tijera Boulevard	New 140-unit apartment and 2,600 SF retail over 241-space parking garage
101	Mixed-Use: Hotel, Retail & Restaurant uses	1027 S. Abbot Kinney Boulevard	New 92-room hotel, 3,000 SF retail and 2,072 SF restaurant
102	Apartment	4090 S. Del Rey Avenue	New four-story, 51-unit apartment building over 3-level parking garage
103	Mixed-Use: Condominium & Office	4210 S. Del Rey Avenue	Proposed 136 condominium Units and 20,000 SF commercial office
104	Fast Food Restaurant w/ Drive-Thru	8521 S. Sepulveda Boulevard	New 3,999 SF Chick-fil-A fast food with drive-thru restaurant
105	OTIS College of Arts & Design	9045 S. Lincoln Boulevard	Relocation and consolidation of existing OTIS College Campus students, faculty and staff. 91,000 SF development (54,000 SF student housing with 240 total beds and 37,000 SF campus uses)
106	Mixed-Use: Condominium & Office	4091 S. Redwood Avenue	67 condominium Units and 7,525 SF commercial office building providing 141 parking spaces

NO.	PROJECT	ADDRESS	PROJECT DESCRIPTION
107	Apartments	3822 S. Dunn Drive	Seven-story, 86-unit apartment building over ground floor parking garage
108	Office	12777 W. Jefferson Boulevard	Commercial office expansion (49,950 SF)
109	Apartments	8740 S. La Tijera Boulevard	New 137-unit apartment building to replace existing 215-student Westchester Secondary Charter School
110	Jefferson & La Cienega Mixed-Use Development Project	3221 S. La Cienega Boulevard	Converting existing ABC Lot to a mixed-Use: 1,218-unit apartment, 200,000 SF office, 50,000 SF grocery store, 30,000 SF retail and 20,000 SF restaurant project
111	LAUSD Elementary School	2224 S. Walgrove Avenue	New 567-Student Elementary School (K-5) Immersive Mandarin Language program
112	Mixed-Use: Apartment, Mini-Warehouse & Office	4040 S. Del Rey Avenue	New 195-unit apartment; 15,000 SF office and 80,000 SF mini-warehouse (option 1) or 235-unit apartment and 15,000 SF office (option 2 preferred)
113	Charter Middle School	8540 S. La Tijera Boulevard	Charter middle school for max enrollment of 525 students
114	Howard Hughes Center	6801 Center Drive	600-unit apartment and 488,659 SF remaining development potential
115	LAX Landside Access Modernization Program (LAMP)	Los Angeles International Airport	Landside Access Modernization Program in Manchester Square
116	LAX Northside Project	Westchester Parkway b/t Pershing Drive and Sepulveda Boulevard	2.32 million SF of development including office, research and development, community/civic uses, recreation and open space
117	Mixed-Use: Apartment & Automotive Dealership	5747 S. Mesmer Avenue	New 400-unit apartment and 250,000 SF automotive dealership
118	Apartments	3739 S. Cardiff Avenue	New 74-unit building replaces existing 5 du
119	Manchester Urban Homes Project	8721 S. Broadway	62 SF affordable and 46 affordable family units and 4 kSF office
120	South LA Redevelopment 5B Office	1636 W. Manchester Avenue	68,250 SF office
121	South LA Redevelopment 6A	5975 S. Western Avenue	225,000 SF industrial
122	Shopping Center	8400 S. Vermont Avenue	180-du apartments, 50,000 SF retail, boarding school 20 faculty rooms and 200 dorm rooms
123	Bethany Square Mixed-Use	8415 S. Hoover Street	142-unit condominiums; 57-unit apartment; 11.55 kSF recreational center; 7.5 kSF retail; 1.5 kSF bank; 15.4 kSF office
124	Mixed-Use	9402 S. Broadway	49-unit senior housing, 25,000 SF
125	Convenience Store	7117 S. Vermont Avenue	3,000 SF retail

NO.	PROJECT	ADDRESS	PROJECT DESCRIPTION
126	Charter Middle School	8705 S. Western Avenue	Middle school, 616 students
127	Gas Station	5816 S. Western Avenue	Fueling positions: 12; additional 4 fueling positions and 1,835 SF convenience store
128	Car Wash & Laundromat	6100 S. Hoover Street	6-stall car wash, 2,328 SF
129	Gas Station	10000 S. Vermont Avenue	Fueling positions: 8; and 2,830 SF convenience store
130	Gas Station w/ Convenience Store	505 W. Century Boulevard	Fueling positions: 6
131	Apartments	6733 Sepulveda Boulevard	176 Units
132	Teledyne Office Project	12964 W. Panama Street	159,000 SF office
133	Jandy Creative Office and Parking	5405 S. Jandy Place	93,950 SF office
134	COU Warehouse to office	4721 S. Alla Road	118,352 gSF; COU warehouse (24,051 SF) to office with 7,926 SF office addition
135	Charter School	12870 W. Panama Street	Relocation of the Ocean Charter School; 532 students (K-8)
136	COU Office to Medical Office	12555 W. Jefferson Boulevard	20,981 gSF medical office
137	Office	11811 S. Teale Street	10,925 gSF; addition of two mezzanines 2,450 SF within an existing 8,475 SF building
138	Apartments	6711 S. Sepulveda Boulevard	180-unit apartment
139	New Smart & Final Supermarket	6855 S. La Cienega Boulevard	New smart and final 22,590 SF on existing vacant parking lot
140	Chick-Fil-A Fast Food Restaurant	5208 W. Centinela Avenue	New fast food restaurant with drive-thru 4,642 SF
141	Townhomes	10501 S. Buford Avenue	11-unit townhouse
142	Apartments	10609 S. Inglewood Avenue	9-unit apartment
143	Apartments	10907 S. Inglewood Avenue	4-unit apartment
144	Apartments	10136 Felton Avenue	19-unit apartment
145	Condominiums	5053 E. 109 Street	17-unit condominiums
146	Restaurant	5301 W. Centinela Avenue	1.640 kSF restaurant
147	Residential	6109 Overhill Drive	2-unit duplex
148	Apartments	1034 W. 109th Place	9-unit apartment
149	Church	10335 S. Vermont Avenue	1.324 kSF church
150	Apartments	10401 S. Vermont Avenue	1-unit apartment and 0.25 kSF commercial use
151	Apartments	1023 W. 107 Street	8-unit apartment

NO.	PROJECT	ADDRESS	PROJECT DESCRIPTION
152	Mixed-Use	Bounded by Century Boulevard, La Cienega Boulevard, Arbor Vitae Street and Vicksburg Avenue	Office 300 kSF; hotel 400 rooms; retail 200 kSF; conference center 100 kSF
153	Theater and Education Center	10341 Graham Avenue	1000-seat theater and 12.417 kSF education center
154	Apartments	3831 W. Stocker Street	127-unit apartment
155	Mixed-use Development	3900 W. Martin Luther King Boulevard	Office 50 kSF; condominiums 200 units; college 3,600 students
156	Senior Housing	4018 S. Buckingham Road	130-unit senior housing
157	Middle School	4115 W. Martin Luther King Boulevard	500 middle school students
158	Apartments	4252 S. Crenshaw Boulevard	111-unit apartment
159	Mixed-use	5950 W. Jefferson Boulevard	Office 64 kSF; retail 4 kSF; quality restaurant 2 kSF; high-turnover restaurant 2 kSF
160	Mixed-use	6024 W. Jefferson Boulevard	Office 123.572 kSF; manufacturing 64.206 kSF; coffee shop with drive-thru 2.2 kSF
161	CVS Pharmacy	8620 Western Avenue	Construct 11,702 SF CVS pharmacy with drive-thru
162	Apartments	3130 Slauson Avenue	Construct a net of 782 du apartments
163	Self-storage Facility & Apartment	7366 Osage Avenue	Three-story, self-storage facility with 3 du apartment to replace existing 8,945 mortuary building
164	Hotel	5250 Century Boulevard	Change of use from office to 452-room hotel with restaurant (3 kSF) and office (8,225 SF)
City of Culver City			
165	Entrada Creative Office	6161 W. Centinela Boulevard	281,209 SF office
166	Bentley Condos	3873 Bentley Avenue	3 new condominium dwelling units, resulting in 2 net new dwellings
167	Mixed Use	6221 Bristol Parkway	Includes 750 du apartments and 21,000 SF retail. Existing 60,157 SF retail to be removed
168	Pennylane Mixed-Use	11924 Washington Boulevard	3,750 SF restaurant, 11,250 SF retail, and 98-unit apartment. Existing 26,445 SF office/commercial to be removed
169	Residential	3837 Bentley Avenue	Addition of 3 new attached condominiums (net addition of two units)
170	Lorcan O'Herlihy Architects	3434 Wesley Street	New TOD Mixed Use project with 15 du, and 14,237 SF of office/gallery on a vacant lot
171	Residential	3906 Sawtelle Boulevard	Addition of one (1) new unit to an existing triplex

NO.	PROJECT	ADDRESS	PROJECT DESCRIPTION
172	Harbor Freight	4545 Sepulveda Boulevard	28,534 SF retail
173	Residential	3832 Bentley Avenue	Four (4) new attached two-story residential condominium dwelling units (net addition of three (3) units) with subterranean parking
174	Residential	4109-4111 Duquesne Avenue	Addition of 2 residential units to existing duplex
175	Condominium/Townhome Redevelopment	4241 Duquesne Avenue	New three detached condominium/townhomes, resulting in 2 net new residential dwelling units
176	Residential	4180 Duquesne Avenue	New two-story, 4-unit condominium development
177	Residential	4234 Sawtelle Boulevard	Three (3) unit condominium with subterranean parking
178	Commercial Building	11198 Washington Place	New 3,850 SF commercial building and 500 SF outdoor dining
179	Office and Retail Building (Culver Pointe)	5800 Bristol Parkway	281,400 SF office
180	Gas Station Car Wash	11197 Washington Place	Conversion of existing vehicle repair and mini-mart into drive-thru car wash and construction of new 2,500 SF convenience store
181	Parcel B	9300 Culver Boulevard	118,000 gSF of office, retail, and restaurant space
182	Retail/Office	5450 Sepulveda Boulevard	14,000 SF commercial/retail building
183	TOD	8770 Washington Boulevard	Planned development/TOD mixed-use with 31,240 SF retail/restaurant and 115 du two-story residential units
184	Mixed-use	11281 Washington Place	New four-story mixed-use project with 4,898 SF retail and 14 residential dwelling units
185	Globe Housing Project	4044-4068 Globe Avenue	A total of 10 new residential dwelling units on existing vacant land. The site was previously developed with 7 single family homes
186	Residential	4227 Ince Boulevard	Subdivision of one (1) parcel into three (3) lots with two (2) units per lot, totaling six (6) du, resulting in five (5) net new units
187	Kayvon Mixed-Use Project	12712-12718 Washington Boulevard	New four-story mixed-use building with 5 for lease residential units, 3,414 SF retail, and subterranean parking. Approximately 2,340 SF existing/previous commercial uses
188	Retail/Restaurant Project	8511 Warner Drive	Five level parking structure with retail/restaurant. 51,520 SF of retail/restaurant uses. Parking Structure -307,522 SF
189	Residential	4034 La Salle Avenue	New two-story, 4-unit condominium development

NO.	PROJECT	ADDRESS	PROJECT DESCRIPTION
190	Residential and Nursing Home	3814 Lenawee Avenue	New 8 single family dwelling units and 95 unit, 110 bed, assisted living and memory care
191	Residential	3961 Tilden Avenue	Five (5) new attached two-story residential condominium dwelling units (net addition of two (2) units) with subterranean parking
192	Shell Car Wash	11224 Venice Boulevard	New 3,150 SF commercial building, which includes a 2,285 SF convenience store and 864 SF automated car wash facility
193	The Culver Studios	9336 Washington Boulevard	Net increase of 413,127 SF of office and support facilities
194	Residential	4118 Wade Street	New 4-unit townhome subdivision
195	Mixed-Use	9355 Culver Boulevard	Three-story mixed use building consisting of a ground level salon, mezzanine, and office totaling 2,947 SF, and four residential units on the third floor
196	Costco Expansion	13463 Washington Boulevard	A 31,023 SF expansion of an existing 142,152 SF retail warehouse and demolition of an existing 63,213 SF grocery store/supermarket. Addition of two fuel pumps at existing fueling station
197	Mixed-Use	3710 & 3750 S. Robertson Boulevard	141-unit apartment, 30,000 SF retail, 64,200 SF office. Existing FedEx distribution center to be removed
198	Office and Retail	11012-11014 Washington Boulevard	Two-story office and retail building totaling 3.385 kSF
199	Baldwin Site Mixed-Use Project	12803 Washington Boulevard	Mixed-use project consisting of 37 du and 7,293 SF of retail
200	Office	12038 Washington Boulevard	New 2,685 SF office building
201	Mixed-Use	9735 Washington Boulevard	New four-story 166,254 SF retail and office building, with 55,477 SF office, 12,379 SF retail and restaurant, and 228 parking spaces
202	Office Building	9919 Jefferson Boulevard	New three-story, 62,558 SF, office and research and development (laboratory) building, as well as a five (5) level parking structure containing 398 parking spaces, and associated site improvements
203	Washington & Helms Mixed-Use Development	Helms Avenue & Washington Boulevard	262-unit apartment, 69,500 SF office, 22,000 SF retail, 5,000 SF restaurant. Existing manufacturing, retail, auto body, residential uses to be removed
204	Residential	12464 Washington Place	New 3-unit residential condominium subdivision (net addition of two (2) units) with on-grade parking garages

NO.	PROJECT	ADDRESS	PROJECT DESCRIPTION
205	Residential	4115 Lincoln Avenue	New 2-unit condominium
206	Residential	3603 Wesley Street	Two new units with reduced backup aisle from parking spaces
207	Mixed-Use	8777 Washington Boulevard	Construct 4,500 SF of retail and 128,000 SF of office use. Demolish existing 12,485 SF of retail use and 4,731 SF of restaurant use
208	Mixed-Use	8888 Washington Boulevard	Construct new office building with 59,325 SF of office use, 2,878 SF of retail, and 3,184 SF of restaurant. Demolish existing 9,992 SF auto repair shop
209	Market Hall Project	NW & NE corner of Centinela Avenue/Washington Boulevard	15,526 SF specialty retail, 14,680 SF quality restaurant and 5,210 SF high-turnover restaurant
210	Triangle Site - Washington/National TOD	Corner of Washington Boulevard/National Boulevard	Transit oriented development to include 200 du, mid-rise apartments, 148-room hotel, 201,000 SF office, 24,000 SF specialty retail, 10,000 SF of high-turnover restaurant and 10,000 SF quality restaurant
211	Office & Retail	10000 Washington Boulevard	Renovation of existing nine-story office building. Convert ground floor lobby space to office, retail and restaurant space. New construction includes a new stand-alone 3,115 SF one-story restaurant building and a second floor within the atrium to add 5,500 SF of office space
212	Airport Marina Ford	6002 Centinela Avenue	27,568 SF addition consisting of 29 service bays and 12,900 SF of parts and service on vacant land
213	Caroline Condominiums	3440 Caroline Avenue	Two (2) new single family dwellings, resulting in one (1) net new dwelling unit
214	Modification to CUP, Enrollment Increase (The Help Group)	12095 - 12101 Washington Boulevard	Increase in enrollment from 600 to 650 students at an existing private school for special needs students, grades Pre-K through 12
215	Union 76	10638 Culver Boulevard	Convenience store 2,676 gSF
216	Stoneview Nature Center	5950 Stoneview Drive	A new four-acre park with a new one-story 4,000 SF building, with a multi-purpose room, staff office, and restrooms
217	Orchard Supply Hardware	11441 Jefferson Boulevard	Addition of 12,737 SF to an existing 19,406 SF commercial space used as a retail office supply store, to be used as a home improvement store, within an existing 36,538 SF

NO.	PROJECT	ADDRESS	PROJECT DESCRIPTION
			multi-tenant commercial building, and conversion of an existing 4,988 SF paint store into an indoor nursery area
218	Grandview Apartments	4025 Grand View Boulevard	New three-story, for lease housing development, consisting of 36 units, with subterranean parking. Previous/existing use includes 20 mobile home units
219	Retail Building	3030 La Cienega Boulevard	Addition of 1,250 SF of retail floor area to an existing 8,338 SF retail building, and new tandem parking
220	The Bridge	6066 Washington Boulevard	Addition of 3,246 SF of commercial (office) floor area with additional stacked/automated parking, to an existing 5,231 SF commercial building
221	4-Unit Sawtelle Condo's	4041 Sawtelle Boulevard	Four (4) new condominium dwelling units, resulting in three (3) net new dwelling units
222	Wouldows School CUP Modification	8509 Higuera Street; 8476 Warner Drive	Modification to previously approved CUP to allow a playfield and increase student enrollment by 100, from 475 to 575, consistent with School Master Plan
223	Auto Repair Facility	2926 La Cienega Boulevard	Four (4) bay auto repair use within existing car rental facility
224	4-Story Commercial	5645 Sepulveda Boulevard	New four-story office building approximately 3,193 SF retail on ground floor and 38,712 SF medical office, 5-level subterranean garage (198 parking spaces). Demolition of approximately 5,000 SF of existing commercial building.
225	Robertson Mixed Use	3727 Robertson Boulevard	New four-story mixed-use development, including approximately 8,135 SF of commercial floor area and eight (8) du. Demolition of approximately 6,800 SF 1-story commercial building and surface parking
226	Washington/Tivoli Mixed Use Project	13112-13114 Washington Boulevard	Mixed-use project with 1,536 SF of retail/restaurant (breakdown unknown at this time), 3,702 SF of office, and two (2) residential dwelling units. Previous/existing uses: vacant land
227	Automated Parking	5977 Washington Boulevard	New 48 space stacked parking facility on a property with a vacant commercial building, to serve as off-site parking for commercial building at 5965 Washington Boulevard
228	Stacked Parking - NFL Building	10950 Washington Boulevard	Addition of approximately 150 parking spaces through installation of two (2) to four (4) level parking stackers and surface lot restriping for tandem parking to support existing media offices. No additional square feet

NO.	PROJECT	ADDRESS	PROJECT DESCRIPTION
229	Jackson Condos	4051 and 4055 Jackson Avenue	New nine (9) unit residential condominium project replacing six (6) existing units, for a net increase of three (3) du
230	Jazz Bakery	9814 Washington Boulevard	New 200 seat Performance Theatre with a museum and bakery/café, 2-stories and estimated 7,500 SF, on a property developed with a vacant residential structure
231	Boutique Hotel	11469 Jefferson Boulevard	Demolition of 12,958 SF commercial shopping center. New five-story hotel of 183 rooms with restaurant and outdoor dining
232	Park Century School	3939 Landmark Street	New athletic field, 2,441 SF classroom building, and two-level subterranean parking, to allow an increase in student enrollment from 120 to 170 and increase of 20 staff people
233	ECF Site	8700, 8710, 8740, and 8750 Washington Boulevard	Preliminary concept - Mixed-use TOD with approximately 199 residential units and 40,00 SF of commercial space (17,250 SF of live/work space, 5,000 SF of restaurant, and 17,750 SF of retail), on a 3.06 to possibly 3.53 acre site, currently developed with multiple uses
234	Bristol Parkway Mixed Use	6201 Bristol Parkway	New mixed-use project, including 16,000 SF of commercial retail/restaurant space, 775 residential dwelling units, and 850 parking spaces on a six (6) acre site. Existing shopping center (approximately 60,000 SF of commercial floor area) to be demolished
235	Office Building	11259 Washington Boulevard	New three-story, 3,682 SF office building with at-grade parking, on an existing vacant site
236	Commercial Building	4333 Sepulveda Boulevard	Commercial building addition 2.971 kSF
237	Residential	9615 Lucerne Avenue	New 2-unit condominium
City of El Segundo			
238	Raytheon Campus Specific Plan Office Park Expansion	2100 El Segundo Boulevard	Existing 2,089 kSF light industrial to be replaced with 7.2 kSF retail, 3.5 kSF bank, 9 kSF full service restaurant, 7.3 kSF fast food restaurant, and 43 kSF medical office
239	Hotel	888, 892 and 898 N. Sepulveda Boulevard	Five-story 190-room, 107,090 gSF hotel on vacant parcel and operate airport park and ride facility on existing 840-space parking structure
240	Convert Warehouse to Office	2265 E. El Segundo Boulevard	Convert 3,050 SF existing warehouse to office use

NO.	PROJECT	ADDRESS	PROJECT DESCRIPTION
241	Wiseburn School District H.S.	201 N. Douglas	335,000 SF total for new high school after demo of 90,000 - 170,000 SF. New high school to contain 180,000 to 240,000 SF of building area and an enrollment of 1,200 students
242	Convert Parking to Hotel	199 Continental Boulevard	152-room hotel, 71,000 SF, to replace existing parking lot
243	Condominiums	711 Main Street	Existing 2-unit (2,758 SF) residential to be expanded to 4-unit (6,963 SF)
244	Office	400 Duley Road	73,000 SF office on vacant parcel
245	Industrial Addition	750 S. Douglas	Additional 4,986 SF to existing 15,076 SF industrial building
246	Corporate Office and Athletic Training Facility	2275 Mariposa Avenue	120,380 SF total new - 52,000 SF corporate office plus 68,380 SF athletic training facility
247	New Office	500 S. Douglas and 2330 Utah Avenue	New 80,000 SF office to replace existing 55,000 SF industrial use
248	Office	123 Nevada Street	New 4-unit commercial office condominium converted from 1,700 SF industrial uses
249	Office and Private Hotel	2125 Campus Drive	A 500-space parking structure, 49,111 SF office building and 104,415 SF office building replacing vacant land
250	Office Boeing S-50 Building Addition	1700 E. Imperial Avenue	Addition of 96.898 kSF to existing 169,390 SF building
251	Condominiums	535 Indiana Street	4-unit condominium to replace 1 single-family unit
252	Data Center/Office	445 N. Douglas Street	New 314,288 SF data center to replace 223,000 SF land use (106,000 SF office and 117,000 SF warehouse industrial)
253	El Segundo Corporate Campus	710 N. Nash Street	611,545 SF office plus 13,660 SF retail on an existing vacant parcel
254	Office	1950 E. Grand Avenue	93.569 kSF office
255	Hotel	101 Continental Boulevard	167-room hotel
256	Data Center/Office	444 N. Nash Street	Demolition of 11,769 SF and construction of 75,435 SF data center. New total: 180,422 SF data center
257	Hotel	1960 E. Grand Avenue	150-room hotel
258	Residential	425-429 Indiana Street	8 residential units
259	Condominiums	616-620 W. Imperial Hwy	12 unit condominiums
260	Condominiums	301, 303, 305 W. Palm Avenue	7 unit condominiums, replacing existing 9-unit apartments

NO.	PROJECT	ADDRESS	PROJECT DESCRIPTION
261	Mattel Grand Way Project - Phase II	455 Continental Boulevard and 1955 E. Grand Avenue	New fourteen-story 300,000 SF R&D office tower and 810-space parking structure (existing 55,000 SF office)
262	Walgreens	331 N. Pacific Coast Hwy	67 kSF retail
263	Parking Structure	525 N. Sepulveda Boulevard	1,029 space 328.532 kSF parking structure
264	Mixed-Use Commercial	141 Main Street	12.550 kSF mixed-use commercial
265	Warehouse, Office, Manufacturing	900, 950 Sepulveda Boulevard & 960, 901 - 915 Selby Street	20.819 kSF warehouse, 139.558 kSF office, 14.025 kSF manufacturing; from existing 80.165 kSF warehouse, 72.084 kSF office, 2.554 kSF manufacturing
266	Senior Assisted Living Facility	540 E. Imperial Avenue	304 senior housing residential units or 58 single and multifamily (175,000 SF); previously 22.5 kSF school
267	Indoor Ice Rink	555 N. Nash Street	17.315 kSF indoor ice rink
268	Office	116 W. El Segundo Boulevard	38 kSF office
269	In-N-Out Burger Fast-Food Restaurant with Drive-Thru	600-630 Sepulveda Boulevard	Existing Sizzler (sit-down dining) to become 3.714 kSF fast-food restaurant with drive-thru
270	Light Industrial	123 Lomita Street	10.764 kSF light industrial
271	General Office	2130 E. Maple Avenue	20.955 kSF general office
272	Research and Development	140 Sheldon Street	7.116 kSF research and development office, replacing 1.756 industrial building
273	Restaurant	2171-2191 Rosecrans Avenue	13.57 kSF restaurant
274	LA Air Force Base - Area A	SE Aviation Boulevard	Remove office 835 kSF; add 525 units condominiums
275	Fast-food Restaurant with Drive-Thru	740 Pacific Coast Highway	Existing Credit Union Bank (8,100 SF) to be replaced with 4,696 gSF fast-food restaurant with drive-thru
276	Hotel	707 Pacific Coast Highway	116-room hotel replacing 7.82 kSF restaurant
277	Mixed-use	2120 Rosecrans Avenue	240 kSF office; 66 kSF studio and production facilities; 7 kSF retail on existing vacant land
278	Pro Shop and Hitting-bay	400 S. Pacific Coast Highway	Three-story (71 kSF) hitting-bay and accessory use (restaurant, bar, meeting and event space) to replace existing 2,500 SF pro shop and driving range
279	Office Addition	140 Oregon Street	Additional 70 kSF office to existing office building
280	Mixed-use	401-615 N. Pacific Coast Highway	Replace existing parking lot with 263-unit apartments and 11 kSF retail/restaurant
281	Mixed-use	212 Eucalyptus Drive	Replace existing warehouse (5.35 kSF) with 13.485 kSF office and 634 SF café/food-to-go
282	Office	2221 E. Park Place	Additional 27.478 kSF office to existing office (56.6 kSF)

NO.	PROJECT	ADDRESS	PROJECT DESCRIPTION
City of Lawndale			
283	Lawndale Annex	14899 Aviation Boulevard	289-unit condominium
284	Grevillea Gardens	4430 W. 153rd Street	41-unit condo and mixed use
285	Condominiums	4741 & 4743 W. 165th Street	4-unit condominium
286	Duplex Development	15133 Osage Avenue	2-unit duplex
287	Del Taco	16606 Hawthorne Boulevard	New fast food restaurant
288	Duplex Development	4212 W. 162nd Street	2-unit duplex
289	Condominiums	4720 & 4724 W. 164th Street	4-unit condominium
290	Duplex Development	4136 W. 160th Street	2-unit duplex
County of Los Angeles			
291	Proposed Aviation Station Project	11604 Aviation Boulevard	Lot 1: 281-unit condo/townhomes, 5 kSF retail/commercial; Lot 2: 112-unit apartment and 21.5 kSF retail/commercial
292	West Los Angeles Community College Master Plan	Overland Avenue at Freshman Drive	approximately 291,300 SF of new building and renovation. Anticipate future student population of approximately 18,904 students and 1,248 employees by Fall 2022. Project includes second access road, parking structures, landscaping and development of athletic facilities
293	Lennox Charter High School	11044 and 11111 Freeman Avenue	560 students
294	Marina Expressway Homes	Marina Expressway Eastbound & Mindanao Way	28 single family condominiums
295	Marina del Rey Local Coastal Plan	1 Marina Expressway	Marina Del Rey Local Coastal Program (MDR LCP) Amendment. Development includes residential: 2,044 du, hotel: 505 rooms, retail: 273,741 SF, restaurant: 1,323 seats, congregate care: 129 du, office: 26,000 SF, dry storage space: 375 spaces, and library: 3,000 SF
296	Senior Housing	1252 W. 105th Street	74-unit, 100% affordable senior housing in the R-2 Zone
297	Laundromat	11034 S. Western Avenue	New use laundromat for a total 4,983 SF
298	Residential	5550 S. La Brea Avenue	32-unit apartment
299	Office Addition to Child Care Center	3816 W. 54th Street	New 2-floor office space 1,196 SF
300	Mixed-Use	11810 Bandera Street	100-unit affordable housing apartment, 5,260 SF child care center, 7,200 SF office
301	Residential	13204 Salinas Avenue	94-unit condominiums

NO.	PROJECT	ADDRESS	PROJECT DESCRIPTION
302	Residential	1212 W. 107th Street	22-unit apartment
303	Hotel	12000 S. Western Avenue	44-room hotel
304	School	11130 S. Western Avenue	11,662 SF school
305	Hotel	11814 Aviation Boulevard	128-room hotel
306	Residential	1743 Imperial Highway	39-unit apartment
307	Residential	1423 W. 120th Street	57-unit condominiums
308	Residential	1509 W. 102nd Street	12-unit apartment
309	Residential	1539 102nd Street	10-unit apartment
310	Residential	8910 S. Normandie Avenue	6-unit apartment
311	Commercial	10601 S. Vermont Street	4,500 SF coin laundry and self-service car wash
312	Residential	215 E. El Segundo Boulevard	9-unit single-family homes
313	Auto Repair	9223 S. Vermont Avenue	2,858 SF auto mechanic shop
314	Warehouse	12804 Spring Street	4,096 SF warehouse
315	Apartments	11824 Aviation Boulevard	36-unit apartment (20 three-bedroom units, 4 two-bedroom units, 12 one-bedroom units), 58 parking spaces, 28 bicycle parking spaces; five-story
316	Apartments	10505 Hawthorne Boulevard	32-unit apartment complex, with 5 units set aside for low-income tenancy
317	Apartments	14733 S. Stanford Avenue	85-unit apartment
318	Charter Middle School	5343 S Mullen Avenue (or 3751 W 54th Street)	Charter middle school
319	multifamily Residence Development	5101 S. Overhill Drive	Create one multifamily residence lot developed with 88 attached single-family residence condominium units on 1.875 acres
320	Dollar Tree Store	3838 W. Slauson Avenue	Convert commercial building into Dollar Tree Store; approved for a 1,060 SF addition to an existing commercial building; 9,877 SF total
321	Apartments	1240 W. 105 Street	42-unit apartment building
322	Arco Gas Station	11408 S. New Hampshire Avenue	Construction of new Arco gas station with 2,900 SF convenience store
323	Residential	2178 Firestone Boulevard	Residential care 16 beds
324	Mixed-Use	905 E. El Segundo Boulevard	Community center 1 kSF; amphitheater and lawn 1,100 seats; music center 1 kSF; nature lab 1 kSF; museum gallery 1 kSF; museum art storage 1 kSF; aquatic center 1

NO.	PROJECT	ADDRESS	PROJECT DESCRIPTION
			kSF; gymnasium 1 kSF; multi-purpose stadium 3,000 seats; outdoor athletic fields 3 fields; equestrian center 85 stables
325	Apartments	1854 E. 118th Street	100-unit apartment
326	Homeless Shelter	13200 S. Avalon Boulevard	Homeless shelter 79 rooms
327	Apartments	11735 Holmes Avenue	61-unit apartment
City of Hawthorne			
328	Residential	Bounded by Ramona Avenue to the west, 116th Street to the north, 118th Street to the south, and Grevillea Avenue to the east	128 single family homes
329	360 South Bay	SE corner of Aviation Boulevard and El Segundo Boulevard	610 condominiums
330	Condominiums/Office	13806 Hawthorne Boulevard	171 units and 32,500 SF of office space
331	Prestige Villas	4500 W. 116th Street	128 detached condominiums
332	Single Family Homes	14000 Yukon Avenue	6 units
333	Downtown Hawthorne Specific Plan	The area boundaries include the I-105 Freeway on the north, Prairie Avenue, Freeman Avenue and its extension through residential neighborhood to the city limits on the south, and Ramona Avenue and Inglewood Avenue on the west. In addition to the major north-south arterial Hawthorne Boulevard, the DHSP area includes the east-west segments of Imperial Highway, 120th Street, El Segundo Boulevard, and Rosecrans Avenue	The DHSP designates five land use areas (Residential, Commercial, Hospitality, Mixed-Use and Public/Quasi Public) and four opportunity sites known as Transformative Projects. The four Transformative Projects in the DHSP are sites identified for new and catalytic development and investment and are listed below
334	Civic Center		A public-private partnership opportunity that can have a mix of civic, hotel, retail and housing uses that frame a community gathering space
335	South Bay Ford		A mid-scale mixed-use development that helps catalyze the southern portion of Hawthorne Boulevard. Medium and higher density residential development
336	St. Joseph's Plaza		A underutilized corner that can become a new, dynamic public space. No set dates. DT Hawthorne Specific Plan design ideas suggest a local plaza for the community
337	Hawthorne Mall Site		Proposed outlet but no set date for development - existing a shuttered mall
338	Green Line Specific Plan Project (Dinerstein Companies Residential)	SE corner of Crenshaw Boulevard and Jack Northrop Avenue	230 du apartments and 3,700 SF of restaurant

NO.	PROJECT	ADDRESS	PROJECT DESCRIPTION
339	Icon at Rosecrans	14135 Cerise Avenue	127 residential units (affordable housing)
340	Marriott Hotels (Courtyard and TownePlace Suites)	4427 El Segundo Boulevard	350 rooms and full-service restaurant
341	Hilton Hotel (Garden Inn)	11519 Acacia Avenue	119-room hotel
342	Residential	11845 Grevillea Avenue	Condos 13 units
343	Residential	3222 W. 139th Street	Condos 7 units
344	Residential	3670 W. Imperial Highway	96 condominium units with 2,000 SF retail space
345	Residential	3857 W. 139th Street	Condos 12 units
346	Residential	13403 Kornblum Avenue	Condos 12 units
347	Residential	14128 Kornblum Avenue	Condos 100 units
348	Residential	14412 Yukon Avenue	Condos 11 units
349	Residential	11416 Inglewood Avenue	Condos 13 units
350	Residential	14105-14137 Chadron Avenue	109 residential units (24 units affordable to moderate income households)
351	Residential	14004 Doty Avenue	22 residential units (6 units moderate income households)
352	Hotel	5151 El Segundo Boulevard	129-room hotel with minimum of 125 parking spaces
353	Costco Gas Station Expansion	14501 Hindry Avenue	Costco gas station expansion
354	Costco Gas Station	12530 Prairie Avenue	Costco gas station
355	Residential	12021 Hawthorne Way	3 single family homes
356	Mixed Use	3670 Imperial Highway	approximately 13,938 SF of commercial and 48 condominiums
357	Parking Structure	East side of Crenshaw Boulevard (between 120th Street and Northrop Avenue)	Seven-story parking structure - approximately 1,469 stalls
City of Gardena			
358	Townhomes	1335 W. 141st Street	50 du townhomes, three-story
359	Mixed-Use	1450 W. Artesia Boulevard	Construction of 73,600 SF industrial uses, 16,000 SF office uses, and 147,200 SF storage uses
360	Industrial	1720 W. 135th Street	100,438 SF industrial building
361	Residential	16819 Normandie Avenue	Single room occupancy, 63 units
362	Residential	14321 Van Ness Avenue	40 condos/townhomes and 1,835 SF retail
363	Residential	1715 W. 149th Street	5-unit townhouse development
364	Residential	1333 168th Street	3-unit condo development
365	Residential	1348 W. 168th Street	Small lot subdivision, 9-unit apartment

NO.	PROJECT	ADDRESS	PROJECT DESCRIPTION
366	Commercial	16016 S. Western Avenue	9,685 SF addition to existing commercial office building
367	Commercial	15106 South Western Avenue	Refacade of an existing 5,895 SF building and change use from automotive repair to retail commercial
368	Commercial	16210 Crenshaw Boulevard	New 4,860 SF drive-thru restaurant
369	Commercial	15930 S Western Avenue	New two-story medical and professional office building, 6.43 kSF
370	Residential	13919 Normandie Avenue	Single room occupancy, 20 units
371	Residential	1341 W. Gardena Boulevard	14 townhomes and 3,385 SF of retail/office
372	Commercial	1399 W. Artesia Boulevard	4,733 SF gas station at an existing Sam's Club retail store (16 fuel positions)
373	Commercial	15501 S. Normandie Avenue	Refacade existing shopping center and develop a new a 1,850 SF drive-thru restaurant
374	Commercial	14105 S. Vermont Avenue	Construction of a new 1,500 SF restaurant
375	Commercial	1201 W. 155th Street	11,550 SF Dialysis Health facility
376	Residential	14504 S. Normandie Avenue	96 townhomes
377	Residential	15350 Van Ness Avenue	42 townhomes
378	Residential	16908 S. Normandie Avenue	21 single family homes
379	Residential	1147 W. Gardena Boulevard	multifamily (apartments), 4 units
380	Residential	16958 S. Western Avenue	46 townhomes
381	Residential	15927 S. Brighton Avenue	multifamily (apartments), 2 units
382	Retail	525 E. Rosecrans Avenue	3.14 kSF of retail
383	Mixed-Use	1112 Gardena Boulevard	12 apartment units and 3,986 SF of commercial space
384	Townhomes	1515 W. 178th Street	New 114 unit townhomes on existing 105,036 SF warehouse
385	KB Home Stonefield	1017 W. 141st Street and 14031 S. Vermont Avenue	Three-story townhomes, 63 units
386	Restaurant	1420 Redondo Beach Boulevard	Restaurant, 4.053 kSF
387	Townhomes	2315, 2401, 2403, 2415, 2421, & 2545 Marine Avenue	54 townhomes and 10 live/work, a total of 64 units
388	Mixed-Use	2129 Rosecrans Avenue	113 du townhomes, three-story, including 15 live/work with 3,969 SF commercial
389	Industrial	1528 W. 134th Street	New 62,960 SF industrial building
390	Restaurant	2169 Redondo Beach Boulevard	New 3, 486 SF drive-thru restaurant

NO.	PROJECT	ADDRESS	PROJECT DESCRIPTION
391	Transit-Oriented Development SP Project	12850 Crenshaw Boulevard	265 du, apartments/studio apartments
392	Townhomes	1938 W. 146th Street	6 du townhomes
393	Residential	13615, 13619, 13633 Vermont Avenue	84 du, 82 market rate units (2 du affordable)
394	Townhomes	1621 W. 147th Street	6 du townhome, three-story

_____

Source:

[1] City of Inglewood, Department of Economic & Community Development website (https://www.cityofinglewood.org/1016/Environmental-Documents), May 2020; City of Inglewood, July 2020.

[2] City of Los Angeles, June 2020.

[3] City of Culver City, Active Projects Map Website. (https://www.culvercity.org/city-hall/city-government/city-departments/community-development/current-planning-division/active-projects-map), May 2020.

[4] City of El Segundo, Department of Planning and Building Safety website. (https://www.elsegundo.org/government/departments/planning-and-building-safety-department/planning-division/cumulative-projects-list), May 2020; City of El Segundo, May 2020.

[5] City of Hawthorne, May 2020.

[6] City of Gardena, Gardena Development Projects Website. (https://www.cityofgardena.org/development-and-planning/), May 2020; City of Gardena, May 2020.

[7] Traffic Impact Study, Continental Grand Campus Specific Plan DEIR, September 2017.

[8] Final Environmental Impact Report, Green Line Mixed-Use Specific Plan, June 2017.

[9] Traffic Study for the Landside Access Modernization Program (LAMP) DEIR, September 2016.

[10] Inglewood Basketball and Entertainment Center Project DEIR, December 2019.

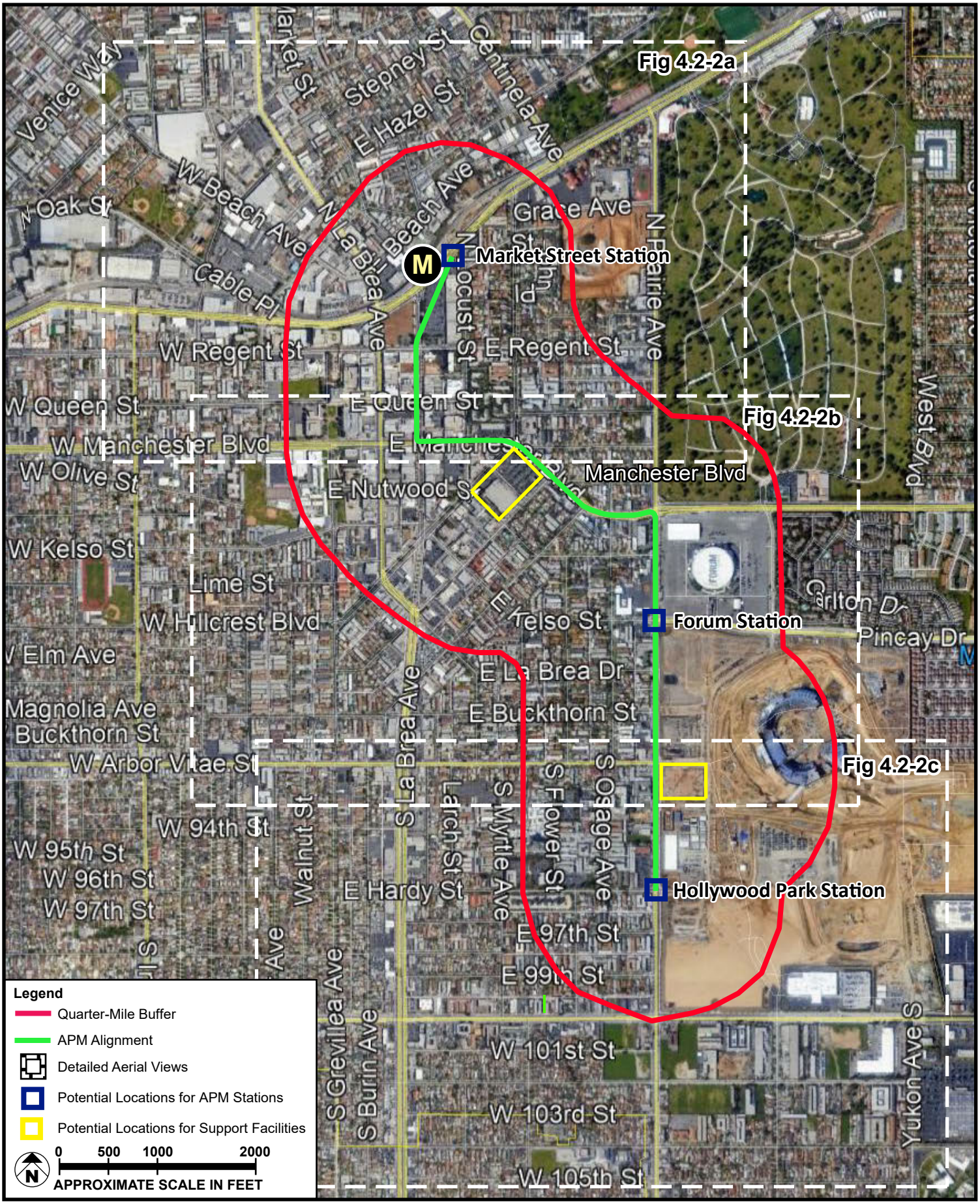


SOURCE: Raju Associates - 2020

FIGURE **4.0-1**

Cumulative Projects Map

208-001-18

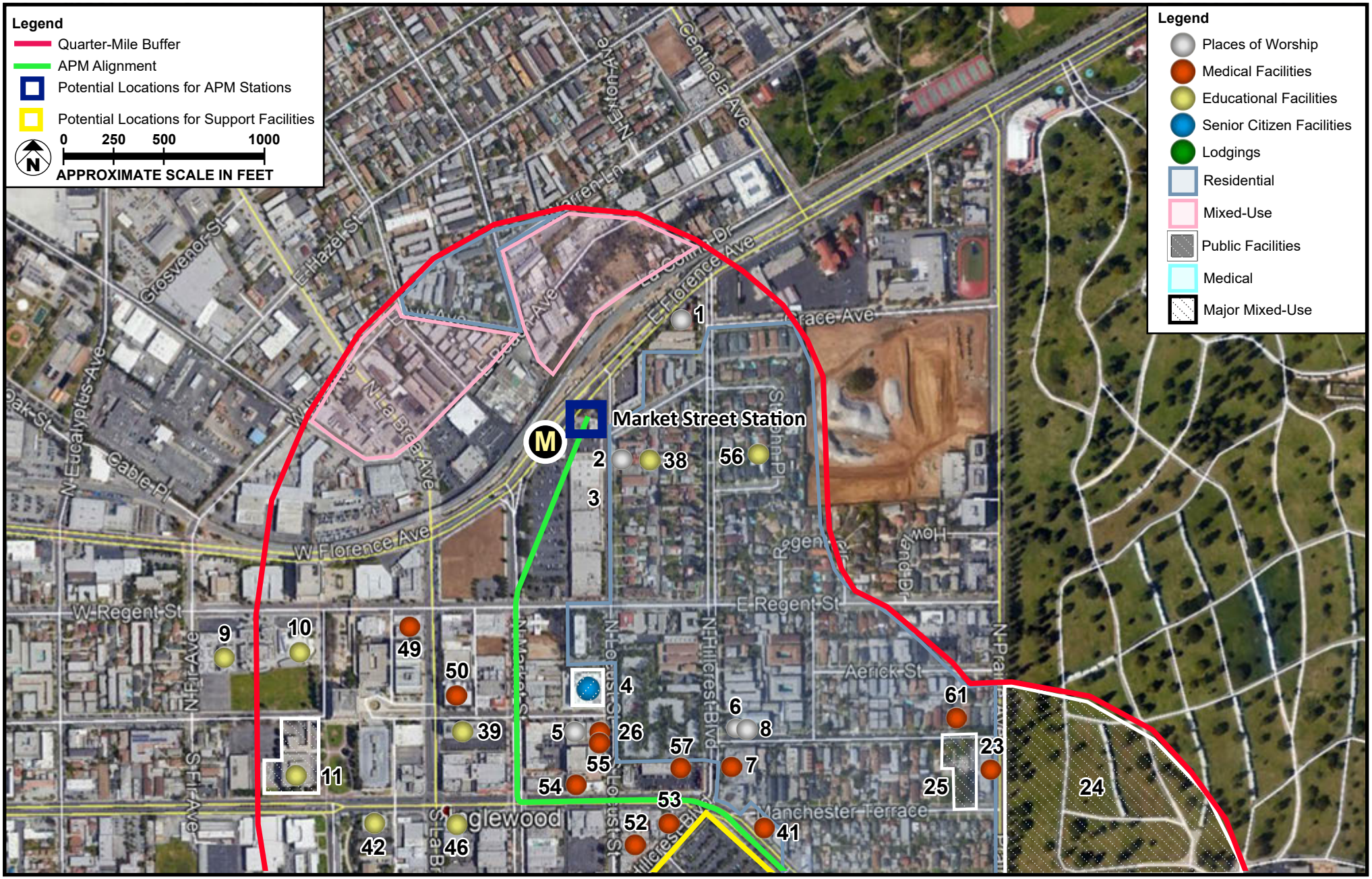


SOURCE: Google Earth - 2020; Meridian Consultants LLC - 2020

FIGURE **4.0-2**

Project Area Quarter-Mile Buffer

208-001-18

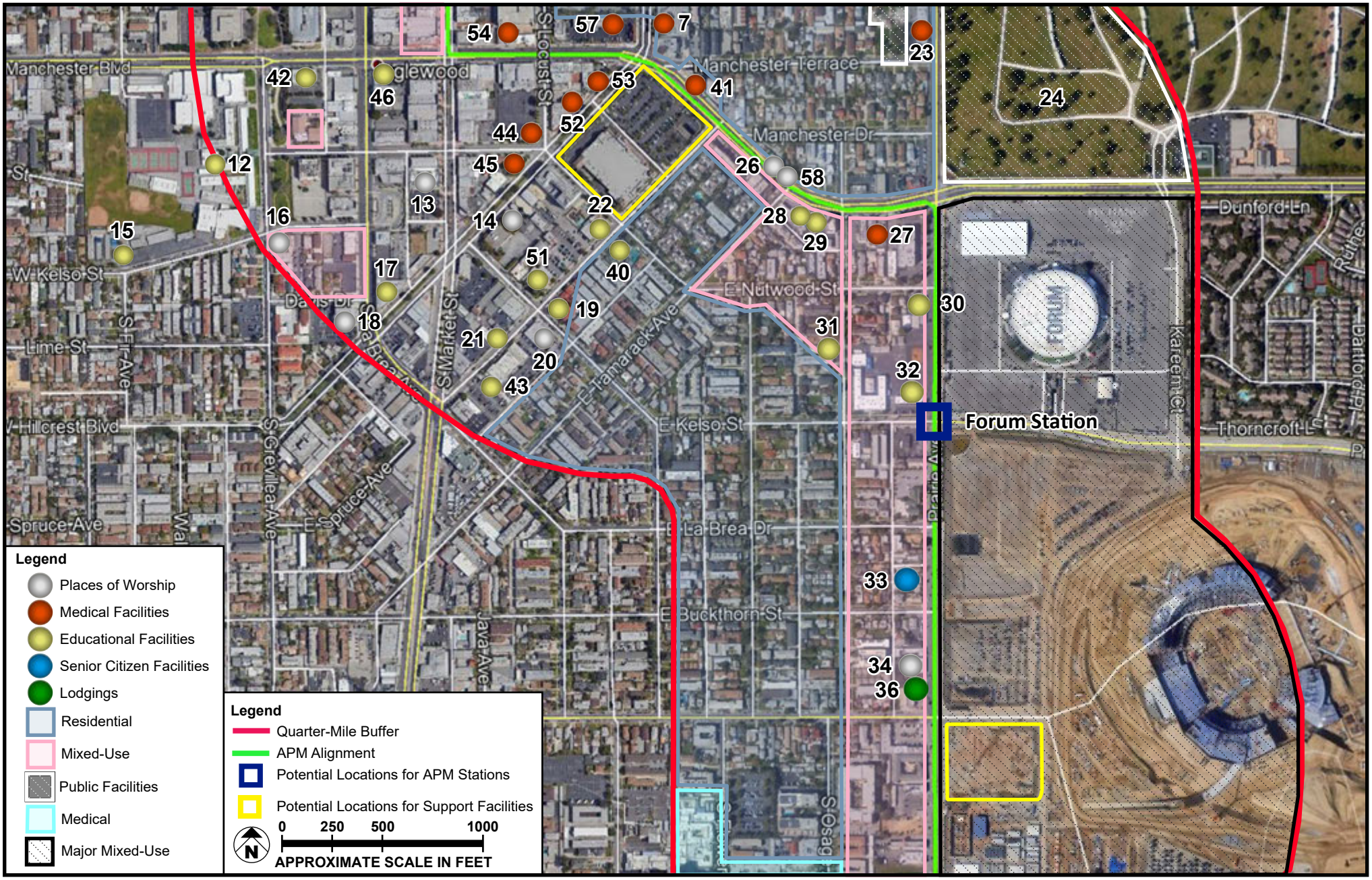


SOURCE: Google Earth - 2020; Meridian Consultants - 2020

FIGURE **4.0-3a**

Sensitive Receptors within a Quarter-Mile of the Project Area

208-001-18

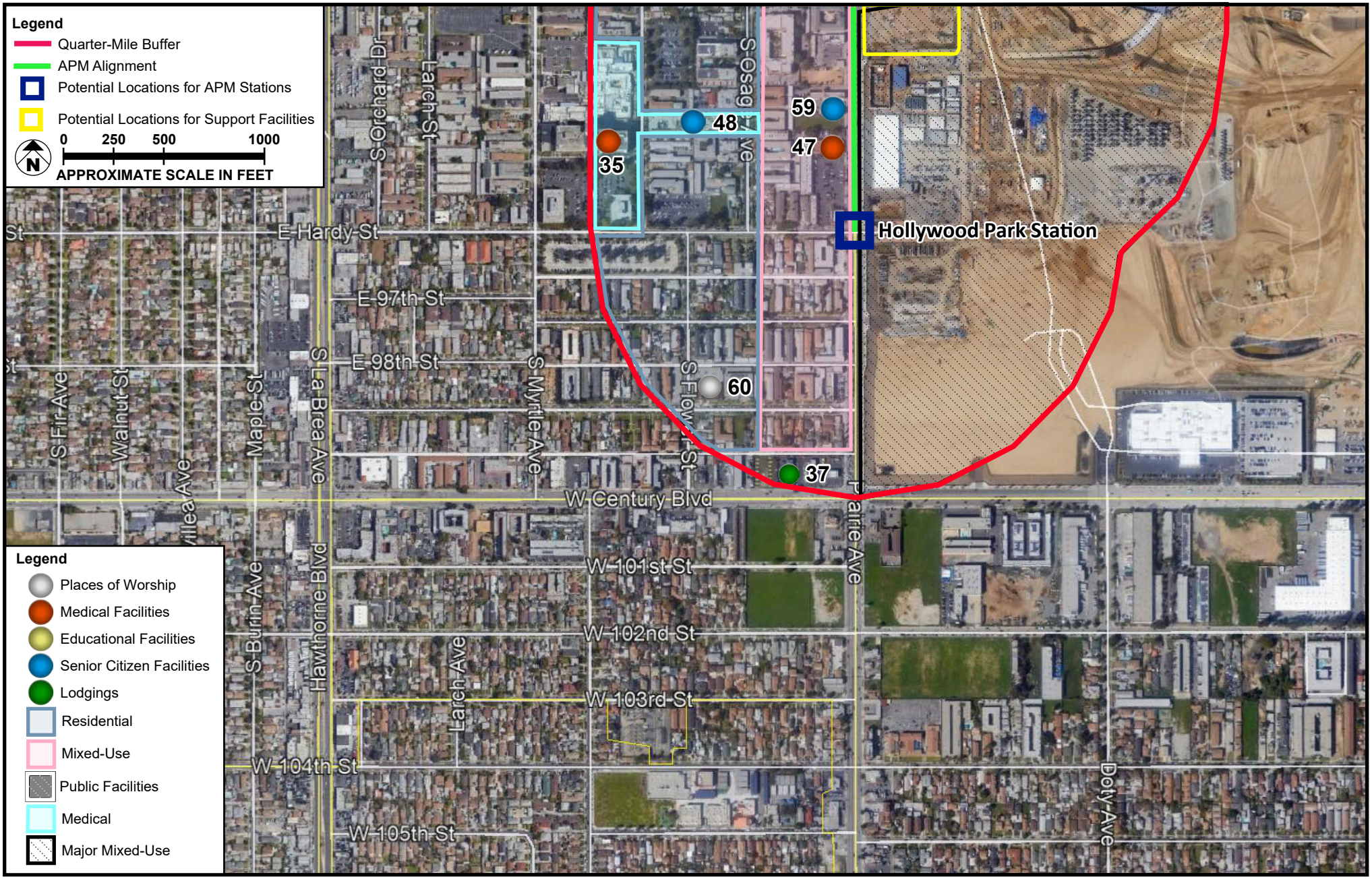


SOURCE: Google Earth - 2020; Meridian Consultants - 2020

FIGURE **4.0-3b**

Sensitive Receptors within a Quarter-Mile of the Project Area

208-001-18



SOURCE: Google Earth - 2020; Meridian Consultants - 2020

FIGURE **4.0-3c**

Sensitive Receptors within a Quarter-Mile of the Project Area

208-001-18

4.1.1 INTRODUCTION

This section of the Draft Environmental Impact Report (Draft EIR) evaluates the impacts of the proposed Inglewood Transit Connector Project (proposed Project or ITC Project) on aesthetics and visual character, obstruction of views, nighttime illumination, light and glare, and shading. The evaluation of aesthetics and visual character impacts considers the existing visual character of the area along the proposed alignment, and how implementation of the proposed Project would affect this visual character. The evaluation of view impacts considers existing viewsheds and visual resources (that may be affected by the development of the Project alignment. The analysis of light and glare assesses the effects of new sources of nighttime lighting and glare from the reflection of sunlight or artificial light from any reflective surface that would be created by the Project. This section also evaluates patterns of shading that would be created by the proposed Project and the effect on uses along the proposed alignment.

Prior to the preparation of this EIR, a Recirculated Initial Study (included as **Appendix 2.0.2a** of this EIR) was prepared using the California Environmental Quality Act (CEQA) Environmental Checklist Form to assess potential environmental impacts associated with aesthetics. For two of these screening thresholds, the Initial Study found that the proposed Project would result in a "Less than Significant Impact," and thus, no further analysis of these topics in an EIR was required. The following Initial Study screening criteria related to aesthetics do not require any additional analysis in this EIR:

- Impacts related to a substantial adverse effect on a scenic vista were evaluated and determined to be "Less than Significant" in the Initial Study. As discussed therein, the City of Inglewood (City)'s General Plan does not designate any scenic vistas within the City or its vicinity. Additionally, no views of regional mountain ranges, focal points, or broad panoramic view corridors are available from public rights-of-way along the proposed alignment. Therefore, impacts on scenic vistas from the proposed Project would be **less than significant.**
- Impacts related to substantial damage to scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway were evaluated and determined to be "Less than Significant" in the Initial Study. As discussed therein, the Project alignment is not located in the vicinity of a designated scenic highway. Thus, no trees or historic resources on the Project alignment are located within a State scenic highway. Additionally, no rock outcroppings are present on or near the Project alignment. Therefore, impacts on scenic resources within a State scenic highway from the proposed Project would be **less than significant.**

Impacts found to be less than significant are further discussed in **Section 6.0: Other Environmental Considerations**.

Please see **Section 8.0** for a glossary of terms, definitions, and acronyms used in this Draft EIR.

4.1.2 OVERVIEW

4.1.2.1 Aesthetic Resources

Aesthetic resources include a range of visual elements, including landforms, vegetation, water features, the urban design characteristics of an area, and the architecture present in an area that define how an observer experiences a place through sensory interaction. Factors considered include visual character, scenic resources, and scenic vistas. These factors, which describe the aesthetic character of a particular area are described further below.

Visual Character

Visual character describes the unique combination of aesthetic resources, scenic elements, and landscape characteristics that contribute to the identity of a particular place. These components provide for the visual sensory interaction with a particular place by users who experience it. This interaction constitutes the basis of the overall impression a place has upon the observer. In urban settings, these characteristics largely include land use type and density, urban landscaping and design, architecture, topography, and background setting.

Scenic Resources

Scenic resources typically include natural open spaces, topographic formations, and landscapes that contribute to a high level of visual quality. They also include ridgelines, parks, trails, nature preserves, sculpture gardens, the built environment, and similar features that are critical in shaping the visual character and scenic identity of a given area and surrounding region.

Scenic Vistas

Scenic vistas are generally described in two ways: panoramic views which is visual access to a large geographic area, for which the field of view can be wide and extend into the distance; and focal views providing visual access to a particular object, scene, or feature of interest. In general, scenic vistas are the range by which scenic resources may be observed. This definition combines visual quality with information about view exposure to describe the level of interest or concern that viewers may have for the quality of a particular view or visual setting.

4.1.3 METHODOLOGY

4.1.3.1 Visual Character

Impacts on visual character were determined by comparing existing visual conditions at and around the proposed Project area alignment with the change in these conditions that would result from implementation of the proposed Project. The study area for the aesthetics analysis comprises the Project alignment and adjacent areas. The Project area includes the APM system components including the guideway and support facility sites (MSF and TPSSs) and properties adjacent to the APM system and proposed components.

The methodology used to assess visual character impacts considers how the proposed Project would affect views of the area. This assessment focuses on views of the proposed Project along major roadways and on other public viewpoints where visual change would occur with implementation of the proposed Project. Public viewpoints of the Project area available to the general public traveling to or near are located along Market Street, Manchester Boulevard, and Prairie Avenue.

Establishing the basis for the analysis also involved collecting and reviewing existing plans and guidelines in effect within or adjacent to the Project area that address design, architecture, and landscaping. These plans include the Hollywood Park Specific Plan[1] (HPSP) and the New Downtown and Fairview Heights Transit-Oriented Development Plan and Design Guidelines (Downtown TOD).[2] These plans define the standards for development within these areas.

4.1.3.2 Light and Glare

Light and glare also influences the visual character of an area. The provision of adequate and appropriate lighting and limiting glare and the potential for glare are fundamental safety requirements in the design of any large facility or structure. By focusing this analysis on light spillover effects, the potential for adverse effects associated with structures or facilities included with the proposed Project can be limited. Light spillover effects involve light that shines beyond the area intended for illumination that can be a source of annoyance to adjoining properties, particularly for residences where light (e.g., direct illumination) might disturb sleep or privacy. Glare—both daytime reflection of sunlight off large expanses of reflective surface (cars, buildings, or structures) and unshielded nighttime lighting (outdoor or indoor)—can also have adverse effects. Accordingly, this section also addresses the potential for the proposed Project to: (1) introduce new light sources that could adversely affect nearby light-sensitive receptors (e.g.,

1 City of Inglewood, *Hollywood Park Specific Plan*, adopted July 8, 2009, amended September 23, 2014, and further amended February 24, 2015.

2 City of Inglewood, *New Downtown and Fairview Heights Transit Oriented Development Plan and Design Guidelines*, November 1, 2016.

residential uses, hotels, and natural areas); and (2) introduce new light or glare sources that could adversely affect day or nighttime views in this area.

4.1.4 REGULATORY FRAMEWORK

4.1.4.1 State Regulations and Directives

California Department of Transportation (Caltrans) Scenic Highway Program

The Caltrans Scenic Highway Program[3] protects and enhances the natural scenic beauty of California's highways and corridors through special conservation treatment. Caltrans defines a scenic highway as any freeway, highway, road, or other public right-of-way that transverses an area of exceptional scenic quality. Caltrans designates a scenic highway by evaluating how much of the natural landscape a traveler sees and the extent to which visual intrusions degrade the scenic corridor. No officially designated scenic highways are located within the City.

4.1.4.2 Local Regulations and Directives

City General Plan

The City General Plan includes the Land Use Element,[4] was adopted in August 1968 and was amended in 1980, with additional amendments, including the latest amendment in 2020. Goals, objectives, and policies of the City's General Plan Land Use Element applicable to this aesthetics section of the Draft EIR are outlined as follows:

Land Use Element

The Land Use Element sets forth Citywide policies for the general location and intensity of land uses, and includes the following goal and policies that are relevant to the proposed Project in this section:

Downtown Transit Oriented District Goals and Policies (as amended September 2016)

Goal 1: Downtown is a place to live, work, shop, recreate, and be entertained.

Policy 1.1: Mixed Use Development. Encourage a range of residential, retail, office, recreational, and institutional uses in the Historic

3 Caltrans, Scenic Highways, https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways, accessed July 30, 2020.

4 *City of Inglewood General Plan,* "Land Use Element" (adopted 1980, last amended 2020), https://www.cityofinglewood.org/DocumentCenter/View/132/Land-Use-Element-1980-Amended-1986-2009-2016-PDF, accessed October 30, 2020.

Downtown to create a vibrant urban district and support local business.

Policy 1.2: Ground Floor Uses and Storefronts. Require uses that activate pedestrian activity such as retail on major streets and plaza frontages. Require that storefronts be historically-sensitive, attractive and transparent in the Historic Downtown.

Goal 2: Downtown is a revitalized yet forward-looking gathering place for the community.

Policy 2.1: Public Gathering Places. Create public spaces in key locations in the public right-of-way and on privately-owned land. In particular, create a central plaza along Market Street between Florence Avenue and Regent Street and/or in the adjacent parcels suitable for eating, resting and people watching, but also for festivals, concerts and events at special times.

Policy 2.3: Preservation of Historic Fabric. Require the preservation of buildings that have been designated as historic and encourage the reuse of other historic buildings. Maintain the sense of place in areas with historic fabric and/or meaning such as Market Street between Regent Street and Hillcrest Avenue and the Hillcrest neighborhood east of Locust Street.

Goal 6: Downtown expresses the unique culture of Inglewood.

Policy 6.1: Districts. Define the following unique districts within the Downtown TOD area, each with their own unifying character or identity that should be preserved and enhanced: Historic Downtown, Civic Center, TechTown, Beach Avenue, Fairview West, Hillcrest and Queen Street.

Policy 6.2: Performing Arts. Build on assets such as the Fox Theater, Forum and Hollywood Park to establish Downtown Inglewood as part of an Inglewood entertainment and performing arts hub serving both the City and the region.

Policy 6.3: Visual Arts. Commission public art to provide an attractive environment for residents, employees and visitors. Take steps to ensure a continuing role for the Inglewood art community in Downtown's visual and performing arts.

Goals and Objectives (as adopted January 1980)

- Promote Inglewood's image and identity as an independent community within the Los Angeles metropolitan area.
- Improve the visual appearance and economic condition of the existing arterial commercial development along Inglewood's major streets.

Open Space Element

The Open Space Element[5] sets forth Citywide policies for current and future recreation needs of the community for park land and recreation facilities. It is also a plan for the conservation or creation of open spaces to mitigate the effects of increasing urbanization of Inglewood. Since Inglewood lacks any natural resource such as a lakeshore or riverbank, the Element focuses on two basic types of open space: the traditional city park and the nonpark open space, including public plazas, landscaped boulevards, and greenbelts between buildings on private property. The following policy is relevant to the proposed Project in this section:

Policy 1: The City of Inglewood and its redevelopment agency, in reviewing and approving development plans, shall require the provision of landscaped plazas and gardens when possible, and the provision of landscaping within building setbacks and parking lots.

New Downtown and Fairview Heights Transit-Oriented Development Plan and Design Guidelines

The New Downtown and Fairview Heights Transit Oriented Development Plan and Design Guidelines[6] (Downtown TOD Plan) covers the Downtown Inglewood and Fairview Heights neighborhoods of the City and works to implement the City's vision for transforming the quality of the environment within these areas. The Downtown TOD Plan area consists of approximately 585 acres located in the center of Inglewood along the new Crenshaw/LAX line just east of the Florence Avenue/La Brea Avenue

5 *City of Inglewood General Plan,* "Open Space Element" (adopted 1973, last amended 1995), https://www.cityofinglewood.org/DocumentCenter/View/132/Land-Use-Element-1980-Amended-1986-2009-2016-PDF, accessed July 30, 2020.

6 City of Inglewood, *New Downtown and Fairview Heights Transit Oriented Development Plan and Design Guidelines*, November 1, 2016.

intersection. This TOD Plan area extends approximately one-half mile in all directions from the Metro Crenshaw/LAX line Downtown Inglewood Station (Downtown Inglewood Station). The Fairview Heights TOD Plan area consists of approximately 328 acres located near the intersection of Florence Avenue and West Boulevard. The Fairview Heights planning and zoning area also extends approximately one-half mile in all directions from the Downtown Inglewood Station.

The Downtown TOD Plan includes concept plans, zoning, development standards and design guidelines, and an implementation action plan for consideration by applicants submitting any proposals for new construction or rehabilitation within the Plan area, as well as for consultation by City Staff when making recommendations for project approvals. The Downtown TOD Plan addresses architectural detail, signage, public art, and civic and cultural life. Further, the Downtown TOD Plan includes street tree concepts, including recommended street tree locations and species along roadways within the Downtown and Fairview Heights neighborhoods.

Section 2.8: Street Trees and Furniture[7] of the Downtown TOD Plan establishes that street trees are important elements of streetscapes and placemaking and provides guidelines on the character of trees placed within key areas of Downtown Inglewood. The Downtown TOD Plan recommends that Manchester Boulevard be lined with London Plane (*Platanus × acerifolia*) trees, or a similar species. This tree's ability to withstand air pollution, drought, as well as most diseases makes it a desirable street tree that would also provide some uniformity and connectivity for Downtown Inglewood. In the case of Florence Avenue, the Downtown TOD Plan calls for London Plane trees alternated with the California fan palm (*Washingtonia filifera*). Market Street should retain its existing street trees. The smaller arterial streets near Market Street may alternate between the Brisbane box (*Lophostemon confertus*), an evergreen tree, and the ginkgo (*Ginkgo biloba*), a deciduous tree. The Downtown TOD Plan states that these smaller street trees bring down the scale of the streets and create a sense of place throughout the streets of Downtown Inglewood.

Hollywood Park Specific Plan

The HPSP[8] establishes development standards and design guidelines for the 238-acre Hollywood Park site at the northeast corner of the Prairie Avenue and Century Boulevard intersection and provides an overview of existing infrastructure and necessary improvements related to the site, including measures for implementation measures of the plan. The site is currently under redevelopment and slated to include

7 City of Inglewood, *New Downtown and Fairview Heights Transit Oriented Development Plan and Design Guidelines*, November 1, 2016, Section 2.8: Street Trees and Furniture, p. 19.

8 City of Inglewood, *Hollywood Park Specific Plan*, adopted July 8, 2009, amended September 23, 2014, and further amended February 24, 2015. https://www.cityofinglewood.org/DocumentCenter/View/1347/Hollywood-Park-Specific-Plan. Accessed November 1, 2020.

a National Football League (NFL) stadium, a 6,000-seat entertainment venue, parks, and retail, housing, entertainment, gaming, hotel, and civic uses.

The HPSP[9] includes guidelines and standards for improvements in the public right-of-way within the plan area, which includes approximately 0.5 miles of street frontage along South Prairie Avenue. The HPSP also provides integrated and coordinated landscape design guidelines for new development along the perimeter of the Plan area with the objective of promoting land use compatibility, particularly along South Prairie Avenue.

The HPSP includes streetscape standards and provides integrated and coordinated landscape design guidelines for new development along the perimeter of the HPSP area to integrate it with the adjoining urban fabric, achieve a diverse urban forest, and assist in developing districts of distinctive and appropriate character.[10] Sidewalk widths are intended to provide walking routes and parkway widths are designed to provide sufficient area for urban tree growth. The HPSP guidelines and standard for streetscape include identity elements that would differentiate Hollywood Park from nearby developments through architectural features, landscaping (such as seasonal displays of color), graphic elements (such as signs or logos), special pedestrian or automobile paving, special night lighting effects, or other similar features.

The HPSP, Section 3.2.2: Streetscape, identifies selected street trees and the desired locations for their placement on internal roadways within the HPSP area as well as along major adjacent roadways, including Prairie Avenue, Century Boulevard, and the intersection corner of those roadways.[11] A majority of the tree species listed in the HPSP were selected from the City's approved tree list.[12] Selections were based upon recommendations from local arborists to create a palette of horticulturally successful, low maintenance, and climate-appropriate tree species. Alternative selections can be proposed, subject to City approval.

The HPSP states that street trees along Prairie Avenue shall be substantial and continuous to achieve an appropriate scale for the street.[13] Along the portion of Prairie Avenue north of Hardy Street, large columnar evergreen trees such as Afghan pine (*Pinus eldarica*) or Canary Island pine (*Pinus canariensis*) would provide continuity with the retail development to the east and the cemetery to the north. This

9 City of Inglewood, *Hollywood Park Specific Plan*, adopted July 8, 2009, amended September 23, 2014, and further amended February 24, 2015.

10 City of Inglewood, *Hollywood Park Specific Plan*, adopted July 8, 2009, amended September 23, 2014, and further amended February 24, 2015., Section 3.2.2, Streetscape, p. 3-28.

11 City of Inglewood, *Hollywood Park Specific Plan*, adopted July 8, 2009, amended September 23, 2014, and further amended February 24, 2015., Section 3.2.2, Streetscape, Exhibit 3-25—Landscape Street Sections Map, p. 3-28.

12 City of Inglewood, *Hollywood Park Specific Plan*, adopted July 8, 2009, amended September 23, 2014, and further amended February 24, 2015., Section 3.2.2, Streetscape, Exhibit 3-25—Landscape Street Sections Map, p. 3-28.

13 City of Inglewood, *Hollywood Park Specific Plan*, adopted July 8, 2009, amended September 23, 2014, and further amended February 24, 2015., Section 3.2.2, Streetscape, p. 3-29.

arrangement is intended to visually reduce the scale of the street and provide ample shade as visitors approach the HPSP site. Both Prairie Avenue south of Hardy Street and the northern side of Century Boulevard would be similarly lined with large evergreen trees such as camphor trees (*Cinnamomum camphora*) or Southern magnolia (*Magnolia grandiflora*). In addition, large canopy flowering trees and palms would mark key points near the HPSP site, including the retail corner and major entries, and maintain adequate street visibility. Selected species include Date palm (*Phoenix dactylifera*), Chanticleer Callery pear (*Pyrus calleryana*), and pink trumpet tree (*Tabebuia impetignosa*). Palm trees at the northeastern corner of Prairie Avenue and Century Boulevard are intended to provide a thematic connection to Century Boulevard near the Los Angeles International Airport (LAX).

City Municipal Code

The City Planning and Zoning Code[14] Chapter 12, Planning and Zoning identifies zoning districts and land use classifications, land use regulations, development standards, and environmental standards. The Zoning Ordinance is intended to protect and promote the public's health, safety, and general welfare, and to implement the policies of the comprehensive General Plan.

Lighting and Signage

Lighting and signage are also regulated by the Inglewood Municipal Code Chapter 12,[15] which defines minimum standards to safeguard life, health, property, and the public welfare by regulating and controlling the design, quality of materials, construction, size, height, location, and maintenance of all signs, sign structures, and other exterior advertising devices.

Tree Preservation

The Municipal Code Tree Preservation[16] recognizes the importance of both native and nonnative trees within the City. Properly maintained trees increase property values, maintain the natural ecology, temper the effects of extreme temperatures, reduce runoff, prevent erosion of topsoil, and help create and maintain the identity and visual character of the City. Prior to removing or cutting a protected tree in the City, a permit must be approved by the City's Parks, Recreation, and Library Services Department.

14 Inglewood, California, Municipal Code, Chapter 12, Planning and Zoning.
15 Inglewood, California, Municipal Code, Chapter 12, Article 23, Sign Regulation.
16 Inglewood, California, Municipal Code, Article 32, Section 12-110 (2012), Tree Preservation.

City Design and Development Standards/Design Review Process

The City's Design and Development Standards,[17] supplements the Municipal Code with design standards and guidelines for development. The City has established a design review process and design standards to accomplish the following:

- To maximize freedom, creativity, and innovation in the architecture, landscape design and graphics of each individual project within the framework of constraints imposed by the community's need to control development for the health, safety, and general welfare of its citizens.
- To promote a visually attractive, safe, and well-planned community through the use of sound design techniques.
- To protect citizens from unsafe or unsightly conditions.
- To minimize potential nuisances to the uses surrounding the new development.
- To preserve and maximize the image, character, and visual quality which is making Inglewood an attractive place to live and work.

Additionally, The Municipal Code outlines the design review process required for development in the "D" Supplemental Design Review Zone.[18] This supplemental designation includes the TOD Mixed Use 1, TOD Mixed Use 2, and Historic Core zones.

4.1.5 EXISTING CONDITIONS

4.1.5.1 Aesthetics and Views

City of Inglewood

The proposed Project is located entirely within the City, approximately 5.5 miles east of the Pacific Ocean, within a broad coastal plain surrounded by rising land to the south and north, and more-level terrain extending east. The City is a highly developed urban area containing moderately dense development along major corridors that consist of commercial, residential, and industrial uses. The street corridors provide the only long-range views available in the City, including limited views of Baldwin Hills to the north and other urban areas in and surrounding the City. Overall, the views within and surrounding the City are consistent with the views of a highly developed urban area.

No designated or otherwise identified scenic views or vistas are located within or visible from the City.[19] The City's General Plan states that no forest resources, wildlife, fisheries, shorelines, or agricultural land

17 City of Inglewood, *Technical Background Report* (2006), Design and Development Standards, adopted January 30, 1979.
18 City of Inglewood, Municipal Code Ch. 12, art. 14 (2010).
19 Google Earth, 2020.

are present in the City,[20] nor does the General Plan designate any scenic vistas within the City or its vicinity. Further, there are no designated or eligible State scenic highways within or adjacent to the Project area.[21] The nearest State scenic highway is Interstate 110 between mile post 25.7 and 31.9, which is located north of downtown Los Angeles and south of Interstate 210 in Pasadena. The closest portion of this scenic highway is approximately ten miles northeast of the Project boundary.

Additionally, the Project area is not near any designated wild or scenic rivers pursuant to the National Wild and Scenic Rivers System.[22] The nearest mountains, the Santa Monica Mountains, are more than 10 miles north of the Project boundary. No views of these mountains or of any other focal points or broad panoramic view corridors are available from public rights-of-way along the proposed alignment.

Project Area

Market Street Segment

The Market Street Segment begins at the intersection of Market Street and Florence Avenue and terminates at the intersection of Market Street and Manchester Boulevard. Aside from the CVS shopping center and the vacant lot immediately south of Florence Avenue, this section of Market Street is composed primarily of low-rise commercial buildings and storefronts along a narrow two-lane roadway, with the exception of the former Fox Theater building, which includes structural components rising above most other nearby structures. Pedestrian sidewalks are landscaped with planters and street trees and street amenities such as benches, decorative streetlights, and decorative street posts. Landscaped medians divide the slightly curving two-lane roadway to define an intimate setting and slow traffic, with metered parking spots lining either side of the roadway to allow patrons to stop and shop at local businesses.

Manchester Boulevard Segment

The Manchester Boulevard Segment begins at the intersection with Market Street and ends at the intersection with Prairie Avenue. Low-rise commercial buildings are located on both sides of Manchester Boulevard with storefronts making up the majority of the building facades along the roadway. Two parking lots approximately a block in length line the street adjacent to Hillcrest Boulevard on either side of the roadway, supporting two commercial shopping centers. Residential and church uses are also adjacent to Manchester Boulevard in smaller numbers, appearing as low-rise buildings along the roadway.

20 City of Inglewood *General Plan*, "Conservation Element" (1997), 1.

21 California Department of Transportation, California Scenic Highway Mapping System, Los Angeles County, http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/, accessed August 2018.

22 US Fish and Wildlife Service, *National Wild and Scenic Rivers System*, available at https://www.rivers.gov/, accessed August 31, 2018.

This segment of Manchester Boulevard includes two travel lanes in each direction with a median turn lane throughout the entire segment. Occasional concrete medians with street signs divide the lanes going in opposite directions and accommodate turn pockets. Metered parking spaces are located along the roadway. Sidewalks are provided on both sides of the street with palm trees, and streetlights on simple gray. Street signs are attached to the poles of the streetlights to help direct traffic with arrows and speed limits. Billboards containing large advertising displays are located on sides of the street. Limited landscaping is provided along this segment. Street benches and trash receptacles of simple design can be found at the bus stops along this segment.

Prairie Avenue Segment

The Prairie Avenue Segment begins at the intersection with Manchester Boulevard and ends at the intersection with Hardy Street. Low-rise commercial buildings, often with adjacent surface parking lots occupy the majority of the area to the west of Prairie Avenue. Located between Nutwood Street and Kelso Street is the Kelso Elementary School with single story structures that are simple in design. The playground and sports facility at the school is raised and located adjacent to Prairie Avenue. Single- and multi-family residential buildings, one- to two-stories in height, are also located along this segment of Prairie Avenue.

The Forum is located east between Manchester Boulevard and Pincay Drive. The Forum is a large circular building surrounded by an expansive surface parking lot, with vehicle entrances along Prairie Avenue. South of Pincay Drive is SoFi Stadium and a mixed-use community under development in the Hollywood Park Specific Plan (HPSP) area. SoFi Stadium opened in September 2020 is located southeast of The Forum property and south of Pincay Drive. The SoFi stadium features a translucent roof which covers the stadium proper, the adjacent pedestrian plaza, and the attached performance venue. The stadium bowl contains open sides as part of its design. The majority of the HPSP site is currently under construction and consists of vacant graded areas enclosed by windscreen fences. Temporary construction lighting is visible throughout the site. Entrances to the construction site with security checkpoints are visible along the west side of Prairie Avenue.

Prairie Avenue includes three travel lane lanes in each direction, with a turn lane at the center of the roadway and additional right turn lanes in some locations Sidewalks are provided on both sides of Prairie Avenue with limited landscaping and street trees. Traffic signs are affixed on gray traffic poles and gray streetlight poles are located along the street. Multiple driveways are located along both sides of the street to allow for vehicles to enter parking lots and construction sites. A stretch of landscaped median extends from south of Arbor Vitae Street to just north of Hardy Street.

4.1.5.2 Light and Glare

The entire Project alignment is located at a highly urbanized area containing numerous light sources that generate varying degrees of light. Nighttime lighting is necessary to provide and maintain safe, secure, and attractive environments. However, these lights have the potential to produce spillover light and glare if designed incorrectly. Light sources located close to light-sensitive receptors, such as residential units at nighttime, are most relevant for this analysis.

As described below, existing light sources in the Project area are typical of a highly developed area containing commercial and residential uses. The Project area does not contain any sources of light or glare that currently interfere with daytime or nighttime visibility. The existing levels of lighting are typical for a mix of commercial and residential uses located in an urban area, and there are no existing sources of light or glare that affect existing uses along these street segments Market Street Segment

Sources of existing ambient light along the Market Street Segment includes streetlights, vehicle headlights, traffic lights, and lighting from parking lots and commercial buildings. There are no existing light sensitive uses located along this segment of Market Street, such as residential dwellings and hotels/motels.

The facades of buildings along Market Street primarily include non-reflective materials that do not create glare. Existing nighttime sources of glare are primarily associated with vehicle headlights traveling throughout the area.

Manchester Boulevard Segment

Sources of nighttime illumination on Manchester Boulevard consist of light sources commonly found in developed urban areas, including streetlights, vehicle headlights, traffic lights, and lighting from adjacent buildings. This segment includes residential homes on the north side of the street between Manchester Drive and Osage Avenue which are currently exposed to these sources of light.

The facades of buildings along this segment primarily include non-reflective materials that do not contribute to glare. Existing nighttime sources of glare are primarily associated with vehicle headlights traveling on Manchester Boulevard and adjacent streets.

Prairie Avenue Segment

Nighttime lighting on Prairie Avenue consists of light sources commonly found in developed urban areas, including streetlights, vehicle headlights, traffic lights, lighting from buildings located along the street and lighting associated with billboards located along this segment of Prairie Avenue. Residential and motel uses located west of Prairie Avenue are currently exposed to these light sources.

East of Prairie Avenue, nighttime lighting associated with the surface parking lots surrounding the Forum and HPSP are also visible from the residential and motel uses west along Prairie Avenue. The parking lot lights at the Forum and HPSP are similar in intensity to the adjacent streetlights. Although located throughout the large surface parking lots and along the perimeter, these lights are shielded and directed and result in limited light spillover onto these light-sensitive uses.

The facades of buildings along this segment primarily consist of non-reflective materials that do not contribute to glare conditions. Existing nighttime sources of glare are primarily associated with vehicle headlights traveling on Prairie Boulevard and adjacent streets.

4.1.5.3 Adjusted Baseline Conditions

The Adjusted Baseline Environmental Setting as described in **Section 4.0: Environmental Impact Analysis**, *4.0-5: Adjusted Baseline* for 2026 is considered in this analysis. The residential, office, retail, and entertainment uses associated with the HPSP Project Adjusted Baseline projects would result in changes to the visual conditions east of Prairie Avenue.

The Champion Park neighborhood planned between Arbor Vitae Street and Hardy Street west of Prairie Avenue would accommodate a range of housing types with a residential gateway constructed at the intersection of Arbor Vitae Street and Prairie Avenue. Street trees along this segment of Prairie Avenue would be primarily Afghan Pine (*Pinus eldarica*) planted along the sidewalks and the roadway median.[23]

At the intersection of Hardy Street and Prairie Avenue a primary point to the HPSP community is planned as a gateway consisting of substantial structures and signage to introduce patrons to the retail and entertainment located west of Prairie Avenue from Hardy Street to Century Boulevard. Street trees south of Hardy Street would be Camphor (*Cinnamomum camphora*) trees. Street trees on the east side of Prairie Avenue would be substantial in stature, ranging from 40 feet to 50 feet in height and create a buffer between this area and Prairie Avenue.[24]

All exterior lighting at the HPSP would be directed onto the driveways, walkways, and parking areas and shielded to minimize glare and light spill onto adjacent properties and streets. In addition to lighting on vertical structures, specialty lighting would be used to highlight architectural elements, landscaping, and building tenant and project signage. Security and safety lighting would also be provided as necessary in parking areas, service passages, and common areas. All lighting would be directed toward the ground wherever feasible or screened to minimize illuminating surrounding areas and minimize glare and interference with vehicular traffic. Additionally, building facades and windows would be constructed of

23 City of Inglewood. Hollywood Park Specific Plan. Adopted July 8, 2009. Amended September 2014 and February 2015.
24 City of Inglewood. Hollywood Park Specific Plan. Adopted July 8, 2009. Amended September 2014 and February 2015.

non-reflective materials to avoid glare impacts on surrounding residential properties and streets. While the new buildings and site improvements in the HPSP area would substantially change the visual environment east of Prairie Avenue, these changes would not conflict with nearby uses.[25]

4.1.6 THRESHOLDS OF SIGNIFICANCE

Criteria outlined in CEQA Guidelines were used to determine the level of significance of aesthetics impacts. Appendix G of State CEQA Guidelines indicates that a project would have a significant impact in relation to aesthetics if it were to:

Threshold AES-1a **Would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings. (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project cause degradation to visual character?**

Threshold AES-1b **If the project is in an urbanized area, would the project be consistent with applicable zoning and planning regulations governing scenic quality?**

Threshold AES-2 **Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area.**

4.1.7 IMPACT ANALYSIS FOR THE PROPOSED PROJECT

The environmental impact analysis presented below is based on determinations made in the Revised Initial Study (Revised IS) for impacts considered to be potentially significant.

Impact AES-1 a: **Would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings. (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project cause degradation to visual character?**

Alterations to visual quality and character can often be perceived as subjective. To better understand the integration of the proposed Project into the existing environment, descriptions of the ITC Design Guidelines, Construction Commitment Program (CCP), and the Transportation Corridor Overlay Zone (TC Overlay Zone) proposed as part of the Project are provided below along with photographic visual simulations of the Project.

25 City of Inglewood. Final Environmental Impact Report. I. Introduction Executive Summary. https://www.cityofinglewood.org/DocumentCenter/View/125/I-Introduction-Execitive-Summary-PDF. Accessed November 30, 2020.

Construction

The proposed Project would include the construction of the APM system including as the stations, guideways, MSF, and two TPSSs. During construction, exposed dirt, construction equipment, and demolition debris would be visible but temporary. Construction would occur in four phases over approximately five years, between 2022 and 2026, with the phases occurring at different times along the segments of streets along the Project site. Phasing the construction activities in this manner would reduce the duration of exposure by each segment. For detailed construction phasing timeframes and construction activities occurring during each phase, please refer to **Section 3: Project Description**.

In order to lessen the temporary aesthetic impacts associates with construction of the Project, the CCP identifies practices to be implemented during construction. These project design features address visually obtrusive erosion control devices such as silt fences, plastic ground cover, and straw bales and removal of these elements as soon as the area is stabilized. Stockpile areas would also be located in areas with the least visibility.

The CCP also address removal and replacement of trees affected by construction of the Project. Tree removal during construction would be avoided to the extent feasible. These guidelines require a tree removal and replacement plan to be prepared that would ensure any landscaping removed to construct the Project is returned to original condition. Any trees requiring removal would be replaced with the same species and planted in the same location as the tree being removed if feasible. If trees cannot be replaced at the same location with the same type of tree, the City's Public Works Department would designate an alternative location, type, and/or size to replace the original tree. All trees removed would also be replaced in a timely manner as long as the replacement does not conflict with any future construction activities or within six months of the completion of construction around the removal site. Lastly, post-planting maintenance of the trees would be required for a period of three years from the date of the planting and the trees and landscaping would have a warranty period of at least one year. The City would conduct an inspection of all replacement trees and landscaping for general health as a condition of final acceptance by the City. These proposed tree protection measures would ensure any tree replacement would be properly implemented and the proposed Project area maintains a high level of aesthetic quality.

Implementation of these measures the proposed Project would reduce unsightly views of construction activities and, for this reason, visual impacts during construction would be less than significant.

Operation

After construction, the components of the proposed APM system that would change the existing visual character along the proposed alignment would include the APM guideway and stations, the MSF, and

related support structures including the two TPSSs. The frequent moving trains on the elevated APM guideway and station structures would be visible from adjacent land uses and the surrounding neighborhoods.

To illustrate the proposed Project's effects on the existing urban environment, a series of visual simulations showing the APM system, including the guideway, stations, and MSF, were prepared. **Figure 4.1-1: View Point Location Map** shows the locations of public viewpoints available to the general public traveling to or near the proposed Project along Market Street, Manchester Boulevard, Prairie Avenue, and Pincay Drive.

View 1–Florence Avenue and Locust Street

The view in **Figure 4.1-2: View 1 – Florence Avenue and Locust Street** shows the proposed Project guideway and the Market Street/Florence Avenue station as it would be viewed from the public right-of-way near Florence Avenue and Locust Street. The top of the station structure and portions of the guideway would be visible from this location.

View 2–Florence Avenue and Market Street

The view in **Figure 4.1-3: View 2 – Florence Avenue and Market Street** shows the proposed Project guideway as it would be viewed from the public right-of-way near Florence Avenue and Market Street. Portions of the guideway would be visible as it enters the public right-of-way on Market Street and heads south.

Under existing conditions, the ongoing construction of a mixed-use project on the west side of Market Street north of Regent is visible, along with portions of the existing commercial center located on the west side of Market Street. Views along Florence Avenue and Market Street currently consist of low-rise commercial development, surface parking, signs, mid-rise office buildings, and the ongoing construction of the Metro Crenshaw/LAX line. Continuing south along Market Street, views include existing low-rise commercial development with street parking and wide sidewalks.

View 3–Manchester Boulevard and Market Street

The view in **Figure 4.1-4: View 3 – Manchester Boulevard and Market Street** shows the proposed guideway as it would be viewed from the public right-of-way just west of Manchester Boulevard and Market Street. The guideway would be visible on the west side of Manchester Boulevard and from south bound Market Street and crossing the intersection of Market Street and Manchester Boulevard.

The view shows existing commercial development along Manchester Boulevard on both the north and south side of the street. Views along Manchester Boulevard toward Prairie Avenue currently consist of low-rise commercial and residential development, as well as street parking.

View 4–Prairie Avenue and Manchester Boulevard

The view in **Figure 4.1-5: View 4 – Prairie Avenue and Manchester Boulevard** shows the proposed Project guideway as seen from public right-of-way near just north of the intersection of Prairie Avenue and Manchester Boulevard. The guideway would be visible as it exits Manchester Boulevard and heads south on Prairie Avenue.

The views show the Forum to the east of the guideway. Views along Prairie Avenue include the Forum monument signage, and the ongoing construction within the HPSP entertainment district, surrounded by largely vacant land.

View 5–Prairie Avenue and Pincay Street

The view in **Figure 4.1-6: View 5 – Prairie Avenue and Pincay Street** shows the guideway and the Prairie Avenue/Pincay Street station viewed from the public right-of-way near Florence Avenue and Locust Street. The station is located over the intersection of Prairie Avenue and Pincay Street, and the guideway extends from the station both north and south along Prairie Avenue.

The view includes the ongoing construction in the HPSP area, as well as the Forum to the right of the station.

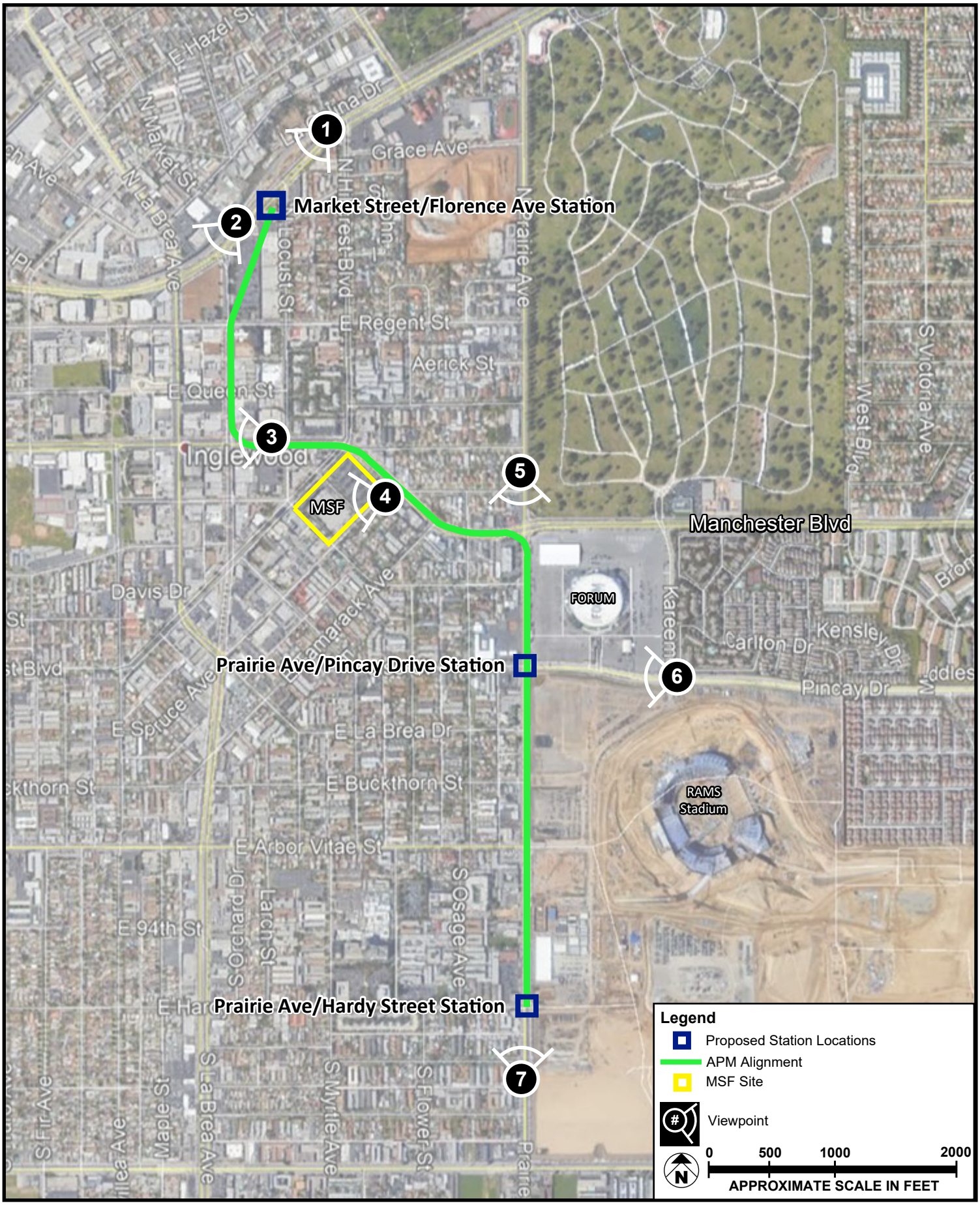
View 6–Prairie Avenue and 97th Street

The view in **Figure 4.1-7: View 6 – Prairie Avenue and 97th Street** shows the Prairie Avenue/Hardy Street station viewed from public right-of-way near Prairie Avenue and 97th Street looking north. The station is located over the intersection of Prairie Avenue and Hardy Street.

Views along Prairie Avenue toward Hardy Street include the Forum and associated monument signage and surface parking, as well as other low-rise commercial development on the west side of Prairie Avenue. Ongoing construction in the HPSP areas is visible on the east side of Prairie Avenue.

View 7–Manchester Boulevard and Spruce Avenue

The view in **Figure 4.1-8: View 7 – Manchester Boulevard and Spruce Avenue** shows the proposed Project the Prairie Avenue/Hardy Street station viewed from public right-of-way near Prairie Avenue and Spruce Avenue looking northwest. The MSF facility is proposed on the site currently developed as a retail commercial area. Spruce Avenue west of Manchester Boulevard would also be visible from this location.



SOURCE: Google Earth - 2020; Meridian Consultants LLC - 2020

FIGURE **4.1-1**

Viewpoint Location Map

208-003-20



Conceptual View Without Project



Conceptual View With Project

SOURCE: Google Earth - 2020; Meridian Consultants LLC - 2020

FIGURE **4.1-2**

View 1 – Florence Avenue at Locust Street

208-003-20



Conceptual View Without Project



Conceptual View With Project

SOURCE: Google Earth - 2020; Meridian Consultants LLC - 2020

FIGURE **4.1-3**

View 2 – Market Street at Florence Avenue



Conceptual View Without Project



Conceptual View With Project

SOURCE: Google Earth - 2020; Meridian Consultants LLC - 2020

FIGURE **4.1-4**

View 3 – Manchester Boulevard at Locust Street



Conceptual View Without Project

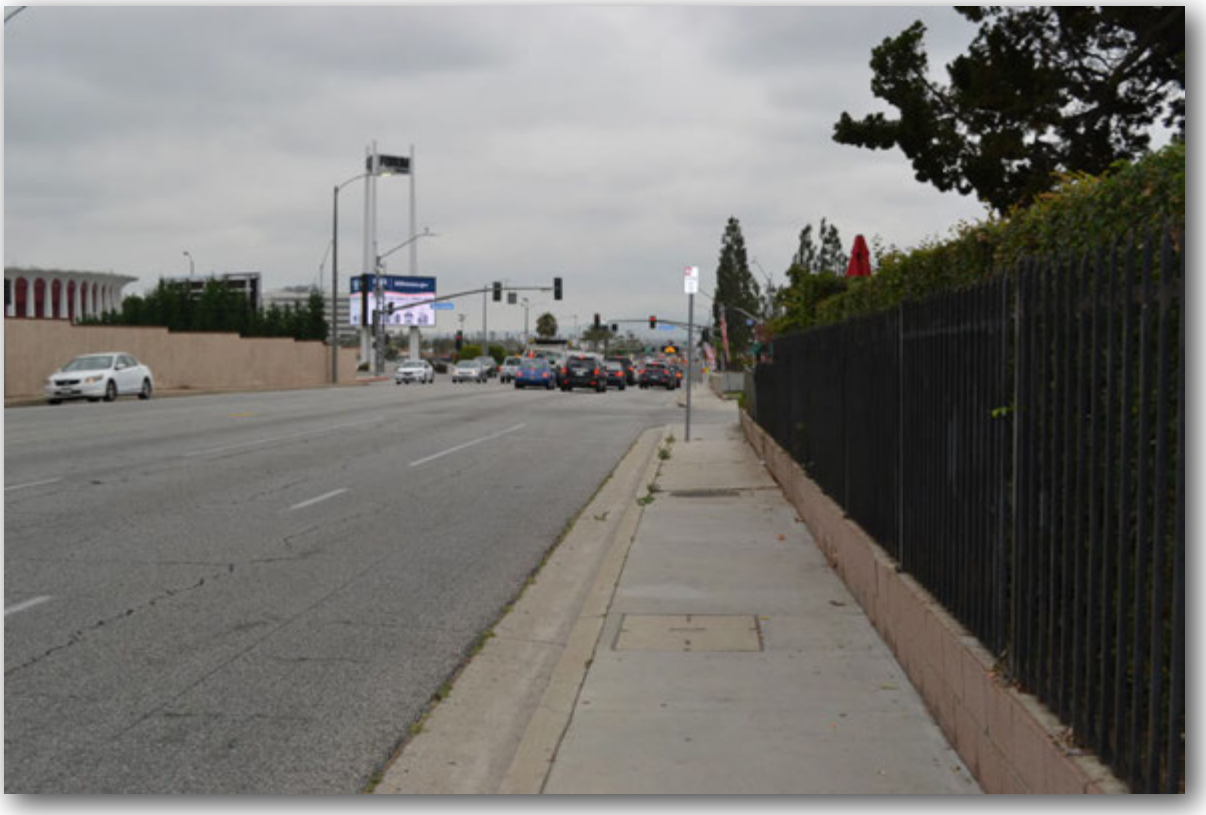


Conceptual View With Project

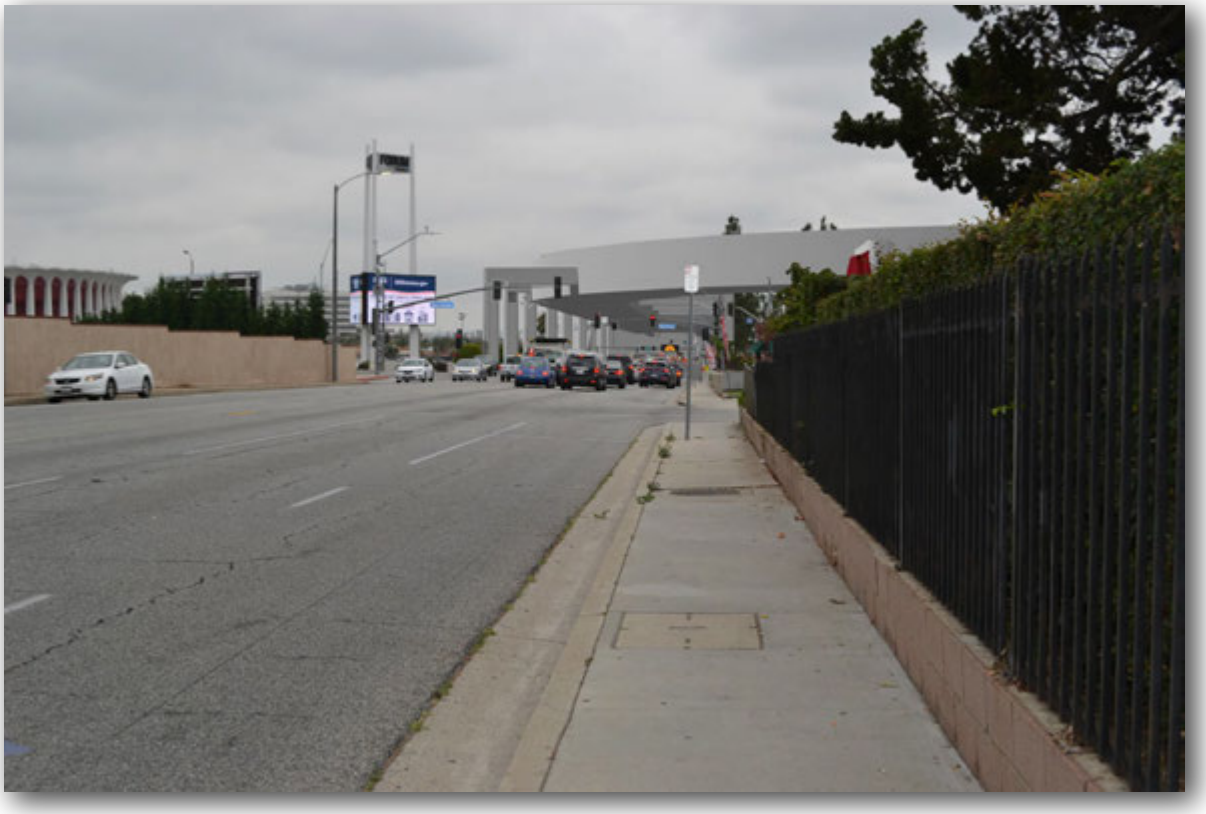
SOURCE: Google Earth - 2020; Meridian Consultants LLC - 2020

FIGURE **4.1-5**

View 4 – Manchester Boulevard at Spruce Avenue



Conceptual View Without Project



Conceptual View With Project

SOURCE: Google Earth - 2020; Meridian Consultants LLC - 2020

FIGURE **4.1-6**

View 5 – Prairie Avenue north of Manchester Boulevard



Conceptual View Without Project



Conceptual View With Project

SOURCE: Google Earth - 2020; Meridian Consultants LLC - 2020

FIGURE **4.1-7**

View 6 – Prairie Avenue at Pincay Street



Conceptual View Without Project



Conceptual View With Project

SOURCE: Google Earth - 2020; Meridian Consultants LLC - 2020

FIGURE **4.1-8**

View 7 – Prairie Avenue at 97th Street

Market Street Segment

Market Street/Florence Avenue Station

The Market Street/Florence Avenue Station would be a focal point of the proposed Project, connecting the APM system to the Metro Crenshaw/LAX line. The Market Street/Florence Avenue station would replace the existing commercial center at 300 E Florence. The station would include ground, mezzanine, and platform levels. The ITC Design Guidelines for design of the station to be sleek, horizontal, and monolithic in the modern style to enhance the user experience and the identity of the proposed Project. The canopies would be the dominant architectural feature providing shade and protection from inclement weather while allowing for natural ventilation and daylight. Vertical circulation including escalators, stairs, and elevators would be included as part of the station. The elevators would be constructed using transparent glass to contribute to a modern exterior while allowing unobstructed views from all sides. For approximate station dimensions, please refer to **Table 4.1-1: ITC Project Component Locations and Sizes (Illustrative).**

The station's exterior would be composed of exposed concrete with a light canopy material. The exposed exterior of the structure would be made with materials resistant to graffiti and vandalism to reduce the potential for unsightly defaced properties. The neutral tone of the station would allow it to blend in with its surroundings. The platform and mezzanine guardrails would be as transparent as possible to enhance the incorporation of the station with its surrounding environment. The Design Guidelines call for the final design of this station to reflect the unique character of downtown Inglewood to further integrate the structure into the surrounding community.

A drop-off/pick-up area on Locust Avenue and Regent Street to facilitate travel mode would be located adjacent to this station along with a public parking lot to accommodate APM riders and consolidate parking while reducing parking impacts to nearby streets and facilities. A surface parking lot currently exists at this location and the view of the new parking lot would be comparable in visual character to the existing parking lot, with additional landscaping and site improvements required by the ITC Design Guidelines.

Table 4.1-1
ITC Project Component Locations and Sizes (Illustrative)

Project Component	General Location	Approximate Size
Guideway	• Located within the existing public rights-of-way of Market Street, Manchester Boulevard, and Prairie Avenue • Acquisitions, and some encroachments onto existing private properties for air rights and/or easements may be required	• Approximately 1.6 miles dual lane, end to end • The guideway would vary in height from a minimum of ~35 feet to a maximum of ~60 feet measured from existing grade to top of guideway deck • The dual lane guideway width would vary from a minimum of ~30 feet to a maximum of ~75 feet. Maximum widths are at stations and approach to stations.
Stations		
Market Street / Florence Avenue Station	• Located on private property (to be acquired by the City) at the southeast corner of Market Street/Florence Avenue	• Up to ~90 feet measured from existing grade to top of station canopy • ~75 feet wide (station structure and guideway only; not including vertical circulation) • ~250 feet long platform for train berthing
Prairie Avenue / Pincay Drive Station	• Located within the public right-of-way at the intersection of Prairie Avenue / Pincay Drive	• Up to ~90 feet measured from existing grade to top of station canopy • ~75 feet wide (station structure and guideway only; not including vertical circulation) • ~250 feet long platform for train berthing
Prairie Avenue / Hardy Street Station	• Located within the public right-of-way just north of the Prairie Avenue / Hardy Street intersection	• Up to ~90 feet measured from existing grade to top of station canopy • ~75 feet wide (station structure and guideway only, not including vertical circulation) • ~250 feet long platform for train berthing
Vertical Circulation Elements	• Located at each station within the public right-of-way • Locations would depend on station specific requirements to connect to existing sidewalk/pedestrian walkways. In some cases, may be located within adjacent private properties beyond existing public rights-of-way	• Vertical circulation elements would exist at each station to provide access from the platform level to the mezzanine level and ground level

Project Component	General Location	Approximate Size
Passenger Walkway	• Located above Florence Avenue connecting the Market Street/Florence Avenue Station to the Metro Crenshaw/LAX Line's Downtown Inglewood Station • Specific location would be determined at time of design and coordinated with Metro	• Up to ~65 feet measured from existing grade to top of structure • ~30 feet wide for pedestrian walkway • ~280 feet long • Minimum vertical clearance of 10 feet within the walkway interior
Maintenance and Storage Facility (MSF)	• Located on private property (to be acquired by the City) at 500 E. Manchester Boulevard	• ~97,400 sf building area • Up to ~75 feet measured from existing grade to top of roof
Traction Power Substation (TPSS)	• Two TPSS's; one located at the MSF site and the second at the City's Civic Center Intermodal Transportation Facility (ITF) site located at the southeast corner of Prairie Avenue and Arbor Vitae Street • Specific locations within each site would be determined during the design phase	• ~30 feet wide x ~100 feet long • Up to ~20 feet clearance measure from floor to ceiling • If located below grade, an additional space of ~30 feet wide x ~30 feet long for vertical circulation • ~20 feet wide x ~40 feet long additional space for auxiliary equipment such as a backup generator, if necessary
Roadway Improvements	• Market Street, Manchester Boulevard and Prairie Avenue	• New roadway striping, lane configurations, partial relocation, on-street parking adjustments, new sidewalks, lighting improvements, and traffic signal adjustments as needed
Pick-Up/Drop-Off Areas, Surface Parking Lots and Staging Areas During Construction	• Market Street/Florence Avenue Station site • 150 S. Market Street • 500 E. Manchester Boulevard	Surface level parking at each site: • ~650 spaces at Market Street/Florence Station • ~50 spaces at 150 S. Market Street • ~450 spaces at 500 E. Manchester Boulevard Pick-Up/Drop-Off Area: • Market Street/Florence Avenue Station site on Locust Street south of Florence Avenue, and Regent Street between Locust Street and Market Street

Passenger Walkway

A passenger walkway would be constructed to connect the Market Street/Florence Avenue Station with the Metro Crenshaw/LAX Line Downtown Inglewood Station. This passenger connection would be elevated and span over Florence Avenue. This walkway would be simple in design and form to deliver functionality and protect passengers from inclement weather. The exterior of the walkway would be constructed with transparent material to the extent feasible to provide a contemporary and appealing aesthetic while providing as much natural daylight and views for pedestrians moving within the walkway. Neutral tones would be used in areas of the structure where transparent material cannot be used to further integrate the pedestrian walkway with the surrounding structures.

APM Guideway

The guideway in this segment would exit the existing commercial center site at the intersection of Market Street and Regent Street and continue south above the Market Street right of way until Manchester Boulevard where the guideway would turn east.

The guideway would have a significant visual presence on Market Street as it travels above the existing two-lane street weaving in between and above buildings. The design of the guideway would be streamlined and horizontal in expression with columns positioned in the middle of the roadway with as much space in between columns as is feasible, away from storefronts and adjacent buildings, to support the guideway structure. As the guideway approaches the intersection of Market Street and Manchester Boulevard, the guideway widens and shifts from a single lane guideway to a dual lane guideway with separation between the guideway structures. The columns would also shift from single columns in the center of the roadway to dual-bend columns spanning the width of the roadway to support the dual guideway. For guideway alignment plans and column placements, please refer to **Appendix 3.0.1: Inglewood Transit Connector EIR Operating Systems Conceptual Planning EIR Project Definition**. Guideway transitions at crossovers would be smooth and rounded with all conduits, guideway equipment, walkways, drainage systems, and other utilities concealed from the ground view. Overall, the guideway would be simple, clean, respectful of the surrounding environment and complimentary to the station designs.

Historic Resources and Character

There are seven identified historical resources on this segment of Market Street, adjacent to the APM guideway. The guideway would result in indirect impacts to the current public views of one building, the former Fox Theater building located at 115 Market Street, identified as a historic resource for its architectural design.

As proposed, the APM guideway would obstruct views of the primary façade of the Fox Theater building. The APM guideway would be located directly in front of the theater building and visually obscure a portion of the sign pylon, creating a visual separation between the uppermost portion of the pylon and the lower portion of the building containing the theater marquee and public entrance. The APM guideway would also limit or block views of the primary façade of the building to the sidewalk directly in front of the building, making it difficult to appreciate the overall design of the building. Because the ability of the former Fox Theater to convey its historic significance would be impaired following the implementation of the proposed Project, this visual impact on the former Fox Theater is considered significant. For detailed analysis and proposed mitigation measures to lessen the effects of the APM guideway on the Fox Theater, please refer to **Section 4.4: Cultural Resources**.

Streetscape

The ITC Design Guidelines include public realm guidelines addressing landscape and the interface of the Project with the existing streets. Under the ITC Design Guidelines, this segment of the streetscape is designed to complement standards and guidelines outlined within the *Downtown TOD Plan*[26] while accommodating Project needs. Specifically, the existing streetscape design and aesthetics as described in the existing conditions would be maintained to the extent feasible while providing necessary upgrades such as ADA compliance ramps. The sidewalks would be designed to be as wide as possible to allow for places to sit and gather and encourage social interaction. Separation of pedestrians from the roadway using the recommended street trees per the ITC Design Guidelines would be incorporated to maintain the character of the historic core. Street furniture and street tree concepts would be consistent with the ITC Design Guidelines, which include consideration of the street furniture and street tree concepts set forth in the *Downtown TOD Plan, Section 2.8, Street Trees and Furniture*.

Shade and Shadow

New shade and shadow patterns in the Market Street segment would be created by the APM guideway structures and the Market Street/Florence Avenue station. The TPSS in this segment would be located on the Market Street/Florence Avenue station site and given its size would not create additional shadow patterns. Uses sensitive to shading along Market Street include residential uses and outdoor spaces associated with residential or recreational uses and solar panels.

The Market Street/Florence Avenue station would be located on the southeast corner of Market Street and Florence Avenue. The station's shadow would be cast furthest on a winter morning and during sunset

26 City of Inglewood. New Downtown and Fairview Heights Transit Oriented Development Plan and Design Guidelines. Adopted November 1st, 2016. http://inglewood.arroyogroup.com/wp-content/uploads/2017/01/The-New-Downtown-Fairview-Heights-TOD-Plan-Design-Guidelines-lo-res.pdf. Accessed November 30, 2020.

on a winter evening. The shadow would be cast northwest over Florence Avenue on a winter morning and southeast on a winter evening. As the surrounding land uses are commercial, no sensitive receptors are present and no shade and shadow impacts to surrounding uses are anticipated. Additionally, there are no existing solar panels in this segment identified through review of aerial photographs.[27]

The guideway within the Market Street right of way would run the entirety of the segment from south of Regent Street to Manchester Boulevard. With the configuration (height/width) of the guideway, the shadows created would be narrow and would not affect large areas at any point during the day. This narrow shadow pattern would also move throughout the day, from northwest to southeast, and no areas would be shaded for long periods. For these reasons, no adjacent properties will be substantially shaded for long periods of time during the day.

As there are no shade and shadow sensitive uses adjacent to this segment, and the shadow of the guideway will not affect the same area for an extended time due to the location and dimensions of the guideway, the proposed Project would have a less than significant shade and shadow impact on the surrounding uses in this segment.

Manchester Boulevard Segment

APM Guideway

The guideway in this segment would travel the entire length of the segment on Manchester Boulevard from Market Street to Prairie Avenue. The dual guideway continues from the Market Street segment as the guideway turns east onto Manchester Boulevard. The elevated dual guideway would be supported by straddle bent columns (dual columns) until the guideway approaches Hillcrest Boulevard and the MSF, where the dual guideway shifts back to a single guideway positioned on the south side of Manchester Boulevard. The single guideway would continue to be supported by dual columns on the south side of Manchester Boulevard until Tamarack Avenue. East of Tamarack Avenue the guideway columns revert back to single columns and both the guideway and the columns would shift to the north side of Manchester Boulevard.

The guideway would travel above the existing six-lane roadway. The design of the guideway would continue to be streamlined and horizontal in expression to integrate into the existing environment. Columns would be spaced apart with as much distance in between as is feasible to reduce aesthetic impacts to travelers on the ground level and nearby land uses. For guideway alignment plans and column placements, please refer to **Appendix 3.0.1**. Transitions at crossovers would be smooth and rounded with

27 Google Earth, 2020.

all conduits, guideway equipment, walkways, drainage systems, and other utilities concealed from the ground view. Overall, the guideway would be simple, clean, respectful of the surrounding environment.

Maintenance and Storage Facility

The ITC Design Guidelines require the massing and height of the Maintenance and Storage Facility (MSF) to be minimized to be as unobtrusive to adjacent neighbors as possible while maintaining functionality and allowing roof access. All rooftop equipment would be fully screened to prevent unsightly views from the ground and adjacent buildings. Building exterior would be covered in a uniform and neutral color to allow proper integration of the structure with the adjacent aesthetic environment. To prevent unsightly graffiti and vandalism, and to reduce the required amount of exterior maintenance, the exterior material of the MSF would be graffiti resistant.

The MSF site would have surface level public parking lot adjacent to the MSF building. The aesthetics of the surface level parking lot would be similar to the existing parking lot at the Project site, with black asphalt and striped spaces throughout the lot. Pedestrian walkways surrounding the site would comply with local standard and guidelines with street trees planted around the site for aesthetic appeal and to separate the MSF building from surrounding uses.

The MSF would include decorative security walls and fences along the edges of the facility to shield view of the MSF from public view. Decorative screening walls and fences would be designed to completely enclose all mechanical equipment while allowing for sufficient airflow. All solid fences or walls would be articulated with similar or complementary materials and colors to the building. Any long expanses of walls and fences would be broken up with projections or recessed elements, landscape pockets and changes in materials or textures. Landscape elements, such as vines to create a green wall or screen, would be used in combination with walls and fences.

Historic Resources and Character

There is one identified historical resource, the Bank of America building, located at 320 Manchester Boulevard. The buildings' scale, massing, and overall composition would remain readily discernable to the viewer despite some interruption of views by the guideway columns and would still convey its historic significance as a historic resource. For additional analysis please refer to **Section 4.4.**

Streetscape

Under the ITC Design Guidelines, the Manchester Boulevard segment between Market Street and Locust Street is designed to complement the standards and guidelines outlined within the *Downtown TOD Plan*[28]*,* similar to the Market Street segment. Necessary upgrades such as ADA compliant ramps would be integrated within the Project site area as applicable. The sidewalks would be designed to be as wide as possible to allow for places to sit and gather and encourage social interaction which would enhance the attractiveness of the sidewalk. Separation of pedestrians from the roadway using street trees would be incorporated. Street furniture and street trees concepts would be consistent with the ITC Design Guidelines, which include coordinating street furniture and street trees included in the ITC Project with the concepts defined in the *Downtown TOD Plan, Section 2.8, Street Trees and Furniture*.

The streetscape design east of Hillcrest Boulevard would also follow the ITC Design Guidelines. The sidewalk zones would be constructed as wide as possible on both sides of the street, with planting zones between the sidewalk and the street where feasible. The planting of street trees and integrated landscaping along the sidewalk enhance the attractiveness of the streets and provides a walkable environment. Planting zones would also be incorporated into roadway medians where feasible to enhance the aesthetic quality of the roadway. Pass-throughs between planting zones and sidewalks would be created to deter drop-offs other than at designated zones and to protect pedestrians from crossing streets at locations other than at marked crossings.

Shade and Shadow

New shade and shadow patterns along the Manchester Boulevard segment would be created by the APM guideway structures and the MSF. Shade and shadow sensitive uses in this segment include the residential uses to the northeast of the segment, west of Osage Avenue. No existing solar panels in this segment that were identified through review of aerial photography.[29]

The MSF would be located off the public right of way on the southeast corner of Manchester Boulevard and Hillcrest Boulevard. The building's shadow would be cast furthest on a winter morning and during sunset on a winter evening. Given the dimension of the building and its distance from surrounding uses, the shadow cast by the building would be entirely contained within the MSF site. As the shade and shadow of the building would be completely contained within the site, no sensitive receptors would be present and no shade and shadow impacts to the surrounding uses is anticipated.

28 City of Inglewood. New Downtown and Fairview Heights Transit Oriented Development Plan and Design Guidelines. Adopted November 1st, 2016. http://inglewood.arroyogroup.com/wp-content/uploads/2017/01/The-New-Downtown-Fairview-Heights-TOD-Plan-Design-Guidelines-lo-res.pdf. Accessed November 30, 2020.

29 Google Earth, 2020.

The guideway would be located entirely within the public right of way of Manchester Boulevard. With the configuration (height/width) of the guideway, the shadows created would be narrow and would not affect large areas at any point during the day. This narrow shadow pattern would also move throughout the day, from northwest to southeast, and no areas would be shaded for long periods. For these reasons, no adjacent properties will be substantially shaded for long periods of time during the day.

As the shadow of the guideway would not be extensive and no adjacent property would be shaded for a substantial portion of the day, the proposed Project would have a less than significant shade and shadow impact on the surrounding uses in this segment.

Prairie Avenue Segment

Prairie Avenue/Pincay Drive Station and Prairie Avenue/Hardy Street Station

The design of this station would be similar to the Market Street/Florence Avenue station, with a sleek, horizontal, and monolithic modern style to enhance the aesthetic appearance of the structure and the identity of the proposed Project. The final design of the station would complement the new surrounding development along Prairie Avenue to visually integrate the proposed Project with the surrounding area.

The station would include ground, mezzanine, and platform levels with vertical circulation consisting of escalators, stairs, and elevators integrated into the station design. Wherever possible, transparent screen walls and railings of the appropriate height would be integrated as part of the station to enhance the appearance of the station and integrate the structure with its surroundings. Where transparent materials cannot be used, a neutral color palette would be used to add to the modern style of the station. Surface materials used for the station would be resistant to graffiti and vandalism to prevent deterioration and unsightly views of the exterior.

Additionally, the Prairie Avenue/Pincay Drive Station would be located near the Kelso Elementary School and passengers traveling to and from the station could potentially distract students on campus. The patrons to the APM system may also loiter near the campus and become a concern for those attending the school. Visual impacts to the school attendees could be potentially significant.

APM Guideway

The guideway in this segment would travel the entire length of the segment on Prairie Avenue from Manchester Boulevard to Hardy Street. The single guideway continues from the Manchester Boulevard segment as the guideway turns south onto Prairie Avenue. The elevated guideway would be supported by dual columns until the guideway approaches La Palma Drive, where the single columns would replace

dual columns in providing support to the guideway. Both the guideway and the columns would shift to the west side of Prairie Avenue. The single columns on the west side of Prairie Avenue continues until the guideway approaches Victory Street and the Prairie Avenue/Hardy Street station, where the dual columns would provide support to the last stretch of the APM guideway.

As the guideway travels above the existing seven-lane roadway down Prairie Avenue it would travel adjacent to Kelso Elementary School. The elevated guideway and traveling train cars would be visible to those on campus and may become distracting to the students. As such, the view of the trains could cause a visual impact to the students on campus.

The design of the guideway would continue to be streamlined and horizontal in expression to support integration into the existing environment and the anticipated new developments on the east side of Prairie Avenue. Columns would be spaced apart with as much distance in between as is feasible to reduce aesthetic impacts to travelers on the ground level and nearby land uses. For guideway alignment plans and column placements, please refer to **Appendix 3.0.1**. Transitions at crossovers would be smooth and rounded with all conduits, guideway equipment, walkways, drainage systems, and other utilities concealed from the ground view. Overall, the guideway would be simple, clean, respectful of the surrounding environment.

Historic Resources and Character

There are two identified historical resources- the Forum located at 3900 Manchester Boulevard and the Lighthouse McCormick Mortuary located at 619 Prairie Avenue. Even with the proposed Project, the scale, massing, and overall composition of these buildings would remain readily discernable to the viewer and would still convey their historic significance. As such, aesthetic impacts to these two historic resources would be less than significant. For additional analysis please refer to **Section 4.4.**

Streetscape

The entire segment not directly adjacent to the HPSP development area would be governed by local ordinances and the ITC Design Guidelines. The sidewalk zones would be constructed as wide as possible on both sides of the street, with planting zones between the sidewalk and the street where feasible. The planting of street trees and integrated landscaping along the sidewalk would enhance the attractiveness of the streets. Planting zones would also be incorporated into roadway medians where feasible to enhance the aesthetic quality of the roadway. Pass-throughs between planting zones and sidewalks would be created to deter drop-offs other than at designated zones and to protect pedestrians from crossing streets at locations other than at marked crossings.

Adjacent to HPSP on the east side of Prairie Avenue, between Arbor Vitae Street and Hardy Street, the ITC Design Guidelines call for the streetscape design to be complementary to the streetscape design guidelines for the HPSP project.[30] The HPSP streetscape plan is designed to create a diverse urban forest that will integrate development in Hollywood Park with the adjoining urban fabric and assist in developing districts of distinctive and appropriate character. Tree selections on Prairie Avenue in the HPSP design guidelines of are Afghan Pine, Camphor Tree, Southern Magnolia, and Canary Island Pine trees. Prairie Avenue adjacent to HPSP would incorporate residential and retail gateways, with the goal of providing an appealing environment for pedestrians and vehicles traveling along Prairie Avenue.

Shade and Shadow

New shade and shadow patterns in the Prairie Avenue segment would be created by the APM guideway structures and the Market Street/Florence Avenue station. The TPSS in this segment would be located at the City's Civic Center site on Prairie Avenue and, given its size, would not create shadow patterns large enough to encroach on adjacent uses at any point during the year or in the day. Nearby shade and shadow sensitive uses include residential uses west of Prairie Avenue. No existing solar panels in this segment that were identified through review of aerial photographs.[31]

The Prairie Avenue/Pincay Drive and the Prairie Avenue/Hardy Street stations would both be located within the public right of way. The stations would cast shadows furthest on a winter morning and during a winter evening. Surrounding uses to the stations are commercial and institutional uses, including the Kelso Elementary School and the Daycare Center. The recreational areas of these facilities are considered shade sensitive uses. However, shade and shadow from the Prairie Avenue/Pincay Drive station would only partially affect the recreational areas of these facilities and the shadow would shift throughout the day to affect different areas surrounding the station. Therefore, no significant shade and shadow impacts to the surrounding uses is anticipated.

The guideway within the Prairie Avenue right of way would run the entirety of the segment from Manchester Boulevard to Hardy Street. With the proposed configuration (height/width) of the guideway, the shadows created would be narrow and would not affect large areas at any point during the day. The narrow shadow pattern would also continue to move throughout the day, from northwest to southeast, spending a minimal amount of time over an area throughout the day. Therefore, no adjacent properties will be substantially shaded for long periods of time during the day.

30 Hollywood Park Lan Company, LLC. *Hollywood Park Specific Plan.* https://www.cityofinglewood.org/DocumentCenter/View/1347/Hollywood-Park-Specific-Plan. Adopted July 8, 2009, Amended September 23, 2014, Amended February 24, 2015.

31 Google Earth, 2020.

As the shadow of the guideway is not anticipated to affect the same area for an extended time due to its size and location, the proposed Project would have a less than significant shade and shadow impact on the surrounding uses in this segment.

Mitigation Measures

See **MM CUL-1** to **MM CUL-3**.

Level of Significance after Mitigation

While the proposed Project, inclusive of the APM guideway, stations, MSF and TPSSs, would result in changes to the existing visual character of the streets it would be located on, the Project would not result in substantial adverse changes to the existing visual character of these street corridors due to the design character of the Project as defined in the ITC Design Guidelines and other project design features defined in the CCP and mitigation measures which would result in the integration of the components of the Project into these street corridors.

Visual impacts associated with construction of the proposed Project would be less than significant with the implementation of measures from the CCP. These CCP measures would reduce the visual duration of the obtrusive erosion control devices to as short of a duration as feasible. The stockpile areas would be limited to areas less visibly sensitive as approved by the City. These measures would minimize the visual degradation impacts of the construction activities. The construction activities would also be phased to limit the exposure of one segment from continual exposure to construction activities and unpleasant views. Construction activities at each segment and overall would be temporary in nature and visual impacts would be alleviated once the construction is completed.

Overall, the APM structure, including the stations, guideway, MSF, and support facilities, would complement the existing surrounding by using transparent and neutral tones as part of its design character. The design would be in the modernist style to enhance the aesthetically pleasing quality of the structure. To prevent unsightly views and defacing of the structure, the exterior material would be anti-graffiti and anti-vandalism. The final design of the stations would also reflect the visual character of Downtown Inglewood and the new development occurring along Prairie Avenue.

The APM guideway and stations would also be designed to be compatible with sensitive uses located along the alignment, such as schools, that have views of the Project. The ITC Design Guidelines include guidelines for wall and fences that would be integrated into the design of the proposed facilities to screen views from sensitive uses. Walls, fences, and screens will be designed to balance functionality with aesthetics to create an attractive environment. Any long expanses of walls and fences will be broken up with textural or recessed elements, landscape pockets, or changes in material, with landscape elements

used in conjunction with these features but not as a substitute for a wall, fence, or other feature that would screens views of the components of the Project where needed to ensure the Project is visually compatible with adjacent uses.

The design of the APM guideway would generally allow the continued expression of the buildings identified as historic resources along Market Street in Downtown Inglewood. While the Project would not result in significant impacts to the overall visual character of Downtown Inglewood along Market Street, the guideway would obstruct views of the former Fox Theater building, identified as a historic resource due the architectural design of the building. While mitigation measures identified in **Section 4.4**, would reduce this impact to the extent feasible, this impact on the visual character of the historic building would be a significant and unavoidable impact of the Project.

Impact AES-1 b: **If the project is in an urbanized area, would the project be consistent with applicable zoning and planning regulations governing scenic quality?**

As previously noted, the proposed Project is located entirely within a developed urban area containing commercial, residential, and industrial uses near major corridors.

City General Plan

The City's General Plan includes the Land Use Element[32] which identifies various goals and policies that indirectly address the City's aesthetic objectives. The Land Use Element includes the following applicable goals:

Goal 1: Promote Inglewood's image and identity as an independent community within the Los Angeles metropolitan area.

Goal 2: Improve the visual appearance and economic condition of the existing arterial commercial development along Inglewood's major streets.

As part of the Downtown Transit Oriented District,[33] the City included the following goals for the area covered by the Downtown TOD Plan in the General Plan Land Use Element:

Goal 1: Downtown is a place to live, work, shop, recreate, and be entertained.

Goal 2: Downtown is a revitalized yet forward-looking gathering place for the community.

32 City of Inglewood *General Plan*, "Land Use Element" (adopted 1980, last amended 2016).

33 City of Inglewood, *New Downtown and Fairview Heights Transit Oriented Development Plan and Design Guidelines*, November 1, 2016.

Goal 6: Downtown expresses the unique culture of Inglewood.

The proposed Project would be consistent with the General Plan goals and policies by improving the general visual appearance of Inglewood through the incorporation of aesthetically pleasing architectural designs in the modern style for the guideway and stations. The structures of the APM system, including the stations, guideway, MSF, and support facilities, would utilize transparent material where feasible and appropriate and neutral tones to better integrate the system into the existing surrounding community. Unique Inglewood Historic Core elements may be incorporated to the extent provided for in the ITC Design Guidelines to further Downtown Inglewood's expression of a unique culture. To ensure the consistency of the APM system with the historic fabric of downtown and the General Plan Land Use Element the proposed amendment is included as part of the Project:

The new text shown as underlined is proposed to be added to the goal below in the "Circulation" subsection of the "Goals and Objectives" section:

- Policy 2.3: *Preservation of Historic Fabric*. Require the preservation of buildings that have been designated as historic and encourage the reuse of other historic buildings. Maintain the sense of place in areas with historic fabric and/or meaning such as Market Street between Regent Street and Hillcrest Avenue and the Hillcrest neighborhood east of Locust Street, <u>while also accommodating for the development of the Inglewood Transit Connector along Market Street between Regent Street and Manchester Boulevard</u>.

The incorporation of the underlined language would allow for the implementation of the proposed Project to be consistent with the existing General Plan.

For detailed consistency analysis of the Land Use goals and policies please see **Table 4.1-2: Scenic Quality Consistency with General Plan Land Use Element**.

Table 4.1-2
Scenic Quality Consistency with General Plan Land Use Element

Goals and Policies	Project Consistency
Goals and Policies added with 2016 Amendment	
Goal 1: Downtown is a place to live, work, shop, recreate, and be entertained.	**Consistent.** The proposed Project would strengthen Downtown Inglewood for commercial and residential uses by increasing accessibility to the downtown from local activity centers and the regional light rail network. This increased transit accessibility would promote local economic development opportunities, and enhance Downtown's retail, recreation, and entertainment offerings and range of housing and employment options. Implementation of the proposed Project would activate

Goals and Policies	Project Consistency
	and complement development in the City, and enhance social cohesion, equity, and community resilience.
Goal 2: Downtown is a revitalized yet forward-looking gathering place for the community.	**Consistent.** The proposed Project would promote economic development opportunities in Downtown Inglewood and support the development of a revitalized Downtown that serves as a gathering place for residents and visitors by increasing transit accessibility.
Policy 2.2: Pedestrian Network. Enhance sidewalks, repurpose alleys and create mid-block passthroughs and internal courtyards to serve as pedestrian passageways and enjoyable public spaces.	**Consistent.** The proposed Project would maintain and enhance sidewalks around the stations and guideway which would enhance the pedestrian environment. Sidewalks would be enhanced and widened at necessary points adjacent to the support columns to meet Americans with Disabilities Act (ADA) pedestrian circulation requirements, including along Market Street. New enjoyable public spaces would be created at each of the proposed stations that would be designed in accordance with the existing planning documents and the ITC Design Guidelines.
Policy 2.3: Preservation of Historic Fabric. Require the preservation of buildings that have been designated as historic and encourage the reuse of other historic buildings. Maintain the sense of place in areas with historic fabric and/or meaning such as Market Street between Regent Street and Hillcrest Avenue and the Hillcrest neighborhood east of Locust Street, <u>while also accommodating for the development of the Inglewood Transit Connector along Market Street between Regent Street and Manchester Boulevard.*</u>	**Consistent.** The proposed Project would result significant impacts to historic buildings. Mitigation measures would be proposed and incorporated to the extent feasible but the impacts would be significant and unavoidable. For detailed analysis, please refer to **Section 4.4 Cultural Resources**. To properly incorporate the proposed Project into the existing historic fabric of Downtown Inglewood, the amendment to Policy 2.3 has been proposed to include the APM system. With the incorporation of the GP amendment and the mitigation measures the proposed Project would be consistent with the GP Land Use Element. Additionally, the ITC Design Guidelines address the integration of the proposed Project into the historic character of the Downtown along Market Street. The guideway would have an integrated, clean design, with round columns. The underside of the guideway would be smooth, and color of the concrete would be neutral with accents achieved through lighting. The design guidelines for the Market Street Station call for large enclosure openings facing east to integrate the station with Downtown in a manner that complements and preserves the historic fabric of Downtown.
Goal 6: Downtown expresses the unique culture of Inglewood.	**Consistent.** The ITC Design Guidelines provide for a streetscape environment with complete streets and furnishings that help define street character. The sidewalks would be designed to be as wide as possible to facilitate the incorporation of street furniture. The Market Street/Florence Avenue Station would be designed with elements reflecting the unique culture of Inglewood.

Goals and Policies	Project Consistency
Goals and Policies (as adopted January 1980)	
General	
Promote Inglewood's image and identity as an independent community within the Los Angeles metropolitan area.	**Consistent.** The proposed Project would incorporate elements unique to Downtown Inglewood to facilitate the promotion of Inglewood's image and identity as an independent and unique community. In addition, the APM system would encourage and facilitate greater access to the City's activity centers, including SoFi Stadium, Forum, IBEC and Downtown Inglewood. These activity centers contribute to the City's status and identity as an entertainment destination within the Los Angeles metropolitan area.
Commercial	
Improve the visual appearance and economic condition of the existing arterial commercial development along Inglewood's major streets.	**Consistent**. The proposed Project would be designed in accordance with the ITC Design Guidelines and will enhance the visual appearance of the major streets containing the APM system by including streetscape improvements including landscaping and street furniture. The appearance of the APM structure would be modern with transparent materials and a natural color scheme to create an appealing appearance. The color scheme is also chosen to help better integrate the APM structure with the adjacent environment. The APM system would facilitate movement of greater numbers of residents and visitors along major streets in the City, thereby having the potential to activate existing commercial corridors, particularly along Market Street.

Source: City of Inglewood General Plan, "Land Use Element" (2016).
**Proposed GP Amendment*

Transportation Corridor Overlay Zone

The Transportation Corridor Overlay Zone (TC Overlay Zone) would apply the Project area and components of the APM including stations and support facilities including the MSF and the TPSSs within the Downtown TOD Plan and HPSP areas. The TC Overlay Zone would provide allowances for encroachment into areas that may be used for the APM system for columns, support structures, and other APM physical components, and establish height limits to accommodate for APM structures. The TC Overlay Zone would provide a design review process unique to the TC Overlay Zone for the construction of the APM system. The TC Overlay zone would take precedence over the requirements of the IMC in the event of a conflict. The TC Overlay Zone is a permissive zone and would not change or restrict the current underlying zoning of any parcel.

With the implementation of the TC Overlay zone, implementation of the APM system would be consistent with the IMC and other local regulations.

Downtown TOD Plan and Design Guidelines

Portions of the proposed Project are located in the Historic Core area designated by the Downtown TOD Plan. While the ITC Design Guidelines address the Project and will not alter or change the standards in the Downtown TOD Plan, the ITC Design Guidelines were created to integrate all Project elements with the Historic Core area vision set forth in the Downtown TOD Plan. Additionally, the ITC Design Guidelines require consideration of the Downtown TOD Plan guidelines during the refinement of the design of the Project.

The Project, would be designed in accordance with the ITC Design Guidelines and would help fulfill the relevant aesthetic goals and policies of the Downtown TOD Plan as outlined in **Table 4.1-2**. For analysis of goals and policies relevant to land use plans and planning, , please refer to **Section 4.9: Land Use and Planning**. As discussed above, the Downtown TOD Plan area includes the entire Market Street segment and a portion of the Manchester Boulevard segment from Market Street to Locust Street. Accordingly, streetscape design and street trees in these areas would complement the guidelines defined within the Downtown TOD Plan. Section 4.10 of the Downtown TOD Plan details the visual design guidelines for Historic Downtown which would be integrated into the design considerations of the proposed Project.

With the incorporation of the General Plan amendment described above, the required consideration of the Downtown TOD Plan guidelines into the ITC Design Guidelines, and the design of the APM system in a complementary and modern style, the proposed Project would be consistent with the Downtown TOD Plan and Guidelines.

Hollywood Park Specific Plan

The ITC Design Guidelines, and resulting design of the proposed Project, would be generally consistent with and further the goals and policies in the HPSP related to visual character. The HPSP[34] provides visual guidelines and standards for the public right-of-way within the plan area, which includes areas north of Hardy Street along Prairie Avenue. The HPSP also provides integrated and coordinated landscape design guidelines for new development in areas subject to HPSP's Plot Plan Review process along the perimeter of the Plan area with the objective of promoting visual compatibility. Similar to the ITC Design Guidelines' approach to the portions of the Project located in the Downtown TOD Plan area, while the ITC Design Guidelines will govern construction of the Project and therefore control over any conflicting provisions

34 City of Inglewood, *Hollywood Park Specific Plan*, adopted July 8, 2009, amended September 23, 2014, and further amended February 24, 2015.

contained in HPSP, the ITC Design Guidelines were created to integrate the Project elements with the HPSP streetscape. Additionally, the ITC Design Guidelines require consideration of the HPSP's design guidelines where applicable during the refinement of Project plans. The foregoing will apply to the portions of the proposed Project adjacent to the HPSP area that are covered by the HPSP's Plot Plan Review process, including the portions of the APM guideway, the Prairie Street/Pincay Street station, the Prairie Street/Hardy Street station, and various support structures and columns.

The ITC Design Guidelines would replace or supplement the HPSP design and streetscape requirements as needed. **Table 4.1-3: Visual Consistency with the Hollywood Park Specific Plan** provides detailed analysis of the proposed Project elements pursuant to the ITC Design Guidelines against applicable design guideline checklist items from HPSP.

Table 4.1-3
Visual Consistency with the Hollywood Park Specific Plan

Principles and Goals	Project Consistency
Design Guideline Checklist	
Pedestrian and vehicular circulation routes shall comply with all requirements of the Americans with Disabilities Act (ADA), and include one or more of the following design elements along all or a portion of all streets or pedestrian pathways: (1) pedestrian pathway includes a pattern, color, or paving material that is differentiated from surrounding landscaping or paved areas; (2) way-finding signage; (3) the streets and pathways are oriented such that they include verifiable lines of sight that would allow both pedestrians and vehicles to see any one or more of the following: (a) Stadium, (b) performance venue, casino, retail or residential gateway, or (c) Champion Plaza, Lake Park, Arroyo Park, or Bluff Park.	**Consistent.** Pedestrian facilities along the guideway, and adjacent to stations adjacent to the HPSP area would be widened and improved to comply with all ADA requirements. The pedestrian walkway would be made of a different paving material than those of the surrounding paved areas and way finding signage would be installed where appropriate. Pedestrian walkways to the east of the guideway and stations will provide lines of sight to the HPSP area and, depending on location, could include the Stadium, the performance venue and/or the retail or residential gateway.
The exterior entryways of buildings shall include one or more of the following: (1) a trim or border of a different color or material than other portions of the façade; (2) an integral porch; (3) an awning; (4) an articulated entryway offset from the immediately adjacent façade by not less than one foot; or (5) an arched opening.	**Consistent.** Stations would incorporate an entry way with distinguishing features.
When using more than one material on a façade (except as a trim or offset portion of the façade or as an entry or window treatment), the variation in materials shall continue to all side and rear elevations that are visible from the front or corner lot line.	**Consistent.** Materials used on the station would continue through the entirety of the station including side and rear elevations that are visible.

Principles and Goals	Project Consistency
Each building shall include one or more of the following: – Entry or window trim/surrounds – Horizontal banding – Corner quoins – Balconies (supported, cantilevered or Juliet) – False, shuttered windows – Awnings – Change in material or color	**Consistent.** Stations would include compatible elements, such as horizontal banding and articulated materials.
Railings shall be constructed of wood, wrought iron, or other material, such as stucco, that is used to construct the façade or entry or window trim on the same building.	**Consistent.** The materials chosen for station railings would be consistent with the other station materials.
Exposed gutters and downspouts shall be colored or painted, and shall not be constructed of unpainted aluminum, copper, or zinc.	**Consistent.** Exposed gutters along Prairie Avenue would be painted or colored.
Stairs shall be constructed of the same material as the deck and landing.	**Consistent.** Station stairs would be constructed of the same material as the deck and landing as feasible.
Columns and posts shall be constructed of stone, stucco, or wood (or other material painted or molded to look like one of the allowed materials) and shall be not less than four inches in diameter if round, or four inches on each side if rectangular.	**Consistent.** Columns and posts would be constructed of materials used elsewhere in the station. The columns would be larger than four inches in diameter or four inches on each side if rectangular.

Inglewood Municipal Code

For the portions of the APM systems that are not in the Downtown TOD or the Hollywood Park Specific Plan, the ITC Design Guidelines would prevail over the IMC, though IMC provisions relating to streetscapes, landscapes and signage are incorporated as part of the design process.

Tree Preservation

The IMC Tree Preservation ordinance[35] recognizes the importance of both native and nonnative trees within the City for the many benefits they provide. Prior to removing or cutting a protected tree in the City, a permit must be obtained with the City's Parks, Recreation, and Library Services Department. All trees removed require replacement with like-size, like-kind trees or an equal value tree or trees as determined by the City's Mater Plan or the Parks, Recreation, and Library Services Department. Compliance with the IMC Section 12-110, Tree Preservation requirements would ensure consistency and compliance of the proposed Project to the existing policies and guidelines.

Additionally, the CCP is consistent with the tree replacement ordinance in the IMC and also requires avoidance of tree removal to the extent feasible along with additional measures. Any and all trees

35 Inglewood, California, Municipal Code, Article 32, Section 12-110 (2012), Tree Preservation.

removed would be replace in kind and the same location if at all possible and in a timely manner, if the replacement of the tree would not conflict with future construction activities of the proposed Project. The CCP also requires the Contractor to maintain any replacement trees for three years after the date of planting and provide a warranty for such trees for at least one additional year post maintenance. The contractor and the City would conduct an inspection of all replaced trees before the one-year warranty expires before the City accepts the tree. These CCP measures, provided as **MM AES-3** to **MM AES-6**, would further the goal of the City to protect and maintain City trees within its jurisdiction.

Transportation Corridor Overlay Zone

The Transportation Corridor Overlay Zone (TC Overlay Zone) would apply the Project area and components of the APM including stations and support facilities including the MSF and the TPSSs within the Downtown TOD Plan and HPSP areas. The TC Overlay Zone would provide allowances for encroachment into areas that may be used for the APM system for columns, support structures, and other APM physical components, and establish height limits to accommodate for APM structures. The TC Overlay Zone would provide a design review process unique to the Overlay Zone for the construction of the APM system. The TC Overlay zone would take precedence over the requirements of the IMC in the event of a conflict. The TC Overlay Zone is a permissive zone and would not change or restrict the current underlying zoning of any parcel.

With the implementation of the TC Overlay zone, implementation of the APM system would be consistent with the IMC and existing local regulations.

Design Review Process

The Public Works Director or his/her designee would, in consultation with the Planning Division Manager or his/her designee, have the authority to review each ITC system project for compliance with all applicable provisions of (i) the ITC Design Guidelines, (ii) all additional technical, aesthetic, and other specifications contained in the procurement document(s) for the applicable ITC system component(s), and (iii) all requirements of the Mitigation Monitoring and Reporting Program set forth in the ITC's Final Environmental Impact Report.

The Director of Public Works or her/his designee would in consultation with the Planning Division Manager or her/his designee have the ability to update and/or revise the ITC Design Guidelines from time to time to include, among other things, alternate technologies, new or updated ITC Design Guidelines, consistency determinations of ITC procurement document(s) and alternative mitigation measures that achieve a comparable level of mitigation and/or, clarifications of existing provisions. The Director of Public Works or her/his designee would have the final decision-making authority regarding the interpretation of the

Design Guidelines should there be an appeal ability to Council. This design process is consistent with the IMC.

Summary

As described previously, the proposed Project would take into consideration and implement visual and materials-related guidelines from adjacent governing plans, the Downtown TOD Plan and the HPSP, to the extent feasible and consistent with the ITC Design Guidelines. The proposed Project would significantly impact historic resources in Downtown Inglewood and an amendment to the General Plan Land Use Element's Policy 2.3 has been introduced to ensure consistency of the proposed Project with the General Plan. The amendment spells out the incorporation and implementation of the APM system into the historic fabric of the Inglewood historic core.

The TC Overlay Zone would also be implemented to accommodate for the APM system and its related elements in the City. The introduction of the TC Overlay Zone would reduce the potential for the proposed Project to conflict with the IMC since the TC Overlay Zone implements the ITC Design Guidelines and applies them to the construction of the APM system and related components within the TC Overlay Zone. The TC Overlay Zone will not have any impacts on other, non-Project elements that fall within the TC Overlay Zone, as those uses would continue to be governed by their existing, underlying zone and other provisions of the IMC.

With the implementation of the TC Overlay Zone and the amendment to the General Plan, the proposed Project would be generally consistent with existing zoning and planning regulations governing scenic quality. Therefore, impacts would be less than significant.

Mitigation Measures

No mitigation is required.

Level of Significance after Mitigation

The impacts associated with applicable zoning and planning regulations governing scenic quality would be less than significant.

Impact AES-2: Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Construction

Under existing conditions, the area surrounding the proposed Project has a relatively high level of ambient lighting, particularly along Florence Avenue, Manchester Boulevard, and Prairie Avenue, as those streets

are well-lit, active transportation corridors. Nighttime construction activities would add to the existing ambient light levels on and in the area surrounding the proposed Project for the construction duration of the proposed Project.

Over the course of the construction of the proposed Project, the length of workdays would vary with the level of activity fluctuating throughout any given day. This would influence the nighttime work hours in a day which would influence the amount of lighting required at a site for a given day. The daily duration of nighttime construction lighting would also vary based on the season, with the longest duration of construction lighting occurring during winter months, when there are fewer hours of daylight, and the shortest duration of construction lighting during the summer months, when there are the most hours of daylight. Nighttime lighting sources during construction would consist mainly of floodlights that would be focused on the work area. Security lighting could also be used on construction sites but would tend to be focused on the Project alignment. Because this lighting is intended to light the Project alignment to allow for nighttime construction and to provide security to the site, it would tend to be directed away from nearby adjacent properties, reducing the potential for spillover lighting effects. Project construction-related lighting could be directly visible to nearby sensitive receptors residing in nearby residences and to drivers of vehicles on roadways in the vicinity of the proposed Project. Due to safety and/or noise concerns, evening and nighttime activities may be less than daytime activities.

Consequently, nighttime construction lighting would be required but temporary in nature. The CCP outlines measures to be taken to limit nighttime light spillage and glare to adjacent uses which are incorporated into this section. Prior to the start of construction, light plans and mitigation measures would be drafted in accordance with the standards for the City issued Construction Permit. Temporary lighting at construction sites would be limited to the amount necessary to safely perform the required work and would be directed downwards and shielded to avoid light spillage. Placement and orientation of the portable lighting fixtures would be placed in a manner to avoid directing lights toward sensitive receptors, including vehicle drivers on the roadway. The placement, shielding, and direction of the lighting would be purposeful and reduce the illumination outside of the intended area to the extent possible. The limited time duration of lighting would also limit the amount of illumination impact on nearby uses to the extend feasible.

In the event where lighting is required near the edge of the construction area, light trespass shall not exceed one foot-candle above ambient light level as measured at any adjacent residential and transient properties as outlined in the CCP. This measure would ensure lighting does not extend outside of the limits of the construction site in any significant manner. To ensure safety, temporary sidewalks, and any sidewalk adjacent to construction activities would be illuminated to City Standards to protect public

safety. The illumination would be equivalent to those of street lighting and would not significantly contribute to visual impacts through significant light spillage or glare.

In addition to minimizing light spill, sensitive receptors and motorists on public streets would not have direct views of the light source from construction lighting in order to limit the potential effects of glare. Sound barriers and temporary construction barriers that would be built in the initial phase of project construction, and, as construction progresses, newly constructed intervening structures would also incrementally block light and obscure views of construction sites from nearby residences and local streets. Further restricting the potential for spillover lighting as construction progresses.

Any nighttime construction activities would be subject to the Inglewood Municipal Code,[36] construction between the hours of 8:00 PM and 7:00 AM of the next day would require a permit from the Permits and License Committee of the City. The proposed Project would comply with any conditions identified by the City reduce nighttime construction lighting. The proposed Project would secure a permit(s) to allow for construction work activities to occur between the hours of 8:00 PM and 7:00 AM.

With the incorporation of the CCP measures the potential impact for construction lighting and glare on surrounding land uses and sensitive receptors would be reduced to the extent feasible. Lighting and glare impacts during construction would be less than significant.

Operation

Market Street Segment

The Market Street segment contains existing ambient lighting conditions typical for a highly developed urban setting. Sources of existing light in this segment includes streetlights, vehicle headlights, traffic lights, and lighting from parking lots, offices, and storefronts. As described under existing conditions, there are no existing light sensitive uses on Market Street such as residential dwelling and hotels/motels. Existing sources of daytime and nighttime glare in the area include mostly headlights of traveling cars in the area.

Market Street/Florence Avenue Station

The station would be located on a site at 300 Florence Avenue currently developed with a retail commercial center. Lighting at the station would include accent lighting, lighting for security placed on pedestrian paths, and interior lighting within the station. Canopy lighting at the station utilize indirect accent lighting to avoid glare and light illumination on adjacent properties. Additional accent lighting would at the station would be less prominent than the accent lighting on the canopy and be of lesser

36 City of Inglewood, Municipal Code, Section 5-41, Construction of Building and Projects Noise Regulated.

visual impact to surrounding uses.[37] Pedestrian friendly lighting would be functional and placed in a manner to minimize negative impacts on adjacent property. Care in the placement of the lighting would further reduce light spillage and glare to nearby uses. Additionally, all lighting facilities at the station would be programmable and sensor controlled to conserve energy and allow control for various settings such as daytime, nighttime, and event lighting. These settings would further ensure lighting at the property would be actively controlled and contained, and the level of lighting would be appropriate for the time of the day or events held at the City.

APM Guideway

The APM Guideway may include lighting fixtures for accent lighting. The light fixtures would be concealed or minimally visible within the guideway structure by design. Care would be taken to place lighting in a manner to limit the illumination impact on adjacent properties and lighting would not be visible from the ground level per the ITC Design Guidelines. The limited visibility of the lighting and lighting fixture would reduce the chance of glare to passersby and adjacent uses. Illumination of the surrounding uses would also be limited by the reduced visibility of the light source. The guideway material would be non-glare to eliminate potential for introducing glare to the surrounding uses. Because of the manner in which the lighting and the light fixture would be designed, and the use of non-glare materials, lighting, and glare impacts of the APM Guideway would be less than significant to surrounding uses and passersby.

Surface Parking Lots

Surface parking lots in the Market Street segment would be provided at the Market Street/Florence Avenue Station and at the existing Hat Store site. Function security lighting for the site would be provided to ensure safety of the lots. Street trees surrounding the parking lot would be provided for aesthetic purposes separating the parking stalls from sidewalks which would also limit light spillage to adjacent areas outside of the parking lot and limit glare. All parking lots are located at sites with existing light sources such as streetlights and interior lighting from buildings. As such, the security lighting at surface parking lots would not have a significant impact on surrounding uses beyond the existing light sources. The light and glare impact of surface parking lot lighting would be less than significant.

Streetscape

Roadway lighting would follow the requirements of the City of Inglewood per the ITC Design Guidelines and would, therefore, be comparable to existing lighting on the roadway and not contribute to additional light spillage or glare. Pedestrian lighting in this segment would be provided on sidewalks, in pedestrian walkways, at public places, and in all pedestrian pathways under APM guideways to ensure safety and

37 ITC Design Guidelines.

security for pedestrians. Along primary circulation routes, light fixtures and incident light sources would provide an average of 3-foot candles to help pedestrians better distinguish color, size, and shape of their surroundings. The streetscape lighting would not significantly contribute to existing lighting at the Project site where existing lighting as described above is consistent with the level of lighting at a highly developed urban area. Therefore, lighting and glare impacts of roadway and street lighting in this segment would be less than significant.

Manchester Boulevard Segment

The Manchester Boulevard segment contains existing ambient lighting characteristic typical for a highly developed urban setting. Sources of existing light in this segment includes streetlights, vehicle headlights, traffic lights, and lighting from parking lots, offices, storefronts, and interior illumination from residences.

APM Guideway

Similar to the Market Street segment, the APM guideway may include accent lighting along the guideway. Care would be taken to place accent and functional lighting in a manner to limit the illumination impact on adjacent properties and lighting would not be visible from the ground level per the ITC Design Guidelines. The limited visibility of the lighting and lighting fixture would reduce the chance of glare to passersby and adjacent uses. Illumination of the surrounding uses would also be limited by the reduced visibility of the light source. The guideway material would be non-glare to eliminate potential for introducing glare to the surrounding uses.

Light sensitive receptors along this segment consist of the homes located on the north side of Manchester Boulevard between Manchester Drive and Osage Avenue. In addition to the design measures mentioned previously to avoid light spillage and glare to nearby uses, the guideway along the segment with residential uses would be positioned towards the south side of the guideway. The positioning of the guideway would allow approximately 30 feet between the closest residential buildings and the edge of the guideway. The elevated guideway would also be substantially above the height of the residential home and the lighting would not be in direct line of sight of the residents at the ground level.

Overall, because of the manner in which the lighting and the light fixture would be designed, the non-glare exterior material of the guideway, and the positioning and height of the guideway, lighting, and glare impacts of the APM Guideway on surrounding uses and sensitive receptors would be less than significant.

Maintenance Storage Facility

The MSF would be built on a site currently developed with a retail commercial center. Lighting would be provided and placed in a manner to minimize negative impact on adjacent properties to limit light spillage

and glare. The Building entrances to the MSF site would be well lit to maintain safety and security of workers and passersby and primary walkways, steps, or ramps along the pedestrian routes would also be illuminated per the ITC Design Guidelines. Security lighting in the parking lot would also be installed to maintain the safety of staffs and visitors.

The MSF would be separated from adjacent uses by the public right of way where existing sources of ambient light and glare includes vehicles, streetlights, and light sources from the interior of other adjacent buildings. Lighting used by the MSF is not anticipated to increase the level of the existing lighting by surrounding uses. Additionally, street trees would surround the MSF site for aesthetic appeal on the sidewalks and further obstruct the lighting provided by the MSF. Therefore, lighting and glare impacts from the MSF site on surrounding uses would be less than significant.

Streetscape

Similar to the Market Street segment, roadway lighting would follow the requirements of the City of Inglewood per the ITC Design Guidelines and would, therefore, be comparable to existing lighting on the roadway and not contribute to additional light spillage or glare. Pedestrian lighting in this segment would be provided similarly to the Market Street segment with the same guidelines and design features. Therefore, lighting and glare impacts of roadway and street lighting in this segment would be less than significant.

Prairie Avenue Segment

The Prairie Avenue segment contains existing ambient lighting characteristic typical for a highly developed urban setting. Sources of existing light in this segment includes streetlights, vehicle headlights, traffic lights, and lighting from parking lots, offices, billboards, and storefronts, security lighting at construction sites, and interior illumination from residences and hotels.

Prairie Avenue/Pincay Drive Station and Prairie Avenue/Hardy Street Station

Similar to the Market Street/Florence Avenue station, lighting at the stations would include accent lighting, lighting for security placed on pedestrian paths, and interior lighting within the station. Canopy lighting at the station utilize indirect accent lighting to avoid glare and light illumination on adjacent properties. Additional accent lighting would at the station would be less prominent than the accent lighting on the canopy and be of lesser visual impact to surrounding uses.[38] Pedestrian friendly lighting would be functional and placed in a manner to minimize negative impacts on adjacent property. Care in the placement of the lighting would further reduce light spillage and glare to nearby uses. Additionally, all

38 ITC Design Guidelines.

lighting facilities at the station would be programmable and sensor controlled to conserve energy and allow control for various settings such as daytime, nighttime, and event lighting. These settings would further ensure lighting at the property would be actively controlled and contained, and the level of lighting would be appropriate for the time of the day or events held at the City.

APM Guideway

Similar to the other segments, the APM guideway may include accent lighting along the guideway. Care would be taken to place lighting in a manner to limit the illumination impact on adjacent properties and lighting would not be visible from the ground level per the ITC Design Guidelines. The limited visibility of the lighting and lighting fixture would reduce the chance of glare to passersby and adjacent uses. Illumination of the surrounding uses would also be limited by the reduced visibility of the light source. The guideway material would be non-glare to eliminate potential for introducing glare to the surrounding uses.

Light sensitive receptors along this segment are residential homes located on the west side of Prairie Avenue just north of Buckthorn Street, a motel just north of Arbor Vitae Street, and a motel approximately 400 feet south of Arbor Vitae Street. However, in addition to the design measures mentioned previously to avoid light spillage and glare to nearby uses, the guideway would be substantially above the height of the sensitive receptors and the lighting would not be in direct line of sight of the residents at the ground level. The positioning of the guideway would allow approximately 10 feet between the closest sensitive receptor and the edge of the guideway.

Because of the manner in which the lighting and the light fixture would be designed, the non-glare exterior material to be used, and the height of the guideway, lighting, and glare impacts of the APM Guideway would be less than significant to surrounding uses and sensitive receptor.

Streetscape

Roadway lighting would follow the requirements of the City of Inglewood per the ITC Design Guidelines and would, therefore, be comparable to existing lighting on the roadway and not contribute to additional light spillage or glare. Pedestrian lighting in this segment would be provided on sidewalks, in pedestrian walkways, at public places, and in all pedestrian pathways under APM guideways to ensure safety and security for pedestrians. Along primary circulation routes, light fixtures and incident light sources would provide an average of 3-foot candles to help pedestrians better distinguish color, size, and shape of their surroundings. The streetscape lighting would not significantly contribute to existing lighting at the Project site where existing lighting as described above is consistent with the level of lighting at a highly developed

urban area. Therefore, lighting and glare impacts of roadway and street lighting in this segment would be less than significant.

Summary

Overall, the light and glare impacts would be less than significant with the incorporation of CCP measures during construction and compliance with the ITC Design Guidelines. As discussed, the Project is proposed within a highly developed neighborhood with high levels of existing ambient lighting. Measures outlined in the CCP would limit light spillage and glare onto adjacent uses through the use of downward directed and shielded lighting and positioning the lighting in a manner that limits the illumination of light outside of the construction area. Construction lighting plans, which would comply with the CCP mitigation measures be developed prior to construction. Any light trespass outside of the construction site would be limited to one foot-candle above light level as measured at any adjacent residential and transient properties, thereby limiting the potential exposure to light spillage of any construction site adjacent uses to a less than significant level.

The ITC Design Guidelines would require APM system lighting to be positioned in a manner to minimize negative impacts to adjacent properties. Lighting at the station would be programmable to allow adjustments for the best use of the lighting at any specific time of the day or event in the City. Accent lighting fixtures on the APM guideway would be hidden by project design to the extent feasible in order to minimize light spillage and glare from lighting used at the system. As shown from the analysis discussed, surface parking lot lighting and street lighting are anticipated to be comparable to the level of lighting currently provided by the City on its roadways and sidewalks. Therefore, light and glare impact during operation to the surrounding land uses would be less than significant.

Mitigation Measures

No Mitigation Measures Needed.

Level of Significance after Mitigation

The impacts associated with light and glare would be less than significant.

4.1.8 CUMULATIVE IMPACTS

4.1.8.1 Visual Character

Overall, the proposed Project would complement the surrounding visual character and be designed in a modern style with a neutral tone and transparent materials wherever feasible. The color scheme and transparent materials would give the structure an appealing appearance while integrating the structure into its surroundings. The design of the structure would also complement its existing and future

surrounding developments as discussed above. As such, the proposed Project would complement its present and future surroundings and would not contribute negatively to visual degradation in general. However, the proposed Project would have a significant impact on the degradation of visual character due to its indirect visual impacts to the Fox Theater on Market Street. As such, implementation of the APM system would have a cumulatively significant impact on the degradation of visual character to its surroundings by removing existing historic elements from downtown Inglewood. Cumulative impact to visual character would be significant.

4.1.8.2 Lighting and Glare

Construction of the proposed Project would have an overall less than significant impact on construction lighting which would be temporary in nature and with the incorporation of **MM AES-9** to **MM AES-13** from the CCP would be less than significant. Nearby construction projects such as the HPSP would also introduce construction lighting near the site. However, the increase in ambient nighttime lighting levels in these areas would only rise minimally because a significant amount of ambient lighting currently exists due to the urbanized nature of the Project area as a whole. Additionally, construction activities on Prairie Avenue for the proposed Project is anticipated to take place from the year 2023 to 2025 which would coincide with the end of the construction of the HPSP development which anticipates completion of construction by 2025. Cumulative impact from nighttime lighting would be reduced as the HPSP development completes its construction and as the proposed Project then initiates construction in the Prairie Avenue segment.

Operationally, cumulative lighting impacts would be less than significant as the HPSP development would reduce lighting and glare impacts from the site's previous use as determined by HPSP's EIR and the proposed Project would have a less than significant impact overall impact on lighting and glare. Both the Project and HPSP projects would utilize non-glare and non-reflective exterior materials for the proposed structures and would not contribute to glare of the surrounding area.

Therefore, no significant cumulative lighting impacts are expected and the Project's contribution would not be cumulatively significant. The Project's incremental impact associated with ambient nighttime lighting and glare effects would not be cumulatively considerable.

4.1.9 CONSISTENCY WITH CITY GENERAL PLAN

As noted under *Impact AES-1b*, the proposed Project does not conflict with the City's General Plan.

4.2 AIR QUALITY

4.2.1 INTRODUCTION

This section of the Draft Environmental Impact Report (Draft EIR) examines air quality emissions that would result from construction and operations associated with the proposed Inglewood Transit Connector Project (proposed Project or ITC Project).

The proposed Project would relieve traffic congestion within the Project area and the surrounding street network; improve access options and the travel experience for passengers to the City of Inglewood (City)'s major activity centers, and provide a connection to the regional Los Angeles County Metropolitan Transportation Authority (Metro) rail system. The proposed Project includes an Automated People Mover (APM) train which would provide access to the City's major activity centers, including The Forum, the Los Angeles Sports and Entertainment District (LASED) including SoFi Stadium, and the Inglewood Basketball and Entertainment Center (IBEC). The APM trains would transport passengers between the Metro rail system and the City's activity centers. Air quality emissions were analyzed using a variety of modeling techniques and are detailed within the following appendices to this Draft EIR:

- **Appendix 4.2.1:** *Air Quality and Heath Risk Assessment Technical Report for the Inglewood Transit Connector Project*, RCH Group, November 2020

Prior to the preparation of this EIR, a recirculated Initial Study (included as **Appendix 2.0.2a: Initial Study** of this Draft EIR) was prepared to assess potential environmental impacts associated with air quality. For one of these impacts, the Initial Study found that the proposed Project would have a less than significant impact, thus, no further analysis of this topic is required in this EIR. The Initial Study concluded:

- Potential impacts related to objectionable odors affecting a substantial number of people were evaluated and determined to have a less than significant impact. Though the proposed Project may produce discernable odors during construction, these odors would decrease, dilute, and become unnoticeable. Moreover, operation of the proposed Project would not include any odor producing land uses.

Other impacts found to be less than significant are further discussed in **Section 6.4: Effects Found Not to be Significant**. Please see **Section 8.0** for a glossary of terms, definitions, and acronyms used in this Draft EIR.

4.2.2 OVERVIEW OF AIR QUALITY

The proposed Project is located within the South Coast Air Basin (Basin), named so because its geographical formation is that of a basin, with the surrounding mountains trapping the air and pollutants in the valleys below. The Basin includes all of Orange County and the non-desert portions of Los Angeles,

San Bernardino, and Riverside Counties. The regional climate within the Basin is considered to be semi-arid and is characterized by warm summers, mild winters, infrequent seasonal rainfall, moderate daytime onshore breezes, and moderate humidity. The air quality within the Basin is primarily influenced by a wide range of emissions sources—such as dense population centers, heavy vehicular traffic, industry, and weather.

Air pollutant emissions within the Basin are generated by stationary and mobile sources. Stationary sources can be divided into two major subcategories: point sources and area sources. Point sources occur at an identified location and are usually associated with manufacturing and industry. Examples of point sources are boilers or combustion equipment that produce electricity or generate heat. Area sources are widely distributed and produce many small emissions. Examples of area sources include residential and commercial water heaters, painting operations, lawn mowers, agricultural fields, landfills, and consumer products, such as barbeque lighter fluid and hair spray. Mobile sources are emissions from motor vehicles, including tailpipe and evaporative emissions, and are classified as either on-road or off-road. On-road sources may be legally operated on roadways and highways. Off-road sources include aircrafts, ships, trains, and self-propelled construction equipment. Air pollutants can also be generated by the natural environment, such as when fine dust particles are pulled off the ground surface and suspended in the air during high winds.

The United States Environmental Protection Agency (USEPA) and the California Air Resources Board (CARB) designate air basins where air pollution levels exceed the State or federal ambient air quality standards (AAQS) as "nonattainment" areas. These pollutants are referred to as "criteria air pollutants" as a result of the specific standards, or criteria, that have been adopted for them. The federal and State standards have been set at levels considered safe to protect public health, including the health of "sensitive" populations, such as asthmatics, children, and the elderly with a margin of safety; and to protect public welfare, including protection against decreased visibility and damage to animals, crops, vegetation, and buildings. If standards are met, the area is designated as an "attainment" area. If there is inadequate or inconclusive data to make a definitive attainment designation, an area is considered "unclassified." Federal nonattainment areas are further designated as marginal, moderate, serious, severe, or extreme as a function of deviation from standards. Transportation conformity for nonattainment and maintenance areas is required under the federal Clean Air Act (CAA) to ensure federally supported highway and transit projects conform to the State Implementation Plan (SIP). The USEPA approved California's SIP revisions for attainment of the 1997 8-hour ozone (O3) National AAQS for the Basin in October 2019.

Ambient air pollution can cause public health concerns and can contribute to increases in respiratory illness and death rates. Air pollution can affect the health of both adults and children. The adverse health

effects associated with air pollution are diverse and include cardiovascular effects, premature mortality, respiratory effects, cancer, reproductive effects, neurological effects, and other health outcomes. [1]

4.2.2.1 Criteria Air Pollutants

The criteria air pollutants that are most relevant to current air quality planning and regulation in the Basin include ,ozone (O_3) carbon monoxide (CO), nitrogen dioxide (NO_2), respirable particulate matter (PM_{10}), fine particulate matter ($PM_{2.5}$), sulfur dioxide (SO_2), and lead (Pb). In addition, volatile organic compounds (VOC) and toxics air contaminants (TACs) are a concern in the Basin but are not classified under AAQS. The characteristics of each of these pollutants are briefly described below.

Ozone (O3)

Ozone is a highly reactive and unstable gas that is formed when reactive organic gases (ROGs), sometimes referred to as VOCs, and nitrogen oxides (NOx), byproducts of internal combustion engine exhaust, undergo slow photochemical reactions in the presence of sunlight. Ozone concentrations are generally highest during the summer months when direct sunlight, light wind, and warm temperature conditions are favorable to the formation of this pollutant.

Carbon Monoxide (CO)

CO is a colorless, odorless gas produced by the incomplete combustion of carbon-containing fuels, such as gasoline or wood. Carbon monoxide concentrations tend to be the highest during the winter morning, when little to no wind and surface-based inversions trap the pollutant at ground levels. Because carbon monoxide is emitted directly from internal combustion engines, unlike ozone, motor vehicles operating at slow speeds are the primary source of carbon monoxide in the Basin. The highest ambient carbon monoxide concentrations are generally found near congested transportation corridors and intersections.

Nitrogen Dioxide (NO_2)

NO_2 is a reddish-brown, highly reactive gas that is formed in the ambient air through the oxidation of nitric oxide (NO), similar to O3. NO_2 is also a byproduct of fuel combustion. NO and NO_2 are collectively referred to as NOx and are major contributors to O3 formation. NO_2 also contributes to the formation of PM_{10}. High concentrations of NO_2 can cause breathing difficulties and there is some indication of a relationship

1 South Coast Air Quality Management District (SCAQMD), 2016 Air Quality Management Plan*, Appendix I: Health Effects (March 2017),* Accessed June 2020, https://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2016-air-quality-management-plan/final-2016-aqmp/appendix-i.pdf?sfvrsn=14.

between NO_2 and chronic pulmonary fibrosis. Some increase of bronchitis in children (2-3 years old) has been observed at concentrations below 0.3 ppm.

Particulate Matter (PM_{10}) and Fine Particulate Matter ($PM_{2.5}$)

Particulate Matter (PM) consists of small liquid and solid particles floating in the air, including smoke, soot, dust, salts, acids, and metals and can form when gases emitted from industries and motor vehicles undergo chemical reactions in the atmosphere. Sources of PM_{10} emissions include dust from construction sites, landfills and agriculture, wildfires and brush/waste burning, industrial sources, and wind-blown dust from open lands. [2] Sources of $PM_{2.5}$ emissions include combustion of gasoline, oil, diesel fuel, or wood. PM_{10} and $PM_{2.5}$ may be either directly emitted from sources (primary particles) or formed in the atmosphere through chemical reactions of gases (secondary particles) such as SO_2, NOx, and certain organic compounds.

A consistent correlation between elevated ambient respirable and fine particulate matter (PM_{10} and $PM_{2.5}$) levels and an increase in mortality rates, respiratory infections, number and severity of asthma attacks, and the number of hospital admissions has been observed in different parts of the United States and various areas around the world. In recent years, some studies have reported an association between long-term exposure to air pollution dominated by fine particles and increased mortality, reduction in life span, and an increased mortality from lung cancer.

Sulfur Dioxide (SO_2)

SO_2 is a colorless, extremely irritating gas or liquid. It enters the atmosphere as a pollutant mainly as a result of burning high sulfur-content fuel oils and coal, as well as from chemical processes occurring at chemical plants and refineries. When SO_2 oxidizes in the atmosphere, it forms sulfates (SO_4). Collectively, these pollutants are referred to as sulfur oxides (SOx).

Lead (Pb)

Lead occurs in the atmosphere as particulate matter and is also considered a TAC. The combustion of leaded gasoline is the primary source of airborne lead in the Basin. The use of leaded gasoline is no longer permitted for on-road motor vehicles, so the majority of such combustion emissions are associated with off-road vehicles. However, because leaded gasoline was emitted in large amounts from vehicles when leaded gasoline was used for on-road motor vehicles, lead is present in many urban soils and can be resuspended in the air. Other sources of lead include the manufacturing and recycling of batteries, paint, ink, ceramics, ammunition, and the use of secondary lead smelters. While the SCAQMD CEQA Air Quality

2 California Air Resources Board, *Inhalable Particulate Matter and Health ($PM_{2.5}$ and PM_{10}),* https://www.arb.ca.gov/research/aaqs/common-pollutants/pm/pm.htm, last reviewed August 10, 2017.

Handbook contains numerical indicators of significance for lead, project construction and operation would not include sources of lead emissions and would not exceed the numerical indicators for lead. Unleaded fuel and unleaded paints have virtually eliminated lead emissions from commercial land use projects.

Volatile Organic Compounds (VOCs)

VOCs include any compound of carbon, excluding CO, carbon dioxide (CO_2), carbonic acid, metallic carbides or carbonates, and ammonium carbonate, which participates in atmospheric photochemical reactions and thus, a precursor of ozone formation. VOC emissions often result from the evaporation of solvents in architectural coatings. Reactive organic gases are any reactive compounds of carbon, excluding methane, CO, CO_2 carbonic acid, metallic carbides or carbonates, ammonium carbonate, and other exempt compounds. ROG emissions are generated from the exhaust of mobile sources. [3] Both VOCs and ROGs are precursors to ozone and the terms can be used interchangeably. [4]

Toxic Air Contaminants (TACs)

TACs refer to a diverse group of "non-criteria" air pollutants that can affect human health but have not had ambient air quality standards established for them. This is not because they are fundamentally different from the pollutants discussed previously, but because their effects tend to be local rather than regional. TACs are classified as carcinogenic and noncarcinogenic, where carcinogenic TACs can cause cancer and noncarcinogenic TACs can cause acute and chronic impacts to different target organ systems (e.g., eyes, respiratory, reproductive, developmental, nervous, and cardiovascular).

CARB and the Office of Environmental Health Hazard Assessment (OEHHA) determine if a substance should be formally identified, or "listed," as a TAC in California. [5] Diesel Particulate Matter (DPM), which is emitted in the exhaust from diesel engines, was listed by the State as a TAC in 1998. DPM has historically been used as a surrogate measure of exposure for all diesel exhaust emissions. DPM consists of fine particles (fine particles have a diameter less than 2.5 micrometer [µm]), including a subgroup of ultrafine particles (ultrafine particles have a diameter less than 0.1 µm). Collectively, these particles have a large surface area, which makes them an excellent medium for absorbing organics. The visible emissions in diesel exhaust include carbon particles or "soot." Diesel exhaust also contains a variety of harmful gases and cancer-causing substances.

3 SCAQMD, Appendix A: Calculation Details for CalEEMod (October 2017), Accessed June 2020, http://www.aqmd.gov/docs/default-source/caleemod/02_appendix-a2016-3-2.pdf?sfvrsn=6.

4 Both VOC and ROGs are precursors to ozone so they are summed in the CalEEMod report under the header ROG. For the purposes of comparing the ROG value to a VOC significance threshold, the terms can be used interchangeably.

5 The complete list of such substances is located at www.arb.ca.gov/toxics/id/taclist.htm.

4.2.2.2 Health Effects of Pollutants

Elevated concentrations of certain air pollutants in the atmosphere have been recognized to cause notable health problems and consequential damage to the environment either directly or in reaction with other pollutants. In the United States, such pollutants have been identified and are regulated as part of the overall endeavor to prevent further deterioration and facilitate improvement in air quality. The following pollutants are regulated by the USEPA and are subject to emissions control requirements adopted by federal, State, and local regulatory agencies. These pollutants are referred to as "criteria air pollutants" as a result of the specific standards, or criteria, which have been adopted pertaining to them.

The EPA established the National Ambient Air Quality Standards (NAAQS) to "provide public health protection, including protecting the health of 'sensitive' populations such as asthmatics, children, and the elderly," allowing "an adequate margin of safety." California Ambient Air Quality Standards (CAAQS) were "established to protect the health of the most sensitive groups in our communities" and "defines the maximum amount of a pollutant averaged over a specified period of time that can be present in outdoor air without any harmful effects on people or the environment."[6]

Ozone

According to the USEPA, ozone can cause the muscles in the airways to constrict potentially leading to wheezing and shortness of breath. Ozone can make it more difficult to breathe deeply and vigorously; cause shortness of breath and pain when taking a deep breath; cause coughing and sore or scratchy throat; inflame and damage the airways; aggravate lung diseases such as asthma, emphysema, and chronic bronchitis; increase the frequency of asthma attacks; make the lungs more susceptible to infection; continue to damage the lungs even when the symptoms have disappeared; and cause chronic obstructive pulmonary disease.[7]

Long-term exposure to ozone is linked to aggravation of asthma and is likely to be one of many causes of asthma development. Long-term exposures to higher concentrations of ozone may also be linked to permanent lung damage, such as abnormal lung development in children.[8] According to CARB, inhalation of ozone causes inflammation and irritation of the tissues lining human airways, causing and worsening a

6 California Air Resources Board, California Ambient Air Quality Standards, https://ww2.arb.ca.gov/resources/california-ambient-air-quality-standards.

7 US Environmental Protection Agency, *Health Effects of Ozone Pollution*, https://www.epa.gov/ground-level-ozone-pollution/health-effects-ozone-pollution, last updated October 10, 2018.

8 US Environmental Protection Agency, *Health Effects of Ozone Pollution,* https://www.epa.gov/ground-level-ozone-pollution/health-effects-ozone-pollution, last updated October 10, 2018.

variety of symptoms, and exposure to ozone can reduce the volume of air that the lungs breathe in and cause shortness of breath.[9]

The USEPA states that people most at risk from breathing air containing ozone include people with asthma, children, older adults, and people who are active outdoors, especially outdoor workers.[10] Children are at greatest risk from exposure to ozone because their lungs are still developing and they are more likely to be active outdoors when ozone levels are high, which increases their exposure.[11] According to CARB, studies show that children are no more or less likely to suffer harmful effects than adults; however, children and teens may be more susceptible to ozone and other pollutants because they spend nearly twice as much time outdoors and engaged in vigorous activities compared to adults.[12] Children breathe more rapidly than adults and inhale more pollution per pound of their body weight than adults and are less likely than adults to notice their own symptoms and avoid harmful exposures. Further research may be able to better distinguish between health effects in children and adults.

Nitrogen Dioxide (NO_2) and Nitrogen Oxides (NOx)

According to the USEPA, short-term exposures to NO_2 can potentially aggravate respiratory diseases, particularly asthma, leading to respiratory symptoms (such as coughing, wheezing or difficulty breathing), hospital admissions and visits to emergency rooms. Longer exposures to elevated concentrations of NO_2 may contribute to the development of asthma and potentially increase susceptibility to respiratory infections. According to CARB, controlled human exposure studies that show that NO_2 exposure can intensify responses to allergens in allergic asthmatics.[13]

In addition, a number of epidemiological studies have demonstrated associations between NO_2 exposure and premature death, cardiopulmonary effects, decreased lung function growth in children, respiratory symptoms, emergency room visits for asthma, and intensified allergic responses.[14] Infants and children are particularly at risk from exposure to NO_2 because they have disproportionately higher exposure to NO_2 than adults due to their greater breathing rate for their body weight and their typically greater outdoor exposure duration while in adults, the greatest risk is to people who have chronic respiratory diseases, such as asthma and chronic obstructive pulmonary disease.

9 California Air Resources Board, *Ozone & Health, Health Effects of Ozone*, https://ww2.arb.ca.gov/resources/ozone-and-health.

10 US Environmental Protection Agency, *Health Effects of Ozone Pollution,* https://www.epa.gov/ground-level-ozone-pollution/health-effects-ozone-pollution, last updated October 10, 2018.

11 US Environmental Protection Agency, *Health Effects of Ozone Pollution,* https://www.epa.gov/ground-level-ozone-pollution/health-effects-ozone-pollution, last updated October 10, 2018.

12 California Air Resources Board, *Ozone & Health, Health Effects of Ozone,* https://ww2.arb.ca.gov/resources/ozone-and-health.

13 California Air Resources Board*, Nitrogen Dioxide & Health,* https://ww2.arb.ca.gov/resources/nitrogen-dioxide-and-health.

14 California Air Resources Board, *Nitrogen Dioxide & Health,* https://ww2.arb.ca.gov/resources/nitrogen-dioxide-and-health.

CARB states that much of the information on distribution in air, human exposure and dose, and health effects is specifically for NO_2 and there is only limited information for NO and NOx, as well as large uncertainty in relating health effects to NO or NOx exposure.[15]

Carbon Monoxide (CO)

According to the USEPA, breathing air with a high concentration of CO reduces the amount of oxygen that can be transported in the blood stream to critical organs like the heart and brain and at very high levels, which are possible indoors or in other enclosed environments, CO can cause dizziness, confusion, unconsciousness and death.[16] Very high levels of CO are not likely to occur outdoors; however, when CO levels are elevated outdoors, they can be of particular concern for people with some types of heart disease since these people already have a reduced ability for getting oxygenated blood to their hearts and are especially vulnerable to the effects of CO when exercising or under increased stress. In these situations, short-term exposure to elevated CO may result in reduced oxygen to the heart accompanied by chest pain also known as angina.

According to CARB, the most common effects of CO exposure are fatigue, headaches, confusion, and dizziness due to inadequate oxygen delivery to the brain.[17] For people with cardiovascular disease, short-term CO exposure can further reduce their body's already compromised ability to respond to the increased oxygen demands of exercise, exertion, or stress; inadequate oxygen delivery to the heart muscle leads to chest pain and decreased exercise tolerance. Unborn babies, infants, elderly people, and people with anemia or with a history of heart or respiratory disease are most likely to experience health effects with exposure to elevated levels of CO.

Sulfur Dioxide (SO_2)

According to the USEPA, short-term exposures to SO_2 can harm the human respiratory system and make breathing difficult.[18] According to CARB, health effects at levels near the State one-hour standard are those of asthma exacerbation, including bronchoconstriction accompanied by symptoms of respiratory irritation such as wheezing, shortness of breath and chest tightness, especially during exercise or physical activity and exposure at elevated levels of SO_2 (above 1 parts per million [ppm]) results in increased incidence of pulmonary symptoms and disease, decreased pulmonary function, and increased risk of

15 California Air Resources Board, *Nitrogen Dioxide & Health,* https://ww2.arb.ca.gov/resources/nitrogen-dioxide-and-health.
16 US Environmental Protection Agency, *Carbon Monoxide (CO) Pollution in Outdoor Air,* https://www.epa.gov/co-pollution/basic-information-about-carbon-monoxide-co-outdoor-air-pollution, last updated September 8, 2016.
17 California Air Resources Board, *Carbon Monoxide & Health,* https://ww2.arb.ca.gov/resources/carbon-monoxide-and-health.
18 US Environmental Protection Agency, *Sulfur Dioxide (SO_2) Pollution*, https://www.epa.gov/so2-pollution/sulfur-dioxide-basics, last updated June 28, 2018.

mortality.[19] Children, the elderly, and those with asthma, cardiovascular disease, or chronic lung disease (such as bronchitis or emphysema) are most likely to experience the adverse effects of SO_2.[20,21]

Particulate Matter (PM_{10} and $PM_{2.5}$)

According to CARB, both PM_{10} and $PM_{2.5}$ can be inhaled, with some depositing throughout the airways; PM_{10} is more likely to deposit on the surfaces of the larger airways of the upper region of the lung, while $PM_{2.5}$ is more likely to travel into and deposit on the surface of the deeper parts of the lung, which can induce tissue damage, and lung inflammation.[22] Short-term (up to 24 hours duration) exposure to PM_{10} has been associated primarily with worsening of respiratory diseases, including asthma and chronic obstructive pulmonary disease, leading to hospitalization and emergency department visits. The effects of long-term (months or years) exposure to PM_{10} are less clear, although studies suggest a link between long-term PM_{10} exposure and respiratory mortality. The International Agency for Research on Cancer published a review in 2015 that concluded that particulate matter in outdoor air pollution causes lung cancer.

Short-term exposure to $PM_{2.5}$ has been associated with premature mortality, increased hospital admissions for heart or lung causes, acute and chronic bronchitis, asthma attacks, emergency room visits, respiratory symptoms, and restricted activity days. Long-term exposure to $PM_{2.5}$ has been linked to premature death, particularly in people who have chronic heart or lung diseases, and reduced lung function growth in children.[23] According to CARB, populations most likely to experience adverse health effects with exposure to PM_{10} and $PM_{2.5}$ include older adults with chronic heart or lung disease, children, and asthmatics. Children and infants are more susceptible to harm from inhaling pollutants such as PM_{10} and $PM_{2.5}$ compared to healthy adults because they inhale more air per pound of body weight than do adults, spend more time outdoors, and have developing immune systems.

Lead (Pb)

Lead can adversely affect the nervous system, kidney function, immune system, reproductive and developmental systems, and the cardiovascular system, and affects the oxygen carrying capacity of blood. The lead effects most commonly encountered in current populations are neurological effects in children, such as behavioral problems and reduced intelligence, anemia, and liver or kidney damage.[24] Excessive lead exposure in adults can cause reproductive problems in men and women, high blood pressure, kidney

19 California Air Resources Board, *Sulfur Dioxide & Health*, https://ww2.arb.ca.gov/resources/sulfur-dioxide-and-health.
20 California Air Resources Board*, Sulfur Dioxide & Health*, https://ww2.arb.ca.gov/resources/sulfur-dioxide-and-health.
21 US Environmental Protection Agency, Sulfur Dioxide (SO_2) Pollution.
22 California Air Resources Board, *Inhalable Particulate Matter and Health ($PM_{2.5}$ and PM_{10}),* https://www.arb.ca.gov/research/aaqs/common-pollutants/pm/pm.htm, last reviewed August 10, 2017.
23 California Air Resources Board, *Inhalable Particulate Matter and Health ($PM_{2.5}$ and PM_{10}),* https://www.arb.ca.gov/research/aaqs/common-pollutants/pm/pm.htm, last reviewed August 10, 2017.
24 California Air Resources Board, *Lead & Health*, https://ww2.arb.ca.gov/resources/lead-and-health.

disease, digestive problems, nerve disorders, memory and concentration problems, and muscle and joint pain.

Toxic Air Contaminants

TACs or HAPs as defined by the USEPA, are defined as those contaminants that are known or suspected to cause serious health problems, but do not have a corresponding ambient air quality standard. For consistency within this document these are referred to as TACs. TACs are also defined as an air pollutant that may increase a person's risk of developing cancer and/or other serious health effects. TACs are emitted by a variety of industrial processes such as petroleum refining, electric utility and chrome plating operations, commercial operations such as gasoline stations and dry cleaners, and motor vehicle exhaust. TACs may exist as PM_{10} and $PM_{2.5}$ or as vapors (gases). TACs include metals, other particles, gases absorbed by particles, and certain vapors from fuels and other sources. The emission of a TAC does not automatically create a health hazard. Other factors, such as the amount of the TAC, its toxicity, how it is released into the air, the weather, and the terrain, all influence whether the emission could be hazardous to human health. Emissions of TACs into the air can be damaging to human health and to the environment. Human exposure to TACs at sufficient concentrations and durations can result in cancer, poisoning, and rapid onset of sickness, such as nausea or difficulty in breathing. Other less measurable effects include immunological, neurological, reproductive, developmental, and respiratory problems. TACs deposited onto soil or into lakes and streams affect ecological systems and eventually human health through consumption of contaminated food. The carcinogenic potential of TACs is a particular public health concern because many scientists currently believe that there is no "safe" level of exposure to carcinogens. Any exposure to a carcinogen poses some risk of contracting cancer.[25]

The public's exposure to TACs is a significant public health issue in California. The Air Toxics "Hotspots" Information and Assessment Act is a State law requiring facilities to report emissions of TACs to air districts.[26] The program is designated to quantify the amounts of potential TACs released, the location of the release, the concentrations to which the public is exposed, and the resulting health risks. The State Air Toxics Program (AB 2588) identified over 200 TACs, including the 188 TACs identified in the CAA.[27]

The USEPA has assessed this expansive list and identified 21 TACs as Mobile Source Air Toxics (MSATs).[28] MSATs are compounds emitted from highway vehicles and nonroad equipment. Some toxic compounds are present in fuel and are emitted to the air when the fuel evaporates or passes through the engine

25 US Environmental Protection Agency, *Hazardous Air Pollutants,* https://www.epa.gov/haps
26 California Air Resources Board, General Information About "Hot Spots." https://www.arb.ca.gov/ab2588/general.htm.
27 California Air Resources Board. AB 25188 Air Toxics "Hot Spots" Program. https://www.arb.ca.gov/ab2588/ab2588.htm.
28 US Environmental Protection Agency, Air Toxics Risk Assessment Reference Library, Volume 1 Technical Resource Manual. April 2004.

unburned. Other toxics are emitted from the incomplete combustion of fuels or as secondary combustion products. Metal air toxics also result from engine wear or from impurities in oil or gasoline. USEPA also extracted a subset of these 21 MSAT compounds that it now labels as the nine priority MSATs: 1,3-butaidene, acetaldehyde, acrolein, benzene, diesel particulate matter (DPM)/diesel exhaust organic gases, ethylbenzene, naphthalene, and polycyclic organic matter (POM). While these nine MSATs are considered the priority transportation toxics, USEPA stresses that the lists are subject to change and may be adjusted in future rules.[29]

Diesel Exhaust

According to the California Almanac of Emissions and Air Quality, the majority of the estimated health risks from TACs can be attributed to relatively few compounds, the most important being particulate matter from the exhaust of diesel-fueled engines (i.e., DPM differs from other TACs in that it is not a single substance, but rather a complex mixture of hundreds of substances).

Diesel exhaust is composed of two phases, gas and particle, and both phases contribute to the health risk. The gas phase is composed of many of the urban TACs, such as acetaldehyde, acrolein, benzene, 1,3-butadiene, formaldehyde, and polycyclic aromatic hydrocarbons. The particle phase is also composed of many different types of particles by size or composition. Fine and ultra-fine diesel particulates are of the greatest health concern and may be composed of elemental carbon with adsorbed compounds such as organic compounds, sulfate, nitrate, metals, and other trace elements. Diesel exhaust is emitted from a broad range of diesel engines; the on-road diesel engines of trucks, buses and cars and the off-road diesel engines that include locomotives, marine vessels, and heavy-duty equipment. Although DPM is emitted by diesel-fueled internal combustion engines, the composition of the emissions varies depending on engine type, operating conditions, fuel composition, lubricating oil, and whether an emission control system is present.

The most common exposure to DPM is breathing air that contains diesel exhaust. The fine and ultra-fine particles are respirable (similar to $PM_{2.5}$), which means that they can avoid many of the human respiratory system defense mechanisms and enter deeply into the lungs. Exposure to DPM comes from both on-road and off-road engine exhaust that is either directly emitted from the engines or lingering in the atmosphere.

Diesel exhaust causes health effects from long-term chronic exposures. The type and severity of health effects depends upon several factors including the amount of chemical exposure and the duration of exposure. Individuals also react differently to different levels of exposure. There is limited information on

29 US Department of Transportation Federal Highway Administration, 2016. Updated Interim Guidance on Mobile Source Air Toxic Analysis in NEPA Documents. October 18, 2016.

exposure to only DPM, but there is enough evidence to indicate that inhalation exposure to diesel exhaust causes chronic health effects as well as having cancer-causing potential.

Because it is part of $PM_{2.5}$, DPM also contributes to the same noncancer health effects as $PM_{2.5}$ exposure. These effects include premature death, hospitalizations, and emergency department visits for exacerbated chronic heart and lung disease, including asthma, increased respiratory symptoms, and decreased lung function in children. Several studies suggest that exposure to DPM may also facilitate development of new allergies. Those most vulnerable to noncancer health effects are children whose lungs are still developing and the elderly who often have chronic health problems.[30]

Gasoline Exhaust

Similar to diesel exhaust, gasoline is composed of two phases, gas and particle, and both phases contribute to the health risk. The gas phase is composed of the same TACs, such as acetaldehyde, acrolein, benzene, 1,3-butadiene, formaldehyde, and polycyclic aromatic hydrocarbons. The particle phase is also composed of many different types of particles by size or composition. Fine and ultra-fine diesel particulates are of the greatest health concern and may be composed of elemental carbon with adsorbed compounds such as organic compounds, sulfate, nitrate, metals, and other trace elements. Gasoline exhaust is primarily emitted from light-duty passenger vehicles. The compounds in the gas and particles phases can cause health effects from short- and long-term exposures similar to those described under the TAC and particulate matter discussions above.

Visibility Reducing Particles

Visibility-reducing particles are any particles in the atmosphere that obstruct the range of visibility by creating haze.[31] These particles vary in shape, size, and chemical composition, and come from a variety of natural and manmade sources including windblown metals, soil, dust, salt, and soot. Other haze-causing particles are formed in the air from gaseous pollutant (e.g., sulfates, nitrates, organic carbon particles) which are the major constituents of fine PM, such as $PM_{2.5}$ and PM_{10}, and are caused from the combustion of fuel. CARB's standard for visibility reducing particles is not based on health effects, but rather on welfare effects, such as reduced visibility and damage to materials, plants, forests, and ecosystems. The health impacts associated with $PM_{2.5}$ and PM_{10} are discussed above under Particulate Matter.

30 California Air Resources Board, *Overview: Diesel Exhaust & Health,* https://ww2.arb.ca.gov/resources/overview-diesel-exhaust-and-health.

31 California Air Resources Board, *Visibility Reducing Particles and Health,* https://ww2.arb.ca.gov/resources/vinyl-chloride-and-health.

4.2.3 METHODOLOGY

4.2.3.1 Emissions Inventory Modeling

Development of the proposed Project would generate air pollutants from a number of individual sources during both construction and post-construction (operational) use. Intermittent, short-term construction emissions that occur from activities such as demolition, site-grading, concrete construction, and other activities were evaluated. Emissions from operation of the Project, including any reductions in emissions were also evaluated. Regulatory models used to estimate air quality and health impacts include:

- CARB's EMFAC2017[32] emissions inventory model. EMFAC2017 is the latest emission inventory model that calculates emission inventories and emission rates for motor vehicles operating on roads in California. This model reflects CARB's current understanding of how vehicles travel and how much they emit. EMFAC2017 can be used to show how California motor vehicle emissions have changed over time and are projected to change in the future.
- CARB OFFROAD2017 emissions inventory model. OFFROAD[33] is the latest emission inventory model that calculates emission inventories and emission rates for off-road equipment such as loaders, excavators, and off-road haul trucks operating in California. This model reflects CARB's current understanding of how equipment operates and how much they emit. OFFROAD can be used to show how California off-road equipment emissions have changed over time and are projected to change in the future.
- American Meteorological Society/USEPA Regulatory Model (AERMOD). AERMOD (Version 19191) is an atmospheric dispersion model which can simulate point, area, volume, and line emissions sources and has the capability to include simple, intermediate, and complex terrain along with meteorological conditions and multiple receptor locations.[34,35] AERMOD is commonly executed to yield 1-hour maximum and annual average concentrations (in parts per million or ppm and micrograms per cubic meter or µg/m3) at each receptor. AERMOD is used to estimate air concentrations at nearby receptors resulting from the activities associated with an air emission source (such as construction equipment).
- The California Emissions Estimator Model (CalEEMod),[36] is the CARB–approved computer program model recommended by SCAQMD for use in the quantification of air quality emissions. CalEEMod was developed under the auspices of SCAQMD, with input from other California air districts. CalEEMod utilizes widely accepted models for emissions estimates combined with appropriate data that can be

32 California Air Resources Board, *EMFAC2017 User's Guide,* March 1, 2018, Accessed July 6, 2020 at: https://ww3.arb.ca.gov/msei/downloads/emfac2017-volume-i-users-guide.pdf and https://www.arb.ca.gov/emfac/2017/.

33 California Air Resources Board, *OFFROAD Instructions,* Accessed July 6, 2020 at: http://www.arb.ca.gov/msprog/ordiesel/info_1085/oei_write_up.pdf and https://www.arb.ca.gov/orion/.

34 United States Environmental Protection Agency Preferred/Recommended Models, *AERMOD Modeling System*, Accessed July 6, 2020 at: https://www.epa.gov/scram/air-quality-dispersion-modeling-preferred-and-recommended-models#aermod.

35 Title 40 CFR Part 51, *Revision to the Guideline on Air Quality Models: Adoption of a Preferred General Purpose (Flat and Complex Terrain) Dispersion Model and Other Revisions;* Final Rule, Accessed July 6, 2020 at: http://www.epa.gov/ttn/scram/guidance/guide/appw_05.pdf.

36 CalEEMod, http://www.caleemod.com/.

used if site-specific information is not available. For example, CalEEMod incorporates USEPA-developed emission factors; CARB's on-road and off-road equipment emission models, such as EMFAC and OFFROAD; and studies commissioned by other California agencies, such as the California Energy Commission and CalRecycle.

4.2.3.2 Construction

The proposed Project Construction Scenarios are provided in **Appendix 3.0.4: ITC Construction Scenarios for the EIR** and were used to estimate construction air quality emissions associated with the proposed Project.

Construction of the proposed Project would have the potential to temporarily emit criteria air pollutant emissions through the use of heavy-duty construction equipment and through vehicle trips generated from workers and haul trucks traveling to and from construction areas. In addition, fugitive dust emissions would result from demolition and various soil-handling activities. Construction emissions can vary substantially from day to day, depending on the intensity and specific type of construction activity. The maximum daily regional emissions are predicted values for the worst-case day and do not represent the emissions that would actually occur during every day of construction. The maximum daily emissions of pollutants were compared to the respective SCAQMD thresholds.

Construction Schedule

Pre-construction of the proposed Project would begin in late 2021 with demolition activities starting early 2022. Construction of the proposed Project would occur over approximately 45 months, from approximately early 2022 through mid-2026. The phasing would include:

- **Phase 1** would include, but not be limited to, demolition of buildings and site improvements on properties acquired for construction of the Project and the beginning of construction of the MSF. The properties where existing buildings and site improvements will be demolished include at the existing retail commercial center at Market Street and Regent Street (CVS plaza), the commercial buildings located at 500 and 501 E. Manchester Avenue (retail commercial site and gas station buildings), and the commercial building at 150 S. Market Street on the northeast corner of Manchester and Market Street. Phase 1 would include utility relocations, if required, construction of cast-in-place (CIP) columns and slabs, foundations for the initial construction of the MSF facility. After demolition, the remaining asphalt flatwork areas at 500 E. Manchester (retail commercial site), the commercial plaza at Market Street and Regent Street (CVS Plaza) and the commercial building at 150 S. Market Street will provide suitable space for construction staging, including but not limited to, space for equipment storage, material staging and storage, contractor jobsite trailers, and on-site parking for construction staff throughout the entire project duration. The first phase of construction would occur between approximately 2022 and 2023.

- **Phase 2** would include activities to enable the construction sequence of the guideway along Prairie Avenue from the Hardy Street intersection to Manchester Boulevard including the demolition of sidewalks, roadways and landscaping as needed, utility relocations, if necessary, foundations, CIP columns, straddle bents and the precast trapezoidal troughs and girders, and the construction of the MSF. The second phase of construction would occur between approximately 2023 and 2025.
- **Phase 3** would include construction of an above-ground passenger access walkway from the Market Street/Florence Avenue Station to the Metro Crenshaw/LAX Line Downtown Inglewood Station, property acquisitions, building demolition, utility relocation (if necessary), foundations, CIP columns, straddle bents and the precast trapezoidal troughs and girders. This phase includes site work completion of the MSF. The third phase of construction would occur between approximately 2024 and 2026.
- **Phase 4** would include completion of the aerial guideway construction elements including the installation of the operation and control systems, track work, station platform equipment and systems, completion of the TPSSs, testing and commissioning of the APM trains, completion of all surface construction activities including electrical, mechanical and utilities energizations, and all surface parking lots. Phase 4 will also include final roadway improvements and modifications, and re-striping of streets as required. The fourth phase of construction would occur between approximately 2022 and 2026.

Construction activity would occur 24-hours a day seven days a week with primarily heavy construction activities (those involving large equipment use on site) would occur over a 16 hour/day schedule with two shifts, either a morning shift from approximately 7:00 AM to 3:00 PM and an evening shift from approximately 3:00 PM to 11:00 PM, or a morning shift from approximately 7:00 AM to 3:00 PM and a night shift from approximately 11:00 PM to 7:00 AM. The night shift would be used for material deliveries, export of soil and debris and other light construction activities.

Combinations of these shifts would be referred to “Morning/Evening” or “Morning/Night.” Other minimal construction work could occur during other hours at a reduced intensity. The analysis of pollutant concentrations and Health Risk Assessment (HRA)results are presented for both the Morning/Evening and Morning/Night construction scenarios.

Air Emission Calculation Methodology

Air emission sources include combustion exhaust from on-road vehicles such as construction worker vehicles, pickup/delivery trucks, and haul trucks, as well as off-road construction equipment such as backhoes, loaders, and graders. Fugitive dust emissions from vehicles from handling of soils and entrainment of dust in vehicle tires are also sources of PM_{10} and $PM_{2.5}$.

On-Road Vehicles

Vehicular on—road emissions were computed using the CARB's emission factor model, EMFAC2017, [37]. Construction worker trips were modeled using the light-duty auto/truck classification. Construction worker trips are a composite of gasoline and diesel vehicles. Foreman trucks used on-site were modeled as gasoline and diesel light heavy-duty trucks. Haul trucks were modeled using the diesel combination long-haul truck classification, which is a heavy-duty truck emission factor for public vehicles. Construction worker commutes were assumed to be 12 miles per one-way trip per day. Distance traveled is conservatively assumed to be 20 miles per one-way trip per day for delivery trucks and concrete trucks.[38] Distance traveled is assumed to be 29 miles per one-way trip per day for asphalt removal trucks, asphalt pavement trucks, and soil spoils dump trucks.[39]

For each phase of construction, a conservative estimate of 10 percent of the total truck trips were assumed to occur on any given day. The usage factor[40] for haul trucks is approximately 25 percent. Paved road dust, brake wear, and tire wear particulate emissions were also accounted for and included in the analysis using EMFAC2017 emission factors and methodologies. For haul trucks, exhaust particulate emissions are approximately 14 percent of the total particulate emissions.

Criteria pollutant emissions associated with on-road vehicles were calculated for each construction year (2022 to 2026) by combining the activity information with emissions factors, in grams per mile, derived using the EMFAC2017 emissions model. The EMFAC2017 emissions factors are summarized in **Appendix 4.2.1: Air Quality and Human Health Risk Assessment** for employee vehicles, pickup trucks, delivery trucks, and haul trucks for construction years 2022 through 2026.

Off-Road Equipment

Construction of the proposed Project would require the use of heavy-duty equipment, such as excavators, loaders, forklifts, backhoes, cranes, and off-road haul trucks.

Emissions from construction activities were estimated based on the projected construction activity schedule, the number of vehicles/pieces of equipment, the types of equipment/type of fuel used, vehicle/equipment utilization rates, equipment horsepower, and the construction year. These estimates were based on the Inglewood Transit Connector: Construction Scenarios for the Environmental Impact Report by Pacifica Services (dated June 27, 2020).

37 *California Emissions Estimator Model (CalEEMod),* Version 2016.3.2

38 The maximum distance from four supporting facilities to the proposed Project is 20 miles: CalPortland, Catalina Pacifica Concrete, Cemex-Inglewood, and Robertson's Read Mix.

39 The distance to Whittier Landfill from the proposed Project is 29 miles.

40 Activity level (or usage factor) are defined as the percent of operation for a piece of equipment over a given time.

Emissions from construction activities were also estimated based on load factor (throttle setting)[41] and usage factor.[42]

For the daily emission estimates and short-term ambient concentration analysis (1-hour to 24-hour averaging periods), a usage factor of 100 percent was applied (i.e., full-time operation) to produce a conservative analysis. For the long-term ambient concentration analyses and the health risk assessment, the usage factor of less than 100 percent was applied by equipment type, as not all of the equipment can be used every hour of the day and every day of the year due to safety issues and manpower constraints.

This information was applied to criteria pollutant emissions factors, in grams per horsepower-hour, primarily derived using the OFFROAD emissions model. Off-road construction equipment emissions were computed, and the emissions factors used in this assessment are summarized, by equipment type within **Appendix 4.2.1** for 2022 through 2026, respectively**.**

4.2.3.3 Operation

Analysis of the proposed Project's operational emissions considers three types of sources: 1) area; 2) energy; and 3) mobile. A description of the proposed Project's various operational components is detailed in **Section 3.5: Project Characteristics**.

Area

Operation of the proposed Project would generate criteria air pollutant emissions from area sources such as operation of landscaping equipment and use of consumer products, including solvents used in nonindustrial applications which emit VOCs during their product use, such as cleaning supplies. The operational area emissions from the proposed Project were estimated using the CalEEMod[43] software. Area source emissions are based on architectural coatings, landscaping equipment, and consumer product usage rates provided in CalEEMod.

Natural Gas

Operation of the proposed Project would generate criteria air pollutant emissions from natural gas combustion. Energy source emissions are generated as a result of activities in buildings which utilize natural gas utility infrastructure. The operational energy emissions from the proposed Project were estimated using the CalEEMod[44] software. Energy source emissions were based on natural gas (building

41 Load factor (or throttle setting) are the engine performance demands, as a percent of maximum power; based on values within OFFROAD and typically ranging from 30 to 80 percent depending on equipment type.
42 Activity level (or usage factor) are defined as the percent of operation for a piece of equipment over a given time.
43 CalEEMod, http://www.caleemod.com/
44 CalEEMod, http://www.caleemod.com/

heating and water heaters) usage rates provided in CalEEMod. Natural gas usage factors in CalEEMod were based on the California Energy Commission California Commercial End Use Survey[45] (CEUS) data set, which provides energy demand by building type and climate zone. Default parameters were used when project-specific data was not available.

Mobile

Operation of the proposed Project would generate criteria air pollutant emissions from mobile sources from Project-generated vehicle trips traveling to and from the MSF and associated facilities, including the surface parking lots proposed to provide public parking at the Market Street/Florence Station, at 150 S. Market Street, and at the MSF Facility site. Mobile emissions were calculated based on the data provided in the proposed Project's Traffic Study (see **Appendix 4.12.1: Transportation Assessment Study**) which is further discussed in **Section 4.12: Transportation**. Under the Traffic Study, vehicle miles traveled (VMT) is the primary performance metric used to identify impacts. VMT's associated with trips to and from all areas within the City were included in the Traffic Study and were utilized to calculate operational air quality emissions from mobiles sources. Emissions from motor vehicles are dependent on vehicle type. Thus, the emissions were calculated using a representative motor vehicle fleet mix for the proposed Project and EMFAC2017 default fuel type.

The Adjusted Baseline Environmental Setting is described in **Section 4.0: Environmental Analysis**. Project operations are expected to commence in 2026. Regulatory models used to estimate air quality from proposed Project operations include the CARB EMFAC2017[46] emissions inventory model. Consistent with the Traffic Study, six operational scenarios were analyzed to evaluate the proposed Project's indirect operational emissions, as follows:

1. Adjusted Baseline,
2. Adjusted Baseline with the proposed Project,
3. Year 2026 with Event Weekday without the proposed Project,
4. Year 2026 with Event Weekday with the proposed Project,
5. Year 2045 with Event Weekday without the proposed Project, and
6. Year 2045 with Event Weekday with the proposed Project.

45 California Energy Commission, *California Commercial End Use Survey,* https://www.energy.ca.gov/data-reports/surveys/california-commercial-end-use-survey#:~:text=The%20California%20Commercial%20End%2DUse,Commission%27s%20commercial%20sector%20forecast%20model.

46 California Air Resources Board, *EMFAC2017 User's Guide,* March 1, 2018, Accessed July 6, 2020 at: https://ww3.arb.ca.gov/msei/downloads/emfac2017-volume-i-users-guide.pdf and https://www.arb.ca.gov/emfac/2017/

Details of each of the above scenarios are provided in **Section 4.12** and in **Appendix 4.12.1**.

The proposed Project would also produce criteria air pollutant emissions from on-site diesel-fueled emergency generators and delivery trucks. Daily maximum criteria air pollutant emissions were compared with SCAQMD thresholds for operation to determine the operational impacts of the proposed Project. Regional operational air quality impacts were assessed based on the incremental increase/decrease in emissions compared to the Adjusted Baseline. Air pollutant emissions from the existing uses to be demolished were removed from the estimated emissions for the proposed Project's operational emissions.

Backup Generators

To assure the ability to allow APM trains to reach the nearest stations to offload riders in the event of loss of electrical supply, each TPSS will be equipped with backup power generators. The proposed Project would include up to two stationary standby generators, on at each of the two TPSS sites, with an estimated total capacity rated at approximately 4,000 kilowatts (kW) to provide emergency power primarily for APM train operation, lighting, and other emergency systems. Emergency generator emissions were calculated based on compliance with applicable federal emissions standards and compliance with SCAQMD Rule 1470[47] (Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines) mandated emission limits and operating hour constraints. This analysis also assumed that the standby generators would operate up to two hours per day and a total of 50 hours per year for testing and maintenance (per SCAQMD Rule 1470 limit). SCAQMD requires that all internal combustion engines (ICE) greater than 50 brake horsepower (bhp) and gas turbines greater than 2,975,000 Btu per hour obtain a permit to construct prior to installation of the engines at a site.

A standby internal combustion engines (ICEs) greater or turbine for nonutility power generation that does not operate more than 200 hours a year and is only operated in the event of an emergency power failure or for routine testing and maintenance is considered an emergency backup generator for power generation. The SCAQMD allows for the use of backup generators thru specific permits prior to installation.[48]

The proposed Project would implement the following operational equipment requirements and operation protocols for operating backup generators. These would include the following:

47 SCAQMD, *Rule 1470 - Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines.*

48 SCAQMD, *Permits, Emergency Generators. http://www.aqmd.gov/home/permits/emergency-generators.*

- All backup generators would be selected from the SCAQMD certified generators list and meet applicable federal standards for diesel emissions. For after-treatment of engine exhaust air, a diesel particulate filter would be provided to meet the emission level requirements of SCAQMD;
- The proposed Project would have two standby generators, each could operate up to two hours per day and a total of 50 hours per year for testing and maintenance (per SCAQMD Rule 1470 limit) to ensure reliability in the case of a power outage; and
- The proposed Project would conduct maintenance and/or testing on the two standby generators on separate days.

As such, each standby generators would operate for 2 hours per day during 24 days per year (twice a month) for a total of not more than 50 hours per year. Each standby generator would be tested during different days; if needed for emergency operation, both generators would operate up to 2 hours each and could occur simultaneously.

4.2.3.4 Health Risk Assessment

A health risk assessment (HRA) estimates the health impacts to be expected from a project's TAC emissions. The greatest potential for TAC emissions during Project construction would be related to diesel particulate matter emissions associated with heavy-duty equipment. Although construction would be temporary, construction health impacts associated with TACs were addressed quantitatively in an HRA. Potential impacts to human health associated with TAC emissions may include increased cancer risks and increased chronic (long-term) and acute (short-term) non-cancer health hazards from inhalation of TACs. An HRA also assesses cancer burden which is the estimated increase in the occurrence of cancer cases in a population as a result of exposure to TAC emissions. The proposed Project's HRA was conducted following the methodologies in OEHHA's Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments[49] and SCAQMD's Risk Assessment Procedures for Rule 1401, 1401.1 and 212.[50] In accordance with SCAQMD guidance, modeled receptors for the HRA were placed at locations in which people are typically located for a period of time. The receptors for the HRA within one quarter of a mile of the proposed Project are as follows:

- Single and multifamily residences along the proposed Project length.
- Off-site workers within industrial and commercial areas surrounding the proposed Project area.
- Recreational facilities such as Queen Park.
- Medical facilities such as Hillcrest Medical Center and Centinela Hospital Medical Center.

49 Office of Environmental Health Hazard Assessment, Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments, February 2015, Accessed April 2, 2019 at: http://oehha.ca.gov/air/hot_spots/hotspots2015.html.

50 *South Coast Air Quality Management District,* Risk Assessment Procedures for Rule 1401, 1401.1 and 212, September 1, 2017, Accessed April 2, 2019 at: http://www.aqmd.gov/docs/default-source/permitting/rule-1401-risk-assessment/riskassessproc-v8-1.pdf?sfvrsn=12.

- Educational facilities such as Inglewood High School, Inglewood Junior Academy, George W Crozier Middle School, and Kelso Elementary School.
- Off-site daycare/childcare such as South Bay Child Development Center, Tender Care Child Development Center, A Bright Beginning Child Development Center, and Debbie's Child Development Center.

Sensitive receptors located within a quarter-mile of the proposed Project are shown in **Section 4.0: Environmental Analysis**, **Figure 4.0-2: Sensitive Receptors within a Quarter-Mile of the Project Area**. All receptors were set so that only ground-level concentrations were analyzed as that is where the sensitive receptors are located.

OEHHA's Guidance Manual[51] ensures that the greater sensitivity of children to cancer and other health risks is reflected in an HRA. For example, OEHHA recommends that risks be analyzed separately for multiple age groups, focusing especially on young children and teenagers, rather than the past practice of analyzing risks to the general population, without distinction by age. OEHHA also recommends that statistical "age sensitivity factors" be incorporated into an HRA, and that children's relatively high breathing rates be accounted for. On the other hand, the Guidance Manual revisions also include some changes that would reduce calculated health risks. For example, under the former guidance, OEHHA recommended that residential cancer risks be assessed by assuming 70 years of exposure at a residential receptor; under the Guidance Manual, this assumption is lessened to 30 years.

Terrain elevations for emission source locations were based on AERMAP (Version 11103). Hourly meteorological data from Los Angeles International Airport, located approximately four miles to the west-southwest of the proposed Project was used in the dispersion modeling analysis and HRA. Once the dispersion modeling estimated TAC concentrations at the receptors, the risk assessment applied established cancer risk estimates and acceptable reference concentrations for noncancer health effects to determine carcinogenic and non-carcinogenic human health impacts, respectively.

Appendix 4.2.1: Air Quality and Human Health Risk Assessment provides additional methodologies and assumptions used within the HRA.

51 Office of Environmental Health Hazard Assessment, Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments, February 2015, Accessed April 2, 2019 at: http://oehha.ca.gov/air/hot_spots/hotspots2015.html.

4.2.4 REGULATORY FRAMEWORK

4.2.4.1 Federal Regulations

Clean Air Act

The USEPA is responsible for the implementation of portions of the CAA of 1970, which regulates certain stationary and mobile sources of air emissions and other requirements. The 1990 amendments to the CAA identify specific emission reduction goals for areas not meeting the NAAQS. These amendments require both a demonstration of reasonable further progress toward attainment and incorporation of additional sanctions for failure to attain or to meet interim milestones. The sections of the CAA that are most applicable to the proposed Project include Title I, Nonattainment Provisions, and Title II, Mobile Source Provisions.

Charged with handling global, international, national, and interstate air pollution issues and policies, the USEPA sets national vehicle and stationary source emission standards, oversees the approval of all State Implementation Plans,[52] provides research and guidance for air pollution programs, and sets national AAQS (NAAQS).[53] NAAQS for the six common air pollutants (ozone, PM_{10} and $PM_{2.5}$, NO_2, CO, Pb, and SO_2) are identified in the CAA.

The NAAQS were amended in July 1997 to include an 8-hour standard for O_3 and to adopt a NAAQS for $PM_{2.5}$. The NAAQS were amended in September 2006 to include an established methodology for calculating $PM_{2.5}$ and to revoke the annual PM_{10} threshold. More stringent area requirements now apply including implementation of Best Available Control Measures/Best Available Control Technology (BACM/BACT), a lower major source threshold (from 100 tons per year to 70 tons per year), and an update to the reasonable further progress (RFP) analysis.[54] Title I (Nonattainment Provisions)[55] requirements are implemented for the purpose of attaining NAAQS for the following criteria air pollutants: O_3; NO_2; CO; SO_2; PM_{10}; and lead. **Table 4.2-1: Federal and State Ambient Air Standards** shows the NAAQS currently in effect for each criteria air pollutant.

52 A State Implementation Plan is a document prepared by each state describing existing air quality conditions and measures that will be followed to attain and maintain National Ambient Air Quality Standards (NAAQS).

53 The NAAQS were established to protect public health, including that of sensitive individuals; for this reason, the standards continue to change as more medical research becomes available regarding the health effects of the criteria pollutants. The primary NAAQS defines the air quality considered necessary, with an adequate margin of safety, to protect the public health.

54 SCAQMD, "Final 2016 Air Quality Management Plan" (2017), accessed January 2019, http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2016-air-quality-management-plan/final-2016-aqmp/final2016aqmp.pdf?sfvrsn=15.

55 USEPA, *Clean Air Act Title I - Air Pollution Prevention and Control, Parts A through D.* https://19january2017snapshot.epa.gov/clean-air-act-overview/clean-air-act-title-i-air-pollution-prevention-and-control-parts-through-d_.html.

Table 4.2-1
Federal and State Ambient Air Standards

		California Standards[a]		National Standards[b]		
Pollutant	**Average Time**	**Concentration[c]**	**Method[d]**	**Primary[c,e]**	**Secondary[c,f]**	**Method[g]**
$O3^{h}$	1 hour	0.09 ppm (180 µg/m³)	Ultraviolet Photometry	-	Same as Primary Standard	Ultraviolet Photometry
	8 hour	0.070 ppm (137 µg/m³)		0.070 ppm (137 µg/m³)		
NO_2^{i}	1 hour (98th Percentile)[i]	0.18 ppm (339 µg/m³)	Gas Phase Chemi-luminescence	100 ppb (188 µg/m³)	None	Gas Phase Chemi-luminescence
	Annual Arithmetic Mean	0.030 ppm (57 µg/m³)		53 ppb (100 µg/m³)	Same as Primary Same as Primary Standard	
CO	1 hour	20 ppm (23 mg/m³)	Non-Dispersive Infrared Photometry (NDIR)	35 pp (40 mg/m³)	None	Non-Dispersive Infrared Photometry (NDIR)
	8 hour	9.0 ppm (10mg/m³)		9 ppm (10 mg/m³)		
	8 hour (Lake Tahoe)	6 ppm (7 mg/m³)		-	-	
SO_2^{j}	1 hour	0.25 ppm (655 µg/m³)	Ultraviolet Fluorescence	75 pp (196 µg/m³)	-	Ultraviolet Fluorescence; Spectrophotometry (Pararosaniline Method)
	3 hour	-		-	.5 ppm (1300 µg/m³)	
	24 hour	0.04 ppm (105 µg/m³)		0.14 ppm (for certain areas)j	-	
	Annual Arithmetic Mean	-		0.030 ppm (for certain areas)j	-	
PM_{10}^{k}	24 Hour	50 µg/m³	Gravimetric or Beta Attenuation	150 µg/m³	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	20 µg/m³		-		
$PM_{2.5}^{k}$	**2**4 Hour	No Separate State Standard		Gravimetric or Beta Attenuation	Same as Primary Standard	High Volume Sampler and Atomic Absorption
	Annual Arithmetic Mean	12 µg/m³	Gravimetric or Beta Attenuation	12.0 µg/m³ k	15 µg/m³	
$Lead^{l,m}$	**3**0 Day Average	1.5 µg/m³	Atomic Absorption	-	-	High Volume Sampler and Atomic Absorption
	Calendar Quarter	-		1.5 µg/m³ (for certain areas)m	Same as Primary Standard	
	Rolling 3-Month Average	-		0.15 µg/m³		
Visibility	8 Hour	Extinction coefficient of 0.23 per kilometer — visibility of			No Federal Standards	

Pollutant	Average Time	California Standards[a]		National Standards[b]		
		Concentration[c]	Method[d]	Primary[c,e]	Secondary[c,f]	Method[g]
Reducing Particles[n]		10 miles or more (0.07 — 30 miles or more for Lake Tahoe) due to particles when relative humidity is less than 70%. Method: Beta Attenuation and Transmittance through Filter Tape.				
Sulfates (SO4)	24 Hour	25 µg/m^3	Ion Chromatography			
Hydrogen Sulfide	1 Hour	0.03 pp (42 µg/m^3)	Ultraviolet Fluorescence			
Vinyl Chloride[l]	24 hour	0.01 pp (26 µg/m^3)	Gas Chromatography			

_____

Notes:

a California standards for ozone, carbon monoxide (except 8-hour Lake Tahoe), sulfur dioxide (1 and 24 hour), nitrogen dioxide, and particulate matter (PM_{10}, $PM_{2.5}$, and visibility reducing particles), are values that are not to be exceeded. All others are not to be equaled or exceeded. CAAQS are listed in the Table of Standards in section 70200 of Title 17 of the California Code of Regulations.

b National standards (other than ozone, particulate matter, and those based on annual arithmetic mean) are not to be exceeded more than once a year. The ozone standard is attained when the fourth highest 8-hour concentration measured at each site in a year, averaged over three years, is equal to or less than the standard. For PM_{10}, the 24-hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above 150 micrograms/per cubic meter (µg/m3) is equal to or less than one. For $PM_{2.5}$, the 24-hour standard is attained when 98 percent of the daily concentrations, averaged over three years, are equal to or less than the standard.

c Concentration expressed first in units in which it was promulgated. Equivalent units given in parentheses are based upon a reference temperature of 25°C and a reference pressure of 760 torr. Most measurements of air quality are to be corrected to a reference temperature of 25°C and a reference pressure of 760 torr; ppm in this table refers to ppm by volume, or micromoles of pollutant per mole of gas.

d Any equivalent procedure which can be shown to the satisfaction of the CARB to give equivalent results at or near the level of the air quality standard may be used.

e National Primary Standards: The levels of air quality necessary, with an adequate margin of safety to protect the public health.

f National Secondary Standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.

g Reference method as described by the USEPA. An "equivalent method" of measurement may be used but must have a "consistent relationship to the reference method" and must be approved by the USEPA.

h On October 1, 2015, the national 8-hour ozone primary and secondary standards were lowered from 0.075 to 0.070 ppm.

i To attain the 1-hour national standard, the 3-year average of the annual 98th percentile of the 1-hour daily maximum concentrations at each site must not exceed 100 ppb.

j On June 2, 2010, a new 1-hour SO_2 standard was established and the existing 24-hour and annual primary standards were revoked. To attain the 1-hour national standard, the 3-year average of the annual 99th percentile of the 1-hour daily maximum concentrations at each site must not exceed 75 ppb. The 1971 SO_2 national standards (24-hour and annual) remain in effect until one year after an area is designated for the 2010 standard, except that in areas designated nonattainment for the 1971 standards, the 1971 standards remain in effect until implementation plans to attain or maintain the 2010 standards are approved.

k On December 14, 2012, the national annual $PM_{2.5}$ primary standard was lowered from 15 µg/m3 to 12.0 µg/m3.

l CARB has identified lead and vinyl chloride as 'toxic air contaminants' with no threshold level of exposure for adverse health effects determined. These actions allow for the implementation of control measures at levels below the ambient concentrations specified for these pollutants.

m The national standard for lead was revised on October 15, 2008, to a rolling 3-month average. The 1978 lead standard (1.5 µg/m3 as a quarterly average) remains in effect until one year after an area is designated for the 2008 standard, except that in areas designated nonattainment for the 1978 standard, the 1978 standard remains in effect until implementation plans to attain or maintain the 2008 standard are approved.

n In 1989, CARB converted both the general statewide 10-mile visibility standard and the Lake Tahoe 30-mile visibility standard to instrumental equivalents, which are "extinction of 0.23 per kilometer" and "extinction of 0.07 per kilometer" for the statewide and Lake Tahoe Air Basin standards, respectively.

Source: CARB, Ambient Air Quality Standards (10/1/15), accessed April 2019.

4.2.4.2 State Regulations

California Clean Air Act

The California CAA,[56] signed into law in 1988, requires all areas of the State to achieve and maintain the CAAQS by the earliest practicable date.[57] CARB, a part of the California EPA (CalEPA), is responsible for the coordination and administration of both State and federal air pollution control programs within California. In this capacity, CARB conducts research, sets State ambient air quality standards, compiles emission inventories, develops suggested control measures, and provides oversight of local programs. CARB establishes emissions standards for motor vehicles sold in California, consumer products, and various types of commercial equipment. It also sets fuel specifications to further reduce vehicular emissions and the CAAQS currently in effect for each of the criteria pollutants, as well as for other pollutants recognized by the State. The CAAQS are more stringent than the NAAQS.

Air Quality and Land Use Handbook

CARB published the *Air Quality and Land Use Handbook*[58] on April 28, 2005, to serve as a general guide for considering health effects associated with siting sensitive receptors proximate to sources of TAC emissions. The recommendations provided therein are voluntary and do not constitute a requirement or mandate for either land use agencies or local air districts. The goal of the guidance document is to protect sensitive receptors, such as children, the elderly, acutely ill, and chronically ill persons, from exposure to TAC emissions.

Some examples of CARB's siting recommendations include the following: (1) avoid siting sensitive receptors within 500 feet of a freeway, urban road with 100,000 vehicles per day, or rural road with 50,000 vehicles per day; (2) avoid siting sensitive receptors within 1,000 feet of a distribution center (that accommodates more than 100 trucks per day, more than 50 trucks with operating transport refrigeration units per day, or where transport refrigeration unit operations exceed 300 hours per week); and (3) avoid siting sensitive receptors within 300 feet of any dry cleaning operation using perchloroethylene and within 500 feet of operations with two or more machines.

California Air Resources Board (CARB)

Mobile sources are a significant contributor to the air pollution in California. CARB has established exhaust emission standards for automobiles, which are more stringent than the federal emissions standards.

56 California Air Resources Board (CARB), California Clean Air Act (1988), https://arb.ca.gov/bluebook/bb05/HEA[14]16/HEA_[14]_16.htm.
57 CARB, "CAAQS" (August 10, 2017), https://www.arb.ca.gov/research/aaqs/caaqs/caaqs.htm.
58 CARB, Air Quality and Land Use Handbook: A Community Health Perspective (April 2005), https://www.arb.ca.gov/ch/handbook.pdf.

Through its Mobile Sources Program, CARB has developed programs and policies to reduce emissions from on-road heavy-duty diesel vehicles. Specifically, the On-Road Heavy-Duty Diesel Vehicle Regulation requires diesel trucks and buses that operate in the State to be upgraded to reduce emissions. By January 1, 2023, nearly all vehicles must have engines certified to 2010 model year engines or equivalent. The Innovative Clean Transit Program (ICT) sets emissions reduction standards for new public transit vehicles and requires major transit agencies to only purchase zero emission (ZE) buses after 2029. The Solid Waste Collection Vehicle Regulation requires solid waste collection vehicles and heavy diesel-fueled on-road single engine cranes to be upgraded. The Rule for On-Road Heavy-Duty Diesel-Fueled Public and Utility Fleets requires fleets to install emission control devices on vehicles or purchase vehicles that run on alternative fuels or use advanced technologies to achieve emissions requirements by specified implementation dates. CARB also establish an In-Use Off-Road Diesel-Fueled Fleets Regulation to impose limits on idling and require fleets to retrofit or replace older engines. Stationary sources can be divided into two major subcategories: point and area sources. Point sources are permitted facilities with one or more emission sources at an identified location (e.g., power plants, refineries). These facilities generally have annual emissions of 4 tons or more of either VOC, NOx, SOx, or total Particulate Matter (PM), or annual emissions of over 100 tons of CO. Facilities are required to report their criteria pollutant emissions pursuant to Rule 301 and selected air toxics to the SCAQMD on an annual basis, subject to audit, if any of these thresholds are exceeded.

Area sources consist of many small emission sources (e.g., residential water heaters, architectural coatings, consumer products and permitted sources that are smaller than the above thresholds) which are distributed across the region and are not required to individually report their emissions. There are about 400 area source categories for which emission estimates are jointly developed by CARB and the SCAQMD.

Regulation to Reduce Emissions of Diesel Particulate Matter, Oxides of Nitrogen and Other Criteria Pollutants from In-Use Heavy-Duty Diesel-Fueled Vehicles

The purpose of this regulation is to reduce emissions of diesel particulate matter (PM), NOx and other criteria pollutants from in-use diesel-fueled vehicles.[59] This regulation applies to any person, business, federal government agency, school district or school transportation provider that owns or operates, leases, or rents, affected vehicles that operate in California. Affected vehicles are those that operate on diesel-fuel, dual-fuel, or alternative diesel-fuel that are registered to be driven on public highways, were originally designed to be driven on public highways whether or not they are registered, yard trucks with on-road engines or yard trucks with off-road engines used for agricultural operations, both engines of two-engine

59 Title 13, California Code of Regulations Division 3: Air Resources Board Chapter 1: Motor Vehicle Pollution Control Devices. § 2025. Regulation to Reduce Emissions of Diesel Particulate Matter, Oxides of Nitrogen and Other Criteria Pollutants from In-Use Heavy-Duty Diesel-Fueled Vehicles. https://ww3.arb.ca.gov/msprog/onrdiesel/documents/tbfinalreg.pdf

sweepers, school buses, and have a manufacturer's gross vehicle weight rating (GVWR) greater than 14,000 pounds (lbs.).

California Air Resources Board Truck and Bus Regulation

In 2008, CARB approved the Truck and Bus Regulation to reduce NOx, PM_{10}, and $PM_{2.5}$ emissions from existing diesel vehicles operating in California. The requirements were amended in December 2010 and apply to nearly all diesel fueled trucks and busses with a gross vehicle weight rating greater than 14,000 pounds. For the largest trucks in the fleet (i.e., those with a gross vehicle weight rating greater than 26,000 pounds), there are two methods to comply with the requirements. The first method is for the fleet owner to retrofit or replace engines, starting with the oldest engine model year, to meet 2010 engine standards, or better. This is phased over eight years, starting in 2015 and would be fully implemented by 2023, meaning that all trucks operating in the State subject to this option would need to meet or exceed the 2010 engine emission standards for NOx and PM by 2023. The second option, if chosen, requires fleet owners, starting in 2012, to retrofit a portion of their fleet with diesel particulate filters achieving at least 85 percent removal efficiency, so that by January 1, 2016, their entire fleet is equipped with diesel particulate filters. However, diesel particulate filters do not typically lower NOx emissions. Thus, fleet owners choosing the second method must still comply with the 2010 engine emission standards for their trucks and busses by 2020. Beginning January 1, 2020, this requirement will be enforced by the California Department of Motor Vehicles (DMV). Senate Bill 1 (SB1), the Road Repair and Accountability Act of 2017, was signed into law on April 28, 2017. SB1 authorizes the DMV to check that vehicles are compliant with or exempt from CARB's Truck and Bus Regulation. If a vehicle is not compliant with the rule, DMV will no longer register that vehicle starting January 1, 2020.

In addition to limiting exhaust from idling trucks, CARB promulgated emission standards for off-road diesel construction equipment of greater than 25 horsepower such as bulldozers, loaders, backhoes, and forklifts, as well as many other self-propelled off-road diesel vehicles. The regulation adopted by CARB on July 26, 2007, aims to reduce emissions by installation of diesel soot filters and encouraging the retirement, replacement, or repower of older, dirtier engines with newer emission-controlled models. Implementation is staggered based on fleet size (which is the total of all off-road horsepower under common ownership or control), with the largest fleets to begin compliance by January 1, 2014. Each fleet must demonstrate compliance through one of two methods. The first option is to calculate and maintain fleet average emissions targets, which encourages the retirement or repowering of older equipment and rewards the introduction of newer cleaner units into the fleet. The second option is to meet the Best Available Control Technology (BACT) requirements by turning over or installing Verified Diesel Emission Control Strategies (e.g., engine retrofits) on a certain percentage of its total fleet horsepower. The

compliance schedule requires that BACT turn overs or retrofits be fully implemented by 2023 in all equipment in large and medium fleets and across 100 percent of small fleets by 2028.

CARB Rule 2449, General Requirements for In-Use Off-Road Diesel-Fueled Fleets

Requires off-road diesel vehicles to limit nonessential idling to no more than 5 consecutive minutes.[60]

CARB Rule 2480 Airborne Toxic Control Measure to Limit School Bus Idling and Idling at Schools

CARB Rule 2480 requires school busses, transit busses, and commercial vehicles (gross vehicle weight greater than 10,001 pounds except for pickup trucks and zero emission vehicles) to limit nonessential idling to no more than 5 consecutive minutes when within 100 feet of a school.[61]

CARB Rule 2485, Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling

The Airborne Toxic Control Measure (ATCM) to Limit Diesel-Fueled Commercial Motor Vehicle Idling[62] measure includes regulations that pertain to air quality emissions. Specifically, Section 2485 states that during construction, the idling of all diesel-fueled commercial vehicles weighing more than 10,000 pounds shall be limited to 5 minutes at any location. In addition, Section 93115 in Title 17 of the California Code of Regulations (CCR)[63] states that operation of any stationary, diesel-fueled, compression-ignition engines shall meet specified fuel and fuel additive requirements and emission standards.

California Building Standards Code

California Energy Code

California's Energy Efficiency Standards for Residential and Nonresidential Buildings[64] were established in 1978 in response to a legislative mandate to reduce California's energy consumption. Title 24 requires the design of building shells and components to conserve energy. The standards are updated periodically to allow consideration and possible incorporation of new energy efficiency technologies and methods.

60 CARB, Final Regulation Order: Regulation for In-Use Off-Road Diesel-Fueled Facts, accessed May 2020, https://ww3.arb.ca.gov/msprog/ordiesel/documents/finalregorder-dec2011.pdf

61 CARB, *Section 2480 in Title 13 of the CCR*, California Administrative Code (December 24, 2010), https://www.arb.ca.gov/toxics/sbidling/SBVIdling.pdf.

64 California Energy Commission, 2019 Building Energy Efficiency Standards, https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2019-building-energy-efficiency.

64 California Energy Commission, 2019 Building Energy Efficiency Standards, https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2019-building-energy-efficiency.

64 California Energy Commission, 2019 Building Energy Efficiency Standards, https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2019-building-energy-efficiency.

The California Energy Commission (CEC) adopted the Title 24 standards as well as the 2019 Title 24 standards, which became effective on January 1, 2020, and are applicable to the proposed Project.[65] The 2019 standards will continue to improve upon prior Title 24 standards for new construction of, and additions and alterations to, residential and nonresidential buildings.[66]

California Green Building Code

The California Green Building Standards Code, which is Part 11 of the CCR, is commonly referred to as the CALGreen Code.[67] The most current version of the CALGreen building code went into effect in January 2020. The purpose is to establish minimum standards to safeguard the public health, safety, and general welfare through structural strength, means of egress facilities, and general stability by regulating and controlling the design, construction, quality of materials, outdoor lighting standards, use and occupancy, location, and maintenance of all building and structures within its jurisdiction.

4.2.4.3 Regional Regulations

South Coast Air Quality Management District

SCAQMD shares responsibility with CARB for ensuring that all State and federal ambient air quality standards are achieved and maintained over an area of approximately 10,743 square miles. This area includes the South Coast Air Basin (SCAB) and portions of the Salton Sea and Mojave Desert Air Basins (MDAB), all of Orange County, and the nondesert portions of Los Angeles, Riverside, and San Bernardino counties. It does not include the Antelope Valley or the nondesert portion of western San Bernardino County.

SCAQMD is responsible for controlling emissions primarily from stationary sources. SCAQMD maintains air quality monitoring stations throughout the SCAB. SCAQMD, in coordination with the Southern California Association of Governments (SCAG), is also responsible for developing, updating, and implementing the AQMP for the SCAB. An AQMP is a plan prepared and implemented by an air pollution district for a county or region designated as nonattainment of the national and/or California ambient air quality standards.

South Coast Air Quality Management District Air Quality Management Plan (AQMP)

The proposed Project lies within the jurisdiction of the SCAQMD, and compliance with SCAQMD rules and guidelines is required. SCAQMD is responsible for controlling emissions primarily from stationary sources.

65 See California Energy Commission, 2019 Building Energy Efficiency Standards for additional information.
66 See California Energy Commission, 2019 Building Energy Efficiency Standards for additional information.
67 California Buildings Standards Commission, California Green Building Standards Code (Cal. Code Regs., Title 24, Part 11), Accessed April 2020, http://www.bsc.ca.gov/Home/CALGreen.aspx.

The SCAQMD approved a Final 2016 AQMP on March 3, 2017.[68] The 2016 AQMP includes transportation control measures developed by SCAG from the 2016 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), as well as the integrated strategies and measures needed to meet the NAAQS. The 2016 AQMP demonstrates attainment of the 1-hour and 8-hour ozone NAAQS as well as the latest 24-hour and annual $PM_{2.5}$ standards.

Under the Federal CAA, SCAQMD has adopted federal attainment plans for O3 and PM_{10}. The SCAQMD reviews projects to ensure that they would not (1) cause or contribute to any new violation of any air quality standard; (2) increase the frequency or severity of any existing violation of any air quality standard; or (3) delay the timely attainment of any air quality standard or any required interim emission reductions or other milestones of any federal attainment plan.

The SCAQMD is responsible for limiting the amount of emissions that can be generated throughout the Basin by various stationary, area, and mobile sources. Specific rules and regulations have been adopted by the SCAQMD Governing Board. These rules and regulations limit the emissions that can be generated by various uses or activities and identify specific pollution reduction measures, which must be implemented in association with various uses and activities. These rules not only regulate the emissions of the federal and State criteria pollutants, but also toxic air contaminants and acutely hazardous materials. The rules are also subject to ongoing refinement by SCAQMD.

South Coast Air Quality Management District Rules and Regulations

Among the SCAQMD rules applicable to the proposed Project are Rule 403 (Fugitive Dust), and Rule 1113 (Architectural Coatings). Rule 403 requires the use of stringent best available control measures to minimize PM_{10} emissions during grading and construction activities. Rule 1113 will require reductions in the VOC content of coatings, with a substantial reduction in the VOC content limit for flat coatings to 50 grams per liter (g/L) in July 2008.[69] Additional details regarding these rules and other potentially applicable rules are presented as follows.

Rule 201 Permit to Construct

Rule 201 requires a permit for installation of any equipment which releases air pollutants.[70]

68 SCAQMD, *Final 2016 Air Quality Management Plan* (2016), Accessed June 2020, http://www.aqmd.gov/home/library/clean-air-plans/air-quality-mgt-plan/final-2016-aqmp.

69 SCAQMD, Rule 1113 Architectural Coating (amended September 6, 2013).

70 SCAQMD, "Rule 201: Permit to Construct" (amended December 3, 2004), http://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-201.pdf.

Rule 401–Visible Emissions

This rule states that a person shall not discharge into the atmosphere from any single source of emission whatsoever any air contaminant for a period or periods aggregating more than three minutes in any one hour which is as dark or darker in shade as that designated No. 1 on the Ringelmann Chart or of such opacity as to obscure an observer's view.[71]

Rule 402 Nuisance Odors

Rule 402 prohibits the discharge of odors that cause injury, detriment, nuisance, or annoyance to a considerable number of people.[72]

Rule 403 Fugitive Dust

Rule 403[73] requires fugitive dust sources to implement Best Available Control Measures for all sources and prohibits all forms of visible particulate matter from crossing any property line. This may include application of water or chemical stabilizers to disturbed soils, covering haul vehicles, restricting vehicle speeds on unpaved roads to 15 miles per hour (mph), sweeping loose dirt from paved site access roadways, cessation of construction activity when winds exceed 25 mph, and establishing a permanent ground cover on finished sites. SCAQMD Rule 403 is intended to reduce PM_{10} emissions from any transportation, handling, construction, or storage activity that has the potential to generate fugitive dust (see also Rule 1186).

Rule 1113 Architectural Coatings

Rule 1113[74] requires manufacturers, distributors, and end users of architectural and industrial maintenance coatings to reduce VOC emissions from the use of these coatings, primarily by placing limits on the VOC content of various coating categories.

Rule 1146.2 Emissions of Oxides of Nitrogen from Large Water Heaters and Small Boilers and Process Heaters

Rule 1146.2[75] requires manufacturers, distributors, retailers, refurbishers, installers, and operators of new and existing units to reduce NOx emissions from natural gas-fired water heaters, boilers, and process heaters as defined in this rule.

---

71 SCAQMD, "Rule 401: Visible Emissions, http://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book

72 SCAQMD, "Rule 402: Nuisance", http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf.

73 SCAQMD, "Rule 403: Fugitive Dust", http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403.pdf.

74 SCAQMD, "Rule 1113: Architectural Coatings", http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-1113.pdf.

75 SCAQMD, "Rule 1146.2: Emissions of Oxides of Nitrogen from Large Water Heaters and Small Boilers and Process Heaters," http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-1146.2.pdf.

Rule 1186, PM_{10} Emissions from Paved and Unpaved Roads, and Livestock Operations

Rule 1186 requires control measures to reduce fugitive dust from paved and unpaved roads in addition to livestock operations.[76]

Regulation XIII – New Source Review (NSR)

The South Coast Air Quality Management District (South Coast AQMD) adopted its New Source Review (NSR) program in October 1976.[77] The current NSR regulation is codified by South Coast AQMD Regulation XIII–New Source Review.

NSR is a preconstruction review required under both federal and State statutes for new and modified sources located in areas that do not meet the Clean Air Act standards for healthy air (nonattainment areas). NSR applies to both individual permits and entire facilities. Any permit that has a net increase in emissions is required to apply Best Available Control Technology (BACT) (equivalent to federal Lowest Achievable Emission Rate). Facilities with a net increase in emissions are required to offset the emission increase by use of Emission Reduction Credits (ERCs). The regulation provides for the application, eligibility, registration, use and transfer of ERCs. For low emitting facilities, the South Coast AQMD maintains an internal bank that can be used to provide the required offsets. In addition, certain facilities are subject to provisions that require public notice and modeling analysis to determine the downwind impact prior to permit issuance.

Regulation XIV – Toxics and Other Noncriteria Air Pollutants

Regulation XIV[78] sets requirements for new permit units, relocations, or modifications to existing permit units which emit toxic air contaminants or other noncriteria air pollutants. The following is a list of rules which may apply to the proposed Project:

Rule 1401 – New Source Review of Toxic Air Contaminants

This rule regulates new or modified facilities to limit cancer and noncancer health risks from facilities located within SCAQMD jurisdiction.

Rule 1402 – Control of Toxic Air Contaminants from Existing Sources

76 SCAQMD, "Rule 1186: PM10 Emissions From Paved and Unpaved Roads, and Livestock Operations" (amended July 11, 2008), http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1186.pdf.

77 SCAQMD, Regulation XIII – New Source Review. October 2016. http://www.aqmd.gov/home/permits/new-source-review,

78 SCAQMD, Regulation XIV – Toxics and Other Noncompliance Air Pollution. http://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book/regulation-xiv

This rule regulates facilities that are already operating in order to limit cancer and noncancer health risks. Rule 1402 incorporates the requirements and methodology of the AB 2588 Air Toxics "Hot Spots" program.

Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities

This rule requires owners and operators of any demolition or renovation activity and the associated disturbance of asbestos-containing materials, any asbestos storage facility, or any active waste disposal site to implement work practice requirements to limit asbestos emissions from building demolition and renovation activities, including the removal and associated disturbance of asbestos-containing materials (see **Section 4.8: Hazards and Hazardous Materials**).

Rule 1470 – Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines

SCAQMD Rule 1470[79] applies to stationary compression ignition (CI) engine greater than 50 brake horsepower and sets limits on emissions and operating hours. In general, new stationary emergency standby diesel-fueled engines greater than 50 brake horsepower are not permitted to operate more than 50 hours per year for maintenance and testing.

South Coast Air Quality Management District CEQA Air Quality Handbook

In 1993, the SCAQMD prepared its *CEQA Air Quality Handbook* (CEQA Handbook) to assist local government agencies and consultants in preparing environmental documents for projects subject to CEQA;[80] the SCAQMD is in the process of developing its *Air Quality Analysis Guidance Handbook* (*Guidance Handbook*) to replace the CEQA Handbook. The *Guidance Handbook* describes the criteria that SCAQMD uses when reviewing and commenting on the adequacy of environmental documents. Although the Guidance Handbook is still being prepared, the *Guidance Handbook* provides the most up-to-date recommended thresholds of significance in order to determine if a project will have a significant adverse environmental impact. SCAQMD provides additional supplementation information including methodologies for estimating project emissions and mitigation measures that can be implemented to avoid or reduce air quality impacts on the Guidance Handbook website. Although the Governing Board of the SCAQMD has not adopted the *Guidance Handbook* and is in the process of developing the *Guidance Handbook*, the SCAQMD does not, nor does it intend to, supersede a local jurisdiction's CEQA procedures.[81]

79 SCAQMD, Rule 1470 - Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines

80 SCAQMD, Air Quality Analysis Guidance Handbook, Accessed June 2020, http://www.aqmd.gov/CEQA/hdbk.html. 2010.

81 SCAQMD, "Frequently Asked CEQA Questions," Accessed June 2020, http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/frequently-asked-questions.

Multiple Air Toxics Exposure Study

To date, the most comprehensive study on air toxics in the Basin is the Multiple Air Toxics Exposure Study (MATES IV),[82] conducted between July 2012 and June 2013. The monitoring program measured more than 30 air pollutants including both gases and particulates. The study concluded that the average of the modeled air toxics concentrations measured at each of the monitoring stations in the Basin equates to a background cancer risk of approximately 418 in one million primarily due to diesel exhaust. Subsequent to SCAQMD's risk calculation estimates, the OEHHA updated the methods for estimating cancer risks.[83] The updated method utilizes higher estimates of cancer potency during early life exposures and uses different assumptions for breathing rates and length of residential exposures. However, DPM remains the largest component of air toxics estimated risk.

SCAQMD is in the process of conducting the MATES V study.[84] This would involve the addition of an advanced monitoring network which would include account flight-based measurements, a mobile laboratory, an optical tent, sensor networks, and community engagement.

Southern California Association of Governments

SCAG 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (2020-2045 RTP/SCS)

SCAG is the metropolitan planning organization (MPO) for Los Angeles, Orange, Ventura, Riverside, San Bernardino, and Imperial Counties and serves as a forum for the discussion of regional issues related to transportation, the economy, community development, and the environment. As the federally-designated MPO for the Southern California region, SCAG is mandated by the federal government to research and develop plans for transportation, hazardous waste management, and air quality. Pursuant to California Health and Safety Code Section 40460(b),[85] SCAG has the responsibility for preparing and approving the portions of the AQMP relating to regional demographic projections and integrated regional land use, housing, employment, and transportation programs, measures, and strategies. SCAG is also responsible under the CAA for determining conformity of transportation projects, plans, and programs with applicable air quality plans.

82 SCAQMD, *Multiple Air Toxics Exposure Study (MATES-IV) in the South Coast Air Basin,* May 1, 2015, Accessed June 2020, http://www.aqmd.gov/home/air-quality/air-quality-studies/health-studies/mates-iv.

83 *California Office of Environmental Health Hazard Assessment (OEHHA), Air Toxics Hot Spots Program (February 2015),* Accessed June 2020, https://oehha.ca.gov/media/downloads/crnr/2015guidancemanual.pdf.

84 SCAQMD, *MATES V Multiple Air Toxics Exposure Study,* Accessed June 2020, http://www.aqmd.gov/home/air-quality/air-quality-studies/health-studies/mates-v.

85 California Health and Safety Code, Division 26. Air Resources, PART 3. Air Pollution Control Districts, Chapter 5.5. South Coast Air Quality Management District, ARTICLE 5. Plan, Section 40460(b). https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?sectionNum=40460.&lawCode=HSC

With regard to air quality planning, SCAG has prepared and adopted the 2020–2045 RTP/SCS,[86] which includes a SCS that addresses regional development and growth forecasts. The SCAG 2020–2045 RTP/SCS is a long-range visioning plan that balances future mobility and housing needs with economic, environmental, and public health goals, with a specific goal of achieving an 8 percent reduction in passenger vehicle GHG emissions on a per capita basis by 2020, 19 percent reduction by 2035, and 21 percent reduction by 2040 compared to the 2005 level. Although the RTP/SCS is not technically an air quality plan, consistency with the RTP/SCS has air quality implications, including the reduction of VMT which reduces air quality emissions.

4.2.4.4 Local Regulations

City

General Plan

California State law requires every city and county to adopt a comprehensive General Plan to guide its future development. The proposed Project is located entirely within the City. The City General Plan[87] includes the following elements: Land Use, Circulation, Safety, Noise, Housing, Open Space, and Conservation.

Land Use Element

The following goals from the Land Use Element[88] of the City General Plan are relevant to air pollutant emissions.

Circulation Goal: Promote and support adequate public transportation within the City and the region.

Circulation Goal: Develop a safe and adequate pedestrian circulation system which is barrier free for the handicapped.

Conservation Element

The City's General Plan Conservation Element addresses the conservation, development, and use of natural resources.[89] Five specific areas of conservation and/or protection that are identified in the Conservation Element include (1) oil and gas production, (2) water production and provision for domestic

86 Southern California Association of Governments (SCAG), Connect SoCal: 2020-2045 Regional Transportation Plan/Sustainable Communities Strategies Draft, "Chapter 1," https://www.connectsocal.org/Pages/Connect-SoCal-Draft-Plan.aspx, Accessed on July 10, 2020.

87 City of Inglewood, Department of Community Development and Housing, General Plan. January 1980

88 City of Inglewood, Department of Community Development and Housing, 1980. Land Use Element of the Inglewood General Plan. January 1980. Amended September 14, 2016.

89 City of Inglewood General Plan, "Conservation Element" (1997), General Plan. January 1980.

use, (3) storm water runoff and wastewater, (4) hazardous waste and solid waste disposal, and (5) air pollution. The Conservation Element notes the following pollution-reducing measures:

- reducing volatile emissions from factories and refineries;
- reducing airborne particulate matter from factories and construction sites;
- reducing numbers of vehicles being driven while increasing the utilization of high occupancy vehicles and alternative transportation;
- requiring improvements to engine efficiency to decrease emissions; and
- increasing the use of clean fuel vehicles.

Environmental Justice Element

The following goals from the Environmental Justice Element[90] of the City General Plan are relevant to air pollutant emissions.

Policy EJ-2.4: Create land use patterns and public amenities that encourage people to walk, bicycle and use public transit.

Policy EJ-2.9: Work with the South Coast Air Quality Management District (SCAQMD), the Los Angeles International Airport (LAX) and other appropriate agencies to monitor and improve air quality in the City of Inglewood.

Policy EJ-2.10: Implement and periodically update the City's Energy and Climate Action Plan to improve air quality and reduce greenhouse gas emissions.

Energy and Climate Action Plan

The City adopted an Energy and Climate Action Plan[91] (ECAP) in 2013 to guide Citywide GHG emissions reduction efforts. The ECAP established four primary compliance paths which projects may choose to adhere to, including: ministerial and exempt project status, implementation of a combination of sustainable development standards, performance-based compliance, or payment of an in-lieu fee. These measures were developed on a points-based system, which were chosen because they have been

90 City of Inglewood, Department of Community Development and Housing, 1980. Environmental Justice Element of the Inglewood General Plan. April 2020.

91 City of Inglewood, Inglewood Energy and Climate Action Plan, March 2013, https://www.cityofinglewood.org/DocumentCenter/View/148/Inglewood-Energy-and-Climate-Action-Plan-ECAP-Adopted-2013-PDF, accessed July 30, 2020.

demonstrated by various studies to directly reduce GHG emissions or support changes in activities that lead to GHG emissions reductions. Each Climate-Ready Development Standard has a point value associated with it that reflects its general effectiveness at reducing GHG emissions. The standards apply to various types of projects, and a qualifier is included denoting which types of projects may implement the standard. Applicants have discretion regarding which measures that they would want their project to comply with; however, for a project to be fully compliant with the goals of the ECAP it must incorporate features meeting the standards sufficient to accrue a total of 20 points. The following two of the five strategies and their related actions included in the ECAP also have the potential for co-benefits of reducing criteria air pollutants and TACs:

- S**trategy 1: Lead by Example with Municipal Government Actions**
  - Accelerate city vehicle fleet replacement
  - Continue commute trip reduction program
  - Planning for electric vehicle infrastructure
- **Strategy 4: Improve Transportation Options and Manage Transportation Demand**
  - Make roadways more efficient
  - Improve transit
  - Improve bicycle facilities
  - Make parking more efficient
  - Reduce commute trips
  - Encourage land use intensification and diversity

4.2.5 EXISTING CONDITIONS

4.2.5.1 Regional Meteorology

Air quality is affected by the rate, amount, and location of pollutant emissions and the associated meteorological conditions that influence pollutant movement and dispersal. Atmospheric conditions, including wind speed, wind direction, stability, and air temperature, in combination with local surface topography (i.e., geographic features such as mountains, valleys, and Pacific Ocean), determine the effect of air pollutant emissions on local air quality.

In general, Southern California has a warm, dry Mediterranean climate; hot in the summer and mild in the winter. Temperatures are cooler near the coast and hotter near inland areas. Most of the precipitation occurs as rain during the winter months, although rain showers are common during the summer in higher-

elevation desert areas. Average annual precipitation is approximately 19 inches and temperatures reach 90 degrees Fahrenheit 100 days of the year on average. August daily highs average 95 degrees while daily lows average 64 degrees Fahrenheit. January typically exhibits average daily highs of 68 degrees and average daily lows of 43 degrees Fahrenheit. The predominant wind directions are either out of the northwest or southeast. Gusts greater than 15 miles per hour occur infrequently, less than two percent of the time.

Basin climate increases the potential to create air pollution problems. Air quality within the Basin generally rates from fair to poor. Sinking or subsiding air from the Pacific High-Pressure System creates a temperature inversion (known as a subsidence inversion), which acts as a lid to vertical movement of air masses and dispersion of pollutants. The lower bound of this inversion at any given time is known as the "mixing height." Restricted maximum mixing heights are 3,500 feet above sea level or less. Weak summertime pressure gradients suppress winds and further limit horizontal dispersion of pollutants in the mixed layer below the subsidence inversion. Poorly dispersed anthropogenic (human-made) emissions, combined with strong sunshine, lead to photochemical reactions that create ozone (O_3) in this surface layer. Daytime onshore air flow (i.e., sea breeze) and nighttime offshore flow (i.e., land breeze) are quite common in Southern California. The sea breeze helps to moderate daytime temperatures and leads to air pollutants being blown out to sea at night and returning to land the following day.

4.2.5.2 Existing Ambient Air Quality

The proposed Project is located within the SCAB which covers approximately 6,745 square miles and is bounded by the Pacific Ocean to the west and south and the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east. The SCAB includes all of Orange County; the nondesert portions of Los Angeles, Riverside, and San Bernardino counties; and the San Gorgonio Pass area in Riverside County.

The SCAB has some of the worst air pollution in the country. The air pollution problems are a consequence of the combination of emissions from the nation's second largest urban area, meteorological conditions unfavorable to the dispersion of those emissions, and mountainous terrain surrounding the SCAB that traps pollutants as they are pushed inland with the sea breeze. Southern California also has abundant sunshine, which drives the photochemical reactions that form pollutants such as ozone (O3) and a significant portion of particulate matter with an aerodynamic diameter less than or equal to 2.5 ($PM_{2.5}$).[92]

The City has been ranked in the 8th percentile of cities for the best overall mild weather.[93] Average temperatures in the vicinity range from the mid-60s to mid-70s Fahrenheit to the upper 40s to low 60s Fahrenheit. The warmest periods tend to be from June to October. Average annual rainfall in the area is

92 South Coast Air Quality Management District, 2017. Final 2016 Air Quality Management Plan. March 2017.
93 City of Inglewood, "About the City," Accessed July 2020. https://www.cityofinglewood.org/493/About-the-City.

approximately 14 inches, with the majority of precipitation occurring from November through March.[94] Winter precipitation usually consists of low-pressure systems dependent up the size and location of the upper-level jet stream. Summer rainfall usually consists of periodic and short-term scattered thunderstorms that are formed by an extension of the North American monsoon pattern that dominates over the southwestern United States.

The SCAQMD maintains a network of monitoring stations within the SCAB that monitor air quality and compliance with applicable ambient standards. The nearest air monitoring station which measures CO, NO_2, SO_2, and PM_{10} is located near Los Angeles International Airport (7201 West Westchester Parkway, Southwest Coastal LA County, Station 820), four miles to the west of the proposed Project. The nearest air monitoring station which measures $PM_{2.5}$ is located in central Los Angeles (1630 North Main Street, Central LA, Station 087), ten miles to the northeast of the proposed Project.

Regional Air Quality

The SCAB's meteorological conditions, in combination with regional topography, are conducive to the formation and retention of ozone. Pollutant concentrations in the SCAB vary with location, season, and time of day. Concentrations of ozone, for example, tend to be lower along the coast, higher in the near inland valleys, and lower in the far inland areas of the SCAB and adjacent desert.[95] The worst air pollution conditions throughout the SCAB typically occur from June through September.

Attainment Status

California Health and Safety Code section 39607(e) requires CARB to establish and periodically review area designation criteria. **Table 4.2-2: South Coast Air Basin Attainment Status (Los Angeles County)** provides a summary of the attainment status of the Los Angeles County portion of the SCAB with respect to the federal and State standards. As shown, the SCAB is designated under federal or State ambient air quality standards as nonattainment for ozone, PM_{10}, and fine particulate matter $PM_{2.5}$. It is noteworthy to mention that air quality in the SCAB has improved substantially over the years, primarily due to the impacts of air quality control programs at the federal, State, and local levels. The ozone and PM levels have fallen significantly compared to the worst years and are expected to continue to trend downward in the future despite increases in the economy and population in the SCAB.[96]

With respect to the State-identified criteria air pollutants (sulfates, hydrogen sulfide, visibility reducing particles, and vinyl chloride) present in **Table 4.2-2**, the proposed Project would either not use these pollutants in the day to day operations or during construction and therefore would not have emissions of

94 Western Regional Climate Center, "Cooperative Climatological Data Summaries," https://wrcc.dri.edu/cgi-bin/cliMAIN.pl?ca8973. Accessed July 2020.

95 South Coast Air Quality Management District, *2017.* Final 2016 Air Quality Management Plan*.* March 2017.

96 South Coast Air Quality Management District, *2017.* Final 2016 Air Quality Management Plan. March 2017, p. 1-6.

those pollutants (hydrogen sulfide, vinyl chloride, and lead), or such emissions would be accounted for as part of the pollutants estimated in this analysis (visibility reducing particles are associated with particulate matter emissions, and sulfates are associated with SO_2). Vinyl chloride is used in the process of making polyvinyl chloride (PVC) plastic and vinyl products, and is primarily emitted from industrial processes.[97] Vinyl chloride would not be emitted directly during operations or during construction; therefore, there would be no project emissions of vinyl chloride. In addition, CARB determined there is not sufficient scientific evidence available to support the identification of a threshold exposure level for vinyl chloride, therefore, CARB does not monitor or make status designations for this pollutant.[98]

Table 4.2-2
South Coast Air Basin Attainment Status (Los Angeles County)

Pollutant	Federal Standards	California Standards
O^3 (1-hour standard)	N/A[a]	Nonattainment
O^3 (8-hour standard)	Nonattainment – Extreme	Nonattainment
CO	Attainment	Attainment
NO_2	Attainment	Attainment
SO_2	Attainment	Attainment
PM_{10}	Attainment	Nonattainment
$PM_{2.5}$	Nonattainment	Nonattainment
Lead	Nonattainment (Partial, Los Angeles County)[b]	Attainment
Visibility Reducing Particles	N/A	Unclassified
Sulfates	N/A	Attainment
Hydrogen Sulfide	N/A	Unclassified
Hydrogen Sulfide	N/A	N/A[c]

Notes:
N/A = not applicable
a The NAAQS for 1-hour ozone was revoked on June 15, 2005, for all areas except Early Action Compact areas.
b Partial Nonattainment designation – Los Angeles County portion of the Air Basin only for near-source monitors.
c In 1990, CARB identified vinyl chloride as a TAC and determined that it does not have an identifiable threshold. Therefore, CARB does not monitor or make status designations for this pollutant.
Source: USEPA, The Green Book Nonattainment Areas for Criteria Air Pollutants, https://www.epa.gov/green-book; CARB, Area Designations Maps/State and National, http://www.arb.ca.gov/desig/adm/adm.htm.

Table 4.2-3: **Air Quality Data Summary** summarizes the most recent three years of data (2017 through 2019) from the nearby air monitoring stations (SCAQMD Station Nos. 091 and 820). The ozone standard was not exceeded. The State annual PM_{10} standard was exceeded in 2018 and the State24-hour PM_{10} standard was exceeded in 2019. The State annual $PM_{2.5}$ standard was exceeded in 2018 and the State24-

97 California Air Resources Board, Vinyl Chloride & Health, https://ww2.arb.ca.gov/resources/vinyl-chloride-and-health.
98 California Air Toxics Board, Toxic Air Contaminant Board, Toxic Air Contaminant Identification List, https://www.arb.ca.gov/toxics/id/taclist.htm, last reviewed July 18, 2011.

hour $PM_{2.5}$ standard was exceeded in 2019. No other exceedances were observed at the nearby air monitoring stations in 2017 through 2019.

Table 4.2-3
Air Quality Data Summary (2017–2019)

Pollutant	Monitoring Data by Year			
	Standard	*2017*	*2018*	*2019*
Ozone				
Highest 1 Hour Average (ppm)	0.09	0.086	0.074	0.082
Days over State Standard	—	0	0	0
Highest 8 Hour Average (ppm)	0.070	0.070	0.065	0.067
Days over National Standard	—	0	0	0
Days over State Standard	—	0	0	0
Nitrogen Dioxide				
Highest 1 Hour Average (ppm)	0.180/0.100	0.072	0.060	0.057
Days over State Standard	—	0	0	0
Annual Average (ppm)	0.030/0.053	0.009	0.009	0.010
Carbon Monoxide				
Highest 1 Hour Average (ppm)	20.0	2.1	1.8	1.8
Days over State Standard	—	0	0	0
Highest 8 Hour Average (ppm)	9.0	1.6	1.5	1.3
Days over State Standard	—	0	0	0
Particulate Matter (PM_{10})				
Highest 24 Hour Average ($\mu g/m^3$)	50	46	45	**62**
Days over State Standard	—	0	0	2
State Annual Average ($\mu g/m^3$)	20	19.8	**20.5**	19.2
Particulate Matter ($PM_{2.5}$)				
Highest 24 Hour Average ($\mu g/m^3$)	35	27.8	30.5	**43.5**
Days over National Standard	—	0	0	1
State Annual Average ($\mu g/m^3$)	12	11.9	**12.6**	10.9

*Notes: Values in **bold** are in excess of at least one applicable standard.*
Generally, State, and national standards are not to be exceeded more than once per year.
ppm = parts per million; $\mu g/m^3$ = micrograms per cubic meter.
PM_{10} is not measured every day of the year. Number of estimated days over the standard is based on 365 days per year.
Source: South Coast Air Quality Management District, Annual Air Quality Summaries, Accessed July 7, 2020 at: http://www.aqmd.gov/home/air-quality/air-quality-data-studies/historical-data-by-year

4.2.5.3 Adjusted Baseline

The Air Quality analysis assumes the Adjusted Baseline Environmental Setting as described in **Section 4.0: Environmental Analysis**; see **Table 4.0-1** for the details of the Adjusted Baseline. Related to air quality, the changes associated with the Hollywood Park Specific Plan (HPSP) Adjusted Baseline projects, currently

under development and anticipated to be operational prior to construction of the proposed Project, include operational air emissions associated with new uses in the HPSP area.

The HPSP projects in the Adjusted Baseline would emit air pollutants associated with vehicle trips, maintenance operations, energy consumption, etc., from all of its operational land uses. Specifically, vehicle trips associated with activities at the HPSP would take place during 2020 and would have an impact on local and regional air quality. Accordingly, the air pollutant emissions associated with this development within the HPSP area are considered as part of the Adjusted Baseline. No other changes to the existing environmental setting related to air quality would occur under the Adjusted Baseline.

4.2.5.4 Existing Emissions

The proposed Project includes approximately 7.7 acres of land consisting of 19 parcels that are currently out of the public right-of-way; the existing uses on these parcels will be removed and converted to Project-related uses (See **Section 3.0** for a detailed discussion of the existing land uses that would be demolished as part of the proposed Project). Presently, a variety of commercial, restaurant, and retail uses that exist where the components of the proposed Project would be constructed. These existing uses currently generate air quality emissions from building operation.

Table 4.2-4: Existing Emissions for Existing Uses identifies the existing emissions from the existing uses within 7.7 acres of land consisting of 19 parcels that will be converted.

In addition to mobile emissions for the Adjusted Baseline projects, emissions for existing uses that will be removed have been estimated. This includes mobile, area and energy emissions for existing uses that will be removed.

Table 4.2-4
Existing Emissions for Existing Uses (lb./day)

Source	VOC	CO	NOx	PM_{10}	$PM_{2.5}$	SO_2
Area (Consumer Products, Landscaping)	4.92	0.02	<0.01	<0.01	<0.01	<0.01
Energy (Natural Gas)	0.16	1.22	1.45	0.11	0.11	0.01
Motor Vehicles	33.2	1,131	120	47.6	20.1	3.22
Total	**38.28**	**1,132.24**	**121.45**	**47.71**	**20.21**	**3.23**

*Source: See **Appendix 4.2.1: Air Quality and Human Health Risk Assessment**.*

4.2.5.5 Sensitive Receptors

Within one quarter mile of the proposed Project guideway, stations, and the MSF site, 63 sensitive receptors have been identified as shown in **Figure 4.0-2**.

Land uses such as schools, children's daycare centers, hospitals, and convalescent homes are considered to be more sensitive than the general public to poor air quality because the population groups associated with these uses have increased susceptibility to respiratory distress. Persons engaged in strenuous work or exercise also have increased sensitivity to poor air quality. The CARB and SCAQMD have identified the following people as most likely to be affected by air pollution: children less than 14 years of age, the elderly over 65 years of age, athletes, and those with cardiovascular and chronic respiratory diseases. These groups are classified as sensitive population groups.

Residential areas are considered more sensitive to air quality conditions than commercial and industrial areas because people generally spend longer periods of time at their residences, resulting in greater exposure to ambient air quality conditions. Recreational uses are also considered sensitive, due to the greater exposure to ambient air quality conditions and because the presence of pollution detracts from the recreational experience. Off-site workers within industrial and commercial areas surrounding the proposed Project area are also considered sensitive receptors by the SCAQMD.

4.2.6 THRESHOLDS OF SIGNIFICANCE

The proposed Project would have a significant impact in relation to air quality if it were to:

Threshold AQ-1 **Conflict with or obstruct implementation of the applicable air quality plan.**

Threshold AQ-2 **Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or State ambient air quality standard.**

Threshold AQ-3 **Expose sensitive receptors to substantial pollutant concentrations.**

The following criteria was used to evaluate air quality impacts:

4.2.6.1 SCAQMD's CEQA Air Quality Handbook

Because of the SCAQMD's regulatory role in the Basin, the significance thresholds and analysis methodologies in the SCAQMD's *CEQA Air Quality Handbook*[99] are used in evaluating project impacts for construction, operations, and air toxics.[100]

99 SCAQMD, Air Quality Analysis Guidance Handbook, Accessed June 2020, http://www.aqmd.gov/CEQA/hdbk.html. 2010.

100 South Coast Air Quality Management District, SCAQMD Air Quality Significance Thresholds, March 2015, Accessed April 2, 2019 at: http://www.aqmd.gov/ceqa/hdbk.html.

Daily Emissions Thresholds

SCAQMD has identified thresholds to determine the significance of regional air quality emissions for construction activities and project operation, as shown in **Table 4.2-5: Mass Daily Emissions Thresholds.**

Construction Emissions

In addition to the mass daily thresholds, a project would result in a significant construction air quality impact if the Project exceeds the concentration significance thresholds set forth in **Table 4.2-6: Ambient Air Quality Significance Thresholds for Criteria Pollutants.** Per SCAQMD guidance, the evaluated concentrations of CO, NO_2, and SO_2 includes both the project contribution plus background concentrations. The total concentration is then compared to the significance thresholds. For CO, NO_2, and SO_2, these significance thresholds are reflective of the CAAQS and NAAQS. Background concentrations were based on existing air monitoring stations near the proposed Project and represent existing air emissions sources within the SCAB. Per SCAQMD guidance, the Project contribution of PM_{10} and $PM_{2.5}$ is compared to the significance thresholds without adding background concentrations.

Table 4.2-5
Mass Daily Emissions Thresholds

Pollutant	Construction	Operation
	Significant Threshold (pounds/day)	
Volatile organic compounds (VOCs)	55	55
Nitrogen dioxide (NOx)	55	55
Carbon monoxide (CO)	550	550
Sulfur dioxide (SOx)	150	150
Respirable particulate matter (PM_{10})	150	150
Fine particulate matter ($PM_{2.5}$)	55	55

Source: South Coast Air Quality Management District, "SCAQMD Air Quality Significance Thresholds" (last revised March 2015).

Table 4.2-6
Ambient Air Quality Significance Thresholds for Criteria Pollutants

Pollutant	Averaging Period	Pollutant Concentration Threshold
CO	1-hour /8-hour	SCAQMD is in attainment (federal and State); project is significant if it causes or contributes to an exceedance of the attainment standards of 20 ppm (1-hour) and 9 ppm (8-hour)
NO_2	1-hour	SCAQMD is in attainment (federal and state); project is significant if it causes or contributes to an exceedance of the following attainment standard 0.18 ppm (state)
	Annual	0.03 ppm (state) and 0.0534 ppm (federal)
PM_{10}	24-hour	10.4 µg/m^3 (construction) and 2.5 µg/m^3 (operation)
	Annual	1.0 µg/m^3 (construction and operation)
$PM_{2.5}$	24-hour	10.4 µg/m^3 (construction) and 2.5 µg/m^3 (operation)
SO_2	1-hour	0.25 ppm (state) and 0.075 ppm (federal)
	24-hour	0.04 ppm (state)
Lead	30-day Average	1.5 µg/m^3 (state)
	Rolling 3-month Average	0.15 µg/m^3 (federal)

Source: South Coast Air Quality Management District, SCAQMD Air Quality Significance Thresholds, March 2015, http://www.aqmd.gov/ceqa/hdbk.html

Operational Emissions

In addition to the mass daily thresholds above, a project would normally have a significant impact on air quality from project operations if any of the following would occur:

- Operational emissions were to exceed 10 tons per year of VOCs or any of the daily thresholds presented above in **Table 4.2-5** (as reprinted from the CEQA Air Quality Handbook):105F105F101
- Either of the following conditions would occur at an intersection or roadway within one-quarter mile of a sensitive receptor:
  - The project causes or contributes to an exceedance of the California 1-hour or 8-hour CO standards of 20 or 9.0 parts per million (ppm), respectively; or
  - The incremental increase due to the project is equal to or greater than 1.0 ppm for the California 1-hour CO standard, or 0.45 ppm for the 8-hour CO standard.
- The project creates an objectionable odor at the nearest sensitive receptor.

Health Risk Assessment (Toxic Air Contaminants)

Per SCAQMD, a project would result in a significant health impact if the carcinogenic or toxic air contaminants individually or cumulatively are equal to or exceed the maximum individual cancer risk of ten in one million persons or a chronic and acute hazard index of 1.0, or the cancer burden of 0.5 excess cancer cases (in areas greater than or equal to one in one million).

4.2.6.2 Consistency with Applicable Plans and Policies

Section 15125 of the State CEQA Guidelines[102] requires the EIR to identify any inconsistencies with applicable governmental plans and policies. The proposed Project's consistency analysis addresses consistency with the SCAQMD's AQMP,[103] the 2020-2045 SCAG RTP/SCS,[104] and policies included within the City's General Plan105 and ECAP.[106]

4.2.7 IMPACT ANALYSIS FOR THE PROPOSED PROJECT

Impact AQ-1: Would the project conflict with or obstruct implementation of the applicable air quality plan?

The following analysis addresses consistency of the proposed Project with applicable plans and policies that regulate air quality. In particular, the analysis addresses consistency with SCAQMD's AQMP, which as discussed above, is an air quality plan that includes strategies for achieving attainment of applicable ozone, PM_{10}, and $PM_{2.5}$ standards. The analysis also includes consistency with SCAG's 2020-2045 RTP/SCS which establishes strategies for achieving improvements in air quality. In addition, consistency with the air quality related policies in the City General Plan Land Use Element, Conservation, and Environmental Justices are also addressed. Finally, this analysis addresses consistency with the City's ECAP, which includes strategies to mitigate the City's impacts on air quality and climate change.

2016 Air Quality Management Plan

As discussed above, SCAQMD has adopted a series of AQMPs to lead the SCAB into compliance with several criteria air pollutant standards and other federal requirements, while taking into account

102 State CEQA Guidelines, Section 15125.

103 SCAQMD, Final Air Quality Management Plan (AQMP*).* Approved March 3, 2017. http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan/final-2016-aqmp.

104 Southern California Association of Governments (SCAG), Connect SoCal: 2020-2045 Regional Transportation Plan/Sustainable Communities Strategies Final Plan*,* https://www.connectsocal.org/Pages/Connect-SoCal-Final-Plan.aspx, Accessed on July 10, 2020.

105 City of Inglewood, *Department of Community Development and Housing, General Plan.* January 1980

106 City of Inglewood, Inglewood Energy and Climate Action Plan*,* March 2013, https://www.cityofinglewood.org/DocumentCenter/View/148/Inglewood-Energy-and-Climate-Action-Plan-ECAP-Adopted-2013-PDF, accessed July 30, 2020.

construction and operational emissions associated with population and economic growth projections provided by SCAG's RTP/SCS.[107]

The current AQMP is the Final 2016 Air Quality Management Plan (2016 AQMP)[108] and is the regional blueprint for achieving air quality standards in the South Coast Air Basin, an area that includes Orange County and the nondesert portions of Los Angeles, Riverside and San Bernardino counties.

The 2016 AQMP represents a thorough analysis of existing and potential regulatory control options, includes available, proven, and cost-effective strategies, and seeks to achieve multiple goals in partnership with other entities promoting reductions in greenhouse gases and toxic risk, as well as efficiencies in energy use, transportation, and goods movement. The 2016 AQMP recognizes the critical importance of working with other agencies to develop funding and incentives that encourage the accelerated transition to cleaner vehicles, and the modernization of buildings and industrial facilities to cleaner technologies in a manner that benefits not only air quality, but also local businesses and the regional economy.

SCAQMD recommends that, when determining whether a project is consistent with the relevant AQMPs, the lead agency should assess whether the project would directly obstruct implementation of the plans by impeding SCAQMD's efforts to achieve attainment with respect to any criteria air pollutant for which it is currently not in attainment of the NAAQS and CAAQS (e.g., ozone, PM_{10}, and $PM_{2.5}$) and whether it is consistent with the demographic and economic assumptions (typically land use related, such as employment and population/residential units) upon which the plan is based.[109] SCAQMD guidance indicates that projects whose growth is included in the projections used in the formulation of the 2016 AQMP are considered to be consistent with the plan and would not interfere with its attainment.[110]

Construction

Control Strategies

During construction, the proposed Project would comply with CARB's requirements to minimize short-term emissions from on-road and off-road diesel equipment, including the ATCM to limit heavy duty diesel motor vehicle idling to no more than 5 minutes at any given time, and with SCAQMD's regulations such as

107 Southern California Association of Governments (SCAG), Connect SoCal: 2020-2045 Regional Transportation Plan/Sustainable Communities Strategies Draft, "Chapter 1," https://www.connectsocal.org/Pages/Connect-SoCal-Draft-Plan.aspx, Accessed on July 10, 2020.

108 South Coast Air Quality Management District, Final 2016 Air Quality Management Plan, March 2017.

109 South Coast Air Quality Management District, Air Quality Analysis Handbook, pp. 12-2, 12-3, http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook. Accessed April 16, 2019.

110 South Coast Air Quality Management District, 1993. CEQA Air Quality Handbook, p. 12-1. November 1993

Rule 403[111] for controlling fugitive dust and Rule 1113[112] for controlling VOC emissions from architectural coatings. Furthermore, the proposed Project would use vehicles from vendors that comply with fleet rules to reduce on-road truck emissions under CARB's Truck and Bus regulation.[113] Compliance with these measures and requirements would be consistent with and meet or exceed the 2016 AQMP requirements for control strategies intended to reduce emissions from construction equipment and activities.

Even though the proposed Project would be consistent with local and State construction regulations, and other voluntary measures designed to reduce nonattainment pollutants, regional emissions during construction would exceed the significance threshold for NOx. Specifically, as shown in **Table 4.2-6**, emissions during construction for 2023 (141 lbs./day), 2024 (138 lbs./day), and 2025 (149 lbs./day) would exceed the SCAQMD's mass threshold of 55 lbs./day. Other criteria pollutants are not predicted to exceed regional mass emission thresholds during construction.

Growth Strategies

The proposed Project would result in an increase in short-term employment compared to existing conditions (see **Section 4.11: Population, Employment, and Housing**). Although the proposed Project would generate construction jobs during the construction process, construction-related jobs generated would likely be filled by employees within the construction industry within the City and the greater Los Angeles County region. Construction industry jobs generally have no regular place of business, as construction workers commute to job sites throughout a given region, which may change several times a year. Moreover, these jobs would be temporary in nature. Therefore, the construction jobs generated by the proposed Project would not conflict with the long-term employment or population projections upon which the 2016 AQMP is based.

However, as the proposed Project would exceed the NOx SCAQMD threshold, construction impacts would be potentially significant.

Operation

Transportation Strategies

The 2016 AQMP includes land use and transportation strategies from the SCAG RTP/SCS that are intended to reduce VMT and resulting regional mobile source emissions. The majority of the transportation

111 SCAQMD, "Rule 403: Fugitive Dust", http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403.pdf.
112 SCAQMD, "Rule 1113: Architectural Coatings", http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-1113.pdf.
113 California Air Resources Board, Truck and Bus Regulation. https://ww2.arb.ca.gov/our-work/programs/truck-and-bus-regulation/about.

strategies are to be implemented by cities, counties, and other regional agencies such as SCAG and SCAQMD, although some can be furthered by individual development projects.

The 2016 AQMP forecasts emissions inventories up to the year 2031 ‘‘with growth’’ through a detailed consultation process with SCAG.[114] The region is projected to see a 12 percent growth in population, 16 percent growth in housing units, 23 percent growth in employment, and 8 percent growth in vehicle miles traveled between 2012 and 2031.

The proposed Project is a transit system that spans the length of approximately 1.6 miles and would be located near existing residential, office, retail, and commercial land uses which generate vehicle trips on local roadways within the City. The proposed Project would provide direct connections between regional transit provided by Metro, specifically at the Crenshaw/LAX line, and other transit providers as well as the City’s major activity centers, such as The Forum, the LASED and HPSP including SoFi stadium, and IBEC. Implementation of the proposed Project would provide an alternate mode of transportation within the City and VMTs.

As further discussed in **Section 4.12: Transportation**, in 2026 the proposed Project would have a daily weekday ridership of 3,098 passengers on a non-event day, and a daily weekday ridership of 25,056 passengers on an NFL event day. Moreover in 2045 the proposed Project would have a daily weekday ridership of 4,405 passengers on a non-event day, and a daily weekday ridership of 31,089 passengers on an NFL event day.

As these increases in public transit ridership reduce potential vehicle trips and air quality emissions, VMT estimates for the six operational scenarios are derived from travel demand modeling in the Traffic Study (see **Appendix 4.12.1**) and are further discussed in **Section 4.12: Transportation** As discussed, the proposed Project daily and annual VMT are less than the daily and annual VMT without the proposed Project. Implementation of the proposed Project would increase transit mode split, reduce vehicle trips, and reduce VMT accordingly when compared to the baseline scenarios without the proposed Project.

The proposed Project will help manage and support the City’s projected growth by providing transit within a safe and accessible walking distance to thousands of new residents, housing units and jobs. The proposed Project’s connection from the City’s new housing and employment centers, and sports and entertainment venues, to the Metro Crenshaw/LAX Line and larger regional and State rail system will result in significant benefits for both the City and southern California region.

Growth Strategies

114 South Coast Air Quality Management District, *Final 2016 Air Quality Management Plan,* March 2017. P. 3-10.

As noted, the 2016 AQMP indicates that the region is projected to see a 12 percent growth in population, 16 percent growth in housing units, and 23 percent growth in employment.[115] According to SCAG's 2020-2045 RTP/SCS, approximately 8,389,000 jobs were available in 2016 across industries in the region and the number of jobs available will increase to 10,050,000 by 2045, an increase of approximately 0.62 percent annually in jobs.[116] Similarly, SCAG projects that the population in the region will increase from approximately 18,832,418 in 2016 to 22,507,188 in 2045, resulting in an increase of approximately 0.61 percent annually.

As discussed further in **Section 4.11: Population, Employment, and Housing,** the proposed Project would generate approximately 150 full-time jobs for the operation and maintenance of the APM trains, tracks, and stations. This results in a net decrease of 343 jobs at the proposed Project area from the existing workforce of 493 employees. However, the reduction of jobs at existing commercial and retail uses to accommodate the proposed Project would not result in a reduction in jobs in the local job market.

Other ongoing and proposed developments and construction in downtown Inglewood and the nearby area, such as the HPSP and the LASED, which are both adjacent to the proposed Project, would provide additional job and employment opportunities. As such, the net loss of jobs resulting from the proposed Project can be absorbed by adjacent development.

An adequate workforce exists and is projected to remain in existence, creating capacity to meet the employment needs of the proposed Project during operation. Further, with the current development of new employment opportunities in the City as well as the region, displacement of any existing workers can be absorbed. Therefore, this growth would not conflict with the 2016 AQMP.

As such, operation of the proposed Project would not conflict with the 2016 AQMP and impacts would be less than significant.

2020-2045 RTP/SCS

SCAG has prepared and adopted the 2020–2045 RTP/SCS,[117] which includes a SCS that addresses regional development and growth forecasts. The SCAG 2020–2045 RTP/SCS is a long-range visioning plan that balances future mobility and housing needs with economic, environmental, and public health goals, with a specific goal of achieving an 8 percent reduction in passenger vehicle GHG emissions on a per capita

115 South Coast Air Quality Management District, *Final 2016 Air Quality Management Plan,* March 2017. P. 3-10.

116 SCAG. Draft 2020-2045 Connect SoCal Demographics And Growth Forecast. https://www.connectsocal.org/Documents/Draft/dConnectSoCal_Demographics-And-Growth-Forecast.pdf. Accessed July 27, 2020.

117 Southern California Association of Governments (SCAG), Connect SoCal: 2020-2045 Regional Transportation Plan/Sustainable Communities Strategies Final Plan*,* https://www.connectsocal.org/Pages/Connect-SoCal-Final-Plan.aspx, Accessed on July 10, 2020.

basis by 2020, 19 percent reduction by 2035, and 21 percent reduction by 2040 compared to the 2005 level. Although the RTP/SCS is not technically an air quality plan, consistency with the RTP/SCS has air quality implications, including the reduction of VMT which reduces air quality emissions.

Currently, the City contains roughly 8,900 housing units and 14,414 employees within one half mile of the proposed Project. By 2040, these areas are projected to increase to roughly 12,875 households, and 38,326 employees.[118] These increases represent a growth rate of approximately 45 percent in households and 166 percent in employment. In comparison to the SCAG region, these projections translate into the City (within a ½ mile of the proposed Project) experiencing almost twice as much growth rate in housing, and more than seven times as much growth rate in employment by 2040.

As part of its vision, the 2020-2045 RTP/SCS includes Connect SoCal;[119] Connect SoCal charts a path toward a more mobile, sustainable, and prosperous region by making connections between transportation networks, between planning strategies and between the people whose collaboration can improve the quality of life for Southern Californians. Connect SoCal builds upon and expands land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern. To augment Connect SoCal's Core Vision, Connect SoCal includes new initiatives at the intersection of land use, transportation, and technology to close the gap and reach our greenhouse gas reduction goals. As part of the planning vision, Connect SoCal looks to complete "last mile" mobility as part of its sustainability goals, Connect SoCal builds upon with regional initiatives that link the built environment and transportation system with policies, projects and programs that strengthen and enhance each other beyond what each would accomplish in isolation.[120]

As part of the state's mandate to reduce per-capita GHG emissions from automobiles and light trucks, Connect SoCal presents strategies and tools that are consistent with local jurisdictions' land use policies and incorporate best practices for achieving the state-mandated reductions in GHG emissions at the regional level through reduced per-capita vehicle miles traveled (VMT). These strategies identify how the SCAG region can implement Connect SoCal and achieve related GHG reductions. SCAG works to support local jurisdictions and partnerships by identifying ways to implement the SCS in a way that fits the vision and needs of each local community.

118 City if Inglewood, *Transit and Intercity Rail Program (TIRCP) Application for the City of Inglewood Transit Connector Project,* January 16, 2020.

119 Southern California Association of Governments (SCAG), *Connect SoCal,* The 2020-2045 Regional Transportation Plan/Sustainable Community Strategy of the Southern California Association of Governments, https://www.connectsocal.org/Pages/Connect-SoCal-Final-Plan.aspx, Accessed on July 10, 2020.

120 Southern California Association of Governments (SCAG), *Connect SoCal,* The 2020-2045 Regional Transportation Plan/Sustainable Community Strategy of the Southern California Association of Governments, p. 4 https://www.connectsocal.org/Pages/Connect-SoCal-Final-Plan.aspx, Accessed on July 10, 2020.

The following Connect SoCal strategies are intended to be supportive of implementing the regional SCS and are applicable to the proposed Project:

Focus Growth Near Destinations & Mobility Options

- Focus on a regional jobs/housing balance to reduce commute times and distances and expand job opportunities near transit and along center-focused main streets.
- Encourage design and transportation options that reduce the reliance on and number of solo car trips.

Support Implementation of Sustainability Policies

- Pursue funding opportunities to support local sustainable development implementation projects that reduce greenhouse gas emissions.

As noted previously, the proposed Project's is approximately 1.6 miles in length and would be located near existing residential, office, retail, and commercial land uses which generate vehicle trips on local roadways within the City. The proposed Project would provide direct connections between regional transit provided by Metro, specifically at the Crenshaw/LAX line, and other transit providers as well as the City's major activity centers, such as The Forum, the LASED and HPSP including SoFi stadium, and IBEC. Implementation of the proposed Project would provide an alternate mode of transportation within the City and decrease VMTs.

The 2020-2045 RTP/SCS states that expanding the transit network is central to the region's plan for meeting mobility and sustainability goals while continuing to grow the regional economy.[121] The proposed Project provides connection to the Crenshaw/LAX line and achieves the last mile/first mile goals of the 2020-2045 RTP/SCS. Further, the proposed Project is consistent with and assisting in achieving Connect SoCal strategies and incorporates best practices for achieving the state-mandated reductions in GHG emissions at the regional level through reduced per-capita VMT.

As such, the proposed Project would not conflict with the 2020–2045 RTP/SCS and impacts would be less than significant.

Inglewood General Plan

The City General Plan includes the following elements: Land Use, Circulation, Safety, Noise, Housing, Open Space, and Conservation.

121 Southern California Association of Governments (SCAG), Connect SoCal, The 2020-2045 Regional Transportation Plan/Sustainable Community Strategy of the Southern California Association of Governments, Chapter 3. https://www.connectsocal.org/Pages/Connect-SoCal-Final-Plan.aspx, Accessed on July 10, 2020.

Land Use Element

The following goals from the Land Use Element[122] of the City General Plan are relevant to air pollutant emissions.

Circulation Goal: Promote and support adequate public transportation within the City and the region.

Circulation Goal: Develop a safe and adequate pedestrian circulation system which is barrier free for the handicapped.

Conservation Element

The City's General Plan Conservation Element addresses the conservation, development, and use of natural resources.[123] Five specific areas of conservation and/or protection that are identified in the Conservation Element include (1) oil and gas production, (2) water production and provision for domestic use, (3) storm water runoff and waste water, (4) hazardous waste and solid waste disposal, and (5) air pollution. [124] The Conservation Element notes the following pollution-reducing measures:

- Reducing airborne particulate matter from factories and construction sites;
- Reducing numbers of vehicles being driven while increasing the utilization of high occupancy vehicles and alternative transportation;
- Requiring improvements to engine efficiency to decrease emissions; and
- Increasing the use of clean fuel vehicles.

122 City of Inglewood, Department of Community Development and Housing, 1980. Land Use Element of the Inglewood General Plan. January 1980. Amended September 14, 2016.
123 City of Inglewood General Plan, "Conservation Element" (1997), General Plan. January 1980.
124 City of Inglewood General Plan, "Conservation Element" (1997), General Plan. January 1980.

Environmental Justice Element

The following goals from the Environmental Justice Element[125] of the City General Plan are relevant to air pollutant emissions.

Policy EJ-2.4: Create land use patterns and public amenities that encourage people to walk, bicycle and use public transit.

Policy EJ-2.9: Work with the South Coast Air Quality Management District (SCAQMD), the Los Angeles International Airport (LAX) and other appropriate agencies to monitor and improve air quality in the City of Inglewood.

Policy EJ-2.10: Implement and periodically update the City's Energy and Climate Action Plan to improve air quality and reduce greenhouse gas emissions.

The proposed Project would comply with CARB's requirements to minimize short-term emissions from on-road and off-road diesel equipment, including the ATCM to limit heavy duty diesel motor vehicle idling to no more than 5 minutes at any given time, and with SCAQMD's regulations such as Rule 403[126] for controlling fugitive dust and Rule 1113[127] for controlling VOC emissions from architectural coatings. Furthermore, the proposed Project would comply with fleet rules to reduce on-road truck emissions under CARBs Truck and Bus regulation.[128] Compliance with these measures and requirements would be consistent with and meet or exceed the AQMP requirements for control strategies intended to reduce emissions from construction equipment and activities.

Once in operation, the proposed Project would result in a decrease in emissions for criteria pollutants (see **Impact AQ-2**). This would include reductions in 2026 for VOC of 7.99 lbs./day, CO of 277 lbs./day, NOx of 55.5 lbs./day, $PM_{2.5}$ of 19.4 lbs./day, PM_{10} of 8.14 lbs./day and SO_2 of 1.16 lbs./day. As discussed previously, the proposed Project would provide direct connections between regional transit provided by Metro, specifically at the Crenshaw/LAX line, and other transit providers as well as the City's major activity

125 City of Inglewood, Department of Community Development and Housing, 1980. Environmental Justice Element of the Inglewood General Plan. April 2020.
126 SCAQMD, "Rule 403: Fugitive Dust", http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403.pdf.
127 SCAQMD, "Rule 1113: Architectural Coatings", http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-1113.pdf.
128 California Air Resources Board, Truck and Bus Regulation. https://ww2.arb.ca.gov/our-work/programs/truck-and-bus-regulation/about

centers, such as the Forum, the LASED and HPSP including SoFi stadium, and IBEC. Implementation of the proposed Project would increase transit mode split, reduce vehicle trips, and reduce per-capita VMT.

For these reasons, the proposed Project would not conflict with Inglewood General Plan policies related to air quality and impacts would be less than significant.

Inglewood Energy and Climate Action Plan

As described above, the City's ECAP includes strategies to mitigate the City's impacts on air quality and climate change. While these strategies are primarily directed towards GHG emission reductions, the measures in the City's ECAP would also achieve co-benefits of reducing criteria air pollutants and TACs. The strategies that apply to the proposed Project include:

- **Strategy 1: Lead by Example with Municipal Government Actions**
  - Continue commute trip reduction program
- **Strategy 4: Improve Transportation Options and Manage Transportation Demand**
  - Make roadways more efficient
  - Improve transit
  - Make parking more efficient
  - Reduce commute trips

As discussed, the proposed Project would provide direct connections between regional transit provided by Metro, specifically at the Crenshaw/LAX line, and other transit providers as well as the City's major activity centers, such as the Forum, the LASED and HPSP including SoFi stadium, and IBEC. Implementation of the proposed Project would increase transit mode split, reduce vehicle trips, and reduce per-capita VMT. The proposed Project would be consistent with Strategy 1 as City would provide local transit that would connect to regional transit thereby allowing for commuters to reduce vehicle travel. The proposed Project would be consistent with Strategy 4 in that roadway improvements would provide for efficient travel along Manchester and Boulevard and Prairie Avenue, would improve transit by connecting the Downtown area with other employment and entertainment areas of the City, and would provide efficient parking within the Downtown area nearby transit options.

The proposed Project would be consistent with the City ECAP and impacts would be less than significant.

Summary

Construction

The proposed Project would comply with CARB's requirements to minimize short-term emissions from on-road and off-road diesel equipment, including the ATCM to limit heavy duty diesel motor vehicle idling to no more than 5 minutes at any given time, and with SCAQMD and CARB regulations. Compliance with these measures and requirements would be consistent with and meet or exceed the 2016 AQMP requirements for control strategies intended to reduce emissions from construction equipment and activities.

Even though the proposed Project would be consistent with applicable c local and State construction regulations, and other voluntary measures designed to reduce nonattainment pollutants, regional emissions during construction of the proposed Project would exceed the significance threshold for NOx, an ozone precursor. Other criteria pollutants are not predicted to exceed regional mass emission thresholds during construction. However, as the proposed Project would exceed the NOx SCAQMD threshold during construction, impacts would be potentially significant.

Operation

The proposed Project will help manage and support the City's projected growth by providing transit within a safe and accessible walking distance to thousands of new residents, housing units and jobs. The proposed Project's connection from the City's new housing and employment centers, and sports and entertainment venues, to the Metro Crenshaw Line and larger regional and State rail system will result in significant air quality benefits for both the City and southern California region.

The proposed Project provides connect transit and is consistent with the last mile/first mile goals of the 2020-2045 RTP/SCS.[129] The proposed Project would provide direct connections between regional transit provided by Metro, specifically at the Crenshaw/LAX line, and other transit providers as well as the City's major activity centers, such as The Forum, the LASED and HPSP, and IBEC; as such, implementation of the proposed Project would provide an alternate mode of transportation within the City and decrease vehicle ridership and thereby VMTs. The proposed Project is consistent with and assisting in achieving Connect SoCal strategies and incorporate best practices for achieving the State-mandated reductions in GHG emissions at the regional level through reduced per-capita VMT.

129 Southern California Association of Governments (SCAG), *Connect SoCal,* The 2020-2045 Regional Transportation Plan/Sustainable Community Strategy of the Southern California Association of Governments, *Chapter 3.* https://www.connectsocal.org/Pages/Connect-SoCal-Final-Plan.aspx, Accessed on July 10, 2020.

Once in operation, the proposed Project would result in a decrease in emissions for criteria pollutants (see **Impact AQ-2**). This would include reductions in 2026 for VOC of 7.99 lbs./day, CO of 277 lbs./day, NOx of 55.5 lbs./day, $PM_{2.5}$ of 19.4 lbs./day, PM_{10} of 8.14 lbs./day and SO_2 of 1.16 lbs./day.

For these reasons, the proposed Project would not conflict with Inglewood General Plan policies related to air quality.

Mitigation Measures

Mitigation Measures MM AQ-1 to **MM AQ-11** have been identified to reduce significant construction related air quality impacts. Specifically, **MM AQ-1** through **MM AQ-4** were included in the post-mitigation modeling for construction of the proposed Project and would result in substantial reductions in emissions.

Level of Significance after Mitigation

Construction

As shown in **Table 4.2-12**, below, regional emissions during construction of the proposed Project would potentially exceed the significance threshold for NOx after implementation of **MM AQ-1** through **MM AQ-4**. **Mitigation Measures MM AQ-5** through **MM AQ-11**, are also recommended. However, the extent to which the remaining measures would reduce air quality impacts is not quantifiable. Other criteria pollutants are not predicted to exceed regional mass emission thresholds during construction.

Impacts would be significant and unavoidable.

Operation

As previously explained, the proposed Project is consistent with the 2016 AQMP, the 2020-2045 RTP/SCS, and the City's General Plan and ECAP. Impacts relative to the operation of the proposed Project with these plans is less than significant.

Impact AQ-2: **Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or State ambient air quality standard?**

The region is designated as a nonattainment area for several pollutants, including ozone, PM_{10}, and $PM_{2.5}$. As noted in the discussion for **Impact AQ-1**, the Project would emit NOx emissions during construction activities that could obstruct implementation of the 2016 AQMP by substantially contributing to possible ozone exceedances. In addition, construction and operation of the Project would result in direct and indirect impacts that could cumulatively affect air quality for other nonattainment pollutants, namely PM_{10} and $PM_{2.5}$.

A cumulatively considerable increase in emissions would occur if the project's impacts substantially contribute to air quality violations when considering other projects that may undertake construction activities at the same time. SCAQMD recommends that any construction-related emissions and operational emissions from individual development projects that exceed the project-specific mass daily emissions thresholds identified above in **Table 4.2-5** also be considered cumulatively considerable.[130]

Construction

Construction of the proposed Project has the potential to temporarily emit criteria air pollutant emissions through the use of heavy-duty construction equipment, and through vehicle trips generated from workers and haul trucks traveling to and from the proposed Project. In addition, fugitive dust emissions would result from demolition and various soil-handling activities. Mobile source emissions, primarily NOx and PM emissions (i.e., PM_{10} and $PM_{2.5}$), would result from the use of diesel powered on-and off-road vehicles and equipment.

Intermittent (short-term) Construction Emissions Analysis

Intermittent (short-term) construction emissions that occur from construction of the proposed Project were evaluated for each construction year (2022 through 2026). The air quality analysis focuses on maximum daily emissions from construction activities (mobile, area, stationary, and fugitive sources) and compares the emission estimates to thresholds of significance identified by the SCAQMD and based on the SCAQMD *Air Quality Handbook.*[131]

Table 4.2-7: Daily Unmitigated Construction Emissions for Proposed Project shows the estimated daily unmitigated emissions for construction related emissions (including combustion engine and fugitive dust emissions) for the proposed Project. The grand total construction emissions as well as the contribution from employee vehicle trips, pickup/delivery trucks, haul trucks, and off-road equipment are presented. The off-road equipment represents the largest contribution to the total construction emissions. The daily unmitigated NOx construction emissions would potentially exceed the SCAQMD thresholds of significance during 2022 through 2025.

130 White Paper on Regulatory Options for Addressing Cumulative Impacts from Air Pollution Emissions, SCAQMD Board Meeting, September 5, 2003, Agenda No. 29, Appendix D, p. D-3.

131 South Coast Air Quality Management District, CEQA Air Quality Handbook, Accessed July 6 ,2020 at: http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook

Table 4.2-7
Daily Unmitigated Construction Emissions for Proposed Project

Construction Year	VOC	CO	NOx	PM_{10}	$PM_{2.5}$	SO_2
	pounds/day					
Grand Total						
2022	10.2	107	**128**	7.76	5.15	0.50
2023	17.3	203	**191**	12.5	8.23	0.88
2024	17.0	198	**179**	11.4	7.63	0.82
2025	18.5	218	**186**	11.5	7.74	0.86
2026	10.6	124	100	6.13	4.17	0.46
Significance Thresholds	75	550	100	150	55	150
Employee Vehicles						
2022	0.18	5.76	0.56	0.31	0.13	0.02
2023	0.42	13.1	1.22	0.76	0.32	0.05
2024	0.30	9.22	0.82	0.57	0.24	0.03
2025	0.42	12.8	1.09	0.84	0.35	0.05
2026	0.13	3.89	0.32	0.27	0.11	0.01
Pickup/Delivery Trucks						
2022	0.34	8.36	4.23	0.69	0.30	0.05
2023	0.70	16.8	8.41	1.54	0.68	0.10
2024	0.73	17.6	8.28	1.73	0.76	0.11
2025	0.53	13.5	5.71	1.39	0.60	0.09
2026	0.49	12.5	5.04	1.39	0.60	0.09
Haul Trucks						
2022	1.29	4.58	48.6	3.66	1.86	0.19
2023	0.35	2.53	44.3	4.64	2.09	0.26
2024	0.28	2.02	35.2	3.67	1.65	0.21
2025	0.27	2.04	35.4	3.73	1.67	0.21
2026	0.10	0.77	13.3	1.41	0.63	0.08
Off-road Equipment						
2022	8.38	88.1	74.4	3.10	2.85	0.24
2023	15.8	171	**137**	5.59	5.15	0.47
2024	15.7	169	**135**	5.41	4.98	0.46
2025	17.3	190	**144**	5.55	5.11	0.51
2026	9.88	107	81.2	3.07	2.82	0.29

*Note: Values in **bold** are in excess of applicable standard.*
*Source: See **Appendix 4.2.1: Air Quality and Human Health Risk Assessment**.*

As shown on **Table 4.2-7**, unmitigated daily emissions for criteria pollutants during construction would exceed significance thresholds for NOx (100 lbs./day)in 2022 (128 lbs./day,) 2023 (191 lbs./day), 2024 (179 lbs./day) and 2025 (186 lbs./day). As such, proposed Project construction impacts for NOx emissions would be potentially significant. Based on SCAQMD's policy, this would be a cumulatively considerable increase in emissions that could increase future exceedances of ozone, a nonattainment pollutant. For all other criteria pollutants, the construction impact would be less than significant.

Operation

Regional air emissions from the proposed Project were assessed based on the incremental increase/decrease in emissions compared to Adjusted Baseline conditions (i.e., existing on-site or off-site Project-related emissions), consistent with SCAQMD methodology.

Operational emissions are based on the estimates for operation of the station components of the proposed Project (APM trains, stations, and MSF). Operation emissions also include mobile emissions that would result from worker commute trips and deliveries for supplies, maintenance, and other needs.

As discussed, the proposed Project would include operations at the MSF facility which would generate air quality emissions from both area and stationary sources. **Table 4.2-8: Operational Air Quality Emissions – Normal Conditions** identifies the operational emissions from the MSF, stations, and other stationary components of the proposed Project. As shown, all emission for criteria pollutants emissions from operation of the proposed Project under normal operating conditions would be less than the existing emissions.

Table 4.2-8
Operational Air Quality Emissions – Normal Conditions

Source	VOC	CO	NOx	PM_{10}	$PM_{2.5}$	SO_2
Employee Trips	0.29	9.23	0.52	0.60	0.25	0.03
Deliveries	0.03	0.33	0.43	0.08	0.04	0.01
Area (Consumer Products, Landscaping)	2.33	0.04	<0.01	<0.01	<0.01	<0.01
Energy Source (Natural Gas)	0.06	0.48	0.57	0.04	0.04	<0.01
Subtotal Project (Typical Operations)	2.72	10.1	1.53	0.73	0.33	0.04

*Source: See **Appendix 4.2.1: Air Quality and Human Health Risk Assessment**.*

Table 4.2-9: Estimated Daily Operational Emissions/Reductions for Proposed Project Motor Vehicles presents the daily criteria air pollutant emissions for the six operational scenarios based on VMTs with and without the proposed Project. As shown, the proposed Project daily criteria air pollutant emissions are less than the daily criteria air pollutant emissions without the proposed Project.

Impacts related to proposed Project operation would be less than significant.

Table 4.2-9
Estimated Daily Operational Emissions/Reductions for Proposed Project Motor Vehicles

Scenario	VOC	CO	NOx	PM_{10}	$PM_{2.5}$	SO_2
	pounds/day					
Adjusted Baseline (2016) Nonevent Weekday without the proposed Project	473	12,315	3,088	403	194	28.3
Adjusted Baseline (2016) Nonevent Weekday with the proposed Project	470	12,234	3,068	400	192	28.2
Year 2026 with Event Weekday without the proposed Project	252	8,738	1,748	610	256	36.4
Year 2026 with Event Weekday with the proposed Project	244	8,461	1,692	591	248	35.3
Year 2045 with Event Weekday without the proposed Project	185	6,728	1,532	653	269	31.5
Year 2045 with Event Weekday with the proposed Project	178	6,471	1,474	628	258	30.3
Incremental Change	**VOC**	**CO**	**NOx**	**PM_{10}**	**$PM_{2.5}$**	**SO_2**
	pounds/day					
Year 2026 with Event Weekday with the proposed Project vs Year 2026 with Event Weekday without the proposed Project	(7.99)	(277)	(55.5)	(19.4)	(8.14)	(1.16)
Year 2045 with Event Weekday with the proposed Project vs Year 2045 with Event Weekday without the proposed Project	(7.09)	(258)	(58.7)	(25.0)	(10.3)	(1.21)

*Source: See **Appendix 4.2.1: Air Quality and Human Health Risk Assessment**.*

Vendor specifications were used to determine air pollutants emission factors for the standby generators. Emission factors are 5.27 g/hp-hour for NOx, 0.5 g/hp-hour for CO, 0.18 g/hp-hour for VOC, and 0.4 g/hp-hour for PM_{10}/$PM_{2.5}$. The estimated annual fuel usage assuming each generator operates of 50 hours per year (2 hours per day) is 27,440 gallons of diesel fuel.[132]

As shown in **Table 4.2-10: Estimated Daily Emissions for Proposed Project Backup Generators**, current estimated emissions for each of the criteria pollutants are noted. As shown, daily emissions for each of the backup generators are estimated to be 4.26 lbs./day for VOC, 11.8 lbs./day for CO, 125 lbs. day for NOx, 0.95 lbs./day for PM_{10}, 0.95 lbs./day for $PM_{2.5}$ and 8.68 lbs./day for SO_2.

Because the backup generators would only run for emergency conditions when the main electrical power was not available, and for regular testing, the emissions would be limited to only those periods and would not be an ongoing operational activity. Nevertheless, their emissions are included in the overall assessment of operational emissions to ensure a conservative analysis. Further, because the emissions

132 Vender Specifications for Standby Generator, Accessed August 25, 2020 at: https://www.cat.com/en_US/products/new/power-systems/electric-power.html

from the operation of the proposed Project would regularly be less than the significance thresholds for NOx, and in fact would result in net negative emissions, the long-term impacts would be less than significant from the use of the backup generators.

Table 4.2-10
Estimated Daily Emissions (pounds) for Proposed Project Backup Generators

Source	VOC	CO	NOx	PM_{10}	$PM_{2.5}$	SO_2
			(lbs. per day)			
Emergency Generator[1]	4.26	11.8	125	0.95	0.95	8.68

*Source: See **Appendix 4.2.1: Air Quality and Human Health Risk Assessment**.*
Notes:
*Values in **bold** are in excess of applicable standard.*
[1] Emissions are for each generator operating up to 2 hours per day for either emergency power needs or testing proposes.

Health Impacts

In its *Friant Ranch* decision, the California Supreme Court acknowledged an explanation of the connection between an individual project's pollutant emissions in excess of thresholds and human health effects may not be possible given the current state of environmental science modeling. However, the California Supreme Court concluded that the *Friant Ranch* Project EIR must explain, in a manner reasonably calculated to inform the public, the scope of what is and is not yet known about the effect of the Project's significant and unavoidable air quality impacts on human health.

SCAQMD has submitted amicus briefs explaining the difficulties in providing correlation between regional pollutant emissions and human health. With regard to the analysis of air quality-related health impacts, the SCAQMD, the air quality authority for the Basin, has stated that "EIRs must generally quantify a project's pollutant emissions, but in some cases it is not feasible to correlate these emissions to specific, quantifiable health impacts (e.g., premature mortality; hospital admissions)." In such cases, a general description of the adverse health impacts resulting from the pollutants at issue may be sufficient.

The SCAQMD has further stated that from a scientific standpoint, it takes a large amount of additional precursor emissions to cause a modeled increase in ambient ozone levels over an entire region. As recommended by the SCAQMD, a description of adverse health effects from pollutants is provided above under **Section 4.2.2.2: Health Effects of Pollutants**. Moreover, as shown in **Table 4.2-11** below, the proposed Project would result in a net reduction in air quality emissions. As such, an analysis of health impacts from regional air quality emissions generated by the proposed Project is not necessary.

Summary

Table 4.2-11: Estimated Total Daily Emissions for Proposed Project presents the daily criteria air pollutant operational emissions under normal operations including employee trips, deliveries, area sources, energy sources (natural gas), motor vehicle, while accounting for the reduction in motor vehicle as a result of the proposed Project and elimination of existing sources. Also presented are the typical daily emissions plus O&M for the standby generators (one generator tested per day for 2 hours) associated with the proposed Project operations (e.g., 126 pounds of NOx). As shown, the typical daily emissions associated with the proposed Project operations would result in a net negative emissions. Therefore, the proposed Project operations would have a less than significant (and beneficial) impact on air quality and would not result in cumulatively considerable increases that for nonattainment pollutants ozone, PM_{10}, and $PM_{2.5}$.

Table 4.2-11
Estimated Total Daily Emissions for Proposed Project

Source	VOC	CO	NOx	PM_{10}	$PM_{2.5}$	SO_2
			(lbs. per day)			
Employee Trips	0.29	9.23	0.52	0.60	0.25	0.03
Deliveries	0.03	0.33	0.43	0.08	0.04	0.01
Area (Consumer Products, Landscaping)	2.33	0.04	<0.01	<0.01	<0.01	<0.01
Energy Source (Natural Gas)	0.06	0.48	0.57	0.04	0.04	<0.01
Subtotal Project (Normal Operations)	**2.72**	**10.1**	**1.53**	**0.73**	**0.33**	**0.04**
Emergency Generators	4.26	11.8	125	0.95	0.95	8.68
Subtotal Project (Normal Operations + O&M)	**6.98**	**21.9**	**126**	**1.67**	**1.28**	**8.72**
Motor Vehicles	-10.9	-377	-75.5	-26.3	-11.1	-1.57
Subtotal (Project with Motor Vehicle Reductions)	**-3.89**	**-355**	**50.7**	**-24.7**	**-9.79**	**7.15**
Existing Condition	-38.3	-1,132	-122	-47.7	-20.1	-3.23
Grand Total (Project)	**-42.1**	**-1,488**	**-71.1**	**-72.3**	**-29.9**	**3.92**
Significance Threshold	55	550	55	150	55	150
Exceeds Threshold?	**No**	**No**	**No**	**No**	**No**	**No**

*Source: See **Appendix 4.2.1: Air Quality and Human Health Risk Assessment**.*
*Notes: Standby generator values based on vendor specifications. Employee trips and deliveries values based on EMFAC. Area sources and energy (Natural Gas) values based on CalEEMod. Existing Condition values based on **Table 4.2-4**.*

Mitigation Measures

The following mitigation measures are included in the proposed Project's Construction Commitment Program and describe a number of specific actions to reduce construction NOx emissions from on-road vehicles and off-road equipment used in construction activities. **MM AQ-1** through **MM AQ-4** were incorporated into the post-mitigation modeling. However, the extent to which the remaining measures would reduce air quality impacts is not quantifiable. Nevertheless, the following mitigation measures are

required to reduce the air quality and health impacts for cumulatively considerable construction emissions of ozone precursor NOx:

MM AQ-1: Construction contractors shall, at a minimum, use equipment that meets the USEPA's Final Tier 4 emissions standards for off-road diesel-powered construction equipment with 50 horsepower (hp) or greater, for all phases of construction activity, unless it can be demonstrated to the City of Inglewood Planning Division with substantial evidence that such equipment is not available. To ensure that Final Tier 4 construction equipment or better shall be used during the proposed Project's construction, the City of Inglewood shall include this requirement in applicable bid documents, purchase orders, and contracts. The City of Inglewood shall also require periodic reporting and provision of written construction documents by construction contractor(s) and conduct regular inspections to the maximum extent feasible to ensure and enforce compliance.

Such equipment will be outfitted with Best Available Control Technology devices including a CARB certified Level 3 Diesel Particulate Filters (DPF). Level 3 DPF are capable of achieving at least 85 percent reduction in particulate matter emissions. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by Final Tier 4 emissions standards for a similarly sized engine, as defined by the CARB's regulations. Successful contractors must demonstrate the ability to supply the compliant construction equipment for use prior to any ground disturbing and construction activities. The proposed Project representative will make available to the lead agency and SCAQMD a comprehensive inventory of all off-road construction equipment, equal to or greater than 50 horsepower, that will be used during construction. The inventory will include the horsepower rating, engine production year, and certification of the specified Tier standard. A copy of each unit's certified tier specification, BACT documentation, and CARB or SCAQMD operating permit shall be maintained on site at the time of mobilization for each applicable piece of construction equipment.

If any of the following circumstances listed below exists and the Contractor provides written documentation consistent with project contract requirements, the Contractor shall submit an alternative compliance plan that identifies operational changes or other strategies that can reduce a comparable level of NOx emissions as Tier 4-certified engines during construction activities.

- The Contractor does not have the required type of off-road construction equipment within its current available inventory as to a particular vehicle or equipment by leasing or short-term rent, and the Contractor has attempted in good faith and with due diligence to lease or short-term rent the equipment or vehicle, but the equipment or vehicle is not available for lease or short-term rent within 120 miles of the Project alignment, and the Contractor has submitted documentation to the City of Inglewood showing that the requirements of this exception provision apply.

- The Contractor has been awarded funding by SCAQMD or another agency that would provide some or all of the cost to retrofit, repower, or purchase a piece of equipment or vehicle, but the funding has not yet been provided due to circumstances beyond the Contractor's control, and the Contractor has attempted in good faith and with due diligence to lease or short-term rent the equipment or vehicle that would comply, but the equipment or vehicle is not available for lease or short-term rent within 120 miles of the Project alignment, and the Contractor has submitted documentation to the City of Inglewood showing that the requirements of this exception provision apply.

- Contractor has ordered equipment or vehicle to be used on the construction project in compliance at least 60 days before that equipment or vehicle is needed at the Project alignment, but that equipment or vehicle has not yet arrived due to circumstances beyond the Contractor's control, and the Contractor has attempted in good faith and with due diligence to lease or short-term rent the equipment or vehicle that would comply, but the equipment or vehicle is not available for lease or short-term rent within 120 miles of the project site, and the Contractor has submitted documentation to the City of Inglewood showing that the requirements of this exception provision apply.

- Construction-related diesel equipment or vehicle will be used on the Project alignment for fewer than 20 calendar days per calendar year. The Contractor shall not consecutively use different equipment or vehicles that perform the same or a substantially similar function in an attempt to use this exception to circumvent the intent of this mitigation measure.

- Documentation of good faith efforts and due diligence regarding the previous exceptions shall include written record(s) of inquiries (i.e., phone logs) to at least three leasing/rental companies that provide construction on-road trucks and off-road equipment, documenting the availability/unavailability of the required types of truck/equipment. The City of Inglewood will, from time-to-time, conduct independent audit of the availability of such vehicles and equipment for lease/rent within a 120 mile radius of the project site, which may be used in reviewing the acceptability of the Contractor's good faith efforts and due diligence.

MM AQ-2: Equipment such as concrete/industrial saws, pumps, aerial lifts, light stands, air compressors, and forklifts shall be electric or alternative-fueled (i.e., non-diesel). Pole power shall be utilized at the earliest feasible point in time, and shall be used to the maximum extent feasible in lieu of generators. If stationary construction equipment, such as diesel-powered generators, must be operated continuously, such equipment must be Final Tier 4 construction equipment or better and located at least 100 feet from air quality sensitive land uses (e.g., residences, schools, childcare centers, hospitals, parks, or similar uses), whenever possible.

MM AQ-3: At a minimum, require that construction vendors, contractors, and/or haul truck operators commit to using 2010 model year trucks (e.g., material delivery trucks and soil import/export with a gross vehicle weight rating of at least 14,001 pounds), or best commercially available equipment, that meet CARB's 2010 engine emissions standards at 0.01 g/hp-hour of particulate matter and 0.20 g/hp-hour of NOx emissions or newer, cleaner trucks, unless the Contractor provides written documentation consistent with project contract requirements the circumstances identified in **MM AQ-1** exist and the Contractor submits an alternative compliance plan. Operators shall maintain records of all trucks associated with Project construction to document that each truck used meets these emission standards. The City of Inglewood shall include this requirement in applicable bid documents, purchase orders, and contracts. Operators shall maintain records of all trucks associated with Project construction to document that each truck used meets these emission standards and make the records available for inspection.

MM AQ-4: Require the use of electric or alternatively fueled (e.g., natural gas) sweepers with high-efficiency particulate air (HEPA) filters.

MM AQ-5: A publicly visible sign shall be posted with the telephone number and person to contact at the City of Inglewood regarding dust complaints. This person shall respond and take corrective action with 24 hours. The Air District's phone number shall also be visible to ensure compliance with applicable regulations.

MM AQ-6: All roadways, driveways, sidewalks, etc., being installed as part of the project should be completed as soon as practical; in addition, building pads should be laid as soon as practical after grading.

MM AQ-7: To the extent feasible, allow construction employees to commute during off-peak hours.

MM AQ-8: Make access available for on-site lunch trucks during construction, as feasible, to minimize off-site construction employee vehicle trips.

MM AQ-9: Every effort shall be made to utilize grid-based electric power at any construction site, where feasible. Grid-based power can be from a direct hookup or a tie into electricity from power poles.

MM AQ-10: Contractors shall maintain and operate construction equipment to minimize exhaust emissions. All construction equipment must be properly tuned and maintained in accordance with the manufacturer's specifications and documentation demonstrating proper maintenance, in accordance with the manufacturer's specifications, shall be maintained on site. Tampering with construction equipment to increase horsepower or to defeat emission control devices must be prohibited.

MM AQ-11: Enter into applicable bid documents, purchase orders, and contracts to notify all construction vendors, contractors, and/or haul truck operators that vehicle and construction equipment idling time will be limited to no longer than five minutes, consistent with the CARB's policy. For any idling that is expected to take longer than five minutes, the engine should be shut off. Notify construction vendors, contractors, and/or haul truck operators of these idling requirements at the time that the purchase order is issued and again when vehicles enter the Project alignment. To further ensure that drivers understand the vehicle idling requirement, post signs at the proposed Project entry gates and throughout the Project alignment, where appropriate, stating that idling longer than five minutes is not permitted.

Level of Significance after Mitigation

Construction

As detailed above, **MM AQ-1** through **MM AQ-4** were included in the post-mitigation modeling for construction of the proposed Project. **MM AQ-1** would require the use equipment that meets the USEPA's Final Tier 4 emissions standards for off-road diesel-powered construction equipment with 50 hp or greater, for all phases of construction activity. Additionally, **MM AQ-2** would require smaller pieces of equipment to be electric or alternative-fueled (i.e., non-diesel) to the maximum extent feasible. **MM AQ-3** would require construction vendors, contractors, and/or haul truck operators commit to using 2010 model year trucks. **MM AQ-4** would require the use of electric or alternatively fueled (e.g., natural gas) sweepers with HEPA filters. Compliance with these mitigation measures would result in substantial reductions in

emissions of VOC, NOx PM_{10}, and $PM_{2.5}$ compared to fleet-wide average emissions for heavy-duty construction equipment and trucks in the southern California region.

Table 4.2-12: Daily Mitigated Construction Emissions for Proposed Project shows the estimated daily mitigated emissions for construction related emissions (including combustion engine and fugitive dust emissions) for the proposed Project including **MM AQ-1** to **MM AQ-4.**

Table 4.2-12
Daily Mitigated Construction Emissions for Proposed Project

Construction Year	VOC	CO	NOx	PM_{10}	$PM_{2.5}$	SO_2
	pounds/day					
Grand Total						
2022	7.07	223	95.1	5.31	2.95	0.43
2023	11.6	443	**141**	8.21	4.35	0.75
2024	11.2	443	**138**	7.21	3.88	0.68
2025	11.7	478	**149**	7.23	3.90	0.68
2026	6.26	260	80.2	3.72	2.01	0.35
Significance Thresholds	**75**	**550**	**100**	**150**	**55**	**150**
Employee Vehicles						
2022	0.18	5.76	0.56	0.31	0.13	0.02
2023	0.42	13.1	1.22	0.76	0.32	0.05
2024	0.30	9.22	0.82	0.57	0.24	0.03
2025	0.42	12.8	1.09	0.84	0.35	0.05
2026	0.13	3.89	0.32	0.27	0.11	0.01
Pickup/Delivery Trucks						
2022	0.34	8.36	4.23	0.69	0.30	0.05
2023	0.70	16.8	8.41	1.54	0.68	0.10
2024	0.73	17.6	8.28	1.73	0.76	0.11
2025	0.53	13.5	5.71	1.39	0.60	0.09
2026	0.49	12.5	5.04	1.39	0.60	0.09
Haul Trucks						
2022	1.29	4.58	48.6	3.66	1.86	0.19
2023	0.35	2.53	44.3	4.64	2.09	0.26
2024	0.28	2.02	35.2	3.67	1.65	0.21
2025	0.27	2.04	35.4	3.73	1.67	0.21
2026	0.10	0.77	13.3	1.41	0.63	0.08
Off-road Equipment						
2022	5.25	205	41.7	0.65	0.65	0.17
2023	10.1	411	86.7	1.26	1.26	0.33
2024	9.93	415	93.2	1.23	1.23	0.32
2025	10.4	450	**107.0**	1.28	1.27	0.33
2026	5.54	243	61.6	0.66	0.66	0.17

*Note: Values in **bold** are in excess of applicable standard.*
*Source: See **Appendix 4.2.1: Air Quality and Human Health Risk Assessment**.*

The total construction emissions including the contribution from employee vehicle trips, pickup/delivery trucks, haul trucks, and off-road equipment are presented. The mitigation measures represent a reduction of approximately 23 percent of NOx emissions. In addition, they would reduce approximately 36 percent

of the PM_{10} emissions, and approximately 48 percent of the $PM_{2.5}$ emissions. Though emissions would be reduced, the daily mitigated NOx construction emissions would exceed the SCAQMD thresholds of significance during 2023 through 2025. Based on the characteristics of the proposed Project and its construction, including the construction schedule, additional feasible mitigation is not available to further reduce NOx emissions. These emissions would be temporary in nature and would cease once construction of the proposed Project is complete. Nevertheless, short-term emissions of NOx would exceed SCAQMD thresholds and this impact would be significant and unavoidable.

Operation

Operational emissions are based on the estimates for both stationary/area and energy sources for operation of the station components of the proposed Project (APM trains, stations, and MSF) and mobile sources from worker commute trips and deliveries for supplies, maintenance, and other needs).

As shown in **Table 4.2-11**, the typical daily emissions associated with the proposed Project operations would result in a net negative emissions. Moreover, daily emissions under normal operations would be below the SCAQMD operational thresholds for all emissions. However, as shown in **Table 4.2-11**, the daily emissions for a backup generator would exceed the NOx SCAQMD threshold. Backup generators would only run for emergency conditions when the main electrical power was not available, and for regular testing. As such, the emissions would be limited to only those periods and would not be an ongoing operational activity. Therefore, the proposed Project operations would have a less than significant (and beneficial) impact on air quality and would not result in cumulatively considerable increases that for nonattainment pollutants ozone, PM_{10}, and $PM_{2.5}$. Pursuant to SCAQMD guidance, the proposed Project's operations would not result in a cumulatively considerable amount of emissions of any nonattainment pollutant.

Impacts related to proposed Project operation would be less than significant.

Impact AQ-3: Would the project expose sensitive receptors to substantial pollutant concentrations?

Construction

Air Dispersion Analysis

A dispersion modeling analysis was also conducted to assess related impacts to air concentrations of CO, NO_2, PM_{10}, $PM_{2.5}$, and SO_2 for nearby receptors within a one quarter mile of the proposed Project.These receptors are designed to represent off-site locations where a person has access and can be situated for

an hour or longer at a time (which is different from the HRA receptors discussed below, which are designed to represent specific residences, schools, daycares, off-site worker locations).

The ambient air quality standards analysis results are presented for both the Morning/Evening and Morning/Night construction scenarios identified in the Construction Scenario (see **Appendix 3.0.4**). Concentrations were compared to SCAQMD's significance thresholds and California/federal ambient air quality standards as identified in **Table 4.2-6**.

Morning/Evening Construction Activities

Estimated emissions for the various criteria pollutants for the Morning/Evening scenario are shown in **Table 4.2-13: Estimated Unmitigated Concentration Impacts from Construction Activities for Morning/Evening Scenario**.

NOx

For the nearby receptors during construction for the Morning/Evening scenario, the incremental 1-hour NO_2 impacts to a receptor, including background concentrations, would be a maximum of 0.16 ppm, which is below the State threshold of 0.18 ppm. The maximum construction incremental annual NO_2 impacts to a nearby receptor, including background concentrations, would be 0.01 ppm, which is below the thresholds of 0.03 ppm (State) and below the threshold of 0.0534 ppm (federal). However, the maximum incremental 98th percentile 1-hour NO_2 impacts to a sensitive receptor, including background concentrations, would be 0.12 ppm, which is above the federal threshold of 0.10 ppm. As such, impacts would be potentially significant for the 1-hour NO_2 federal threshold of 0.10 ppm.

Particulate Matter

As shown in **Table 4.2-13**, for the nearby receptors during construction, the maximum incremental 24-hour and annual PM_{10} impacts to a sensitive receptor would be 3.02 µg/m^3 and 0.23 µg/m^3, respectively; impacts would be below the 24-hour PM_{10} threshold of 10.4 µg/m^3 and below the annual PM_{10} threshold of 1.0 µg/m^3. The construction maximum incremental 24-hour $PM_{2.5}$ impacts to a sensitive receptor would be 2.78 µg/m^3, which would be below the 24-hour $PM_{2.5}$ threshold of 10.4 µg/m^3. Therefore, unmitigated construction activities would result in a less than significant air quality impact of PM_{10} and $PM_{2.5}$ on nearby receptors due to construction activities.

CO and SO_2

Concentrations of CO and SO_2 during the Morning/Evening scenario would not exceed significant thresholds on nearby receptors as shown in **Table 4.2-13**. Impacts would be less than significant.

Morning/Night Construction Activities

As shown in **Table 4.2-14: Estimated Unmitigated Concentration Impacts from Construction Activities for Morning/Night Scenario**, estimated emissions for the various criteria pollutants for the Morning/Night scenario.

NOx

For the nearby receptors during construction for the Morning/Night scenario, the maximum construction incremental 1-hour NO_2 impacts to a receptor, including background concentrations, would be 0.16 ppm, which is below the State threshold of 0.18 ppm. The maximum construction incremental annual NO_2 impacts including background concentrations would be 0.01 ppm, which is below the thresholds of 0.03 ppm (State) and 0.0534 ppm (federal). The maximum incremental 98th percentile 1-hour NO_2 impacts to nearby receptor, including background concentrations, would be 0.12 ppm, which is above the federal threshold of 0.10 ppm. As such, impacts would be potentially significant for the 1-hour NO_2 federal threshold of 0.10 ppm.

Particulate Matter

As shown in **Table 4.2-14**, for the nearby receptors, the construction maximum incremental 24-hour and annual PM_{10} impacts to a receptor would be 2.79 µg/m^3 and 0.22 µg/m^3, respectively. Impacts would be below the 24-hour PM_{10} threshold of 10.4 µg/m^3 and below the annual PM_{10} threshold of 1.0 µg/m^3. The construction maximum incremental 24-hour $PM_{2.5}$ impacts would be 2.56 µg/m^3, which would be below the 24-hour $PM_{2.5}$ threshold of 10.4 µg/m^3. Therefore, unmitigated construction activities would result in a less than significant air quality impact of PM_{10} and $PM_{2.5}$ on nearby receptors due to construction activities.

CO and SO_2

Concentrations of CO and SO_2 during the Morning/Night scenario would not exceed significant thresholds on nearby receptors as shown in **Table 4.2-14**. Impacts would be less than significant.

Table 4.2-13
Estimated Unmitigated Concentration Impacts from Construction Activities for Morning/Evening Scenario
(Approximately 7:00 AM to 3:00 PM and 3:00 PM to 11:00 PM)

Criteria	Maximum 1-Hour NO_2 (ppm)	98% 1-Hour NO_2 (ppm)	CAAQS Annual NO_2 (ppm)	NAAQS Annual NO_2 (ppm)	24-Hour PM_{10} ($\mu g/m^3$)	Annual PM_{10} ($\mu g/m^3$)	24-Hour $PM_{2.5}$ ($\mu g/m^3$)	CAAQS 1-Hour SO_2 (ppm)	NAAQS 1-Hour SO_2 (ppm)	24-Hour SO_2 (ppm)	1-Hour CO (ppm)	8-Hour CO (ppm)
Off-site Receptor (Project Increment)	0.06	0.05	<0.01	<0.01	3.02	0.23	2.78	<0.01	<0.01	<0.01	0.29	0.03
Background Concentration	0.07	0.05	0.01	0.01				0.01	0.01	<0.01	2.10	1.60
Adjusted Baseline Concentration	0.03	0.02	<0.01	<0.01				<0.01	<0.01	<0.01	1.80	0.80
Total Concentration	**0.16**	**0.12**	**0.01**	**0.01**	**3.02**	**0.23**	**2.78**	**0.01**	**0.01**	**<0.01**	**4.19**	**2.43**
Significance Threshold	*0.18*	*0.10*	*0.03*	*0.0534*	*10.4*	*1.00*	*10.4*	*0.25*	*0.075*	*0.04*	*20.0*	*9.00*
Potentially Significant (Yes or No)?	No	**Yes**	No	No	No	No	No	No	No	No	No	No

*Source: See **Appendix 4.2.1: Air Quality and Human Health Risk Assessment**.*
Total concentrations reflect rounding of values (Project Increment plus background concentration). Per SCAQMD guidance, PM_{10} and $PM_{2.5}$ impacts do not include background concentrations.

Table 4.2-14
Estimated Unmitigated Concentration Impacts from Construction Activities for Morning/Night Scenario
(Approximately 7:00 AM to 3:00 PM and 11:00 PM to 7:00 AM)

Criteria	Maximum 1-Hour NO_2 (ppm)	98% 1-Hour NO_2 (ppm)	CAAQS Annual NO_2 (ppm)	NAAQS Annual NO_2 (ppm)	24-Hour PM_{10} ($\mu g/m^3$)	Annual PM_{10} ($\mu g/m^3$)	24-Hour $PM_{2.5}$ ($\mu g/m^3$)	CAAQS 1-Hour SO_2 (ppm)	NAAQS 1-Hour SO_2 (ppm)	24-Hour SO_2 (ppm)	1-Hour CO (ppm)	8-Hour CO (ppm)
Off-site Receptor (Project Increment)	0.06	0.05	<0.01	<0.01	2.79	0.22	2.56	<0.01	<0.01	<0.01	0.29	0.03
Background Concentration	0.07	0.05	0.01	0.01				0.01	0.01	<0.01	2.10	1.60
Adjusted Baseline Concentration	0.03	0.02	<0.01	<0.01				<0.01	<0.01	<0.01	1.80	0.80
Total Concentration	**0.16**	**0.12**	**0.01**	**0.01**	**2.79**	**0.22**	**2.56**	**0.02**	**0.02**	**<0.01**	**4.19**	**2.43**
Significance Threshold	*0.18*	*0.10*	*0.03*	*0.0534*	*10.4*	*1.00*	*10.4*	*0.25*	*0.075*	*0.04*	*20.0*	*9.00*
Potentially Significant (Yes or No)?	No	**Yes**	No	No	No	No	No	No	No	No	No	No

*Source: See **Appendix 4.2.1: Air Quality and Human Health Risk Assessment**.*
Total concentrations reflect rounding of values (Project Increment plus background concentration). Per SCAQMD guidance, PM_{10} and $PM_{2.5}$ impacts do not include background concentrations.

Health Risk Assessment

An HRA was conducted for the proposed Project to address the potential for human health impacts associated with construction of the proposed Project The SCAQMD thresholds of significance applied to assess project-level health impacts are the exposure of persons to substantial levels of air toxics resulting in (a) a cancer risk level greater than 10 per one million persons; or (b) a noncancerous risk (chronic or acute) hazard index greater than 1; or (c) a cancer burden of greater than 0.5 excess cancer cases.[133] For this threshold, sensitive receptors include residential uses, schools, daycare centers, nursing homes, medical centers, and off-site workers.

Lifetime Cancer Risk

The proposed Project would constitute a new emission source of DPM due to its construction activities. Studies have demonstrated that DPM from diesel-fueled engines is a human carcinogen and that chronic (long-term) inhalation exposure to DPM poses a chronic health impact. Health effects from carcinogenic air toxics are usually described in terms of individual cancer risk. Individual cancer risk is the likelihood that a person exposed to air toxic concentrations over a 70-year lifetime will contract cancer, based on the use of standard risk-assessment methodology and a 30-year exposure duration. The maximally exposed individual (MEI) represents the worst–case risk estimate, based on a theoretical person exposed for a period of 30 years at the highest concentration. This is a highly conservative assumption since most people do not remain in place all day and on average residents change residences every 11 to 12 years and do not stay in the same place of work for 25 years. In addition, this assumes that individuals are experiencing outdoor concentrations for the entire exposure period (even when indoors). A school child exposure duration is between ages 2 and 16 years old, which again, is conservative because the elementary, middle, and high school are not often located at the same location.

If incremental individual cancer risk from the proposed Project would exceed the SCAQMD regulatory threshold of an incremental increase of 10 in one million, then an estimated determination of population level risks is required (a cancer burden analysis). For the cancer burden analysis, the proposed Project risks from construction and operation impacts are evaluated for a 70-year residential scenario.[134]

Noncarcinogenic Health Risk (Chronic and Acute)

The HRA also evaluates the risk of potential noncarcinogenic negative health outcomes related to TACs exposure from airborne emissions during the construction of the proposed Project. For construction, the potential TAC emission sources are heavy-duty equipment used during demolition, grading and excavation,

133 South Coast Air Quality Management District, 2017. Risk Assessment Procedures for Rule 1401, 1401.1, and 212, Version 8.1, September 1, 2017.

134 South Coast Air Quality Management District, 2017. Risk Assessment Procedures for Rule 1401, 1401.1, and 212, Version 8.1, September 1, 2017.

and building construction activities. The HRA followed the procedures and methods provided in the Guidance Manual for Preparation of Health Risk Assessments issued by the OEHHA in 2015[135] as well as the methods in the SCAQMD's Risk Assessment Procedures[136] used in conjunction with the associated SCAQMD Permit Application Package "N."[137] Noncancer effects of chronic (i.e., long- term) and acute (i.e., short-term) TAC exposure were evaluated using the Hazard Index (HI) approach consistent with the OEHHA and SCAQMD guidance.

A chronic health impact equal to or greater than 1.0 represents a significant chronic health hazard. A chronic health effect could include irritation to eyes, throat, lungs, or neurological damage. The proposed Project related TACs with known or suspected chronic health effects emitted during construction could include DPM, acetaldehyde, benzene, 1,3-butadiene, formaldehyde, and nickel.[138] An acute health impact equal to or greater than 1.0 represents a significant acute health hazard. An acute health effect could include irritation to eyes, throat, or lungs, sensory irritation, or coughing, chest pain or vomiting.

Morning/Evening Construction Activities

Table 4.2-15: Estimated Unmitigated Health Impacts from Construction Activities for Morning/Evening Scenario provides the proposed Project's unmitigated health impacts from construction activities for existing residences, schools, daycares, and off-site workers receptors. A large majority of the health impacts are due to off-road construction equipment operating within the proposed Project construction areas with a minimal contribution from off-site construction truck travel along nearby roadways.

As shown in **Table 4.2-15**, the maximum cancer risk from unmitigated proposed Project construction emissions for a residential receptor would be 27.6 per one million persons. The maximum cancer risks would occur at a residential receptor (also known as the maximum exposed individual or MEI). Thus, the cancer risk for residential receptors due to construction activities would be potentially above the SCAQMD threshold of 10 per one million persons and would be potentially significant for residential receptors due to construction activities. The cancer burden due to construction activities would be 0.03[139] and below the SCAQMD threshold of 0.5 excess cancer cases and would therefore be less than significant for all residential receptors due to construction activities.

135 Office of Environmental Health Assessment, Air Toxic Hotspots Program, Risk Assessment Guidelines – Guidance Manual for Preparation of Health Risk Assessment, February 2015. https://oehha.ca.gov/media/downloads/crnr/2015guidancemanual.pdf

136 South Coast Air Quality Management District, 2017. Risk Assessment Procedures for Rule 1401, 1401.1, and 212, Version 8.1, September 1, 2017.

137 SCAQMD, Permit Application Package "N", for Use in Conjunction with the Risk Assessment Procedures for Rules 1401, 1401.1, and 212, Draft Version 8.1.

138 Office of Environmental Health Hazard Assessment. Determination of Noncancer Chronic Reference Exposure Levels. February 2000.

139 Cancer burden is the total cancer risk for all receptors divided by the estimated population within the modeling domain.

Table 4.2-15
Estimated Unmitigated Health Impacts from Construction Activities
for Morning/Evening Scenario
(Approximately 7:00 AM to 3:00 PM and 3:00 PM to 11:00 PM)

Criteria	Cancer Risk	Chronic/Acute Impact
Existing Residence	**27.6**	0.02
Significance Threshold	10.0	1.0
Potentially Significant (Yes or No)?	**Yes**	No
Off-site School/Daycare	2.20	0.02
Significance Threshold	10.0	1.0
Potentially Significant (Yes or No)?	No	No
Off-site Worker	0.76	0.03
Significance Threshold	10.0	1.0
Potentially Significant (Yes or No)?	No	No

*Note: Values in **bold** are in excess of applicable standard.*
*Source: See **Appendix 4.2.1: Air Quality and Human Health Risk Assessment**.*

The unmitigated chronic health impact would be 0.02, based on a proposed Project-related maximum annual diesel concentration of 0.08 μg/m^3 (per dispersion modeling analysis) or 0.08 μg/m^3/5.0 μ g/m^3, which is 0.02. The chronic health impact due to construction activities would be below the project-level threshold of 1 and would therefore be less than significant for all residential receptors due to construction activities.

As shown in **Table 4.2-15**, the maximum cancer risk from unmitigated proposed Project construction emissions for a school/daycare receptor would be 2.2 per one million persons. Thus, the cancer risk for school/daycare receptors due to construction activities would be below the SCAQMD threshold of 10 per one million persons and would be less than significant for all off-site school/daycare receptors due to construction activities.

The maximum unmitigated chronic health impact for an off-site school/daycare receptors would be 0.02. Thus, the chronic health impact due to construction activities for all off-site school/daycare receptors would be below the project-level threshold of 1 and the chronic health impact would be less than significant for all off-site school/daycare receptors due to construction activities.

Morning/Night Construction Activities

Table 4.2-16: Estimated Unmitigated Health Impacts from Construction Activities for Morning/Night Scenario provides the proposed Project's unmitigated health impacts from construction activities for

existing residences, schools, daycares, and off-site workers receptors. A large majority of the health impacts are due to off-road construction equipment operating within the proposed Project construction areas with a minimal contribution from off-site construction truck travel along nearby roadways.

As shown in **Table 4.2-16**, the maximum cancer risk from unmitigated proposed Project construction emissions for a residential receptor would be 33.8 per one million persons. Thus, the cancer risk for residential receptors due to construction activities would be potentially above the SCAQMD threshold of 10 per one million persons and would be potentially significant for residential receptors due to construction activities. The cancer burden due to construction activities would be 0.03[140] and below the SCAQMD threshold of 0.5 excess cancer cases and would therefore be less than significant for all residential receptors due to construction activities.

The unmitigated chronic health impact would be 0.02, based on a proposed Project-related maximum annual diesel concentration of 0.10 $\mu g/m^3$ (per dispersion modeling analysis) or 0.10 $\mu g/m^3$/5.0 μ g/m^3, which is 0.02. The chronic health impact due to construction activities would be below the project-level threshold of 1 and would therefore be less than significant for all residential receptors due to construction activities.

As shown in **Table 4.2-16**, the maximum cancer risk from unmitigated proposed Project construction emissions for a school/daycare receptor would be 2.45 per one million persons. Thus, the cancer risk for school/daycare receptors due to construction activities would be below the SCAQMD threshold of 10 per one million persons and would be less than significant for all off-site school/daycare receptors due to construction activities.

140 Cancer burden is the total cancer risk for all receptors divided by the estimated population within the modeling domain.

Table 4.2-16
Estimated Unmitigated Health Impacts from Construction Activities for Morning/Night Scenario (Approximately 7:00 AM to 3:00 PM and 11:00 PM to 7:00 AM)

Criteria	Cancer Risk	Chronic/Acute Impact
Existing Residence	**33.8**	0.02
Significance Threshold	10.0	1.0
Potentially Significant (Yes or No)?	**Yes**	No
Off-site School/Daycare	2.45	0.02
Significance Threshold	10.0	1.0
Potentially Significant (Yes or No)?	No	No
Off-site Worker	0.64	0.02
Significance Threshold	10.0	1.0
Potentially Significant (Yes or No)?	No	No

*Note: Values in **bold** are in excess of applicable standard.*
*Source: See **Appendix 4.2.1: Air Quality and Human Health Risk Assessment**.*

The maximum unmitigated chronic health impact for an off-site school/daycare receptors would be 0.012. Thus, the chronic health impact due to construction activities for all off-site school/daycare receptors would be below the project-level threshold of 1 and the chronic health impact would be less than significant for all off-site school/daycare receptors due to construction activities.

As shown in **Table 4.2-16**, the maximum cancer risk from unmitigated proposed Project construction emissions for an off-site worker receptor (such as office buildings, retail centers, hotels, hospitals) would be 0.6 per one million persons. Thus, the cancer risk for off-site worker receptors due to construction activities would be below the SCAQMD threshold of 10 per one million persons and would be less than significant health impacts for all off-site worker receptors due to construction activities.

The maximum unmitigated chronic health impact modeled to occur at an off-site worker receptor would be 0.01. Thus, the chronic health impact due to construction activities at all off-site worker receptors would be below the project-level threshold of 1 and would be less than significant for all off-site worker receptors due to construction activities.

Summary

As a result of emissions from TACs for both the Morning/Evening and Morning/Night scenarios, the proposed Project, without mitigation could result in an incremental cancer risk that exceeds applicable standards, the impacts related to such exposures are potentially significant.

The proposed Project, without mitigation, would result in noncarcinogenic health risk that would be below the significance threshold of a chronic health impact of 1.0 for the maximum impacted resident, worker, school (child), and early childhood education (child) receptors and, this, this impact would be less than significant.

Operation

As discussed in **Impact AQ-2**, the typical daily emissions associated with the proposed Project operations would result in a net negative emissions. As a result, the proposed Project would not expose sensitive receptors to substantial pollutant concentrations. Impacts from operation would be less than significant.

Mitigation Measures

Construction Mitigation

MM AQ-1 through **MM AQ-4** were included in the post-mitigation modeling for construction of the proposed Project and would result in substantial reductions in emissions. **Mitigation Measures MM AQ-1** through **MM AQ-11** above have been identified to reduce significant impacts.

Operation Mitigation

As there are no significant impacts resulting from operation of the proposed Project, no mitigation required.

Level of Significance after Mitigation

Air Dispersion Analysis

Morning/Evening Scenario

As noted above, during the Morning/Evening scenario the unmitigated maximum incremental 98th percentile 1-hour NO_2 impacts to a sensitive receptor, including background concentrations, would be 0.12 ppm, which is above the federal threshold of 0.10 ppm. As shown in **Table 4.2-17: Estimated Mitigated Concentration Impacts from Construction Activities for Morning/Evening Scenario**, for the air quality receptors during construction, the maximum incremental 98th percentile 1-hour NO_2 impacts to a sensitive receptor, including background concentrations, would be 0.098 ppm, which is below the federal threshold of 0.10 ppm. The maximum construction incremental annual NO_2 impacts including background concentrations would be 0.01 ppm, which is below the thresholds of 0.03 ppm (state) and below the threshold of 0.0534 ppm (federal). Therefore, mitigated construction activities would not exceed the 1-hour and annual NO_2 thresholds.

Impacts would be less than significant with incorporation of mitigation for NO_2 on nearby receptors during construction activities for the Morning/Evening Scenario.

Morning/Night Scenario

As noted above, during the Morning/Night scenario the unmitigated maximum incremental 98th percentile 1-hour NO_2 impacts to nearby receptor, including background concentrations, would be 0.12 ppm, which is above the federal threshold of 0.10 ppm. As shown in **Table 4.2-18: Estimated Mitigated Concentration Impacts from Construction Activities for Morning/Night Scenario**, for the air quality receptors, themaximum incremental 98th percentile 1-hour NO_2 impacts to a sensitive receptor, including background concentrations, would be 0.098 ppm, which is below the federal threshold of 0.10 ppm. The maximum construction incremental annual NO_2 impacts to a sensitive receptor, including background concentrations, would be 0.01 ppm, which is below the thresholds of 0.03 ppm (State) and 0.0534 ppm (federal).

Impacts would be less than significant with incorporation of mitigation for NO_2 on nearby receptors during construction activities for the Morning/Night Scenario.

Table 4.2-17
Estimated Mitigated Concentration Impacts from Construction Activities for Morning/Evening Scenario
(Approximately 7:00 AM to 3:00 PM and 3:00 PM to 11:00 PM)

Criteria	Maximum 1-Hour NO_2 (ppm)	98% 1-Hour NO_2 (ppm)	CAAQS Annual NO_2 (ppm)	NAAQS Annual NO_2 (ppm)	24-Hour PM_{10} ($\mu g/m^3$)	Annual PM_{10} ($\mu g/m^3$)	24-Hour $PM_{2.5}$ ($\mu g/m^3$)	CAAQS 1-Hour SO_2 (ppm)	NAAQS 1-Hour SO_2 (ppm)	24-Hour SO_2 (ppm)	1-Hour CO (ppm)	8-Hour CO (ppm)
Off-site Receptor (Project Increment)	0.04	0.03	<0.01	<0.01	0.65	0.06	0.65	<0.01	<0.01	<0.01	0.68	0.08
Background Concentration	0.07	0.05	0.01	0.01				0.01	0.01	<0.01	2.10	1.60
Adjusted Baseline Concentration	0.03	0.02	<0.01	<0.01				<0.01	<0.01	<0.01	1.80	0.80
Total Concentration	**0.14**	**0.10[a]**	**0.01**	**0.01**	**0.65**	**0.06**	**0.65**	**0.01**	**0.01**	**<0.01**	**4.58**	**2.48**
Significance Threshold	*0.18*	*0.10*	*0.03*	*0.0534*	*10.4*	*1.00*	*10.4*	*0.25*	*0.075*	*0.04*	*20.0*	*9.00*
Threshold Exceeded?	No	No	No	No	No	No	No	No	No	No	No	No

*Source: See **Appendix 4.2.1: Air Quality and Human Health Risk Assessment**.*
Total concentrations reflect rounding of values (Project Increment plus background concentration). Per SCAQMD guidance, PM_{10} and $PM_{2.5}$ impacts do not include background concentrations.
[a] This value was rounded up from 0.098 and would be below the threshold of 0.10.

Table 4.2-18
Estimated Mitigated Concentration Impacts from Construction Activities for Morning/Night Scenario
(Approximately 7:00 AM to 3:00 PM and 11:00 PM to 7:00 AM)

Criteria	Maximum 1-Hour NO_2 (ppm)	98% 1-Hour NO_2 (ppm)	CAAQS Annual NO_2 (ppm)	NAAQS Annual NO_2 (ppm)	24-Hour PM_{10} ($\mu g/m^3$)	Annual PM_{10} ($\mu g/m^3$)	24-Hour $PM_{2.5}$ ($\mu g/m^3$)	CAAQS 1-Hour SO_2 (ppm)	NAAQS 1-Hour SO_2 (ppm)	24-Hour SO_2 (ppm)	1-Hour CO (ppm)	8-Hour CO (ppm)
Off-site Receptor (Project Increment)	0.04	0.03	<0.01	<0.01	0.62	0.06	0.60	<0.01	<0.01	<0.01	0.67	0.07
Background Concentration	0.07	0.05	0.01	0.01				0.01	0.01	<0.01	2.10	1.60
Adjusted Baseline Concentration	0.03	0.02	<0.01	<0.01				<0.01	<0.01	<0.01	1.80	0.80
Total Concentration	**0.13**	**0.10[a]**	**0.01**	**0.01**	**0.62**	**0.06**	**0.60**	**0.02**	**0.02**	**<0.01**	**4.57**	**2.47**
Significance Threshold	*0.18*	*0.10*	*0.03*	*0.0534*	*10.4*	*1.00*	*10.4*	*0.25*	*0.075*	*0.04*	*20.0*	*9.00*
Threshold Exceeded?	No	No	No	No	No	No	No	No	No	No	No	No

*Source: See **Appendix 4.2.1: Air Quality and Human Health Risk Assessment**.*
Total concentrations reflect rounding of values (Project Increment plus background concentration). Per SCAQMD guidance, PM_{10} and $PM_{2.5}$ impacts do not include background concentrations.
[a] This value was rounded up from 0.098 and would be below the threshold of 0.10.

Health Risk Assessment

Morning/Evening Scenario

As noted above, during the Morning/Evening scenario the unmitigated maximum cancer risk would be 27.6 per one million persons which is above the SCAQMD threshold of 10 per one million persons. **Table 4.2-19: Estimated Mitigated Health Impacts from Construction Activities for Morning/Evening Scenario** provides the mitigated proposed Project health impacts from construction activities for existing residences, schools, daycares, and off-site workers receptors. A large majority of the health impacts are due to off-road construction equipment operating within the proposed Project construction areas with a minimal contribution from off-site construction truck travel along nearby roadways.

Table 4.2-19
Estimated Mitigated Health Impacts from Construction Activities for Morning/Evening Scenario (Approximately 7:00 AM to 3:00 PM and 3:00 PM to 11:00 PM)

Criteria	Cancer Risk	Chronic/Acute Impact
Existing Off-site Residence	7.63	<0.01
Significance Threshold	10.0	1.0
Threshold Exceeded?	No	No
Off-site School/Daycare	0.60	0.01
Significance Threshold	10.0	1.0
Threshold Exceeded?	No	No
Off-site Worker	0.20	0.01
Significance Threshold	10.0	1.0
Threshold Exceeded?	No	No

*Notes: Values in **bold** are in excess of applicable standard.*
*Source: See **Appendix 4.2.1: Air Quality and Human Health Risk Assessment**.*

Residential Receptors

As shown in **Table 4.2-19**, the maximum cancer risk from mitigated proposed Project construction emissions for a residential receptor would be 7.6 per one million persons. The maximum cancer risks would occur at a residential receptor. Thus, the cancer risk for residential receptors due to construction activities would be less than significant for all residential receptors due to construction activities. The cancer burden due to construction activities would be 0.01[141] and below the SCAQMD threshold of 0.5 excess cancer cases.

141 Cancer burden is the total cancer risk for all receptors divided by the estimated population within the modeling domain.

The mitigated chronic health impact would be less than 0.01, based on a proposed Project-related maximum annual diesel concentration of 0.02 µg/m^3 (per dispersion modeling analysis) or 0.02 µg/m^3/5.0 µ g/m^3, which is 0.01. The chronic health impact due to construction activities would be below the project-level threshold of 1.

Impacts for chronic health issues would be less than significant for all residential receptors due to construction activities.

School/Daycare Receptors

As shown in **Table 4.2-19**, the maximum cancer risk from mitigated proposed construction emissions for a school/daycare receptor would be 0.6 per one million persons.[142] Thus, the cancer risk for school/daycare receptors due to construction activities would be below the SCAQMD threshold of 10 per one million persons and would be less than significant health impacts for all school/daycare receptors due to construction activities. The maximum mitigated chronic health impact for a school/daycare receptor would be 0.01. The chronic health impact due to construction activities for all school/daycare receptors would be below the project-level threshold of 1.

The chronic health impact would be less than significant for all school/daycare receptors during construction activities.

Off-site Worker Receptor

As shown in **Table 4.2-19**, the maximum cancer risk from mitigated proposed Project construction emissions for an off-site worker receptor would be 0.2 per one million persons. Thus, the cancer risk for off-site worker receptors due to construction activities would be below the SCAQMD threshold of 10 per one million persons

Impacts would be less than significant health impacts for all off-site worker receptors during construction activities.

The maximum mitigated chronic health impact modeled to occur at an off-site worker receptor would be 0.01. Thus, the chronic health impact due to construction activities at all off-site worker receptors would be below the project-level threshold of 1.

Impacts for chronic health issues would be less than significant for all off-site worker receptors during construction activities.

Morning/Night Scenario

142 Primarily due to construction activities during year 3 (2024) and 4 (2025) associated with Phase 2 and 3.

As noted above, during the Morning/Night scenario the unmitigated maximum cancer risk would be 33.8 per one million persons which is above the SCAQMD threshold of 10 per one million persons. **Table 4.2-20: Estimated Mitigated Health Impacts from Construction Activities for Morning/Night Scenario** provides the mitigated proposed Project health impacts from construction activities for existing residences, schools, daycares, and off-site workers receptors. A large majority of the health impacts are due to off-road construction equipment operating within the proposed Project construction areas with a minimal contribution from off-site construction truck travel along nearby roadways.

Table 4.2-20
Estimated Mitigated Health Impacts from Construction Activities for Morning/Night Scenario (Approximately 7:00 AM to 3:00 PM and 11:00 PM to 7:00 AM)

Criteria	Cancer Risk	Chronic/Acute Impact
Existing Off-site Residence	9.43	0.01
Significance Threshold	10.0	1.0
Threshold Exceeded?	No	No
Off-site School/Daycare	0.67	0.01
Significance Threshold	10.0	1.0
Threshold Exceeded?	No	No
Off-site Worker	0.18	0.01
Significance Threshold	10.0	1.0
Threshold Exceeded?	No	No

*Note: Values in **bold** are in excess of applicable standard.*
*Source: **Appendix 4.2.1: Air Quality and Human Health Risk Assessment**.*

Residential Receptors

As shown in **Table 4.2-20**, the maximum cancer risk from mitigated proposed construction emissions for a residential receptor would be 9.4 per one million persons. Thus, the cancer risk for residential receptors due to construction activities would be less than significant for all residential receptors due to construction activities. The cancer burden due to construction activities would be 0.01[143] and below the SCAQMD threshold of 0.5 excess cancer cases.

143 Cancer burden is the total cancer risk for all receptors divided by the estimated population within the modeling domain.

The mitigated chronic health impact would be 0.01, based on a proposed Project-related maximum annual diesel concentration of 0.03 µg/m^3 (per dispersion modeling analysis) or 0.03 µg/m^3/5.0 µ g/m^3, which is 0.01. The chronic health impact due to construction activities would be below the project-level threshold of 1.

Impacts for chronic health issues would be less than significant for all residential receptors during construction activities.

School/Daycare Receptors

As shown in **Table 4.2-20**, the maximum cancer risk from mitigated proposed Project construction emissions for a school/daycare receptor would be 0.7 per one million persons.[144] Thus, the cancer risk for school/daycare receptors due to construction activities would be below the SCAQMD threshold of 10 per one million persons.

The maximum mitigated chronic health impact for all school/daycare receptors would be 0.01. Thus, the chronic health impact due to construction activities for all school/daycare receptors would be below the project-level threshold of 1.

The chronic health impact would be less than significant for all school/daycare receptors during construction activities.

Off-site Worker Receptor

As shown in **Table 4.2-20**, the maximum cancer risk from mitigated proposed Project construction emissions for an off-site worker receptor would be 0.2 per one million persons. Thus, the cancer risk for off-site worker receptors due to construction activities would be below the SCAQMD threshold of 10 per one million persons.

The maximum mitigated chronic health impact modeled to occur at an off-site worker receptor would be 0.01. Thus, the chronic health impact due to construction activities at all off-site worker receptors would be below the project-level threshold of 1.

Impacts would be less than significant for all off-site worker receptors during construction activities.

Summary

The SCAQMD thresholds of significance applied to assess project-level health impacts are the exposure of persons to substantial levels of air toxics resulting in (a) a cancer risk level greater than 10 per one million

144 Primarily due to construction activities during year 3 and 4 associated with Phase 2 and 3.

persons or (b) a noncancerous risk (chronic or acute) hazard index greater than 1 or (c) a cancer burden of greater than 0.5 excess cancer cases.[145]

Localized impacts from criteria pollutants would be a less than significant with incorporation of mitigation measures designed to reduce NO_2 on nearby receptors during construction activities for the Morning/Evening and Morning/Night Scenarios during construction.

The proposed Project would result in carcinogenic health risk that would be below the significance threshold for the maximum impacted resident, worker, school (child), and early childhood education (child) receptors and, this, this impact would be less than significant with the implementation of mitigation.

Emissions of TACs would result in acute and chronic noncarcinogenic health risks below applicable standards, the impacts related to such exposures are less than significant. Therefore, the impacts related to exposing air quality sensitive receptors to substantial pollutant emissions would be less than significant with the implementation of mitigation.

4.2.8 CUMULATIVE IMPACTS

The following cumulative impact analysis is based on the recommendations provided by SCAQMD in the *Potential Control Strategies to Address Cumulative Impacts from Air Pollution White Paper*.[146] SCAQMD's guidance for assessing a project's cumulative impacts recommends the use of two alternative methodologies: (1) that project-specific air quality impacts be used to determine the project's potential cumulative impacts to regional air quality; or (2) that a project's consistency with the AQMPs are used to determine its potential cumulative impacts. Under SCAQMD's guidance, "[p]rojects that exceed the project-specific significance thresholds are considered by SCAQMD to be cumulatively considerable. This is the reason project-specific and cumulative significance thresholds are the same. Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant." Consistent with this guidance, the potential for the proposed Project to results in cumulative impacts from regional emissions is assessed based on SCAQMD thresholds.

145 South Coast Air Quality Management District, 2017. Risk Assessment Procedures for Rule 1401, 1401.1, and 212, Version 8.1, September 1, 2017.

146 SCAQMD, White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution, August 2003. http://www.aqmd.gov/docs/default-source/Agendas/Environmental-Justice/cumulative-impacts-working-group/cumulative-impacts-white-paper.pdf

According to the SCAQMD, individual development projects that exceed the SCAQMD-recommended daily thresholds for project-specific impacts would cause a cumulatively considerable increase in emissions for those pollutants for which the Basin is in nonattainment.

4.2.8.1 Construction

The SCAQMD CEQA *Air Quality Handbook*[147] states: "[f]rom an air quality perspective, the impact of a project is determined by examining the types and levels of emissions generated by the project and its impact on factors that affect air quality. As such, projects should be evaluated in terms of air pollution thresholds established by the District." According to the SCAQMD, if an individual project results in air emissions of criteria pollutants that exceed the SCAQMD's recommended daily thresholds for project-specific impacts, then the project would also result in a cumulatively considerable net increase of these criteria pollutants.

During construction, with the exception of NOx, the proposed Project's daily criteria air pollutant emissions are less than the daily criteria air pollutant emissions without the proposed Project. Implementation of **MM AQ-1** through **MM AQ-4** would reduce potential construction-related proposed Project's daily emissions. Construction-related daily emissions would exceed the SCAQMD's regional significance threshold for NOx even with mitigation. As such, impacts from the proposed Project would be significant and unavoidable and would result in a cumulatively considerable increase of NOx during the construction period.

Unmitigated construction activities would potentially exceed the 1-hour NO_2 threshold at nearby receptors. However, implementation of **MM AQ-1** through **MM AQ-4** would reduce potential construction-related daily emissions for the proposed Project below the 1-hour NO_2 threshold, as such, the construction related activities would be less than significant with mitigation. All other pollutant emissions during construction would fall below the thresholds and cumulative impacts would be less than significant.

The maximum cancer risk from unmitigated proposed Project construction emissions for a residential receptor would be potentially above the SCAQMD threshold of 10 per one million persons. However, implementation of **MM AQ-1** through **MM AQ-4** would reduce potential construction-related emissions for the proposed Project below the 10 per one million persons threshold. Thus, the cancer risk for residential receptors due to construction activities would be less than significant with mitigation for all residential receptors due to construction activities.

147 SCAQMD, Air Quality Analysis Guidance Handbook, Accessed June 2020, http://www.aqmd.gov/CEQA/hdbk.html. 2010.

Based on SCAQMD methodology, the proposed Project construction emissions would represent a considerable contribution to a cumulative impact, resulting in a potentially significant and unavoidable cumulative impact.

4.2.8.2 Operation

Daily criteria air pollutant emissions for the six operational scenarios was based on VMTs with and without the proposed Project. The 2026 and 2045 scenarios include the development of the related projects identified in **Section 4.0.6: Cumulative Assumptions.** In addition, the traffic study (see **Appendix 4.12.1**) the SCAG 2020 RTP/SCS [148] Socio-economic data (SED) for base year (2016) and Future baseline (2045) constrained conditions were utilized as the basis for developing the socio-economic data for use with the Inglewood Travel Demand Forecast (TDF) model. Updates to the socioeconomic data include those associated with known related projects from various cities and adjacent jurisdictions. Opening year (2026) SED database was used for the Inglewood TDF developed using interpolation of the 2016 and 2045 databases from SCAG 2020 RTP/SCS data updated for related projects. Therefore, the 2028 and 2045 scenarios account for the growth associated with related project and future growth as provided by SCAG.

With the proposed Project, emissions would result in decreases for all criteria pollutants (VOC, CO, NOx, PM_{10}, $PM_{2.5}$ and SO_2) compared to existing conditions, as well as the 2026 and 2045 scenarios without the proposed Project. Thus, operations would not have a significant cumulative regional air quality impact due to criteria pollutant emissions. In fact, emissions would be reduced from existing and future 2026 and 2045 No Project scenarios. As such, cumulative impacts from Project operations would be beneficial.

4.2.9 CONSISTENCY WITH CITY GENERAL PLAN

As discussed previously under **MM AQ-1**, the proposed Project would provide direct connections between regional transit provided by Metro, specifically at the Crenshaw/LAX line, and other transit providers as well as the City's major activity centers, such as The Forum, the LASED and HPSP including SoFi stadium, and IBEC. Implementation of the proposed Project would increase transit mode split, reduce vehicle trips, and reduce per-capita VMT. For these reasons, the proposed Project would not conflict with Inglewood General Plan policies related to air quality.

148 Southern California Association of Governments (SCAG), Connect SoCal: 2020-2045 Regional Transportation Plan/Sustainable Communities Strategies Draft, "Chapter 1," https://www.connectsocal.org/Pages/Connect-SoCal-Draft-Plan.aspx, Accessed on July 10, 2020.

4.3.1 INTRODUCTION

This section of the Draft Environmental Impact Report (Draft EIR) evaluates the impacts of the proposed Inglewood Transit Connector Project (proposed Project) on nesting or migratory birds/raptors and trees afforded additional protection pursuant to Federal, State of California (State), and local statues and regulations. The existing biological resource conditions in the area of the proposed Project are described, along with the methodology and the regulatory framework that guided the evaluation of biological resources. Potential impacts to biological resources that would result from the proposed Project are identified, along with any measures to mitigate significant effects of the proposed Project. Information from the following studies of the proposed Project area are incorporated into this section:

- *Preliminary Tree Survey of APM Alignment*, Meridian Consultants LLC, June 11, 2018 (prepared for the Initial Study for the proposed Project and included as **Appendix 4.3.1: Preliminary Tree Survey of APM Alignment** of this Draft EIR);
- *Preliminary Tree Survey of Potential Support Facility Sites*, Meridian Consultants LLC, September 20, 2018 (included as **Appendix 4.3.2: Preliminary Tree Survey of Potential Support Facility Sites** of this Draft EIR); and
- *Tree Inventory*, Pax Environmental, Incorporated, December 10, 2018 (included as **Appendix 4.3.3: Tree Inventory** of this Draft EIR).

The existing biological resources within the footprint of the proposed Project and immediate surrounding area have been evaluated based on existing published information and database research. The existing resources have been identified, along with the methodology and the regulatory framework that guided the evaluation thereof. Direct and/or indirect impacts to biological resources that would result from the demolition and clearing of existing vegetation, construction and operation of the proposed Project were identified and evaluated as part of the Recirculated Initial Study (included as **Appendix 2.0.2a: Recirculated Initial Study** of this Draft EIR) and it was determined that the proposed Project would result in a "Less than Significant Impact.". Additionally, for three of these thresholds, the Initial Study found that the proposed Project would have "No Impact."

The following impacts are considered less than significant:

- A substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife (CDFW) or U.S. Fish and Wildlife Service (USFWS).
- A substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the CDFW or USFWS.

- A substantial adverse effect on State or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.
- Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan.

Impacts found to be less than significant are further discussed in **Section 6.0: Other Environmental Considerations**. Please see **Section 8.0** for a glossary of terms, definitions, and acronyms used in this Draft EIR.

4.3.2 METHODOLOGY

The methodology used to evaluate impacts to biological resources entails a review of the appropriate biological resources databases to determine which threatened or endangered plant or animal species have the potential to occur within the 7.5-minute quadrangles in which the proposed Project, including the guideway and stations, support facility sites are located. The visual surveys were conducted to determine whether biological resources, including sensitive ecological areas, wetlands, wildlife migratory corridors, and/or habitat conservation areas, occur within 0.25 mile radius of the proposed guideway, stations, and other support facility sites to support these sensitive species. If the proposed Project could potentially impact biological resources that exist within this area, there would be a potential for adverse impacts.

The environmental review process for the Initial Study of the proposed Project included a biological field survey performed by Meridian Consultants staff on May 23, 2018 (see **Appendix 2.0.2**) to determine if any sensitive species or habitat were present. The field survey was reviewed for potential habitat for the sensitive and special-status species identified from literature and database searches. A species is determined to have the potential to occur within the footprint of the proposed Project if its documented geographical range from the literature and database searches includes the vicinity and if suitable habitat for the species was identified within or near the proposed Project. As mentioned previously, a number of CEQA Guidelines thresholds related to biological resources were able to be scoped out from further review based on the findings presented in the Initial Study.

The Initial Study determined that there may be potential impacts to certain biological resources resulting from the loss of existing street trees and other landscaping (see **Appendix 2.0.2**). Preliminary tree surveys were conducted for the area of the proposed Project including areas which would be occupied by the guideway, stations, and potential locations for support facilities (MSF and TPSS sites), to develop an understanding of the potential impacts to biological resources (see **Appendix 4.3.1** and **Appendix 4.3.2**). A more intensive tree survey was completed to identify and categorize the existing street trees and landscaping that may be impacted (see **Appendix 4.3.3**). This tree inventory covered the entire guideway

alignment and locations of stations, including the public rights-of-way along the proposed Project with an approximately 50-foot buffer, as well as sites for potential support facilities. As the proposed Project has been refined, some of these potential locations have been eliminated from further consideration and were not analyzed in this section. Additionally, as the 50-foot buffer area included in the *Tree Inventory* provided a considerably conservative analysis for potential impacts of the proposed Project on biological resources, this section only addresses trees identified in the report that have been reasonably inferred to be within or near the footprint for the proposed guideway, stations, and support facilities.

The *Tree Inventory* collected information on all trees meeting the specifications for protected tree status as described by the City of Inglewood Tree Preservation Ordinance.[1] Data collection included a determination of species, geographic positioning system (GPS) coordinates, tree diameter at breast height (DBH) at 54.5 inches above the ground, and a description of tree health (poor, fair, or good as determined in the field). The information included in this tree inventory was reported in accordance with accepted scientific and technical standards that are consistent with the requirements of the USFWS and the CDFW. Based on the results of this inventory and the proposed improvements, loss of biological resources and their resulting impacts were identified. Construction of the guideway and stations would include equipment staging areas that may reach 22 feet from the guideway. As such, this analysis conservatively assumed that all existing trees within 25 feet of the proposed guideway and stations, and the MSDF and TPSS sites could be removed during construction. Additionally, potential measures to mitigate significant impacts have been identified of the proposed Project, as necessary.

4.3.3 REGULATORY FRAMEWORK

A review of the various federal, State, regional, and local government regulatory requirements was conducted to identify regulations that provide protections of biological resources. This section summarizes the various regulatory requirements that are relevant to the proposed Project.

4.3.3.1 Federal Regulations

Federal Endangered Species Act

The Federal Endangered Species Act[2] (FESA) of 1973, as amended, was promulgated to protect and conserve any species of plant or animal that is endangered or threatened with extinction and the habitats in which these species are found.

1 Inglewood Municipal Code Chapter 12, Article 32, Tree Preservation.
2 United Sate Code (USC), Title 16, Sections 1531-1544, Endangered Species Act.

Section 4(a) of the FESA[3] requires that critical habitat be designated by the USFWS "to the maximum extent prudent and determinable, at the time a species is determined to be endangered or threatened." Critical habitat is formally designated by USFWS to provide guidance for planners/managers and biologists with an indication of where suitable habitat may occur and where high priority of preservation for a particular species should be given. "Take" of endangered species is prohibited under Section 9[4] of the FESA. Take, as defined under FESA, means to "harass, harm, pursue, hunt, wound, kill, trap, capture, collect, or attempt to engage in any such conduct." Section 7 of the FESA requires federal agencies to consult with the USFWS on proposed federal actions that may affect any endangered, threatened or proposed (for listing) species or critical habitat that may support the species.

Section 10[5] of the FESA provides the regulatory mechanism that allows the incidental take of a listed species by private interests and nonfederal government agencies during lawful activities. Habitat conservation plans (HCPs) for the impacted species must be developed in support of incidental take permits for nonfederal projects to minimize impacts to the species and develop viable mitigation measures to offset the unavoidable impacts.

Migratory Bird Treaty Act

The Migratory Bird Treaty Act[6] (MBTA) of 1918 is the domestic law that affirms or implements the United States' commitment to four international conventions with Canada, Japan, Mexico, and Russia for the protection of shared migratory bird resources. The MBTA governs the taking, killing, possession, transportation, and importation of migratory birds, their eggs, parts, and nests, and prohibits the take, possession, import, export, transport, sale, purchase, barter, or offering of these activities, except under a valid permit or as permitted in the implementing regulations.

As with the FESA, the MBTA also authorizes the Secretary of the Interior to issue permits for take. The procedures for securing such permits are found in Title 50 of the Code of Federal Regulations, together with a list of the migratory birds covered by the act. This law is generally protective of migratory birds but does not specify the type of protection required. USFWS administers permits to take migratory birds in accordance with the regulations promulgated by the MBTA. Nesting raptors, such as red-tailed hawks and

3 USC Title 16, Section 1533. [ESA Section 4] Determination of endangered species and threatened species.
4 USC Title 16, Section 1538. [ESA Section 9] Prohibited acts.
5 USC Title 16, Section 1539. [ESA Section 10] Exceptions.
6 U.S. Fish and Wildlife Service (USFWS), Migratory Bird Treaty Act of 1918 (16 U.S.C. 703-712; Ch. 128; July 3, 1918; 40 Stat. 755) as amended by: Chapter 634; June 20, 1936; 49 Stat. 1556; P.L. 86-732; September 8, 1960; 74 Stat. 866; P.L. 90-578; October 17, 1968; 82 Stat. 1118; P.L. 91-135; December 5, 1969; 83 Stat. 282; P.L. 93-300; June 1, 1974; 88 Stat. 190; P.L. 95-616; November 8, 1978; 92 Stat. 3111; P.L. 99-645; November 10, 1986; 100 Stat. 3590 and P.L. 105-312; October 30, 1998; 112 Stat. 2956

burrowing owls, are protected under the MBTA. In common practice, USFWS places restrictions on disturbances allowed near active raptor nests.

4.3.3.2 State Regulations

California Endangered Species Act (CESA)

In addition to federal laws, the State implements the California Endangered Species Act,[7] (CESA) which is enforced by CDFW. The CESA program maintains a separate listing of species beyond the FESA, although the provisions of each act are similar.

State-listed threatened and endangered species are protected under provisions of the CESA. Activities that may result in "take" of individuals (defined in CESA as; "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill") are regulated by CDFW. Habitat degradation or modification is not included in the definition of "take" under CESA. Nonetheless, CDFW has interpreted "take" to include the destruction of nesting, denning, or foraging habitat necessary to maintain a viable breeding population of protected species.

The State of California considers an endangered species as one whose prospects of survival and reproduction are in immediate jeopardy. A threatened species is considered as one present in such small numbers throughout its range that it is likely to become an endangered species in the near future in the absence of special protection or management. A rare species is one that is considered present in such small numbers throughout its range that it may become endangered if its present environment worsens. State threatened and endangered species are fully protected against take, as defined above.

The CDFW has also produced a species of special concern list to serve as a species watch list. Species on this list are either of limited distribution or their habitats have been reduced substantially, such that a threat to their populations may be imminent. Species of special concern may receive special attention during environmental review, but they do not have formal statutory protection. At the federal level, USFWS also uses the label species of concern, as an informal term that refers to species which might be in need of concentrated conservation actions. As the Species of Concern designated by USFWS do not receive formal legal protection, the use of the term does not necessarily ensure that the species will be proposed for listing as a threatened or endangered species.

7 California, Fish and Game Code, Section 2050 et. seq. California Endangered Species Act.

California Native Plant Protection Act

The California Naïve Plant protection Act[8] (NPPA) was enacted in 1977 and allows the Fish and Game Commission to designate plants as rare or endangered. There are 64 species, subspecies, and varieties of plants that are protected as rare under the NPPA. The NPPA prohibits take of endangered or rare native plants, but includes some exceptions for agricultural and nursery operations; emergencies; and after properly notifying CDFW for vegetation removal from canals, roads, and other sites, changes in land use, and in certain other situations (see Fish and Game Code section 1900 et seq. for more information).

California Fish and Game Code

Section 3500-3516 – Birds

California Fish and Game Code Sections 3503, 3503.5, 3511, and 3513[9] are applicable to natural resource management. Section 3503 of the Code makes it unlawful to destroy any birds' nest or any birds' eggs that are protected under the MBTA. Further, any birds in the orders Falconiformes or Strigiformes (Birds of Prey, such as hawks, eagles, and owls) are protected under Section 3503.5 of the Fish and Game Code which makes it unlawful to take, possess, or destroy their nest or eggs.

A consultation with CDFW may be required prior to the removal of any bird of prey nest that may occur on a project site. Section 3511 of the Fish and Game Code lists fully protected bird species, where the CDFW is unable to authorize the issuance of permits or licenses to take these species. Pertinent species that are State fully protected by the State include golden eagle (*Aquila chrysaetos*) and white-tailed kite (*Elanus leucurus*).

Section 3513 of the Fish and Game Code makes it unlawful to take or possess any migratory nongame bird as designated in the MBTA or any part of such migratory nongame bird except as provided by rules and regulations adopted by the Secretary of the Interior under provisions of the MBTA.

California Fish and Game Code Sections 1900–1913 – Rare and Endangered Plants

California Fish and Game Code Sections 1900–1913[10] were developed to preserve, protect, and enhance Rare and Endangered plants in the State. The act requires all State agencies to use their authority to carry out programs to conserve Endangered and Rare native plants. Provisions of the Native Plant Protection Act prohibit the taking of listed plants from the wild and require notification of the CDFW at least ten days

8 California Department of Fish and Wildlife, Native Plant Protection Act (NPPA), accessed June 2020, https://www.wildlife.ca.gov/Conservation/Plants/Laws.

9 California Department of Fish and Wildlife, Fish and Game Code (FGC), Division 4. Birds and Mammals, [3000 - 4904](Division 4 enacted by Stats. 1957, Ch. 456), Part 2. Birds [3500 - 3864] (Part 2 enacted by Stats. 1957, Ch. 456)

10 California Fish and Game Code, Fish and Game Code (FGC), Division 2, Department of Fish and Wildlife, (700-1940), Chapter 10, Sections 1900-1913, Native Plant protection.

in advance of any change in land use which would adversely impact listed plants. This allows the CDFW to salvage listed plant species that would otherwise be destroyed.

California Native Plant Society Rare and Endangered Plant Species

Vascular plants listed as rare or endangered by the California Native Plant Society (CNPS), but which have no designated status under FESA or CESA. The CNPS Inventory of Rare and Endangered Plants is a widely-recognized resource that directly guides rare plant protection, conservation planning, and land acquisition and management in California. CNPS published the first edition of its Inventory of Rare and Endangered Plants in 1974, with the Inventory currently in its 8th edition.[11]

The CNPS Inventory of Rare and Endangered Plants ranks plants and threats as follows:

California Rare Plant Rank

- 1A – Plants Presumed Extirpated in California and either Rare or Extinct Elsewhere
- 1B – Plants Rare, Threatened, or Endangered in California and Elsewhere
- 2A – Plants Presumed Extirpated in California, But More Common Elsewhere
- 2B – Plants Rare, Threatened, or Endangered in California, But More Common Elsewhere
- 3 – Plants about Which More Information is Needed - A Review List
- 4 – Plants of Limited Distribution - A Watch List

Threat Ranks

- .1 – Seriously threatened in California (over 80 percent of occurrences threatened/high degree and immediacy of threat)
- .2 – Moderately threatened in California (20-80 percent occurrences threatened/moderate degree and immediacy of threat)
- .3 – Not very threatened in California (less than 20 percent of occurrences threatened/low degree and

California Environmental Quality Act

The California Environmental Quality Act (CEQA) provides for the protection of the environment within the State of California by establishing State policy to prevent significant, avoidable damage to the environment through the use of alternatives or mitigation measures for projects. It applies to actions directly undertaken, financed, or permitted by State lead agencies. If a project is determined to be subject

11 California Native Plant Society (CNPS), Inventory of Rare and Endangered Plants (V. 6) 2001, Note - the Inventory switched to being online (V. 7, developed and maintained by Larry Levine), and is currently in its 8th edition. https://www.cnps.org/rare-plants/cnps-inventory-of-rare-plants

to CEQA, the lead agency will be required to conduct an Initial Study (IS); if the IS determines that the proposed Project may result in significant impacts on the environment, the lead agency will subsequently be required to write an EIR. A finding of nonsignificant effects will require either a Negative Declaration or a Mitigated Negative Declaration instead of an EIR.

Section 15380 of the CEQA Guidelines[12] independently defines "endangered" and "rare" species separately from the definitions of the CESA.[13] Under CEQA, "endangered" species of plants or animals are defined as those whose survival and reproduction in the wild are in immediate jeopardy, while "rare" species are defined as those who are in such low numbers that they could become endangered if their environment worsens.

Special Status-Species

Special-status species are those animal and plant species that, in the judgment of the resource agencies, trustee agencies, and certain nongovernmental organizations, warrant special consideration in the CEQA process. This includes the following:

- Officially designated "threatened," "endangered," or "candidate" species federally listed by the USFWS and protected under the Federal Endangered Species Act.
- Officially designated "rare," "threatened," "endangered," or "candidate" species State-listed by the CDFW and protected under the California Endangered Species Act. CDFW also maintains a list of "Fully Protected" species as well as "California Species of Special Concern" that are also generally treated as special-status species under CEQA.
- Species considered rare, threatened, or endangered under the conditions of Section 15380 of the CEQA Guidelines, such as plant species identified on lists 1A, 1B, and 2 in the CNPS Inventory of Rare and Endangered Vascular Plants of California, which may include species not found on either State or federal endangered species list.
- Other species considered sensitive, such as birds protected under the MBTA, which includes most native birds. A species may also be designated as special concern at the local level.

4.3.3.3 Local Plans and Regulations

General Plan

The City's General Plan Conservation Element addresses the conservation, development, and use of natural resource including water, soils, lakes, and mineral deposits.[14] The Conservation Element notes that

12 California Code of Regulations, Title 14, Division 6, Chapter 3, Article 20, § 15380.
13 California, Fish and Game Code, Section 2050 et. seq. California Endangered Species Act.
14 City of Inglewood *General Plan*, "Conservation Element" (1997).

resources which are typically addressed in conservation elements, including biological resources such as forests, wildlife, fisheries, shorelines, and agricultural land, are not found in Inglewood.

Conservation Element

The Conservation Element of the City's General Plan was adopted in October 1997 and addresses the conservation, development, and use of natural resource including water, soils, lakes, and mineral deposits.[15] The Conservation Element notes that resources which are typically addressed in conservation elements, including biological resources such as forests, wildlife, fisheries, shorelines, and agricultural land, are not found in Inglewood.

Land Use Element

The Land Use Element of the City's General Plan describes tree masses as an important component the physical environment of the City.[16] The Land Use Element states that trees are not merely aesthetic elements of the urban setting, but also provide beneficial effects such as noise attenuation, amelioration of air pollution and dust, and temperature control. As such, landowners are encouraged to plant trees to realize these benefits. The following policy from the Land Use Element is applicable to the proposed Project:

Policy 3.2: Green Boulevards

Create Green Boulevards that protect cyclists, infiltrate stormwater and use vegetation to create a sense of place on Florence Avenue, La Brea Avenue, Manchester Boulevard and Prairie Avenue.

New Downtown and Fairview Heights Transit Oriented Development Plan and Design Guidelines

The New Downtown and Fairview Heights Transit Oriented Development Plan and Design Guidelines[17] (Downtown TOD Plan) provides guidelines and standards for design, including landscaping, within the Downtown Inglewood and Fairview Heights neighborhoods of the City and works to implement the City's vision for transforming the quality of the environment within these areas. The Downtown TOD Plan area consists of approximately 585 acres located in the center of Inglewood along the Metro Crenshaw/LAX line just east of the Florence Avenue/La Brea Avenue intersection. This Downtown planning and zoning area extends approximately one-half mile in all directions from the Metro Crenshaw/LAX Line Downtown

15 City of Inglewood *General Plan*, "Conservation Element" (1997).
16 City of Inglewood *General Plan*, "Land Use Element" (adopted 1980, amended 1986, 2009, and 2016).
17 City of Inglewood, *New Downtown and Fairview Heights Transit Oriented Development Plan and Design Guidelines*, November 1, 2016.

Inglewood station. The Fairview Heights TOD Plan area consists of approximately 328 acres located near the intersection of Florence Avenue and West Boulevard. This Fairview Heights planning and zoning area also extends approximately one-half mile in all directions from the Metro Station.

The Downtown TOD Plan includes concept plans, zoning, development standards and design guidelines, and an implementation action plan for consideration by applicants submitting any proposals for new construction or rehabilitation within the Plan area, as well as for consultation by City Staff when making recommendations for project approvals. The Downtown TOD Plan addresses architectural detail, signage, public art, and civic and cultural life. Further, the Downtown TOD Plan includes street tree concepts, including recommended street tree locations and species along roadways within the Downtown and Fairview Heights neighborhoods.

Section 2.8: Street Trees and Furniture[18] of the Downtown TOD Plan establishes that street trees are important elements of streetscapes and placemaking and provides guidelines on the character of trees placed within key areas of Downtown Inglewood. The Downtown TOD Plan recommends that Manchester Boulevard be lined with London Plane (*Platanus × acerifolia*) trees, or a similar species. This tree's ability to withstand air pollution, drought, as well as most diseases makes it a desirable street tree that would also provide some uniformity and connectivity for Downtown Inglewood. In the case of Florence Avenue, the Downtown TOD Plan calls for London Plane trees alternated with the California fan palm (*Washingtonia filifera*). Market Street should retain its existing street trees. The smaller arterial streets near Market Street may alternate between the Brisbane box (*Lophostemon confertus*), an evergreen tree, and the ginkgo (*Ginkgo biloba*), a deciduous tree. The Downtown TOD Plan states that these smaller street trees bring down the scale of the streets and create a sense of place throughout the streets of Downtown Inglewood.

Hollywood Park Specific Plan

The Hollywood Park Specific Plan (HPSP)[19] establishes development standards and design guidelines for the 238-acre Hollywood Park site at the northeast corner of the Prairie Avenue and Century Boulevard intersection and provides an overview of existing infrastructure and necessary improvements related to the Hollywood Park site, including measures for implementation measures of the HPSP. Portions of the area within the HPSP site are currently under redevelopment and slated to include a National Football

18 City of Inglewood, *New Downtown and Fairview Heights Transit Oriented Development Plan and Design Guidelines*, November 1, 2016, Section 2.8: Street Trees and Furniture, p. 19.

19 City of Inglewood, *Hollywood Park Specific Plan*, adopted July 8, 2009, amended September 23, 2014, and further amended February 24, 2015.

League (NFL) stadium (SoFi Stadium), a 6,000-seat entertainment venue, parks, and retail, housing, entertainment, hotel, and civic uses as part.

The HPSP provides guidelines and standards for improvements in the public right-of-way within the Specific Plan area, which includes approximately 0.5 miles of street frontage along Prairie Avenue. The HPSP includes streetscape standards and provides integrated and coordinated landscape design guidelines for new development along the perimeter of the HPSP area to integrate it with the adjoining urban fabric, achieve a diverse urban forest, and assist in developing districts of distinctive and appropriate character.[20] Sidewalk widths are intended to provide walking routes and parkway widths are designed to provide sufficient area for urban tree growth. The HPSP guidelines and standard for streetscape include identity elements that will differentiate Hollywood Park from nearby developments through architectural features, landscaping (such as seasonal displays of color), graphic elements (such as signs or logos), special passenger or automobile paving, special night lighting effects, or other similar features.

The HPSP, Section 3.2.2: Streetscape, identifies selected street trees and the desired locations for their placement on internal roadways within the HPSP area as well as along major adjacent roadways, including Prairie Avenue, Century Boulevard, and the intersection corner of those roadways.[21] A majority of the tree species listed in the HPSP were selected from the City of Inglewood's approved tree list.[22] Selections were based upon recommendations from local arborists to create a palette of horticulturally successful, low maintenance, and climate-appropriate tree species. Alternative selections can be proposed, subject to City approval.

The HPSP states that street trees along Prairie Avenue shall be substantial and continuous to achieve an appropriate scale for the street.[23] Along the portion of Prairie Avenue north of Hardy Street, large columnar evergreen trees such as Afghan pine (*Pinus eldarica*) or Canary Island pine (*Pinus canariensis*) will provide continuity with the retail development to the east and the cemetery to the north. This arrangement is intended to visually reduce the scale of the street and provide ample shade as visitors approach the HPSP site. Both Prairie Avenue south of Hardy Street and the northern side of Century Boulevard will be similarly lined with large evergreen trees such as camphor trees (*Cinnamomum camphora*) or Southern magnolia (*Magnolia grandiflora*). In addition, large canopy flowering trees and palms will mark key points near the HPSP site, including the retail corner and major entries, and maintain

20 City of Inglewood, *Hollywood Park Specific Plan*, adopted July 8, 2009, amended September 23, 2014, and further amended February 24, 2015., Section 3.2.2, Streetscape, p. 3-28.

21 City of Inglewood, *Hollywood Park Specific Plan*, adopted July 8, 2009, amended September 23, 2014, and further amended February 24, 2015., Section 3.2.2, Streetscape, Exhibit 3-25—Landscape Street Sections Map, p. 3-28.

22 City of Inglewood, *Hollywood Park Specific Plan*, adopted July 8, 2009, amended September 23, 2014, and further amended February 24, 2015., Section 3.2.2, Streetscape, Exhibit 3-25—Landscape Street Sections Map, p. 3-28.

23 City of Inglewood, *Hollywood Park Specific Plan*, adopted July 8, 2009, amended September 23, 2014, and further amended February 24, 2015., Section 3.2.2, Streetscape, p. 3-29.

adequate street visibility. Selected species include Date palm (*Phoenix dactylifera*), Chanticleer Callery pear (*Pyrus calleryana*), and pink trumpet tree (*Tabebuia impetignosa*). Palm trees at the northeastern corner of Prairie Avenue and Century Boulevard are intended to provide a thematic connection to Century Boulevard near the Los Angeles International Airport (LAX).

City of Inglewood Municipal Code

The City of Inglewood Municipal Code (IMC), Tree Preservation.[24] recognizes the importance of both native and nonnative trees within the City for the many benefits they provide. Properly maintained trees increase property values, maintain the natural ecology, temper the effects of extreme temperatures, reduce runoff, prevent erosion of topsoil, and help create and maintain the identity and visual character of the City.

Prior to removing or cutting a protected tree in the City, a permit must be obtained with the City's Parks, Recreation, and Library Services Department. Protected trees are specified by IMC include:[25]

(A) Trees having a minimum trunk diameter of eight inches measured fifty-four inches above the ground. When measuring a multitrunk tree, the diameters of the largest three trunks shall be added together.
(B) Street trees or other required trees such as those required as a condition of approval, Use Permit, or other zoning requirement, regardless of size.
(C) All memorial trees dedicated by an entity recognized by the City, and all specimen trees that define a neighborhood or community.
(D) Trees of the following species that have reached a minimum of four inches diameter trunk size:

- Big Leaf Maple (*Acer macrophyllum*)
- California Buckeye (*Aesculus californica*)
- Madrone Arbutus (*menziesii*)
- Western Dogwood (*Cornus nuttallii*)
- California Sycamore (*Platanus racemose*)
- Coast Live Oak (*Quercus agrifolia*)
- Canyon Live Oak (*Quercus chrysolepis*)
- Blue Oak (*Quercus douglassii*)
- Oregon White Oak (*Quercus garryana*)
- California Black Oak (*Quercus kelloggii*)
- Valley Oak (Quercus lobata)
- Interior Live Oak (Quercus wislizenii)
- California Bay (Umbellularia californica)

24 Inglewood, California, Municipal Code, Article 32, Section 12-110 (2012), Tree Preservation.
25 Inglewood, California, Municipal Code, Section 12-113, Protected Trees.

(E) A tree or trees of any size planted as a replacement for a protected tree.

Pursuant to the provisions of City Ordinance 12-06 5-8-12,[26] no person shall remove, destroy, perform cutting of branches over one inch in diameter, or disfigure or cause to be removed or destroyed or disfigured any protected tree without having first obtained a permit to do so. Moreover, an application for a Protected tree Removal or Cutting Permit shall be filed for removal of the protected trees along with the inspection fee as specified in the City's Master Fee Schedule.[27] All protected trees shall require a permit for removal, relocation, cutting or reshaping. All removed or disfigured trees shall also require replacement with like-size, like-kind trees or an equal value tree or trees as determined by the Parks, Recreation and Library Services Department.[28] If a replacement tree is unavailable in like size or kind, the value of the original protected tree shall be determined using the latest edition of *Guide for Plant Appraisal* by the International Society of Arboriculture.[29] The valuation is used to determine the number and size of replacement trees required. The replacement trees must be located on site wherever possible.[30] Where there is not sufficient room on site for the replacement trees in the judgment of the City's Parks, Recreation and Library Services Department, another site may be designated that is mutually agreeable.[31]

Inglewood and Lennox Greening Plan

The Social Justice Learning Institute and TreePeople joined forces in 2009 to improve the environmental and health conditions in the City of Inglewood and the adjacent unincorporated community of Lennox in developing the Inglewood and Lennox Greening Plan (Greening Plan).[32] The Greening Plan was completed via a grant provided by the State Strategic Growth Council Urban Greening and Sustainable Communities Planning Grant Program, under the authority of the Safe Drinking Water, Water Quality and Supply, Flood Control, River and Coastal Protection Bond Act of 2006 (Proposition 84).[33]

The Greening Plan is meant to serve as a master document to guide and coordinate greening efforts within Inglewood and Lennox. Priority actions include increasing tree canopy cover, building community gardens and implementing practices to capture and conserve rainwater on select sites identified in the Plan. Strategies have also been developed that will increase opportunities for active living and enhanced community health. In the Greening Plan, the term "greening" encompasses a comprehensive suite of objectives, activities, and strategies outlined throughout the plan.

26 Inglewood, California, Municipal Code, Chapter 12, Article 32, Section 12-117 (2012).
27 City of Inglewood, "Master Fee Schedule", September 2016.
28 Inglewood, California, Municipal Code, Chapter 12, Article 32, Section 12-117 (2012).
29 International Society of Arboriculture, *Guide for Plan Appraisal, 10th Edition*, 2018.
30 Inglewood, California, Municipal Code, Chapter 12, Article 23, Section 12-116 (2012).
31 *Id*.
32 TreePeople, *Inglewood and Lennox Greening Plan*, December 2016.
33 California Code of Regulations, Division 43. The Safe Drinking Water, Water Quality and Supply, Flood Control, River and Coastal Protection Bond Act of 2006.

4.3.4 EXISTING CONDITIONS

The proposed Project is located in the central and northern portions of the City of Inglewood, east of the San Diego Freeway (I-405) and north of the Glen Anderson Freeway (I-105) in Los Angeles County, California. The proposed Project would begin along Market Street near the Metro Crenshaw/LAX Line and proceed south through downtown Inglewood, east on Manchester Boulevard, and south on Prairie Avenue until its intersection with Hardy Street.

As shown in **Section 3.0: Project Description**, **Figure 3.0-3: Project Vicinity Map**, the proposed Project would primarily be confined to public rights-of-way within the City, along with several developed properties adjacent to the proposed Project which would accommodate the guideway, stations, and support facilities; the exception would be for portions of the proposed Project associated with the MSF site that is currently located on private property outside of the right-of-way. An additional TPSS station would be co-located at the City's Civic Center site on Prairie Avenue, which is now under construction and set to open this Fall 2020. The alignment of the guideway and locations of stations, and support facility sites (MSF and TPSSs) consists of developed or disturbed areas adjacent to active roadways. Disturbed land are areas that have been previously disturbed by grading, vehicle use, and/or vegetation clearing and maintenance while urban/developed land are areas that consist of buildings, roadways, and other built infrastructure.

4.3.4.1 Database Review

California Natural Diversity Database

The California Natural Diversity Database (CNDDB)[34] is an inventory of the status and locations of rare plants and animals in California maintained by CDFW. CNDDB staff work with partners to maintain current lists of rare species, as well as to maintain an ever-growing database of GIS-mapped locations for these species.

As part of the environmental review for the Initial Study (see **Appendix 2.0.2**) of the proposed Project completed in 2018, a review of the CNDDB found that the only plant species consist of ornamental landscaping and street trees as well as weeds and ruderal vegetation.

A subsequent review of the CNDDB[35] was completed in June 2020 for the nine quadrangles (the Inglewood Quadrangle in which the prospect is located and the surrounding eight quadrangles including Beverly Hills, Hollywood, Los Angeles, Venice, South Gate, Redondo Beach, Torrance, and Long Beach) that encompass

34 California Department of Fish and Wildlife (CDFW), California Natural Diversity Database, accessed June 2020, https://www.wildlife.ca.gov/Data/CNDDB.

35 CDFW, California Natural Diversity Database, "Maps and Data," accessed June 2020, https://www.wildlife.ca.gov/Data/CNDDB.

the proposed Project.[36] The review indicated that 100 species were identified for the nine quadrangles; this includes 22 species located within the Inglewood quadrant. Of these, five species were previously identified within approximately one mile of the proposed Project. These consisted of two wildlife species, crotch bumble bee (*Bombus crotchii*) and pocketed free-tailed bat (*Nyctinomops femorosaccus*), and three plant species, southern tarplant (*Centromadia parryi ssp. australis*), spreading navarretia (*Navarretia fossalis*), and prostrate vernal pool navarretia (*Navarretia prostrata*). Spreading navarretia and prostrate vernal pool navarretia are presumed extirpated from the area. The other species are presumed extant, but only occur in specific habitats that are not located within the footprint of the proposed Project.[37]

The CNDDB does not list any recently recorded observations of sensitive plant or animal species or sensitive habitats protected by State or federal law. However, it should be noted that a lack of records in CNDDB should not be construed to mean that no rare plants or animals occur in a given area.

eBird Database

The eBird[38] is the world's largest biodiversity-related citizen science project, with more than 100 million bird sightings contributed each year by eBirders around the world. eBirders are a collaborative enterprise with hundreds of partner organizations, thousands of regional experts, and hundreds of thousands of users, and is managed by the Cornell Lab of Ornithology.

A review of the eBird database was completed in June 2020.[39] Common bird species noted in the eBird database historically observed within the area near the proposed Project include Brewer's Blackbird (*Euphagus cyanocephalus*), Black-bellied Plover (*Pluvialis squatarola*), Tricolored Blackbird (*Agelaius tricolor*), Canada Goose (*Branta canadensis*), Northern Rough-winged Swallow (*Stelgidopteryx serripennis*), American Coot (*Fulica americana*), Western Bluebird (*Sialia mexicana*), Lincoln's Sparrow (*Melospiza lincolnii*), Brown-headed Cowbird (*Molothrus ater*), Cliff Swallow (*Petrochelidon pyrrhonota*), Bushtit (*Psaltriparus minimus*), white-crowned sparrow (*Zonotrichia leucophrys*), house finch (*Carpodacus mexicanus*), and the common house sparrow (*Passer domesticus*).[40] None of these species are sensitive or protected by State or federal law.

36 See **Appendix 4.3.4: CNDDB Survey** to this Draft EIR.
37 CDFW, California Natural Diversity Database, "Maps and Data," accessed June 2020, https://www.wildlife.ca.gov/Data/CNDDB.
38 Cornell Lab of Ornithology, *eBird*, accessed June 2020, https://ebird.org/about.
39 Cornell Lab of Ornithology, *eBird*, "Hotspot Map," accessed June 2020, https://ebird.org/home.
40 Cornell Lab of Ornithology, *eBird*, "Hotspot Map," accessed June 2020, https://ebird.org/home.

While the proposed Project does not include native habitat areas that are used for wildlife movement or migration corridors, various roadways and proposed support facility sites include and are lined with street trees and other landscaping that could harbor native birds or raptors and their nests.

4.3.4.2 Biological Setting

This section identifies areas within 0.25-mile radius of either side of the proposed Project guideway, stations, and support facility sites for the MSF and TPSSs that may be considered to have biological resources. The proposed Project is located within a highly developed and urbanized area and potential biological resources are limited to a few small parks. These parks are primarily landscaped areas and wildlife species utilizing the parks are mostly those adapted to living in an urban environment.

Sensitive animal and plant species and vegetation communities identified by the CNDDB as having the potential to occur within 0.25-mile radius of either side of the proposed Project's guideway, stations, and support facility sites are largely absent. Due to their mobility, some sensitive bird species may utilize existing mature trees during migration but would not be supported as residents within this urbanized setting.

With the exception of the small pond located within the Inglewood Park Cemetery, there are no wetland areas within 0.25-mile radius of either side of the guideway, stations, support facility sites. Vegetation around this pond is nonnative, landscaped vegetation, but waterfowl were observed utilizing the small amount of open water there. No wildlife corridors exist within this area to support movement of wildlife species other than birds.

There are no Habitat Conservation Plans (HCPs) for this area. Further, there are no Significant Ecological Areas (SEAs) as designated by Los Angeles County Department of Regional Planning located within 0.25-mile radius of either side of the guideway, stations, support facility sites.[41]

Visual surveys were conducted in May 2018. The surveys consisted of visual observation and photographic documentation of all parks and open space areas along the guideway, stations, and support facility sites. During the surveys, mature trees existing in roadway medians directly within the footprint of the proposed Project were also observed.

4.3.4.3 Trees and Landscaping

The Tree Inventory conducted by Pax Environmental on November 15, 16, and 18, and December 6, 2018, covered the entire footprint of the proposed Project, including the public rights-of-way along the length

41 Los Angeles County Department of Regional Planning, Significant Ecological Areas Program, GIS Web Application, accessed June 2020, http://rpgis.isd.lacounty.gov/Html5Viewer/index.html?viewer=GISNET_Public.GIS-NET_Public.

of the guideway, locations of stations and the support facilities (MSF and TPSS sites) with an approximately 50-foot buffer. This inventory involved a more intensive effort to identify and categorize the existing street trees and landscaping within the proposed Project and listed only trees determined to qualify as protected according to the provisions of the City's Tree Preservation Ordinance. The 50-foot buffer area included in the Tree Inventory (refer to **Appendix 4.3.3**) provided a conservative analysis potential impacts to biological resources. See **Figure 4.3-1: Existing Trees – CVS Plaza(a)** through **Figure 4.3-19: Existing Trees – Prairie Avenue(f)** (see end of this section) which shows the exiting tree locations along the guideway and within the acquisition sites. A breakdown of these trees by Project component is provided.

As shown in **Figure 3.0-2: City Location Map**, the proposed Project, including the guideway and stations, support facility sites, would be developed within areas included in the Downtown Transit Oriented Development (TOD) Plan and the western portion of the HPSP area. As such, these Project components would be subject to the provisions with these plans; the remainder of the proposed Project would be subject to the requirements of the IMC.

Guideway

The proposed APM guideway would be approximately 1.6-miles long, elevated approximately 60 feet above existing grade and primarily located within the public right-of-way along Market Street, Manchester Boulevard, and Prairie Avenue with limited encroachments into adjacent areas. All protected trees identified along the guideway consist of nonnative tree species which are commonly used in ornamental landscaping. Protected tree species within these areas predominantly consist of Mexican fan palm, little-leaved fig, narrow-leaved eucalyptus, Jacaranda, Canary Island pine, and Queen palm. See below for more detail.

Market Street

Figure 4.3-2, **Figure 4.3-4**, and **Figure 4.3-5** identify the existing trees along Market Street from Florence Avenue to Manchester Boulevard. **Table 4.3-1: Summary of Protected Trees Along Market Street** summarizes the types of trees located along and within the vicinity of the Market Street segment.

Table 4.3-1
Summary of Protected Trees Along Market Street

Common Name	Scientific Name	Quantity
Brazilian pepper	*Schinus terebinthifolius*	6
Callery pear	*Pyrus calleryana*	3
Canary Island pine	*Pinus canariensis*	1
Carrotwood	*Cupaniopsis anacardioides*	2
Coral tree	*Erythrina caffra*	6
European hackberry	*Celtis australis*	1
Jacaranda	*Jacaranda mimosifolia*	12
Little-leaved Fig	*Ficus microcarpa*	11
Mexican fan palm	*Washingtonia robusta*	2
Narrow-leaved eucalyptus	*Magnolia grandiflora*	22
Queen palm	*Syagrus romanzoffiana*	2
Western sycamore	*Platanus racemosa*	1
N/A[a]	*N/A[a]*	7
Total		76

Source: Tree Inventory, Pax Environmental, Inc., December 10, 2018. Included as ***Appendix 4.3.3*** *of this Draft EIR.*
[a] Unidentified tree species not included in the Tree Inventory but may qualify as protected.

As shown in **Table 4.3-1**, a total of 76 protected trees were identified for the Market Street segment. All 76 trees are located within the Downtown TOD Plan and at least 69 of them qualify as protected by meeting the minimum trunk diameter size requirements of the IMC.[42] As shown, **Table 4.3-1** includes 7 unidentified trees along Market Street which were not accounted for in the Tree Inventory survey but may be considered protected by IMC standards.

Manchester Boulevard

Figure 4.3-5 through **Figure 4.3-8**, and **Figure 4.3-10** through **Figure 4.3-19** identify the existing trees along Manchester Boulevard from Market Street to Prairie Avenue. **Table 4.3-2: Summary of Protected Trees Along Manchester Boulevard** summarizes the types of trees located along and within the vicinity of the Manchester Boulevard segment.

42 City of Inglewood, IMC Section 12-113, Protected Trees.

Table 4.3-2
Summary of Protected Trees Along Manchester Boulevard

Common Name	Scientific Name	Quantity
Callery pear	*Pyrus calleryana*	1
Canary Island pine	*Pinus canariensis*	10
Carrotwood	*Cupaniopsis anacardioides*	2
Fern pine	*Podocarpus gracilior*	2
Italian stone pine	*Pinus pinea*	1
Jacaranda	*Jacaranda mimosifolia*	2
Liquidambar	*Liquidambar styraciflua*	2
Little-leaved Fig	*Ficus microcarpa*	6
Mexican fan palm	*Washingtonia robusta*	68
Queen palm	*Syagrus romanzoffiana*	3
Red Gum	*Eucalyptus camaldulensis*	5
N/A[a]	*N/A[a]*	12
Total		114

*Source: Tree Inventory, Pax Environmental, Inc., December 10, 2018. Included as **Appendix 4.3.3** of this Draft EIR.*
[a] Unidentified tree species not included in the Tree Inventory but may qualify as protected.

As shown in **Table 4.3-2**, a total of 114 protected trees were identified for the Manchester Boulevard segment. All 114 trees are located within the Downtown TOD Plan and at least 102 of them qualify as protected by meeting the minimum trunk diameter size requirements of the IMC.[43] As shown, **Table 4.3-2** includes 12 unidentified trees along Manchester Boulevard which were not accounted for in the Tree Inventory survey but may be considered protected by IMC standards.

Prairie Avenue

Figure 4.3-12 through **Figure 4.3-19** identify the existing trees along Prairie Avenue from Manchester Boulevard to E. 97th Street. **Table 4.3-3: Summary of Protected Trees Along Prairie Avenue** summarizes the types of trees located along and within the vicinity of the Prairie Avenue segment.

43 City of Inglewood, IMC Section 12-113, Protected Trees.

Table 4.3-3
Summary of Protected Trees Along Prairie Avenue

Common Name	Scientific Name	Quantity
Canary Island pine	*Pinus canariensis*	8
Carrotwood	*Cupaniopsis anacardioides*	3
Chinese elm	*Ulmus parvifolia*	5
European hackberry	*Celtis australis*	1
Evergreen ash	*Fraxinus uhdei*	2
Fern pine	*Podocarpus gracilior*	3
Giant yucca	*Yucca gigantea*	2
Gold medallion tree	*Cassia leptophylla*	1
Jacaranda	*Jacaranda mimosifolia*	8
Liquidambar	*Liquidambar styraciflua*	1
Little-leaved Fig	*Ficus microcarpa*	15
Magnolia	*Magnolia grandiflora*	4
Mexican fan palm	*Washingtonia robusta*	22
Peruvian pepper	*Schinus molle*	1
Queen palm	*Syagrus romanzoffiana*	20
Red Gum	*Eucalyptus camaldulensis*	1
Total		97

*Source: Tree Inventory, Pax Environmental, Inc., December 10, 2018. Included as **Appendix 4.3.3** of this Draft EIR.*

As shown in **Table 4.3-3**, a total of 97 protected trees were identified along Prairie Avenue. These trees are not located within a City plan but remain within the jurisdiction of the IMC and qualify as protected by meeting the minimum trunk diameter size requirements of the IMC.[44] As discussed previously, a portion of the proposed Project would be located within the HPSP area which includes the east side of Prairie Avenue from Pincay Drive to Century Boulevard. All street trees located within the HPSP area along Prairie Avenue have already been removed for future development.

The guideway and stations would be developed within areas included in the Downtown TOD Plan and the western portion of the HPSP area. As such, the proposed Project would be subject to the design guidelines included in these plans. The remainder of the guideway would be subject to the requirements of the IMC. While the Downtown TOD Plan and HPSP do not contain provisions regarding the removal of trees or

44 City of Inglewood, IMC Section 12-113, Protected Trees.

protected trees beyond the requirements of the IMC, they do contain unique provisions and recommendations for the location of tree placement and types of tree species to be used.

Acquisition Sites

The proposed Project would require a number of full and/or partial property and air rights acquisitions and easements or leases for construction and continued operation of the guideway, stations, MSF, and other support facilities. The acquisition sites include two retail commercial centers and a and a commercial building as described below.

Market Street/Florence Avenue Station

The CVS Plaza is located along a portion of Market Street and Florence Avenue where the proposed Market Street/Florence Avenue station would be located.

Figure 4.3-1 through **Figure 4.3-3** identify the existing trees associated the CVS Plaza. **Table 4.3-4: Summary of Protected Trees Within the CVS Plaza** summarizes the types of trees associated with the CVS Plaza. As shown in **Table 4.3-4,** a total of 79 protected trees are associated with the CVS Plaza. Of these, 47 are located within the site and are considered private property. The remaining 32 trees are public street trees located throughout the perimeter of the site along Florence Avenue, Locust Street, and Regent Street. All protected trees identified within this area and adjoining parcels consist of nonnative, ornamental tree species which are commonly used in ornamental landscaping. Protected tree species within this site predominantly consist of Little-leaved Fig, Brazilian pepper, and Coral tree. As no protected tree *species* were identified, the 79 trees identified as protected qualified as such by meeting the minimum trunk diameter size requirements of the IMC Section 12-113.[45] This site would be developed within an area included in the Downtown TOD Plan. While the Downtown TOD Plan does not contain provisions regarding the removal of trees or protected trees beyond the requirements of the IMC, it does contain unique provisions and recommendations for the location of tree placement and types of tree species to be used.

Maintenance and Storage Facility (MSF)

The MSF is proposed on a site developed with an existing retail commercial center (Retail Plaza).

Figure 4.3-7 through **Figure 4.3-9** identify the existing trees associated the Retail Plaza. **Table 4.3-5: Summary of Protected Trees Within the Retail Plaza** summarizes the types of trees associated with the Retail Plaza. As shown in **Table 4.3-5**, a total of 175 protected trees are associated with the Retail Plaza. Of

45 City of Inglewood, IMC Section 12-113, Protected Trees.

these, 171 are located within the site and are considered private property. The remaining 4 trees are public street trees located along Nutwood Street. All protected trees identified within the Retail Plaza consist of nonnative, ornamental tree species which are commonly used in ornamental landscaping. Protected tree species within this site predominantly consist of Mexican fan palm, red gum, and Chinese elm. As no protected tree *species* were identified, the 175 trees identified as protected qualified as such by meeting the minimum trunk diameter size of 1.5 inches pursuant of the IMC Section 12-113.[46] The entirety of the MSF would be developed within an area included in the Downtown TOD Plan. While the Downtown TOD Plan does not contain provisions regarding the removal of trees or protected trees beyond the requirements of the IMC, it does contain unique provisions and recommendations for the location of tree placement and types of tree species to be used.

Table 4.3-4
Summary of Protected Trees Within the CVS Plaza

Common Name	Scientific Name	Quantity
Brazilian pepper	*Schinus terebinthifolius*	21
Cajeput	*Melaleuca quinquenervia*	10
California fan palm	*Washingtonia filifera*	2
Canary Island pine	*Pinus canariensis*	2
Coral tree	*Erythrina caffra*	11
European hackberry	*Celtis australis*	1
Little-leaved Fig	*Ficus microcarpa*	31
Mexican fan palm	*Washingtonia robusta*	8
Narrow-leaved eucalyptus	*Magnolia grandiflora*	2
Red Gum	*Eucalyptus camaldulensis*	1
Total		79

Source: Tree Inventory, Pax Environmental, Inc., December 10, 2018. Included as ***Appendix 4.3.3*** *of this Draft EIR.*

APM Guideway

Acquisition and demolition of a commercial building located at 150 S. Market Street is proposed to accommodate the guideway as it moves from Market Street to Manchester Boulevard. There are currently no trees located within this site.

46 City of Inglewood, IMC Section 12-113, Protected Trees.

Table 4.3-5
Summary of Protected Trees Within the Retail Plaza

Common Name	Scientific Name	Quantity
Callery pear	*Pyrus calleryana*	1
Canary Island pine	*Pinus canariensis*	2
Carrotwood	*Cupaniopsis anacardioides*	1
Chinese elm	*Ulmus parvifolia*	10
Fern pine	*Podocarpus gracilior*	2
Jacaranda	*Jacaranda mimosifolia*	2
Liquidambar	*Liquidambar styraciflua*	7
Little-leaved Fig	*Ficus microcarpa*	7
Mexican fan palm	*Washingtonia robusta*	115
Red Gum	*Eucalyptus camaldulensis*	28
Total		175

Source: Tree Inventory, Pax Environmental, Inc., December 10, 2018. Included as ***Appendix 4.3.3*** *of this Draft EIR.*

Traction Power Substations

The proposed Project includes two TPSSs which would be necessary to enable operation of the proposed Project. One of the TPSS sites would be located within the MSF site. As discussed above, the MSF site which includes the first TPSS would be developed within an area included in the Downtown TOD Plan and would be subject to the tree requirements for this plan. The second TPSS would be located within the City's Civic Center site on Prairie Avenue. Detailed site plans for the Civic Center site have not been developed. Therefore, a final location for this TPSS has not yet been determined.

The Civic Center site is an approximately 4-acre site on the southeastern corner of the Prairie Avenue and Arbor Vitae intersection. The landscaping requirements with the proposed Civic Center site in which the second TPSS would be located would be subject to the requirements of the HPSP. While the HPSP does not contain provisions regarding the removal of trees or protected trees beyond the requirements of the IMC, it does contain unique provisions and recommendations for the location of tree placement and types of tree species to be used.

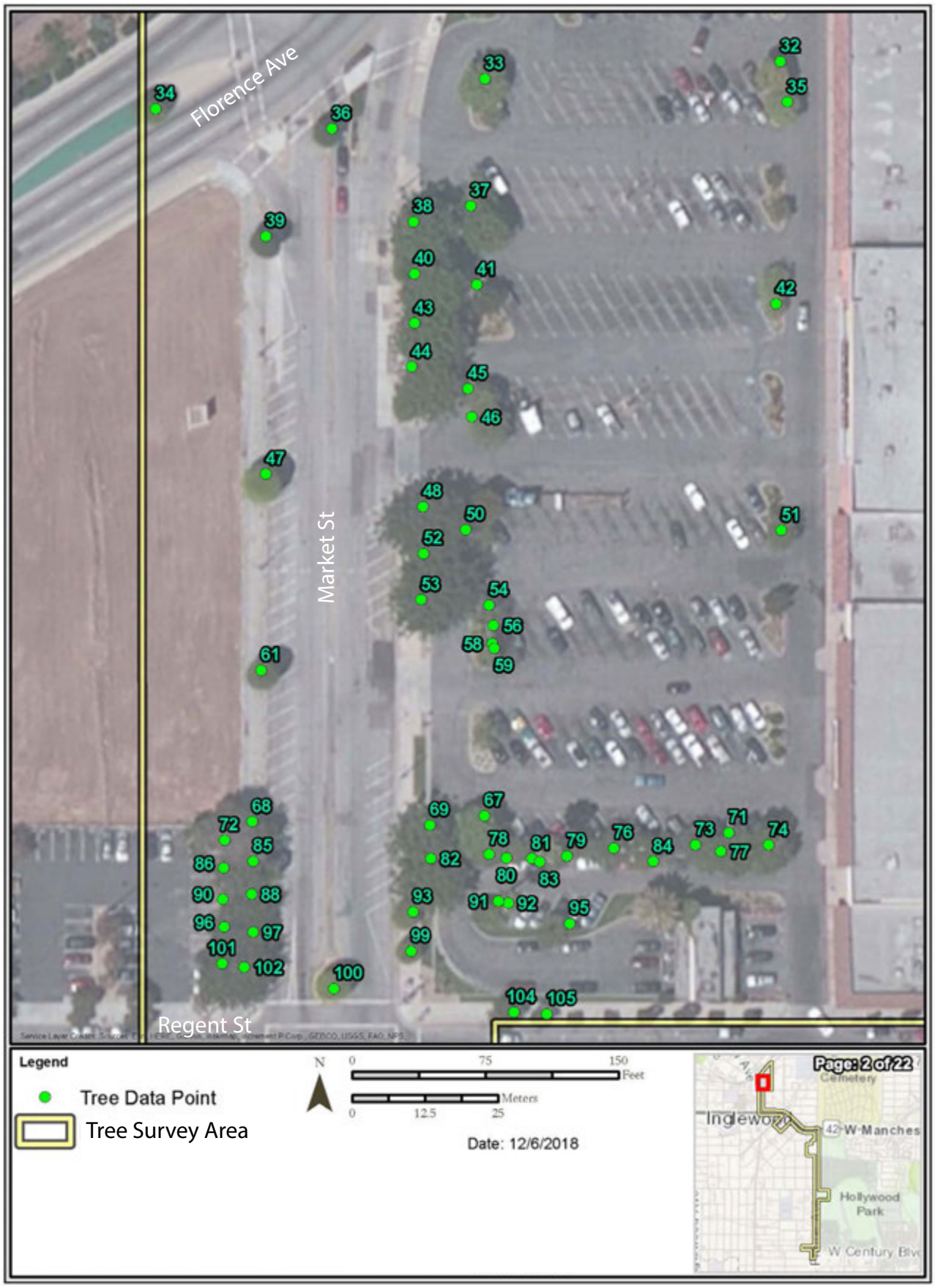


SOURCE: Pax Environmental, Inc. – December 2018; Meridian Consultants - 2020

FIGURE **4.3-1**

Existing Trees – CVS Plaza(a)

208-001-18



SOURCE: Pax Environmental, Inc. – December 2018; Meridian Consultants - 2020

FIGURE **4.3-2**

Existing Trees – CVS Plaza(b)

208-001-18

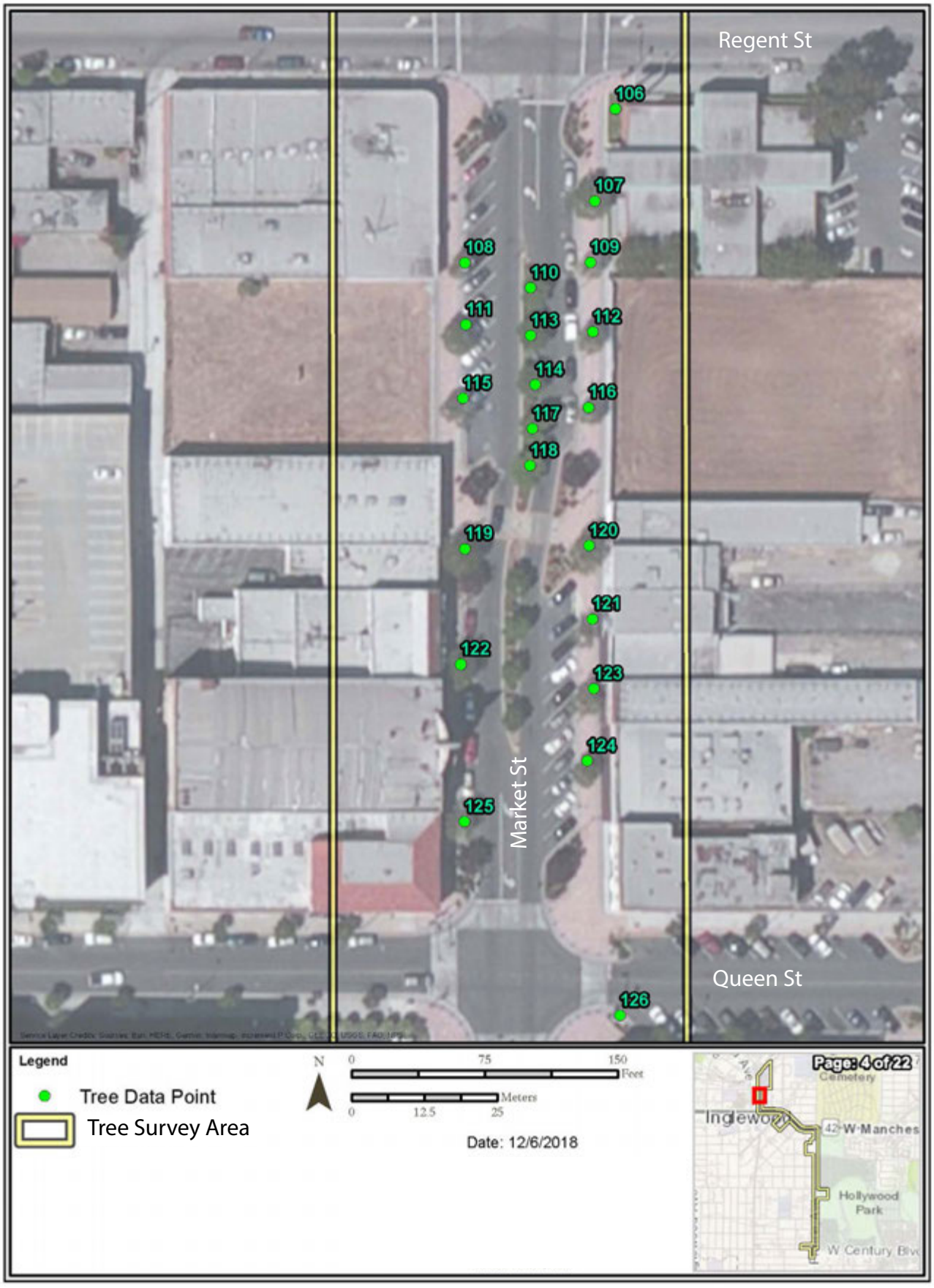


SOURCE: Pax Environmental, Inc. – December 2018; Meridian Consultants - 2020

FIGURE **4.3-3**

Existing Trees – CVS Plaza(c)

208-001-18



SOURCE: Pax Environmental, Inc. – December 2018; Meridian Consultants - 2020

FIGURE **4.3-4**

Existing Trees – Market Street

208-001-18

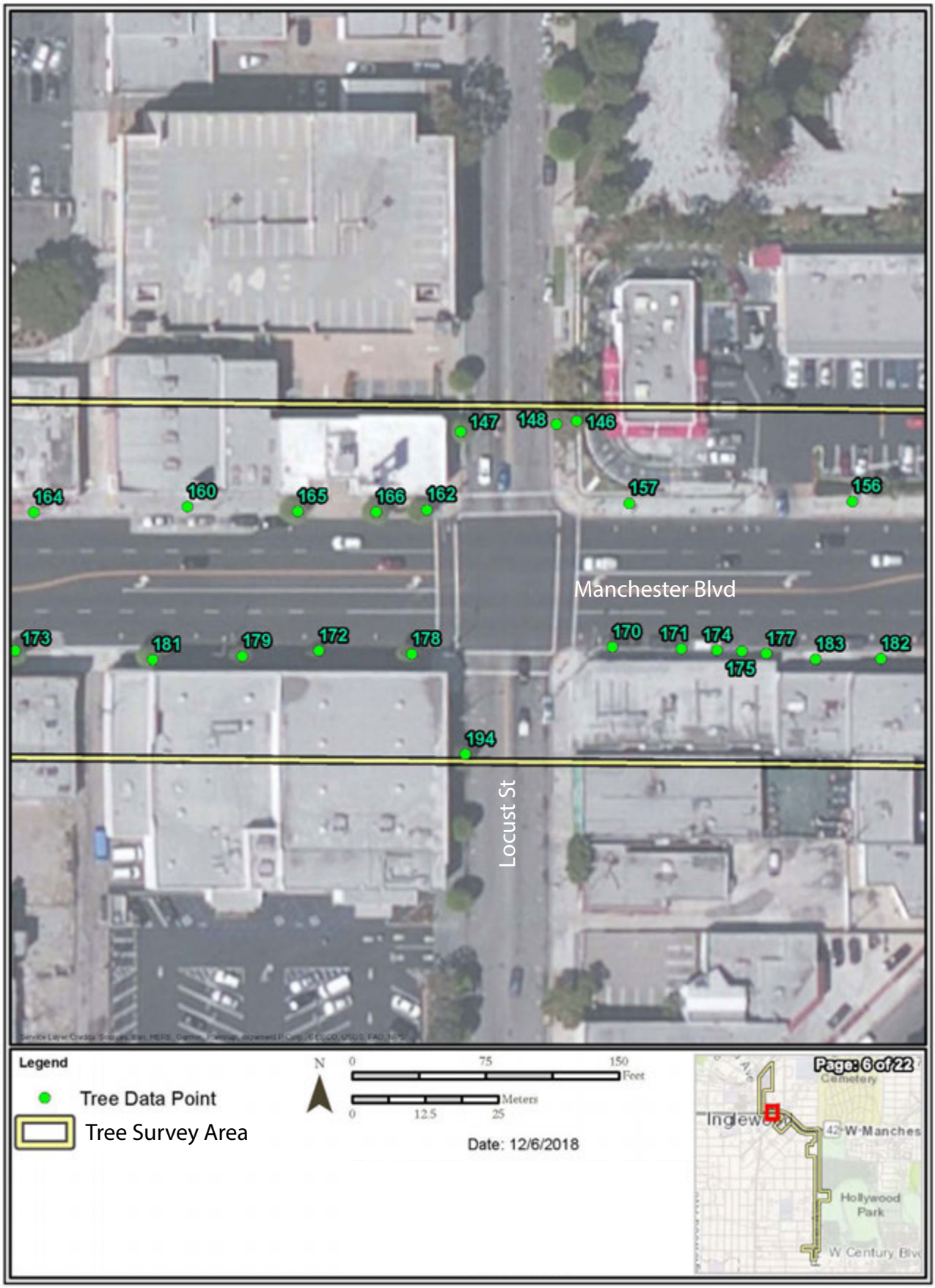


SOURCE: Pax Environmental, Inc. – December 2018; Meridian Consultants - 2020

FIGURE **4.3-5**

Existing Trees – Market Street/Manchester Boulevard

208-001-18

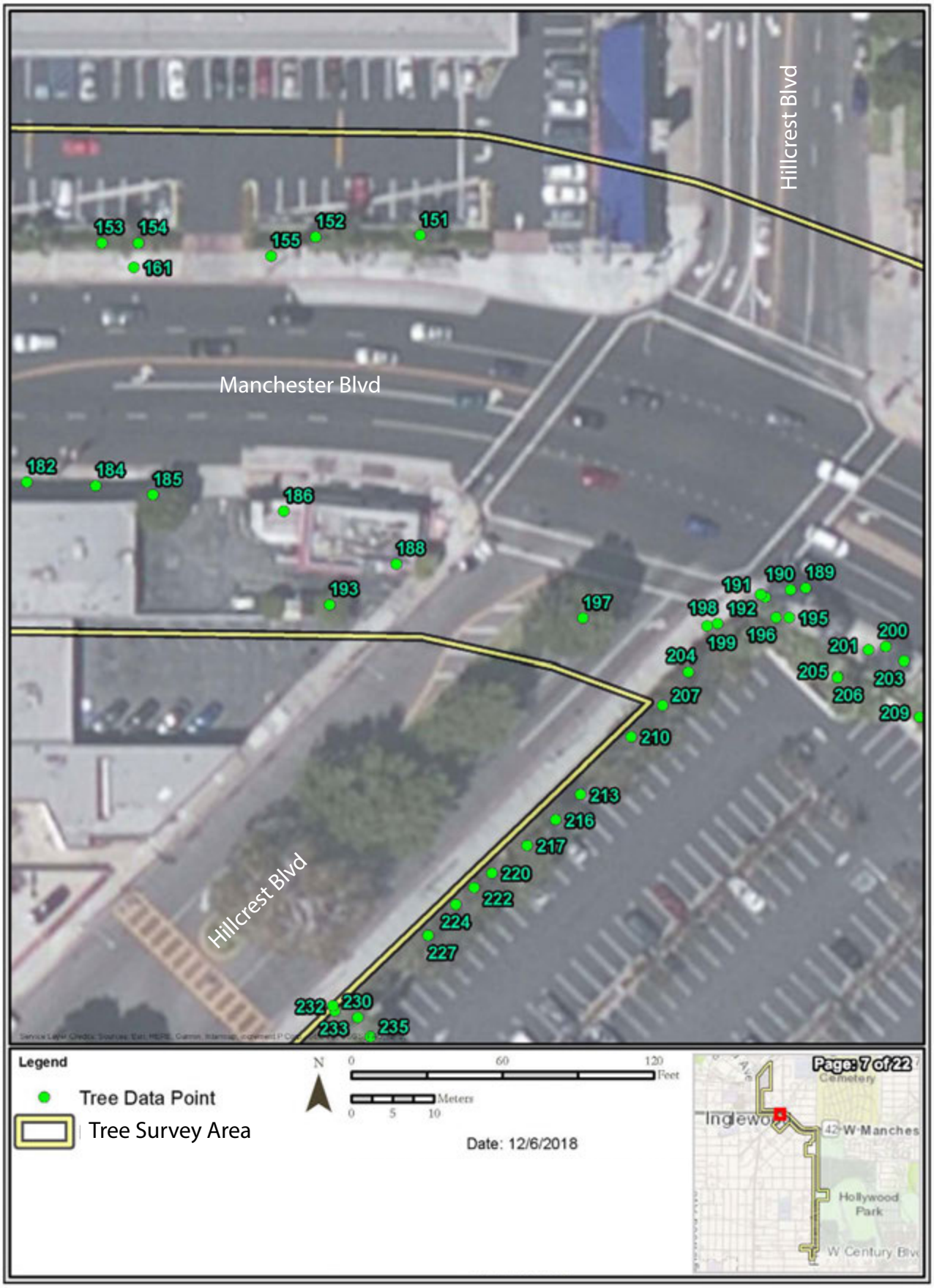


SOURCE: Pax Environmental, Inc. – December 2018; Meridian Consultants - 2020

FIGURE **4.3-6**

Existing Trees – Manchester Boulevard(a)

208-001-18

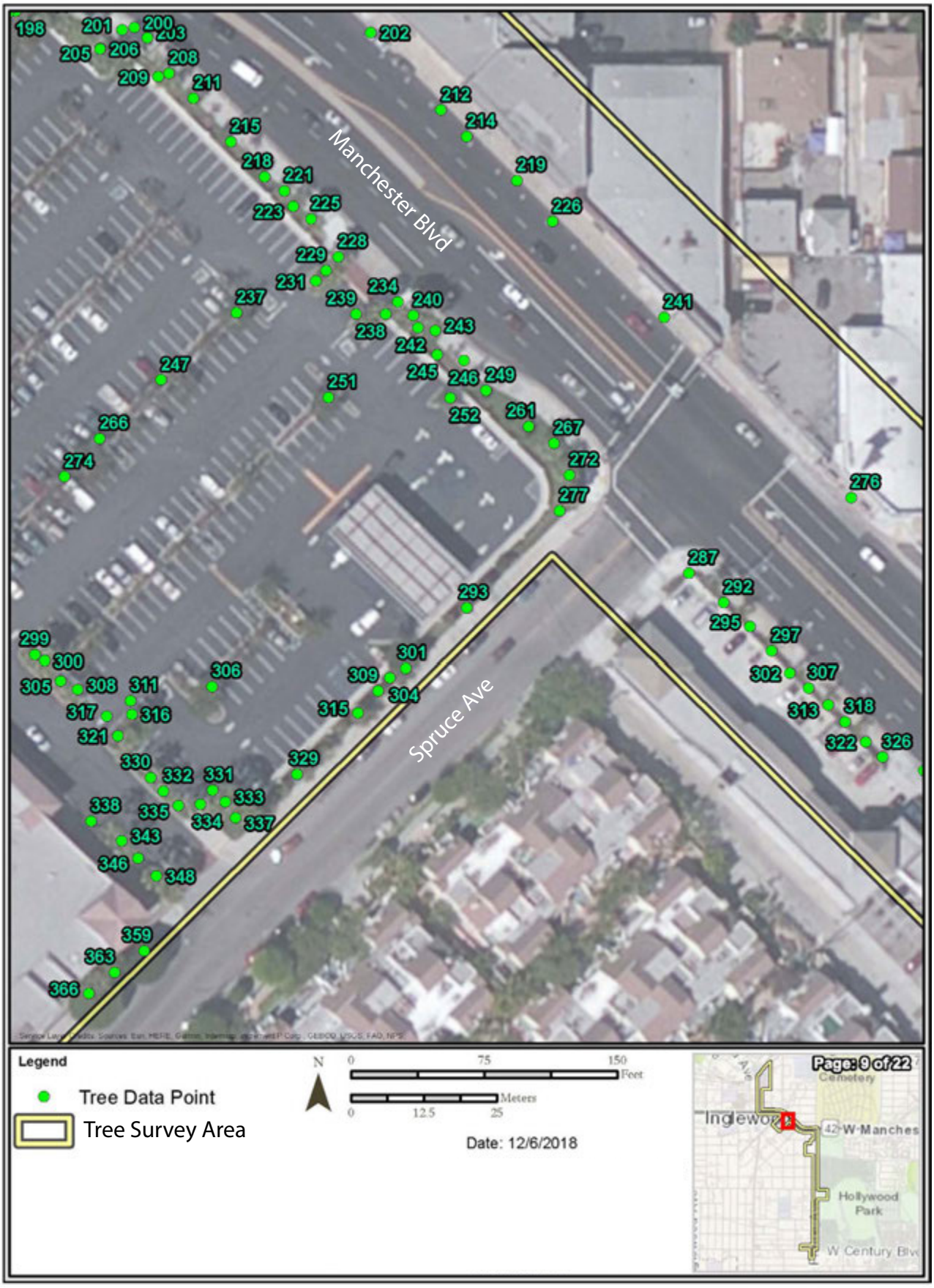


SOURCE: Pax Environmental, Inc. – December 2018; Meridian Consultants - 2020

FIGURE **4.3-7**

Existing Trees – Manchester Boulevard/Vons Plaza(a)

208-001-18

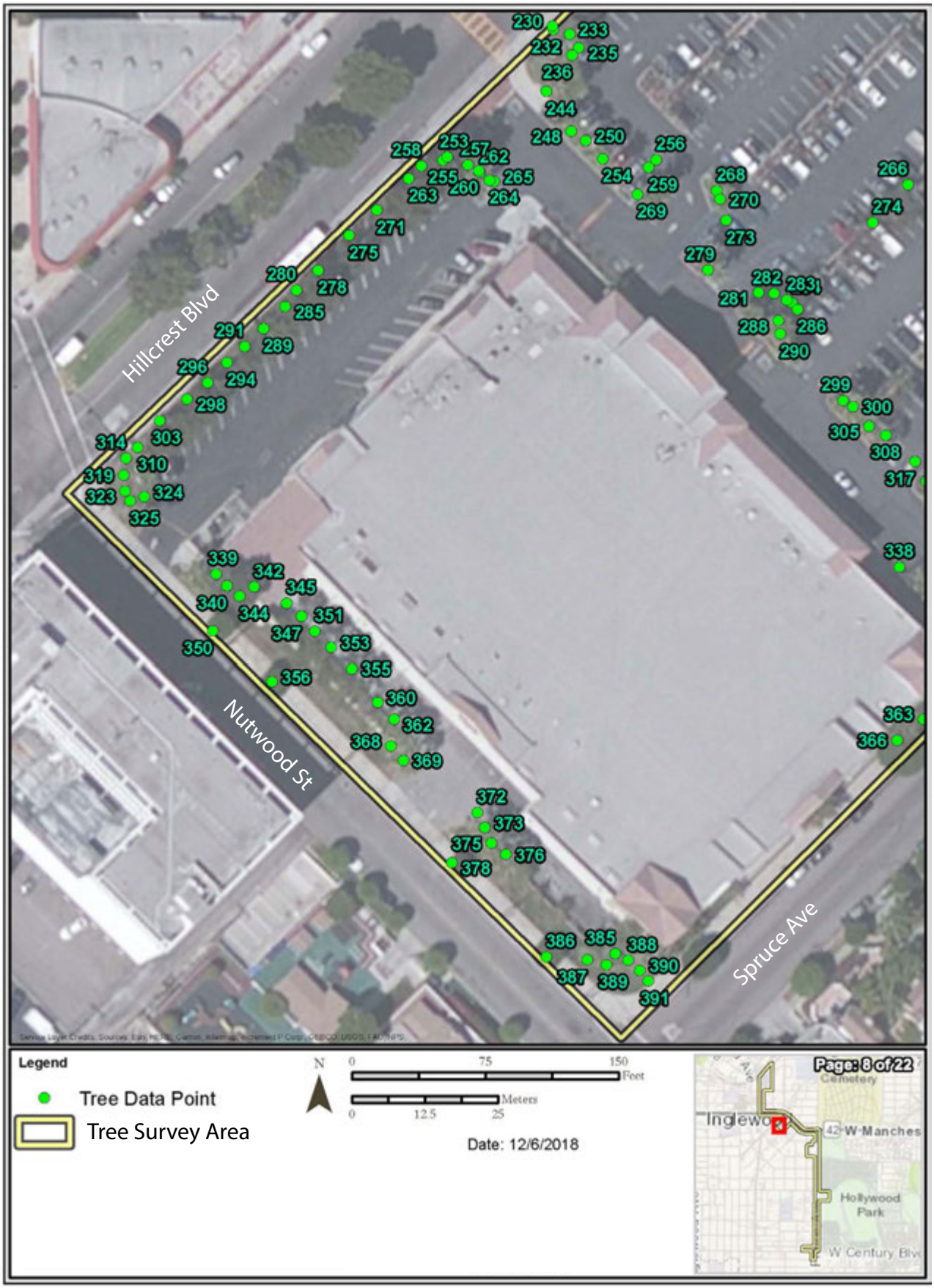


SOURCE: Pax Environmental, Inc. – December 2018; Meridian Consultants - 2020

FIGURE **4.3-8**

Existing Trees – Manchester Boulevard/Vons Plaza(b)

208-001-18



SOURCE: Pax Environmental, Inc. - December 2018; Meridian Consultants - 2020

FIGURE **4.3-9**

Existing Trees – Vons Plaza

208-001-18



SOURCE: Pax Environmental, Inc. - December 2018; Meridian Consultants - 2020

FIGURE **4.3-10**

Existing Trees – Manchester Boulevard(b)

208-001-18



SOURCE: Pax Environmental, Inc. - December 2018; Meridian Consultants - 2020

FIGURE **4.3-11**

Existing Trees – Manchester Boulevard(c)

208-001-18



SOURCE: Pax Environmental, Inc. - December 2018; Meridian Consultants - 2020

FIGURE **4.3-12**

Existing Trees – Manchester Boulevard/Prairie Avenue

208-001-18



SOURCE: Pax Environmental, Inc. - December 2018; Meridian Consultants - 2020

FIGURE **4.3-13**

Existing Trees – Osage Avenue

208-001-18



SOURCE: Pax Environmental, Inc. - December 2018; Meridian Consultants - 2020

FIGURE **4.3-14**

Existing Trees – Prairie Avenue(a)

208-001-18



SOURCE: Pax Environmental, Inc. - December 2018; Meridian Consultants - 2020

FIGURE **4.3-15**

Existing Trees – Prairie Avenue(b)

208-001-18

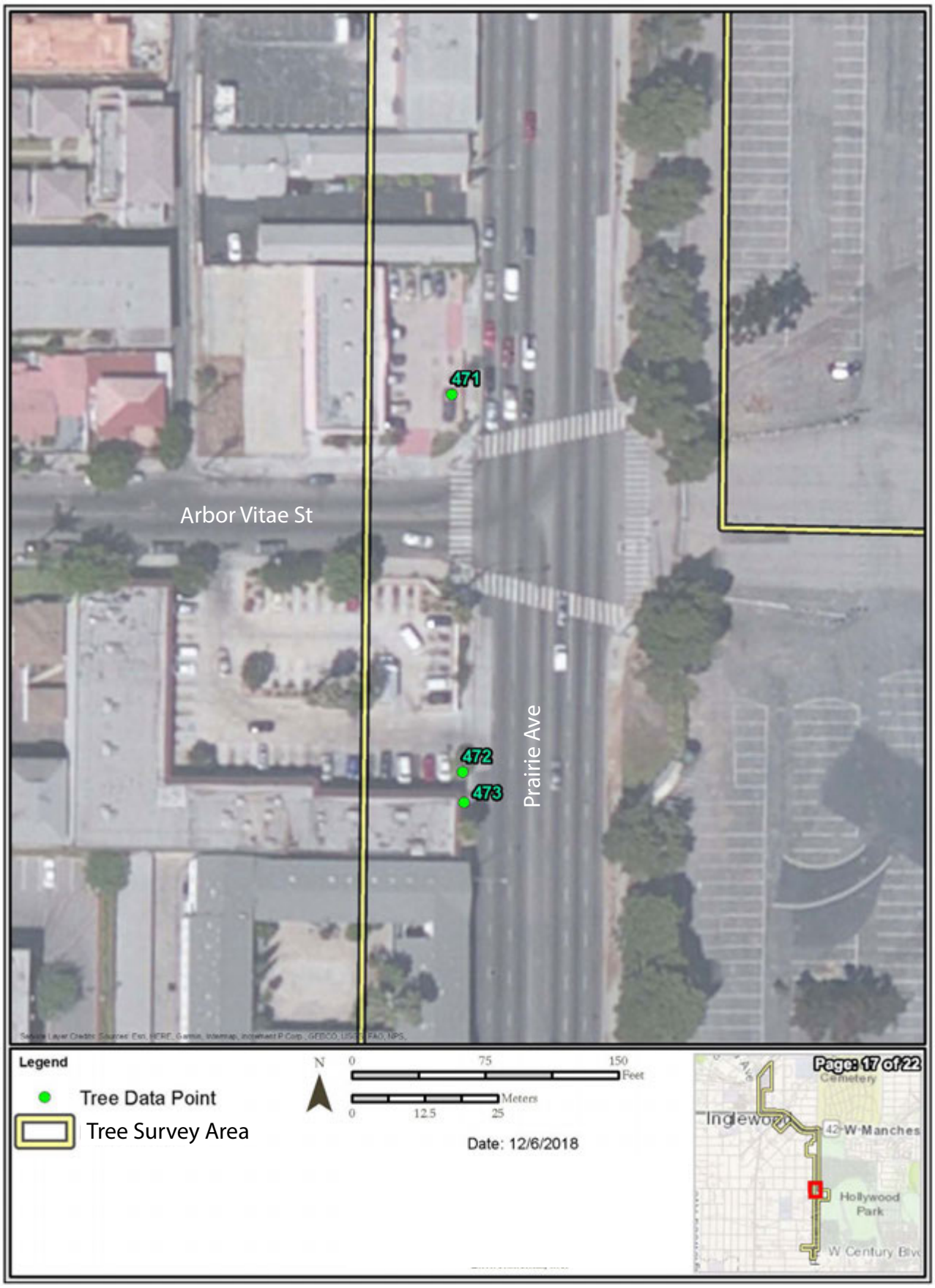


SOURCE: Pax Environmental, Inc. - December 2018; Meridian Consultants - 2020

FIGURE **4.3-16**

Existing Trees – Prairie Avenue(c)

208-001-18

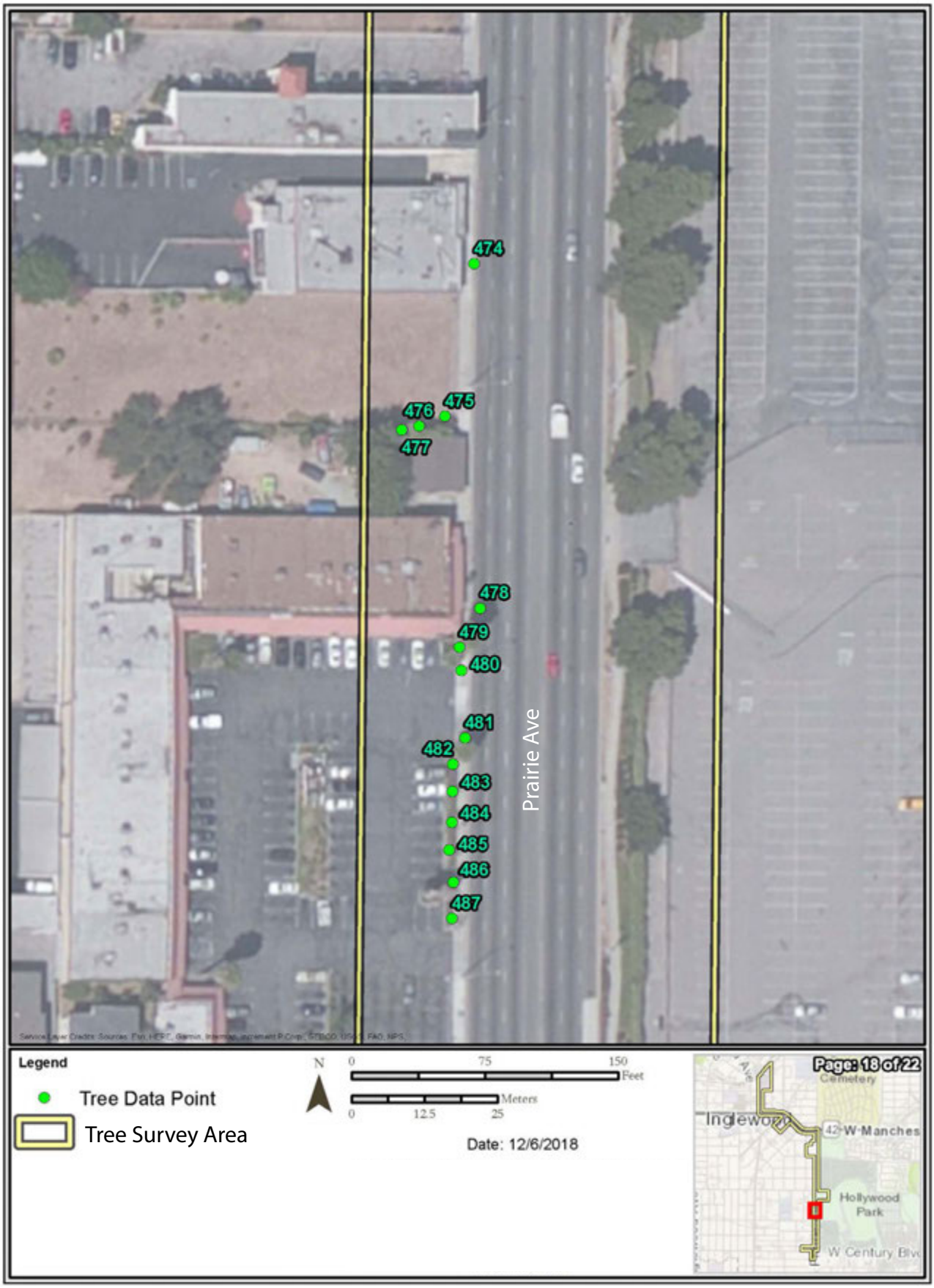


SOURCE: Pax Environmental, Inc. - December 2018; Meridian Consultants - 2020

FIGURE **4.3-17**

Existing Trees – Prairie Avenue(d)

208-001-18

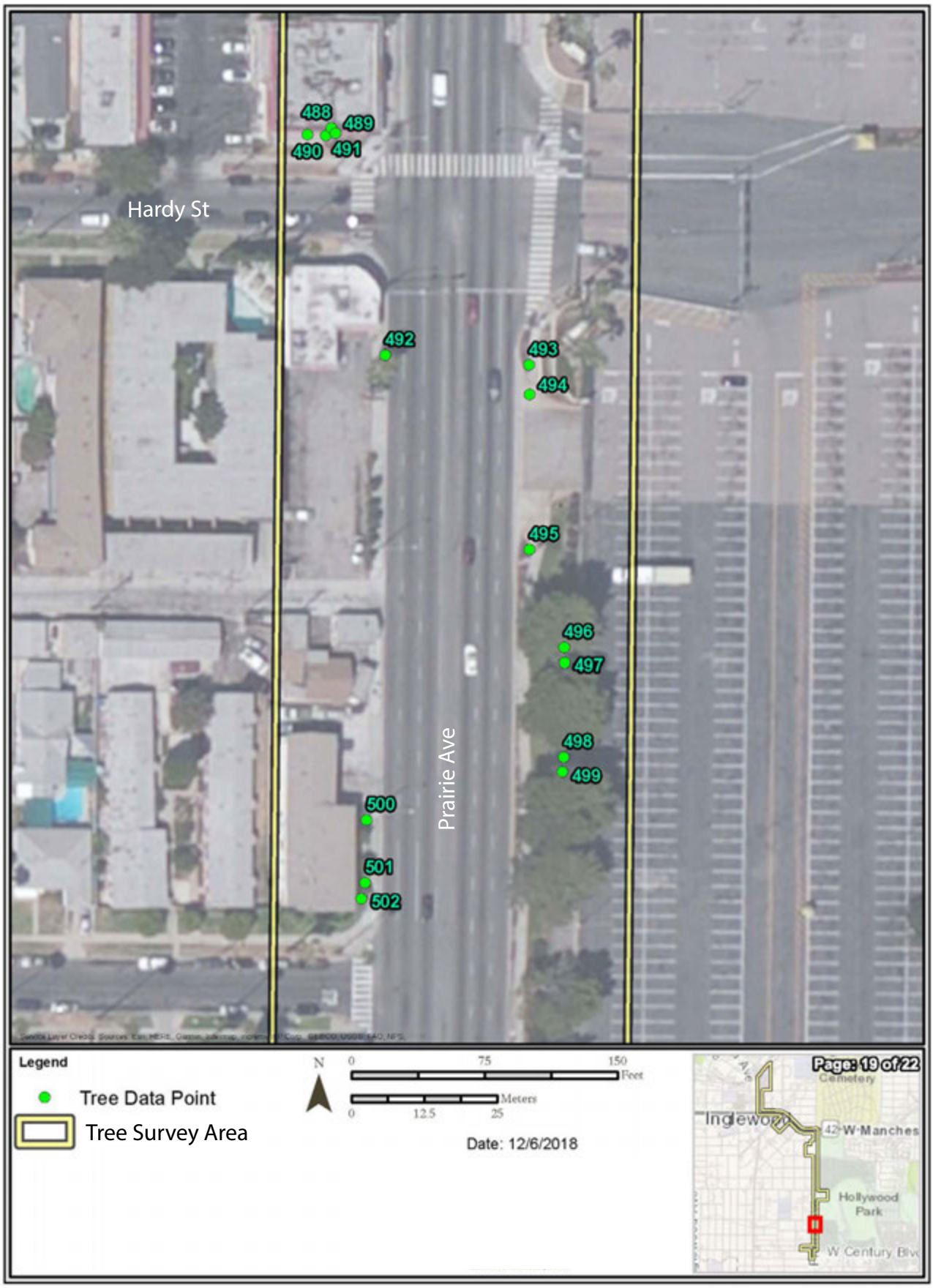


SOURCE: Pax Environmental, Inc. - December 2018; Meridian Consultants - 2020

FIGURE **4.3-18**

Existing Trees – Prairie Avenue(e)

208-001-18



SOURCE: Pax Environmental, Inc. - December 2018; Meridian Consultants - 2020

FIGURE **4.3-19**

Existing Trees – Prairie Avenue(f)

208-001-18

4.3.4.4 Wildlife

Birds

Common bird species historically observed near the proposed Project as noted in the CNDDB[47] and eBird[48] database include Brewer's Blackbird (Euphagus cyanocephalus), Black-bellied Plover (Pluvialis squatarola), Tricolored Blackbird (Agelaius tricolor), Canada Goose (Branta canadensis), Northern Rough-winged Swallow (Stelgidopteryx serripennis), American Coot (Fulica americana), Western Bluebird (Sialia mexicana), Lincoln's Sparrow (Melospiza lincolnii), Brown-headed Cowbird (Molothrus ater), Cliff Swallow (Petrochelidon pyrrhonota), Bushtit (Psaltriparus minimus), white-crowned sparrow (Zonotrichia leucophrys), house finch (Carpodacus mexicanus), and the common house sparrow (Passer domesticus).[49] None of these species are sensitive or protected by State or federal law.

Given the nature that birds will nest in a variety of trees and other locations, the possibility exists that these species listed above, as well as others, may be present and nest in existing trees within the footprint of the proposed Project

Other Wildlife Species

Wildlife species identified during the most recent review of the CNDDB crotch bumble bee (*Bombus crotchii*) and pocketed free-tailed bat (*Nyctinomops femorosaccus*). However, observation of neither species has been recently recorded on site; observation of the pocketed free-tailed bat was last recorded in 1994 and the crotch bumble bee in 1953.[50]

Additionally, the CDFW describes the habitat used by the pocketed free-tailed bat as including rock crevices in cliffs in pinyon-juniper woodlands, desert scrub, desert succulent shrub, desert riparian, desert wash, alkali desert scrub, Joshua tree, and palm oasis.[51] Habitat used by the crotch bumble bee consists of shrubland and grassland.[52] None of these habitats occur within or are adjacent to the proposed Project.

Wildlife in the area predominantly consists of domesticated animals and pets, though wild animals that are capable of living in close proximity to man, such as birds, skunks, and squirrels, are found in the area.

47 CDFW, California Natural Diversity Database, "Maps and Data," accessed June 2020, https://www.wildlife.ca.gov/Data/CNDDB.
48 Cornell Lab of Ornithology, *eBird*, "Hotspot Map," accessed June 2020, https://ebird.org/home.
49 Cornell Lab of Ornithology, *eBird*, "Hotspot Map," accessed June 2020, https://ebird.org/home.
50 CDFW, California Natural Diversity Database, "Maps and Data," accessed June 2020, https://www.wildlife.ca.gov/Data/CNDDB.
51 CDFW, California Interagency Wildlife Task Group, *California Wildlife Habitat Relationships System*, "Pocketed Free-Tailed Bat," accessed June 2020, https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=2353.
52 International Union for Conservation of Nature, "Crotch bumble bee," accessed June 2020, https://www.iucnredlist.org/species/44937582/46440211.

4.3.5 ADJUSTED BASELINE

As discussed previously, the street trees along Prairie Avenue have since been removed for the development of the HPSP. Moreover, the HPSP area would be fully developed ,per the design guidelines of the HPSP, prior to the construction of the proposed Project.[53] The HPSP calls for large columnar evergreen trees such as Afghan pine (*Pinus eldarica*) or Canary Island pine (*Pinus canariensis*) along Prairie Avenue north of Hardy Street. This arrangement will visually reduce the scale of the street and will provide ample shade as visitors approach the Hollywood Park entries. In addition, large-canopy flowering trees and palms will mark major entry points and maintain adequate street visibility.

Landscaping along Prairie Avenue would also include a setback area which would serve as a primary welcoming edge of Hollywood Park. The Prairie Avenue setback will feature drought-tolerant plantings which will add a lush Mediterranean character to the spaces. Specifically, plant materials within the formal entrances will include hedges, colorful flowering groundcovers and various flowering trees. Taller evergreen hedges and shrubs will be used to create strong entry drives and to screen undesirable views.

4.3.6 THRESHOLDS OF SIGNIFICANCE

Criteria outlined in the CEQA Guidelines were used to determine the level of significance of biological resource impacts. Appendix G of the State CEQA Guidelines indicates that a project would have a significant impact in relation to biological resources if it were to:

Threshold BIO-1: **Interfere substantially with the movement of any resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.**

Threshold BIO-2: **Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.**

4.3.6.1 ITC Construction Commitment Program

The proposed Project includes the ITC Construction Commitment Program (CCP) to proactively address the potential effects of the construction of the Project on the community. The CCP identifies features and actions incorporated into the Project to lessen or avoid potential impacts. The CCP contains the following requirements related to the removal and replacement of trees:

53 City of Inglewood, *Hollywood Park Specific Plan*, adopted July 8, 2009, amended September 23, 2014, and further amended February 24, 2015., Chapter 3, Design Guidelines.

Tree Removal and Replacement

Tree removal will be avoided wherever possible. The Contractor shall strictly comply with a tree removal and replacement plan that will ensure that any landscaping removed as a result of Contract Construction is eventually returned to its condition prior to removal. The tree removal and replacement plan shall be approved in writing by the City before any trees are removed and shall substantially conform to the following requirements:

- Requirement set forth in the mitigation requirements of the environmental review.
- New permanent replacement trees shall be a 36-inch box of the same species and planted in the same location as the removed tree when not in conflict with new infrastructure, in which case the City's Public Works Department shall designate an alternative location, type and/or size.
- New permanent replacement palm trees shall be a minimum 20 feet in height.
- The Contractor shall permanently replace trees within six (6) months of restoration and completion of that portion of streets that may impact the tree. To the extent feasible, the Contractor shall permanently replace trees on an ongoing basis so long as doing so does not conflict with future construction.
- If construction of the project requires pruning of native tree species, the pruning shall be performed in a manner that does not cause permanent damage or adversely affect the health of the trees.

The Contractor shall coordinate with the City's Public Works Department to ensure that the tree removal and replacement plan is executed to the satisfaction of Public Works. The Contractor shall maintain all permanent trees and other landscaping installed by the Contractor for a period of three (3) years from the date of planting and shall warranty the trees and landscaping for one (1) year after planting. Prior to the end of the one-year warranty period, the City and the Contractor will conduct an inspection of all permanent replacement trees and landscaping for general health as a condition of final acceptance by the City. If, in the City's determination, a permanent replacement tree or landscaping does not meet the health requirements of the City, then the Contractor shall replace that tree within thirty (30) days. For any permanent trees or landscaping that must then be removed, the original warranty shall be deemed renewed commencing from when the tree or landscaping is replaced.

4.3.7 IMPACT ANALYSIS FOR THE PROPOSED PROJECT

The environmental impact analysis presented below is based on determinations made in the Initial Study for impacts considered to be potentially significant.

Impact BIO-1: Would the project interfere substantially with the movement of any resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Sensitive animal and plant species and vegetation communities identified by the CNDDB as having the potential to occur within 0.25 mile radius of either side of the proposed Project, including the guideway and stations, support facility sites are largely absent. Due to their mobility, some sensitive bird species may utilize existing mature trees during migration but would not be supported as residents within this urbanized setting. With the exception of the small pond located within the Inglewood Park Cemetery, there are no wetland areas within 0.25 mile radius of either side of the proposed Project, including the guideway and stations, support facility sites. Vegetation around this pond is nonnative, landscaped vegetation, but waterfowl were observed utilizing the small amount of open water there. No wildlife corridors exist within this area to support movement of wildlife species other than birds.

Construction

Impacts to nesting birds from the removal of street trees within areas that could be directly affected by the proposed Project's demolition and clearing of existing vegetation, and construction and improvements were inventoried along the guideway, stations, and support facility locations. Common bird species historically observed in the area of the proposed Project as noted in the CNDDB and eBird database include Brewer's Blackbird (Euphagus cyanocephalus), Black-bellied Plover (Pluvialis squatarola), Tricolored Blackbird (Agelaius tricolor), Canada Goose (Branta canadensis), Northern Rough-winged Swallow (Stelgidopteryx serripennis), American Coot (Fulica americana), Western Bluebird (Sialia mexicana), Lincoln's Sparrow (Melospiza lincolnii), Brown-headed Cowbird (Molothrus ater), Cliff Swallow (Petrochelidon pyrrhonota), Bushtit (Psaltriparus minimus), white-crowned sparrow (Zonotrichia leucophrys), house finch (Carpodacus mexicanus), and the common house sparrow (Passer domesticus).[54]

The review of the CNDDB notes that the pocketed free-tailed bat (*Nyctinomops femorosaccus*) and crotch bumble bee (*Bombus crotchii*) have been observed within a one-mile area of the proposed Project, including the guideway and stations, and support facility sites. However, observations of neither species have been recently recorded in the area; the last recorded observation of the pocketed free-tailed bat was

54 Cornell Lab of Ornithology, *eBird*, "Hotspot Map," accessed June 2020, https://ebird.org/home.

in 1994 and the crotch bumble bee in 1953.[55] Additionally, the CDFW describes the habitat used by the pocketed free-tailed bat as including rock crevices in cliffs in pinyon-juniper woodlands, desert scrub, desert succulent shrub, desert riparian, desert wash, alkali desert scrub, Joshua tree, and palm oasis.[56] Habitat used by the crotch bumble bee consists of shrubland and grassland.[57] Given that these species occur in specific habitats that do not occur within or near the proposed Project, including the guideway and stations, and support facility sites, as the area is completely developed and paved area with no natural plant communities, the pocketed free-tailed bat or crotch bumble bee are not anticipated to be encountered within the proposed Project, including the guideway and stations, support facility sites during demolition and clearing of existing vegetation, and construction.

The removal of trees will require that the proposed Project meet the requirements of the City's Municipal Code relative to tree preservation. In accordance with the IMC, the proposed Project will be required to plant replacement trees for every protected tree that would be removed within the areas subject to IMC provisions, after having obtained a permit to do so from the City.[58] Replacement trees are required to be replaced at a 1:1 ratio minimum and with a tree of like-size and species or an equal value tree (or trees) as determined by the City. The CCP, contained in **Appendix 3.0.5**, addresses tree removals and replacement. This program requires that tree removals be avoided where possible, and that all trees removed be replaced with a 36-inch box tree of the same species and planted in the same general location as the tree being removed within 6 months of the completion of any construction work that could impact the replacement tree. To comply with the requirements of the Tree Preservation Ordinance, an application for a Protected Tree Removal or Cutting Permit shall be filed for removal of the protected trees along with the inspection fee as specified in the City's Master Fee Schedule.[59] The application shall be filed and approved prior to any tree removal, relocation or cutting, per City Ordinance.[60]

Guideway

Market Street

Several common bird species were historically observed in the area as noted in the CNDDB and eBird database. As discussed previously, a total of approximately 76 trees have been recorded along Market

55 CDFW, California Natural Diversity Database, "Maps and Data," accessed June 2020., https://www.wildlife.ca.gov/Data/CNDDB.
56 CDFW, California Interagency Wildlife Task Group, *California Wildlife Habitat Relationships System*, "Pocketed Free-Tailed Bat," accessed June 2020, https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=2353.
57 International Union for Conservation of Nature, "Crotch bumble bee," accessed June 2020, https://www.iucnredlist.org/species/44937582/46440211.
58 City of Inglewood, IMC Section 12-113, Protected Trees.
59 City of Inglewood, Master Fee Schedule, September 2016.
60 City of Inglewood, Ordinance 12-06 5-8-12 and Ordinance 13-04 11-5-13.

Street. Given the nature that birds will nest in a variety of trees and other locations, the possibility exists that trees located along Market Street may provide habitat for wildlife.

Demolition and clearing of existing vegetation, and construction of the guideway would result in removals and/or trimming of trees and other ornamental vegetation along Market Street. As such, removal and/or trimming of trees along Market Street could result in impacts to migratory or nesting birds, or raptors protected under the MBTA[61] and/or California Fish and Game Code.[62]

Impacts to biological resources from demolition and clearing of existing vegetation, and construction of the guideway along Market Street are potentially significant because tree and vegetation trimming or removal could interfere with the movement of resident or migratory wildlife species that could occur within the area.

Manchester Boulevard

Several common bird species were historically observed in the area as noted in the CNDDB and eBird database. As discussed previously, a total of approximately 114 trees have been recorded along Manchester Boulevard. Given the nature that birds will nest in a variety of trees and other locations, the possibility exists that trees located along Manchester Boulevard may provide habitat for wildlife.

Demolition and clearing of existing vegetation, and construction of the guideway would result in removals and/or trimming of trees and other ornamental vegetation along Manchester Boulevard. As such, removal and/or trimming of trees along Manchester Boulevard could result in impacts to migratory or nesting birds, or raptors protected under the MBTA[63] and/or California Fish and Game Code.[64]

Impacts to biological resources from demolition and clearing of existing vegetation, and construction of the guideway along Manchester Boulevard are potentially significant because tree and vegetation

61 U.S. Fish and Wildlife Service (USFWS), Migratory Bird Treaty Act of 1918 (16 U.S.C. 703-712; Ch. 128; July 3, 1918; 40 Stat. 755) as amended by: Chapter 634; June 20, 1936; 49 Stat. 1556; P.L. 86-732; September 8, 1960; 74 Stat. 866; P.L. 90-578; October 17, 1968; 82 Stat. 1118; P.L. 91-135; December 5, 1969; 83 Stat. 282; P.L. 93-300; June 1, 1974; 88 Stat. 190; P.L. 95-616; November 8, 1978; 92 Stat. 3111; P.L. 99-645; November 10, 1986; 100 Stat. 3590 and P.L. 105-312; October 30, 1998; 112 Stat. 2956

62 California Department of Fish and Wildlife, Fish and Game Code (FGC), Division 4. Birds and Mammals, [3000 - 4904](Division 4 enacted by Stats. 1957, Ch. 456), Part 2. Birds [3500 - 3864] (Part 2 enacted by Stats. 1957, Ch. 456)

63 U.S. Fish and Wildlife Service (USFWS), Migratory Bird Treaty Act of 1918 (16 U.S.C. 703-712; Ch. 128; July 3, 1918; 40 Stat. 755) as amended by: Chapter 634; June 20, 1936; 49 Stat. 1556; P.L. 86-732; September 8, 1960; 74 Stat. 866; P.L. 90-578; October 17, 1968; 82 Stat. 1118; P.L. 91-135; December 5, 1969; 83 Stat. 282; P.L. 93-300; June 1, 1974; 88 Stat. 190; P.L. 95-616; November 8, 1978; 92 Stat. 3111; P.L. 99-645; November 10, 1986; 100 Stat. 3590 and P.L. 105-312; October 30, 1998; 112 Stat. 2956

64 California Department of Fish and Wildlife, Fish and Game Code (FGC), Division 4. Birds and Mammals, [3000 - 4904](Division 4 enacted by Stats. 1957, Ch. 456), Part 2. Birds [3500 - 3864] (Part 2 enacted by Stats. 1957, Ch. 456)

trimming or removal could interfere with the movement of resident or migratory wildlife species that could occur within the area.

Prairie Avenue

Several common bird species were historically observed in the area as noted in the CNDDB and eBird database. As discussed previously, a total of approximately 97 trees have been recorded along Prairie Avenue. Given the nature that birds will nest in a variety of trees and other locations, the possibility exists that trees located along Prairie Avenue may provide habitat for wildlife.

Demolition and clearing of existing vegetation, and construction of the guideway would result in removals and/or trimming of trees and other ornamental vegetation along Prairie Avenue. As such, removal and/or trimming of trees along Prairie Avenue could result in impacts to migratory or nesting birds, or raptors protected under the MBTA[65] and/or California Fish and Game Code.[66]

Impacts to biological resources from demolition and clearing of existing vegetation, and construction of the guideway along Prairie Avenue are potentially significant because tree and vegetation trimming or removal could interfere with the movement of resident or migratory wildlife species that could occur within the area.

Stations

Market Street/Florence Avenue

The Market Street/Florence station site including the adjoining parcels are currently developed as a commercial shopping center and associated parking lot. The site is landscaped with a variety of trees and other shrubbery. As discussed previously, a total of approximately 79 trees are associated with the Market Street/Florence station site. These existing trees may provide habitat for nesting birds. Several common bird species were historically observed in the area as noted in the most recent CNDDB[67] and eBird[68] database. Given the nature that birds will nest in a variety of trees and other locations, the possibility

65 U.S. Fish and Wildlife Service (USFWS), Migratory Bird Treaty Act of 1918 (16 U.S.C. 703-712; Ch. 128; July 3, 1918; 40 Stat. 755) as amended by: Chapter 634; June 20, 1936; 49 Stat. 1556; P.L. 86-732; September 8, 1960; 74 Stat. 866; P.L. 90-578; October 17, 1968; 82 Stat. 1118; P.L. 91-135; December 5, 1969; 83 Stat. 282; P.L. 93-300; June 1, 1974; 88 Stat. 190; P.L. 95-616; November 8, 1978; 92 Stat. 3111; P.L. 99-645; November 10, 1986; 100 Stat. 3590 and P.L. 105-312; October 30, 1998; 112 Stat. 2956

66 California Department of Fish and Wildlife, Fish and Game Code (FGC), Division 4. Birds and Mammals, [3000 - 4904](Division 4 enacted by Stats. 1957, Ch. 456), Part 2. Birds [3500 - 3864] (Part 2 enacted by Stats. 1957, Ch. 456)

67 CDFW, California Natural Diversity Database, "Maps and Data," accessed June 2020, https://www.wildlife.ca.gov/Data/CNDDB.

68 Cornell Lab of Ornithology, *eBird*, "Hotspot Map," accessed June 2020, https://ebird.org/home.

exists that these species listed above, as well as others, may be present within Market Street/Florence station site.

Demolition of the existing shopping center and construction of the proposed the Market Street/Florence Avenue station would result in removals and/or trimming of trees and other ornamental vegetation. While preservation of trees will be prioritized, in cases where removal and/or trimming of trees is unavoidable, the demolition and construction efforts could result in impacts to migratory or nesting birds, or raptors protected under the MBTA[69] and/or California Fish and Game Code.[70]

Impacts to biological resources from demolition and clearing of existing vegetation, and construction of the Market Street/Florence station are potentially significant because tree and vegetation trimming or removal could interfere with the movement of resident or migratory wildlife species that could occur within the area.

Prairie Avenue/Pincay Drive

The Prairie Avenue/Pincay Drive station would be located above the intersection of Prairie Avenue and Pincay Drive. This station includes the development of dual tracks situated on both sides of the Prairie Avenue right-of-way and include crossover rail switches located on the northern approach of the station.

As discussed previously, a total of approximately 97 trees have been recorded along Prairie Avenue. Demolition and clearing of existing vegetation, and construction of the Prairie Avenue/Pincay Drive station would result in removals and/or trimming of trees and other ornamental vegetation along Prairie Avenue. As such, removal and/or trimming of trees along Prairie Avenue could result in impacts to migratory or nesting birds, or raptors protected under the MBTA[71] and/or California Fish and Game Code.[72]

Impacts to biological resources from demolition and clearing of existing vegetation, and construction of the of the Prairie Avenue/Pincay Drive station are potentially significant because tree and vegetation

69 U.S. Fish and Wildlife Service (USFWS), Migratory Bird Treaty Act of 1918 (16 U.S.C. 703-712; Ch. 128; July 3, 1918; 40 Stat. 755) as amended by: Chapter 634; June 20, 1936; 49 Stat. 1556; P.L. 86-732; September 8, 1960; 74 Stat. 866; P.L. 90-578; October 17, 1968; 82 Stat. 1118; P.L. 91-135; December 5, 1969; 83 Stat. 282; P.L. 93-300; June 1, 1974; 88 Stat. 190; P.L. 95-616; November 8, 1978; 92 Stat. 3111; P.L. 99-645; November 10, 1986; 100 Stat. 3590 and P.L. 105-312; October 30, 1998; 112 Stat. 2956

70 California Department of Fish and Wildlife, Fish and Game Code (FGC), Division 4. Birds and Mammals, [3000 - 4904](Division 4 enacted by Stats. 1957, Ch. 456), Part 2. Birds [3500 - 3864] (Part 2 enacted by Stats. 1957, Ch. 456)

71 U.S. Fish and Wildlife Service (USFWS), Migratory Bird Treaty Act of 1918 (16 U.S.C. 703-712; Ch. 128; July 3, 1918; 40 Stat. 755) as amended by: Chapter 634; June 20, 1936; 49 Stat. 1556; P.L. 86-732; September 8, 1960; 74 Stat. 866; P.L. 90-578; October 17, 1968; 82 Stat. 1118; P.L. 91-135; December 5, 1969; 83 Stat. 282; P.L. 93-300; June 1, 1974; 88 Stat. 190; P.L. 95-616; November 8, 1978; 92 Stat. 3111; P.L. 99-645; November 10, 1986; 100 Stat. 3590 and P.L. 105-312; October 30, 1998; 112 Stat. 2956

72 California Department of Fish and Wildlife, Fish and Game Code (FGC), Division 4. Birds and Mammals, [3000 - 4904](Division 4 enacted by Stats. 1957, Ch. 456), Part 2. Birds [3500 - 3864] (Part 2 enacted by Stats. 1957, Ch. 456)

trimming or removal could interfere with the movement of resident or migratory wildlife species that could occur within the area.

Prairie Avenue/Hardy Street

The Prairie Avenue/Hardy Street station would include a crossover switch on the northern approach and be located above the intersection of Prairie Avenue and Hardy Street, largely within the right-of-way of the existing roadway.

As discussed previously, a total of approximately 97 trees have been recorded along Prairie Avenue. Demolition and clearing of existing vegetation, and construction of the Prairie Avenue/Hardy Street station would result in removals and/or trimming of trees and other ornamental vegetation along Prairie Avenue. As such, removal and/or trimming of trees along Prairie Avenue could result in impacts to migratory or nesting birds, or raptors protected under the MBTA[73] and/or California Fish and Game Code.[74]

Impacts to biological resources from demolition and clearing of existing vegetation, and construction of the of the Prairie Avenue/Hardy Street station are potentially significant because tree and vegetation trimming or removal could interfere with the movement of resident or migratory wildlife species that could occur within the area.

Support Facilities

Maintenance and Storage Facility

Several common bird species were historically observed in the area as noted in the CNDDB and eBird database. Further, approximately 175 trees have been recorded within and immediately near the MSF site. These existing trees may provide habitat for nesting birds. Given the nature that birds will nest in a variety of trees and other locations, the possibility exists that these trees, as well as others, may provide habitat for wildlife.

Demolition and clearing of existing vegetation, and construction of the MSF site would result in removals and/or trimming of trees and other ornamental vegetation. As such, removal and/or trimming of trees

73 U.S. Fish and Wildlife Service (USFWS), Migratory Bird Treaty Act of 1918 (16 U.S.C. 703-712; Ch. 128; July 3, 1918; 40 Stat. 755) as amended by: Chapter 634; June 20, 1936; 49 Stat. 1556; P.L. 86-732; September 8, 1960; 74 Stat. 866; P.L. 90-578; October 17, 1968; 82 Stat. 1118; P.L. 91-135; December 5, 1969; 83 Stat. 282; P.L. 93-300; June 1, 1974; 88 Stat. 190; P.L. 95-616; November 8, 1978; 92 Stat. 3111; P.L. 99-645; November 10, 1986; 100 Stat. 3590 and P.L. 105-312; October 30, 1998; 112 Stat. 2956

74 California Department of Fish and Wildlife, Fish and Game Code (FGC), Division 4. Birds and Mammals, [3000 - 4904](Division 4 enacted by Stats. 1957, Ch. 456), Part 2. Birds [3500 - 3864] (Part 2 enacted by Stats. 1957, Ch. 456)

within or immediately near the MSF site could result in impacts to migratory or nesting birds, or raptors protected under the MBTA and/or California Fish and Game Code.[75]

Impacts to biological resources from demolition and clearing of existing vegetation, and construction of the MSF are potentially significant because tree and vegetation trimming or removal could interfere with the movement of resident or migratory wildlife species that could occur within the area.

Traction Power Substations

The proposed Project will include two TPSS sites; one would be located within the MSF site analyzed above, and a second would be located within the Civic Center site on Prairie Avenue. As previously noted, the City is proposing to develop a Civic Center site on Prairie Avenue; at this time, the exact location for the TPSS has not yet been determined but the substation would be co-located within the 4-acre site. The impacts of flora and fauna associated with the development of the MSF and the TPSS to be co-located with it are discussed above.

The impacts associated with the construction of a TPSS site at the Civic Center site are subject to the site conditions that would be present at the time of construction. As the Civic Center site is located within the HPSP area, it is subject to the requirements of the HPSP with regards to future landscaping. The placement of a TPSS on the Civic Center site would look to avoid the trimming or removal of any trees or other biological resources. If avoidance could not occur, tree and vegetation trimming or removal could result.

Demolition and construction of the TPSS sites would result in removals and/or trimming of trees and other ornamental vegetation. Therefore, removal and/or trimming of trees within or immediately near the TPSS sites could result in impacts to migratory or nesting birds, or raptors protected under the MBTA and/or California Fish and Game Code.[76]

Impacts to biological resources from demolition and clearing of existing vegetation, and construction of the TPSSs are potentially significant because tree and vegetation trimming or removal could interfere with the movement of resident or migratory wildlife species that could occur within the area.

Summary of Construction Impacts

The loss of trees along the proposed Project, including the guideway and stations, support facility sites could reduce nesting opportunities for birds. While preservation of the existing trees will be prioritized, in

75 California Department of Fish and Wildlife, Fish and Game Code (FGC), Division 4. Birds and Mammals, [3000 - 4904](Division 4 enacted by Stats. 1957, Ch. 456), Part 2. Birds [3500 - 3864] (Part 2 enacted by Stats. 1957, Ch. 456)

76 California Department of Fish and Wildlife, Fish and Game Code (FGC), Division 4. Birds and Mammals, [3000 - 4904](Division 4 enacted by Stats. 1957, Ch. 456), Part 2. Birds [3500 - 3864] (Part 2 enacted by Stats. 1957, Ch. 456)

the case where trimming and tree removal is unavoidable, loss of these trees could be considered a potentially significant impact that could affect wildlife movement.

Operation

Guideway and Stations

Operation of the proposed Project, including APM trains using the guideway and stations, would be a part of a developed sites within an urbanized area. Operation of the guideway and stations would not create a significant change in habitat value or nesting sites. The guideway and stations would involve the construction of new buildings and structures, some of which would have windows that could pose obstacles to migratory birds. However, compared to the 220,091 SF of existing commercial uses, the guideway and stations would not include an increased number of windows which may impede migratory birds within the vicinity. During operation of the guideway and stations, it is possible that migratory or nesting birds would build nests within the structure or near the area. However, operation of the guideway and stations would not substantially interfere with these nests once built as the majority of the Project components would remain stationary with exception of the APM train cars.

Exterior lighting associated with these structures would be consistent with the lighting already in place in these areas and any new or remodeled lighting would be consistent with the Design Guidelines for the proposed Project. The Design Guidelines would serve to provide for well designed, energy efficient site lighting that contributes to a safe and inviting atmosphere without casting light into the night sky or adjacent properties. This would be accomplished through measures such as light shielding, automatic controls, and architectural compatibility in design, among others. These measures would have the additional effect of minimizing the potential for lighting of the guideway and stations to attract or disorient nocturnal migrating birds.

The proposed Market Street/Florence Avenue station and adjoining parcels would be within a developed site in an urbanized area. Operation of the proposed Market Street/Florence Avenue station would not create a significant change in habitat value or nesting sites. As there are no native or nonnative vegetated corridors in the proximity of the proposed Project, the potential impact of the proposed station on migratory birds is anticipated to be minimal. During operation of the proposed Market Street/Florence Avenue station, it is possible that migratory or nesting birds would build nests within the structures or near the area. However, operation of the proposed Market Street/Florence Avenue station would not substantially interfere with these nests once built as the majority of the Project components would remain stationary with exception of the APM trains.

Exterior lighting associated with this site would be consistent with the lighting already in place in this area and any new or remodeled lighting would be consistent with the Design Guidelines for the proposed Project. The Design Guidelines would serve to provide for well designed, energy efficient site lighting that contributes to a safe and inviting atmosphere without casting light into the night sky or adjacent properties. This would be accomplished through measures such as light shielding, automatic controls, and architectural compatibility in design, among others. These measures would have the additional effect of minimizing the potential for lighting of the proposed Market Street/Florence Avenue station to attract or disorient nocturnal migrating birds.

The guideway and stations would not diminish the chances for long-term survival of bird species or their habitats. Throughout operation vegetation maintenance and abatement would be performed as needed for City street trees and landscaping on the station and MSF sites. No additional tree and/or ornamental vegetation removals are planned and, as such, no significant impacts to nesting birds/raptors would occur from the operation of the guideway and stations.

Support Facilities

Maintenance and Storage Facility

Operation of the MSF would be within the existing Retail Plaza which is located within an urbanized area of the City. Operation of the MSF site would not create a significant change in habitat value or nesting sites. The MSF site would include the construction of an approximately 97,400 square-foot building which would have windows that could pose obstacles to migratory birds. However, compared to the 220,091 SF of existing commercial uses, the 97,400 square-foot MSF would not include an increased number of windows which may impede migratory birds in the vicinity. During operation of the MSF site, it is possible that migratory or nesting birds would build nests within the structure or near the area. However, operation of the MSF site would not substantially interfere with these nests once built as the majority of the Project components would remain stationary with exception of the APM train cars.

Exterior lighting associated with this site would be consistent with the lighting already in place in this area and any new or remodeled lighting would be consistent with the Design Guidelines for the proposed Project (see **Section 3.0**, *3.5.6*). The Design Guidelines would serve to provide for well designed, energy efficient site lighting that contributes to a safe and inviting atmosphere without casting light into the night sky or adjacent properties. This would be accomplished through measures such as light shielding, automatic controls, and architectural compatibility in design, among others. These measures would have the additional effect of minimizing the potential for lighting of the MSF site to attract or disorient nocturnal migrating birds.

The MSF site would not diminish the chances for long-term survival of bird species or their habitats. Throughout operation vegetation maintenance and abatement would be performed as needed for City street trees and the proposed Project's landscaping. No additional tree and/or ornamental vegetation removals are planned and, as such, no significant impacts to nesting birds/raptors would occur from the operation of the MSF site.

Traction Power Substations

As discussed previously, one TPSS would be located within the MSF site which is analyzed above. The second TPSS would be co-located at the existing Civic Center site. Operation of the TPSS sites would not create a significant change in habitat value or nesting sites. The TPSS sites would involve the construction of new buildings and structures, some of which would have windows that could pose obstacles to migratory birds. However, as there are no native or nonnative vegetated corridors in the proximity of the proposed Project, the potential impact of these structures on migratory birds is anticipated to be minimal. During operation of the TPSSs, it is possible that migratory or nesting birds would build nests within or near the area. However, operation of the TPSSs would not substantially interfere with these nests once built as the majority of the Project components would remain stationary with exception of the APM train cars.

Exterior lighting associated with these sites would be consistent with the lighting already in place in this area and any new or remodeled lighting would be consistent with the Design Guidelines for the proposed Project. The Design Guidelines would serve to provide for well designed, energy efficient site lighting that contributes to a safe and inviting atmosphere without casting light into the night sky or adjacent properties. This would be accomplished through measures such as light shielding, automatic controls, and architectural compatibility in design, among others. These measures would have the additional effect of minimizing the potential for lighting of the TPSSs to attract or disorient nocturnal migrating birds.

The TPSSs would not diminish the chances for long-term survival of bird species or their habitats. Throughout operation vegetation maintenance and abatement would be performed as needed for City street trees and proposed Project's landscaping. No additional tree and/or ornamental vegetation removals are planned and, as such, no significant impacts to nesting birds/raptors would occur from the operation of the TPSSs.

Summary of Operational Impacts

As described, the 0.25-mile radius area surrounding the proposed Project, including the guideway and stations, support facility sites are heavily urbanized. Due to lack of suitable habitat, no listed sensitive

species are anticipated to occur. Further, since there are no sensitive ecological areas, wetlands, or wildlife migratory corridors within the 0.25-mile radius area of the proposed Project.

Operation of the proposed Project would not result in significant impacts to such biological resources with respect to interfering with the movement of any resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impeding the use of native wildlife nursery sites.

Mitigation Measures

The following Mitigation Measures (MMs) have been identified to mitigate the impacts of the Project to less than significant.

Construction

MM BIO-1: **Conservation of Faunal Resources: Nesting Birds/Raptors.** The City shall require demolition and construction contractors to implement the following measures:

- Prior to initiating any demolition and/or construction activities, a nesting bird survey shall be conducted to determine the presence of any nesting birds within 500 feet of demolition and/or construction activities. In addition, nesting bird surveys shall be conducted at least every six (6) months until the completion of construction activities, as specified below.

Nesting bird survey shall include:

- Prior to any demolition and/or construction, and a least every six (6) months during and prior to the raptor nesting season until the completion of construction activities, January 1 to September 1, a qualified biologist shall conduct a site survey for active nests 30 days prior to any scheduled clearing, demolition, grading, or construction activities. The survey shall be conducted within all trees, manmade structures, and any other potential raptor nesting habitat.

- Prior to any vegetation disturbance between March 1 and September 15, and a least every six (6) months until the completion of construction activities, a qualified biologist shall conduct a survey for nesting birds in all breeding/nesting habitat within the construction or demolitions areas and within 300 feet of all disturbance areas and submit the results of these surveys to the City. The surveys shall be conducted within trees and structures, wherever nesting bird species may be located. Nesting bird surveys shall be conducted no earlier than 30 days prior to the initiation of ground or vegetation disturbance. If no breeding/nesting birds are observed, site preparation, demolition and construction activities may begin. If breeding activities and/or an

active bird nest is located, the breeding habitat/nest site shall be fenced by the biological monitor a minimum of 300 feet (500 feet for raptors) in all directions, and this area shall not be disturbed until the nest becomes inactive, the young have fledged, the young are no longer being fed by the parents, the young have left the area, and/or the young shall no longer be impacted. If the qualified biologist determines that a narrower buffer between the demolition and/or construction activities and the observed active nests is warranted, the biologist may submit a written explanation as to why (e.g., species-specific information; ambient conditions and bird's habituation to them; terrain, vegetation, and birds' lines of sight between the demolition and/or construction activities and the nest and foraging areas) to the City and, upon request, the CDFW. Based on the submitted information, the City, acting as the lead agency (and CDFW, if CDFW requests) shall determine whether to allow a narrower buffer.

Operation

No mitigation is required for biological resources during operation of the proposed Project.

Level of Significance after Mitigation

Construction

With implementation of **MM BIO-1**, significant impacts to nesting birds/raptors would be reduced to a level that is less than significant. These measures would prevent substantial interference with the movement of resident or migratory wildlife species through protecting nesting birds/raptors.

Operation

Impacts to biological resources would be less than significant.

Impact BIO-2: Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

As detailed under existing conditions, approximately 541 trees exist along the proposed Project, including the guideway and stations, support facility sites. Loss of these trees would be considered a significant impact if removal and replacement of these trees does not comply with the City's tree preservation ordinance. As described above, the ITC Project CCP contains project measures that supplement the requirements of the City's tree preservation ordinance.

The CCP, contained in **Appendix 3.0.5**, addresses tree removals and replacement. This program requires that tree removals be avoided where possible, and that all trees removed be replaced with a 36-inch box tree of the same species and planted in the same general location as the tree being removed within 6

months of the completion of any construction work that could impact the replacement tree. To comply with the requirements of the Tree Preservation Ordinance, an application for a Protected Tree Removal or Cutting Permit is required to be filed for removal of the protected trees along with the inspection fee as specified in the City's Master Fee Schedule.[77] This application is required to be filed and approved prior to any tree removal, relocation or cutting, per City Ordinance.[78]

Construction

This section discusses the potential impacts to trees that may be impacted as a result of the proposed Project. As previously noted, construction of the guideway and stations would include equipment staging areas that may reach 22 feet from the guideway. As such, this analysis conservatively assumed that all existing trees within 25 feet of the proposed guideway and stations, and the MSF and TPSS sites could be removed during construction. The locations of trees with respect to the proposed Project are shown on **Figure 4.3-20: Potential Tree Impacts – Market Street/Florence Avenue Station(a)** through **Figure 4.3-36: Potential Tree Impacts – Prairie Avenue(e)** that are available at the end of this section.

Guideway

Market Street

As discussed previously, a total of approximately 76 trees exist along Market Street. All of these trees are located within the Downtown TOD Plan and at least 69 of them qualify as protected by meeting the minimum trunk diameter size requirements of the IMC.[79] The proposed guideway along Market Street in relation to the existing trees is shown in **Figure 4.3-21**, **Figure 4.3-23**, and **Figure 4.3-24**. As shown, 52 trees, including the 7 unidentified trees, are located within the path of the guideway or within the 25-foot construction equipment staging zone. As such, these trees may be removed during construction.

In accordance with the City's Tree Preservation Ordinance and the ITC CCP, replacement trees will be planted for every protected tree that would be removed within areas after a permit is approved for tree removal.[80] Replacement trees will be replaced at a 1:1 ratio minimum with a tree of like-size and species or an equal value tree (or trees) as determined by the City. Due to compliance with the requirements of the Tree Preservation Ordinance, an application for a Protected Tree Removal or Cutting Permit shall be filed for removal of the protected trees along with the inspection fee as specified in the City's Master Fee Schedule.[81] This application will be filed and approved prior to any tree removal, relocation or cutting, per

77 City of Inglewood, Master Fee Schedule, September 2016.
78 City of Inglewood, Ordinance 12-06 5-8-12 and Ordinance 13-04 11-5-13.
79 City of Inglewood, IMC Section 12-113, Protected Trees.
80 City of Inglewood, IMC Section 12-113, Protected Trees.
81 City of Inglewood, Master Fee Schedule, September 2016.

City Ordinance.[82] As the Project will comply with the City's Tree Preservation ordinance, and the supplemental standards in the ITC CCP will also be implemented, impacts will be less than significant.

In addition, although preservation and avoidance of existing trees would be implemented to the extent feasible, activities associated with demolition and/or construction of the guideway could impact street trees that would be retained by encroaching the root zone (i.e., Tree Protective Zone) or by damaging above-ground parts (i.e., branches and trunk), or indirectly through changes in hydrology or water quality. These demolition and/or construction activities could impact the trees' survivability and could create potentially significant impacts.

In addition to being subject to the IMC, the trees along Market Street would be developed within the Downtown TOD Plan area, as shown in **Figure 3.0-2**. While the Downtown TOD Plan does not contain provisions regarding the removal of trees or protected trees beyond the requirements of the IMC, it contains unique provisions and recommendations for the location of tree placement and types of tree species.

In particular, the New Downtown and Fairview Heights Transit Oriented Development Plan and Design Guidelines[83] provide guidance and recommendations regarding tree placement location and species. The Downtown TOD Plan calls for Market Street to retain its existing street trees, and the smaller arterial streets including Regent Street and Locust Street may alternate between the Brisbane box (*Lophostemon confertus*), an evergreen tree, and the ginkgo (*Ginkgo biloba*), a deciduous tree.

As the Project will comply with the City's Tree Preservation ordinance, and the supplemental standards in the ITC CCP will also be implemented, impacts will be less than significant.

Manchester Boulevard

As discussed previously, a total of approximately 114 trees exist along Manchester Boulevard. All of these trees are located within the Downtown TOD Plan and at least 102 of them qualify as protected by meeting the minimum trunk diameter size requirements of the IMC.[84] The proposed guideway along Manchester Boulevard in relation to the existing trees is shown in **Figure 4.3-24** through **Figure 4.3-26**, and **Figure 4.3-28** through **Figure 4.3-31**. As shown, 59 trees, including the 12 unidentified trees, are located within the path of the guideway or within the 25-foot construction equipment staging zone. As such, these trees may be removed during construction.

82 City of Inglewood, Ordinance 12-06 5-8-12 and Ordinance 13-04 11-5-13.

83 City of Inglewood, *New Downtown and Fairview Heights Transit Oriented Development Plan and Design Guidelines*, November 1, 2016.

84 City of Inglewood, IMC Section 12-113, Protected Trees.

In accordance with the IMC, the proposed Project shall plant replacement trees for every protected tree that would be removed within areas subject to IMC provisions, after having obtained a permit to do so.[85] Replacement trees shall be replaced at a 1:1 ratio minimum and shall be like-size and species or an equal value tree (or trees) as determined by the City. Due to compliance with the requirements of the Tree Preservation Ordinance, an application for a Protected Tree Removal or Cutting Permit shall be filed for removal of the protected trees along with the inspection fee as specified in the City's Master Fee Schedule.[86] The application shall be filed and approved prior to any tree removal, relocation or cutting, per City Ordinance.[87] While the trees would be replaced at a 1:1 ratio minimum per City requirements, impacts associated with the loss of protected trees would be potentially significant.

In addition, although preservation and avoidance of existing trees would be implemented to the extent feasible, activities associated with demolition and/or construction of the guideway could impact street trees that would be retained by encroaching the root zone (i.e., Tree Protective Zone) or by damaging above-ground parts (i.e., branches and trunk), or indirectly through changes hydrology or water quality. This demolition and/or construction activity could impact the trees' survivability and could create potentially significant impacts.

In addition to being subject to the IMC, the trees along Manchester Boulevard would be developed within the Downtown TOD Plan area, as shown in **Figure 3.0-2**. While the Downtown TOD Plan does not contain provisions regarding the removal of trees or protected trees beyond the requirements of the IMC, it contains unique provisions and recommendations for the location of tree placement and types of tree species.

In particular, the New Downtown and Fairview Heights Transit Oriented Development Plan and Design Guidelines[88] provide guidance and recommendations regarding tree placement location and species. The Downtown TOD Plan identifies Manchester Boulevard as a Green Boulevard which are streets designed with green dividers that separate bike lanes from traffic lanes. The Downtown TOD Plan states that Green Boulevards should be lined with London Plane trees, or a similar species.

As the Project will comply with the City's Tree Preservation ordinance, and the supplemental standards in the ITC CCP will also be implemented, impacts will be less than significant.

85 City of Inglewood, IMC Section 12-113, Protected Trees.
86 City of Inglewood, Master Fee Schedule, September 2016.
87 City of Inglewood, Ordinance 12-06 5-8-12 and Ordinance 13-04 11-5-13.
88 City of Inglewood, *New Downtown and Fairview Heights Transit Oriented Development Plan and Design Guidelines*, November 1, 2016.

Prairie Avenue

As discussed previously, a total of approximately 97 trees have been recorded along Prairie Avenue. These trees are located within the HPSP and qualify as protected by meeting the minimum trunk diameter size requirements of the IMC.[89] The proposed guideway along Prairie Avenue in relation to the existing trees is shown in **Figure 4.3-31** through **Figure 4.3-36**. As shown, 45 trees are located within the path of the guideway or within the 25-foot construction equipment staging zone. As such, these trees may be removed during construction.

In accordance with the City's Tree Preservation Ordinance and the ITC CCP, replacement trees will be planted for every protected tree that would be removed within areas after a permit is approved for tree removal.[90] Replacement trees will be replaced at a 1:1 ratio minimum with a tree of like-size and species or an equal value tree (or trees) as determined by the City. Due to compliance with the requirements of the Tree Preservation Ordinance, an application for a Protected Tree Removal or Cutting Permit shall be filed for removal of the protected trees along with the inspection fee as specified in the City's Master Fee Schedule.[91] This application will be filed and approved prior to any tree removal, relocation or cutting, per City Ordinance.[92] As the Project will comply with the City's Tree Preservation ordinance, and the supplemental standards in the ITC CCP will also be implemented, impacts will be less than significant.

In addition, although preservation and avoidance of existing trees would be implemented to the extent feasible, activities associated with demolition and/or construction of the guideway could impact street trees that would be retained by encroaching the root zone (i.e., Tree Protective Zone) or by damaging above-ground parts (i.e., branches and trunk), or indirectly through changes in hydrology or water quality. This demolition and/or construction activity could impact the trees' survivability and could create potentially significant impacts.

In addition to being subject to the IMC, the trees along Prairie Avenue would be developed within the HPSP area, as shown in **Figure 3.0-2**. While the HPSP does not contain provisions regarding the removal of trees or protected trees beyond the requirements of the IMC, it does contain unique provisions and recommendations for the location of tree placement and types of tree species.

In particular, the HPSP area is located adjacent to an approximately 0.5-mile portion of the Prairie Avenue segment of the guideway. Specifically, the east side of Prairie Avenue would be subject to the HPSP.[93]

89 City of Inglewood, IMC Section 12-113, Protected Trees.
90 City of Inglewood, IMC Section 12-113, Protected Trees.
91 City of Inglewood, Master Fee Schedule, September 2016.
92 City of Inglewood, Ordinance 12-06 5-8-12 and Ordinance 13-04 11-5-13.
93 City of Inglewood, *Hollywood Park Specific Plan*, adopted July 8, 2009, amended September 23, 2014, and further amended February 24, 2015.

while the west side would remain subject to the IMC. Portions of the guideway and support columns would be situated within the setback of the HPSP area along Prairie Avenue. Within the HPSP area, minimum building setback requirements involve 30 feet of separation from the roadway along Prairie Avenue extending from Pincay Drive/Kelso Street to approximately midblock between Hardy Street and 97th Street.[94]

As discussed previously, the street trees along Prairie Avenue have since been removed for the development of the HPSP area. Moreover, the HPSP area would be fully developed prior to the construction of the proposed Project. Specifically, Prairie Avenue would be developed per the design guidelines of the HPSP.[95] The HPSP calls for large columnar evergreen trees such as Afghan pine (*Pinus eldarica*) or Canary Island pine (*Pinus canariensis*) along Prairie Avenue north of Hardy Street. This arrangement will visually reduce the scale of the street and will provide ample shade as visitors approach the Hollywood Park entries. In addition, large-canopy flowering trees and palms will mark major entry points and maintain adequate street visibility.

Landscaping along Prairie Avenue would also include a setback area which would serve as a primary welcoming edge of Hollywood Park. The Prairie Avenue setback will feature drought-tolerant plantings which will add a lush Mediterranean character to the spaces. Specifically, plant materials within the formal entrances will include hedges, colorful flowering groundcovers and various flowering trees. Taller evergreen hedges and shrubs will be used to create strong entry drives and to screen undesirable views.

The proposed Project would be required to conform to these design guidelines should any trees or vegetation be removed during construction after development of the HPSP area along Prairie Avenue.

As the Project will comply with the City's Tree Preservation ordinance, and the supplemental standards in the ITC CCP will also be implemented, impacts will be less than significant.

Stations

Market Street/Florence Avenue

As discussed previously, a total of approximately 79 trees are associated with the CVS Plaza which is where the Market Street/Florence station would be developed. Of these, 47 are located within the site and are considered private property. The remaining 32 trees are public street trees located throughout the perimeter of the site along Florence Avenue, Locust Street, and Regent Street. These trees are located

94 City of Inglewood, *Hollywood Park Specific Plan*, "Exhibit 6-5- Minimum Building Setbacks," 6-30, adopted July 8, 2009, amended September 23, 2014, and further amended February 24, 2015.

95 City of Inglewood, *Hollywood Park Specific Plan*, adopted July 8, 2009, amended September 23, 2014, and further amended February 24, 2015., Chapter 3, Design Guidelines.

within the Downtown TOD Plan and qualify as protected by meeting the minimum trunk diameter size requirements of the IMC.[96] The proposed Market Street/Florence station in relation to the existing trees is shown in **Figure 4.3-20** through **Figure 4.3-22**. The area within the site boundaries of the CVS Plaza shown in **Figure 4.3-20** through **Figure 4.3-22** would be demolished during construction. As shown, 37 private trees are located within the site boundaries, and 20 street trees are located along the perimeter of the site boundaries. As such, these trees may be removed during construction.

The Market Street/Florence Avenue station would be located within an area bound by the Downtown TOD Plan which supersedes the provisions within the IMC. While the Downtown TOD Plan does not contain provisions regarding the removal of trees or protected trees beyond the requirements of the IMC, it does contain unique provisions and recommendations for the location of tree placement and types of tree species.

In particular, the Downtown TOD Plan calls for Market Street to retain its existing street trees, and the smaller arterial streets including Regent Street and Locust Street may alternate between the Brisbane box (*Lophostemon confertus*), an evergreen tree, and the ginkgo (*Ginkgo biloba*), a deciduous tree. The Downtown TOD Plan also recommends that Florence Avenue be lined with tall California Fan Palm trees, London Plane trees, or a similar species of either.

While the trees would be replaced at a 1:1 ratio minimum per City requirements, impacts associated with the loss of protected trees within the Downtown TOD Plan would be potentially significant.

Prairie Avenue/Pincay Drive

The Prairie Avenue/Pincay Drive station would be located above the intersection of Prairie Avenue and Pincay Drive. This station includes the development of dual tracks situated on both sides of the Prairie Avenue right-of-way and include crossover rail switches located on the northern approach of the station.

As discussed previously, the trees along Prairie Avenue would be subject to the IMC and the HPSP. In accordance with the IMC, the proposed Project shall plant replacement trees for every protected tree at a 1:1 ratio minimum. Moreover, the HPSP area would be fully developed prior to the construction. Specifically, Prairie Avenue would be developed per the design guidelines of the HPSP.[97] The HPSP calls for large columnar evergreen trees such as Afghan pine (*Pinus eldarica*) or Canary Island pine (*Pinus canariensis*) along Prairie Avenue north of Hardy Street. In addition, large-canopy flowering trees and palms will mark major entry points and maintain adequate street visibility.

96 City of Inglewood, IMC Section 12-113, Protected Trees.

97 City of Inglewood, *Hollywood Park Specific Plan*, adopted July 8, 2009, amended September 23, 2014, and further amended February 24, 2015., Chapter 3, Design Guidelines.

Landscaping along Prairie Avenue would also include a setback area which would serve as a primary welcoming edge of Hollywood Park. The Prairie Avenue setback will feature drought-tolerant plantings which will add a lush Mediterranean character to the spaces. Specifically, plant materials within the formal entrances will include hedges, colorful flowering groundcovers and various flowering trees. Taller evergreen hedges and shrubs will be used to create strong entry drives and to screen undesirable views.

The proposed Project would be required to conform to these design guidelines should any trees or vegetation be removed during construction after development of the HPSP area along Prairie Avenue.

While the trees would be replaced at a 1:1 ratio minimum per City requirements, impacts associated with the loss of protected trees within the HPSP area would be potentially significant.

Prairie Avenue/Hardy Street

The Prairie Avenue/Hardy Street station would include a crossover switch on the northern approach and be located above the intersection of Prairie Avenue and Hardy Street, largely within the right-of-way of the existing roadway.

As discussed previously, the trees along Prairie Avenue would be subject to the IMC and the HPSP. In accordance with the IMC, the proposed Project shall plant replacement trees for every protected tree at a 1:1 ratio minimum. Moreover, activities within the HPSP would be fully developed prior to the construction of the proposed Project. Specifically, Prairie Avenue would be developed per the design guidelines of the HPSP.[98] The HPSP calls for large columnar evergreen trees such as Afghan pine (*Pinus eldarica*) or Canary Island pine (*Pinus canariensis*) along Prairie Avenue north of Hardy Street. In addition, large-canopy flowering trees and palms will mark major entry points and maintain adequate street visibility.

Landscaping along Prairie Avenue would also include a setback area which would serve as a primary welcoming edge of Hollywood Park. The Prairie Avenue setback will feature drought-tolerant plantings which will add a lush Mediterranean character to the spaces. Specifically, plant materials within the formal entrances will include hedges, colorful flowering groundcovers and various flowering trees. Taller evergreen hedges and shrubs will be used to create strong entry drives and to screen undesirable views.

As the Project will comply with the City's Tree Preservation ordinance, and the supplemental standards in the ITC CCP will also be implemented, impacts will be less than significant.

98 City of Inglewood, *Hollywood Park Specific Plan*, adopted July 8, 2009, amended September 23, 2014, and further amended February 24, 2015., Chapter 3, Design Guidelines.

Support Facilities

Maintenance and Storage Facility

As discussed previously, a total of approximately 175 trees are associated with the Retail Plaza site which is where the MSF and one TPSS would be developed. Of these, 171 are located within the site and are considered private property. The remaining 4 trees are public street trees located along Nutwood Street. These trees qualify as protected by meeting the minimum trunk diameter size requirements of the IMC.[99] The proposed MSF site in relation to the existing trees is shown in **Figure 4.3-26** through **Figure 4.3-28**. All uses within the Retail Plaza would be removed prior to construction of the MSF. As such, all 175 trees, including 4 street trees, may be removed during construction.

The MSF site is located within an area bound by the Downtown TOD Plan which supersedes the provisions within the IMC. While the Downtown TOD Plan does not contain provisions regarding the removal of trees or protected trees beyond the requirements of the IMC, it does contain unique provisions and recommendations for the location of tree placement and types of tree species.

In particular, the Downtown TOD Plan provides guidance and recommendations regarding tree placement location and species. The Downtown TOD Plan recommends that Manchester Boulevard be lined with London Plane trees, or a similar species.

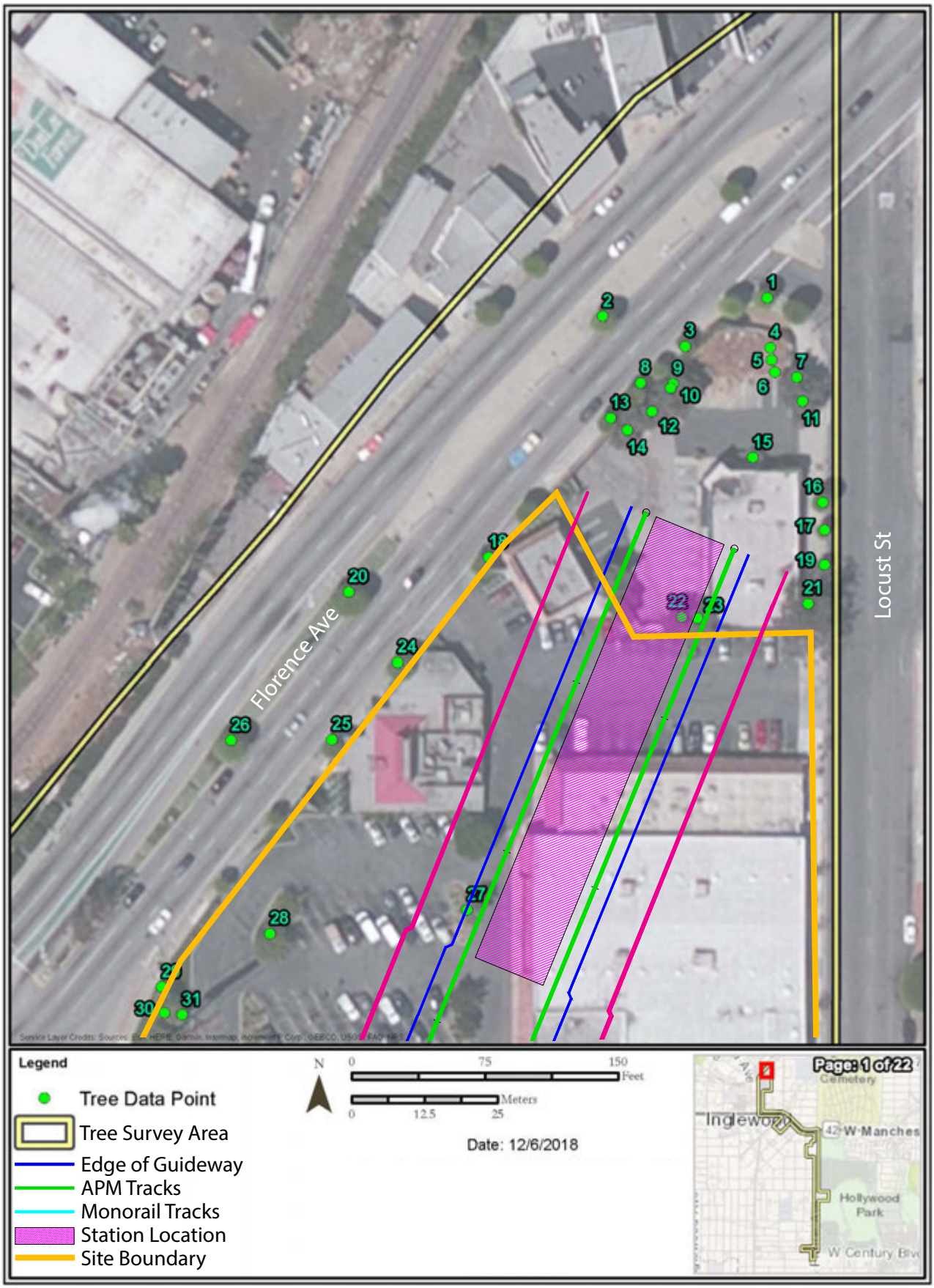
As the Project will comply with the City's Tree Preservation ordinance, and the supplemental standards in the ITC CCP will also be implemented, impacts will be less than significant.

Traction Power Substations

The proposed Project would include two TPSS sites; one would be located within the MSF site, which is analyzed above, and a second would be located within the Civic Center site on Prairie Avenue. As previously noted, the City is proposing to develop a 4-acre Civic Center site. The final location for the TPSS within the City's Civic Center site on Prairie Avenue is yet to be determined.

The TPSS facility to be located at the City's Civic Center site on Prairie would be located within an area bound by the HPSP which supersedes the provisions within the IMC. While the HPSP does not contain provisions regarding the removal of trees or protected trees beyond the requirements of the IMC, it does contain unique provisions and recommendations for the location of tree placement and types of tree species to be used.

99 City of Inglewood, IMC Section 12-113, Protected Trees.

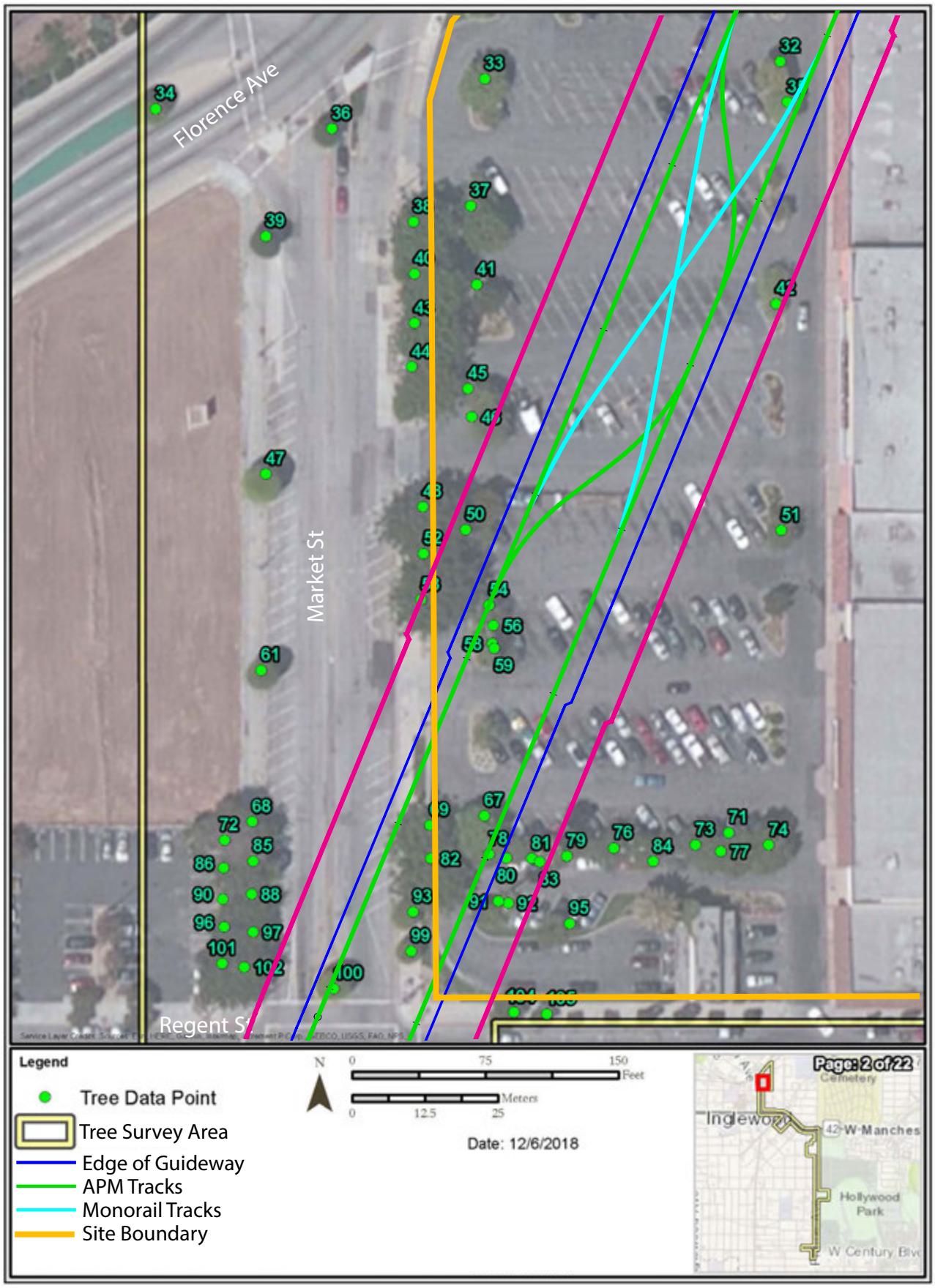


SOURCE: Pax Environmental, Inc. – December 2018; Meridian Consultants - 2020

FIGURE **4.3-20**

Potential Tree Impacts – Market Street/Florence Avenue Station(a)

208-001-18

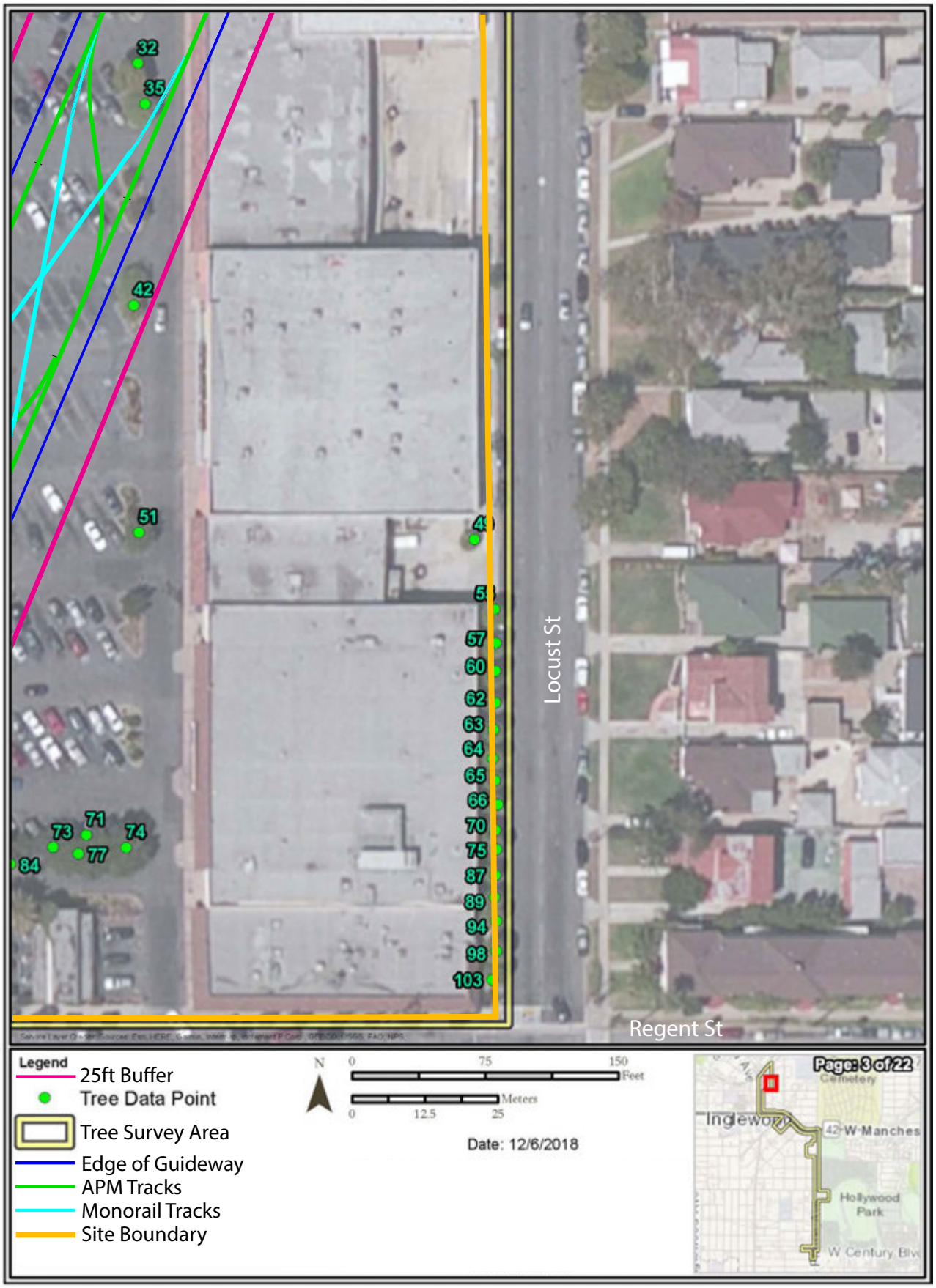


SOURCE: Pax Environmental, Inc. – December 2018; Meridian Consultants - 2020

FIGURE **4.3-21**

Potential Tree Impacts – Market Street/Florence Avenue Station(b)

208-001-18

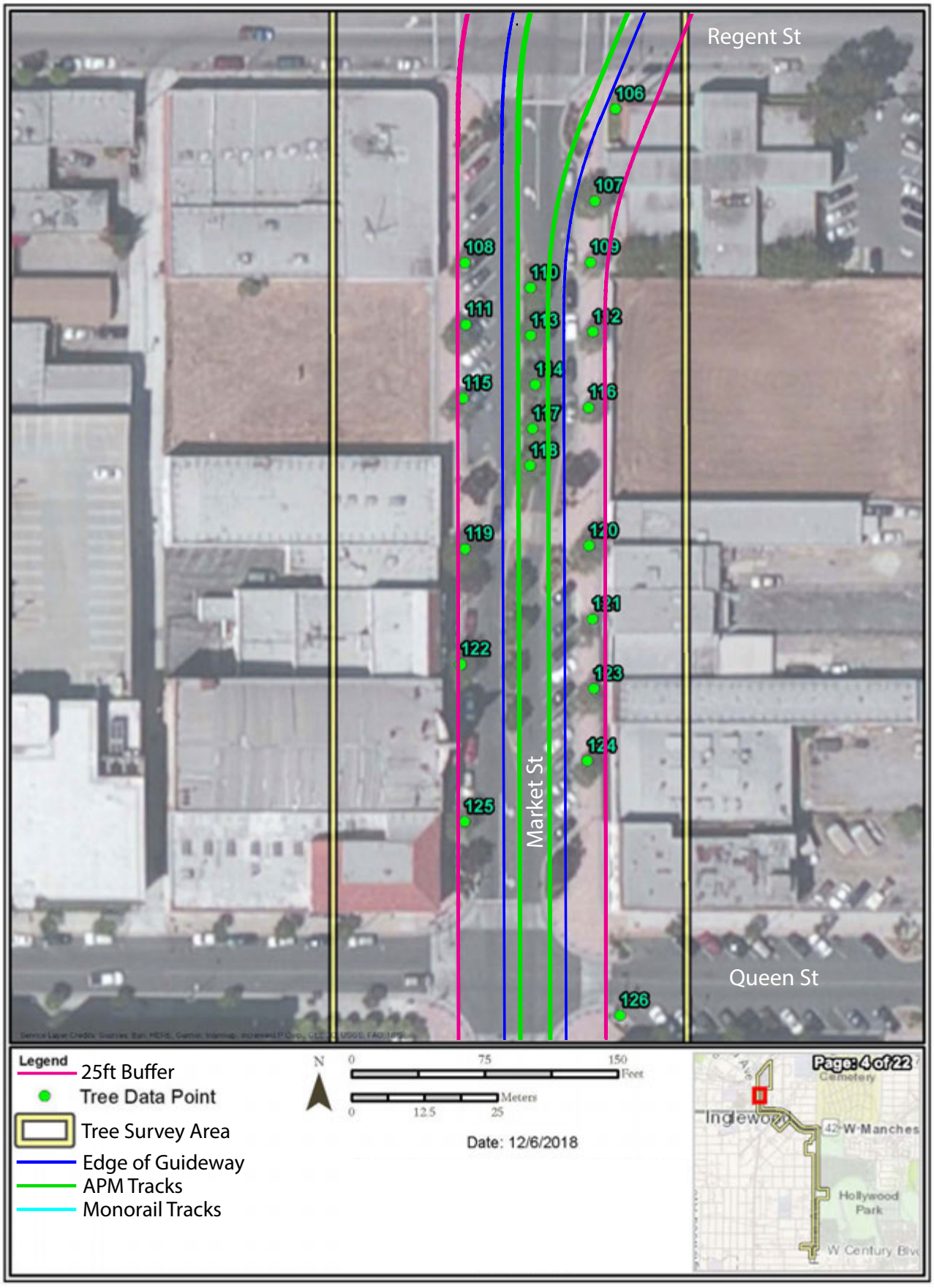


SOURCE: Pax Environmental, Inc. – December 2018; Meridian Consultants - 2020

FIGURE **4.3-22**

Potential Tree Impacts – Market Street/Florence Avenue Station(c)

208-001-18

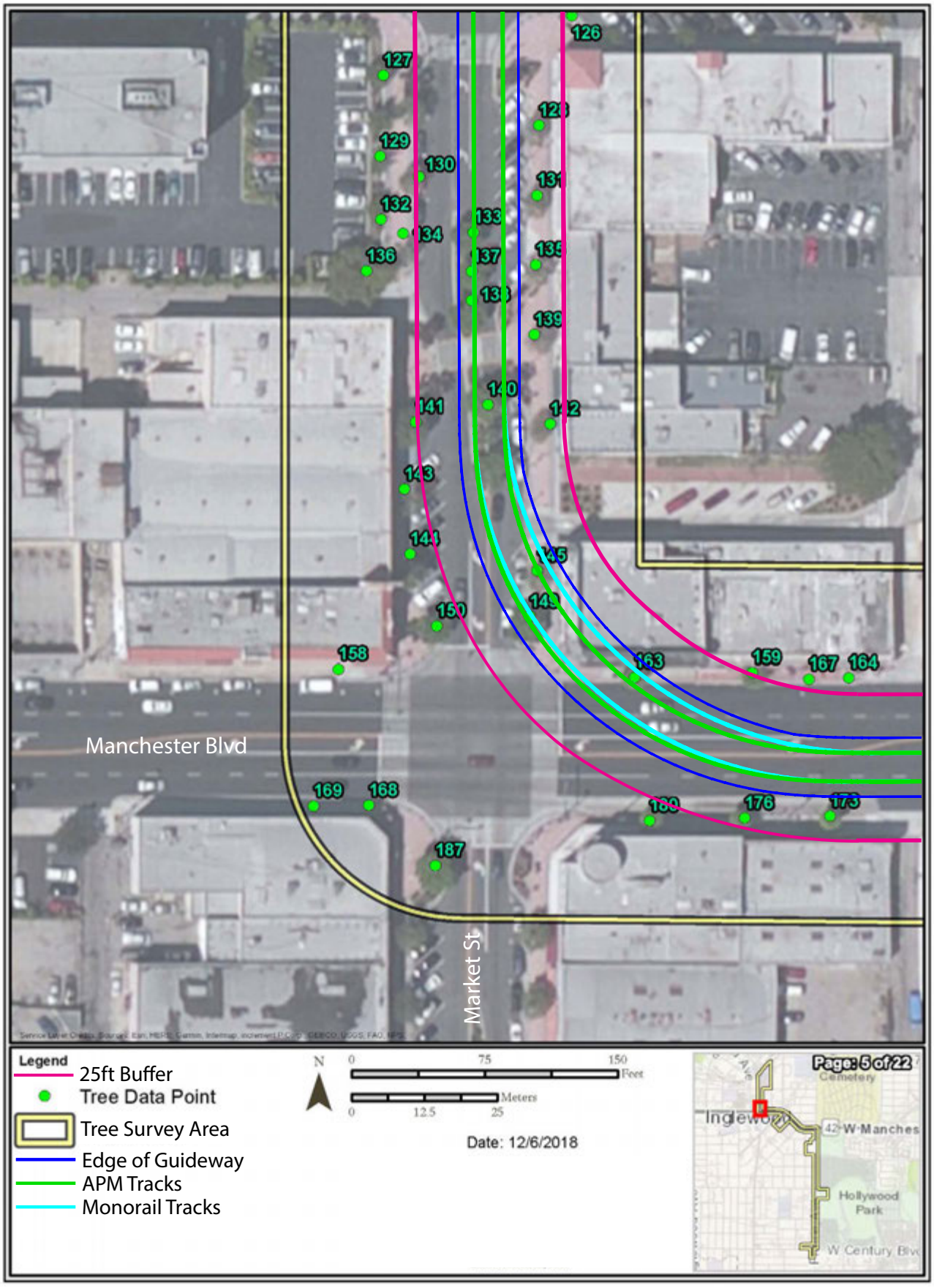


SOURCE: Pax Environmental, Inc. – December 2018; Meridian Consultants - 2020

FIGURE **4.3-23**

Potential Tree Impacts – Market Street

208-001-18

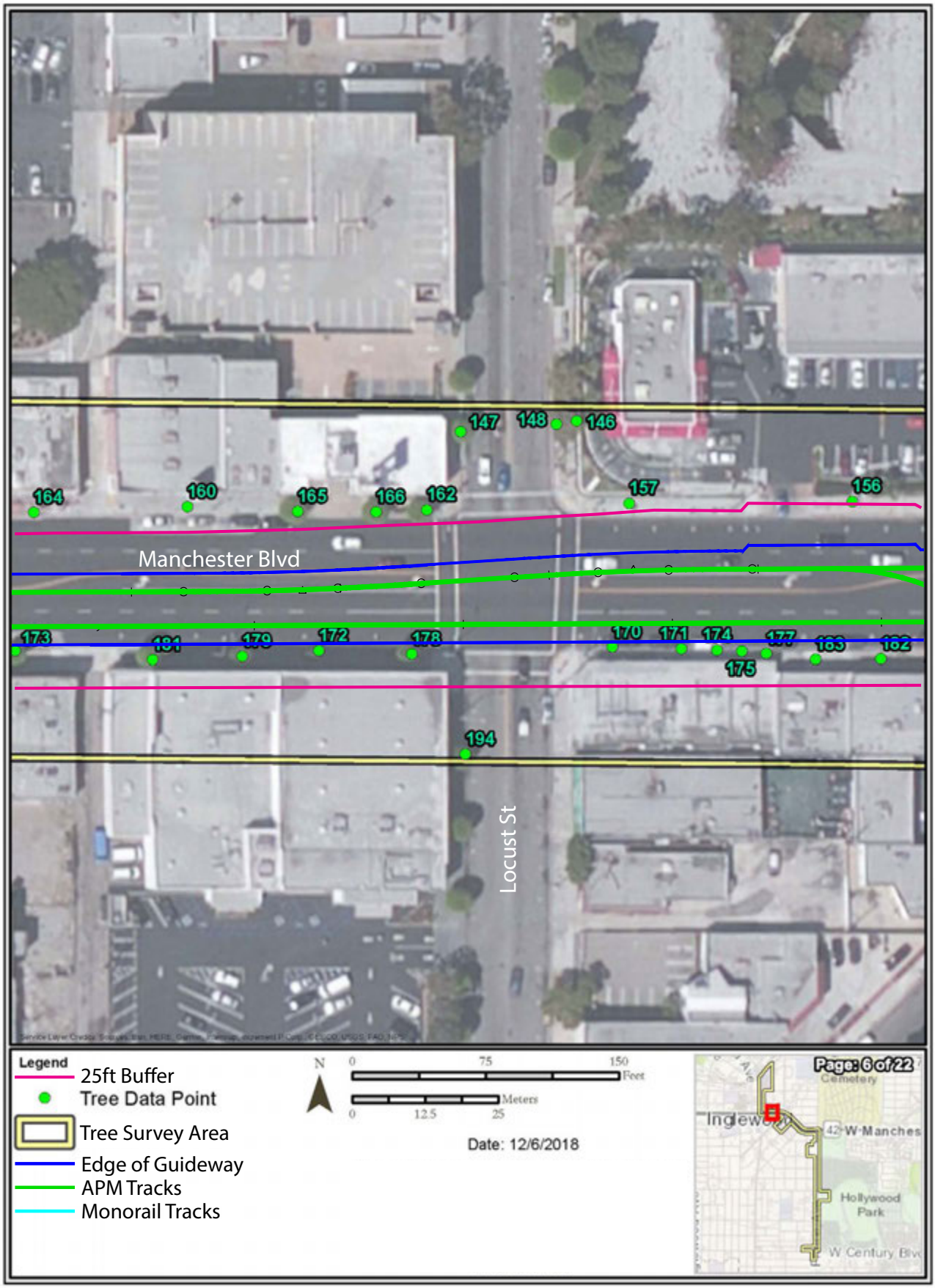


SOURCE: Pax Environmental, Inc. – December 2018; Meridian Consultants - 2020

FIGURE **4.3-24**

Potential Tree Impacts – Market Street/Manchester Boulevard

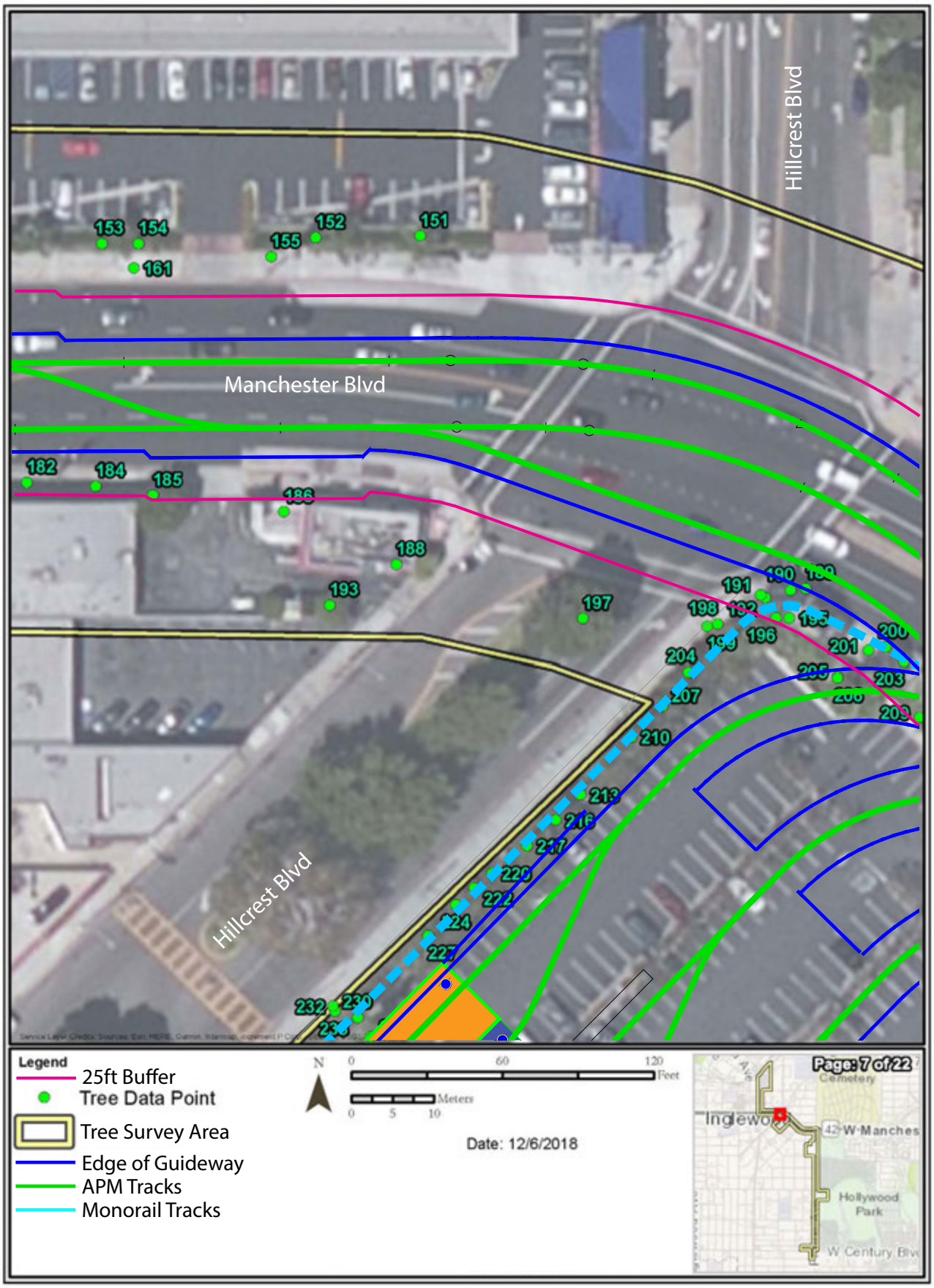
208-001-18



SOURCE: Pax Environmental, Inc. – December 2018; Meridian Consultants - 2020

FIGURE **4.3-25**

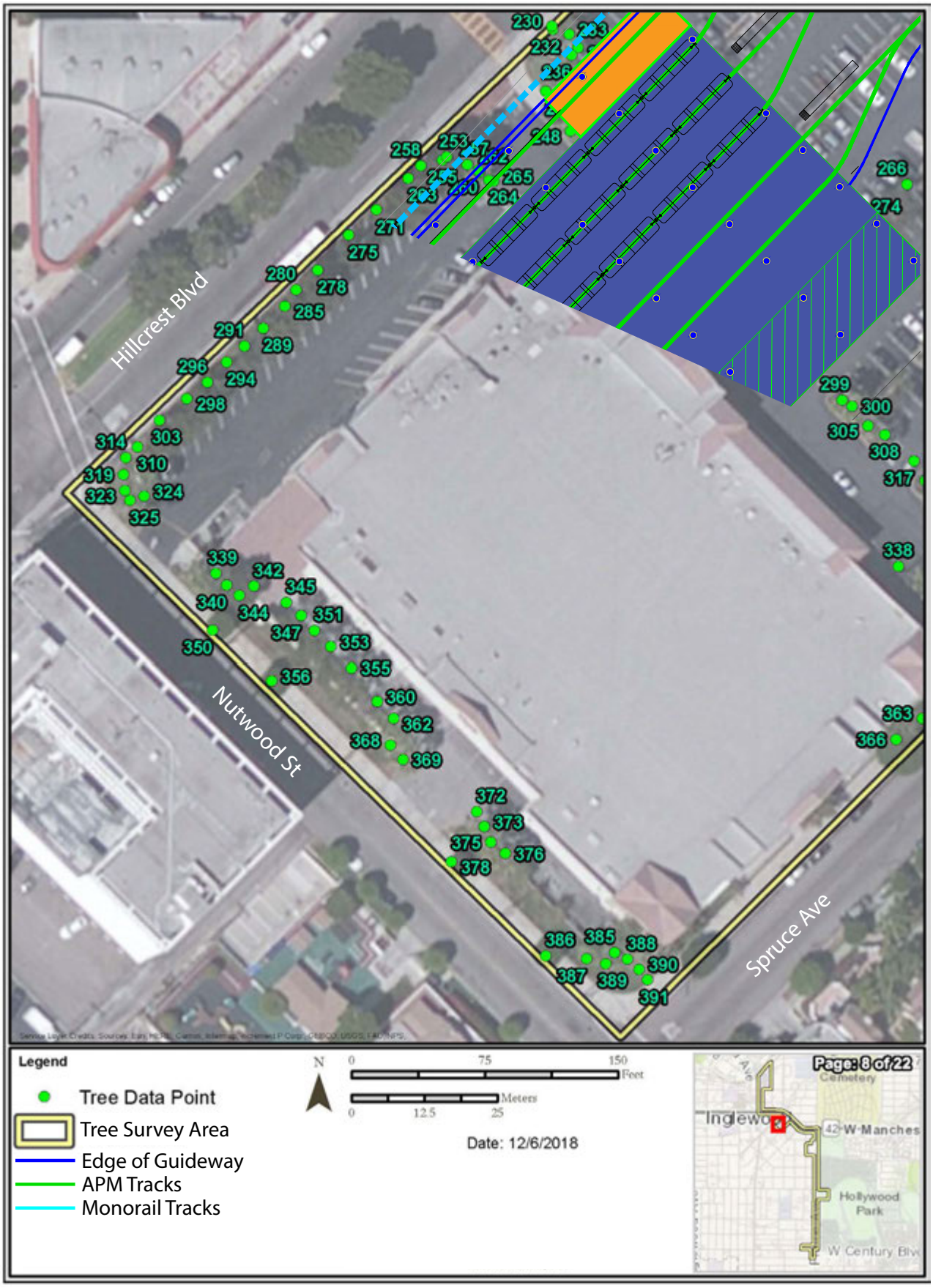
Potential Tree Impacts – Manchester Boulevard(a)



SOURCE: Pax Environmental, Inc. – December 2018; Meridian Consultants - 2020

FIGURE **4.3-26**

Potential Tree Impacts – Manchester Boulevard/MSF Site(a)

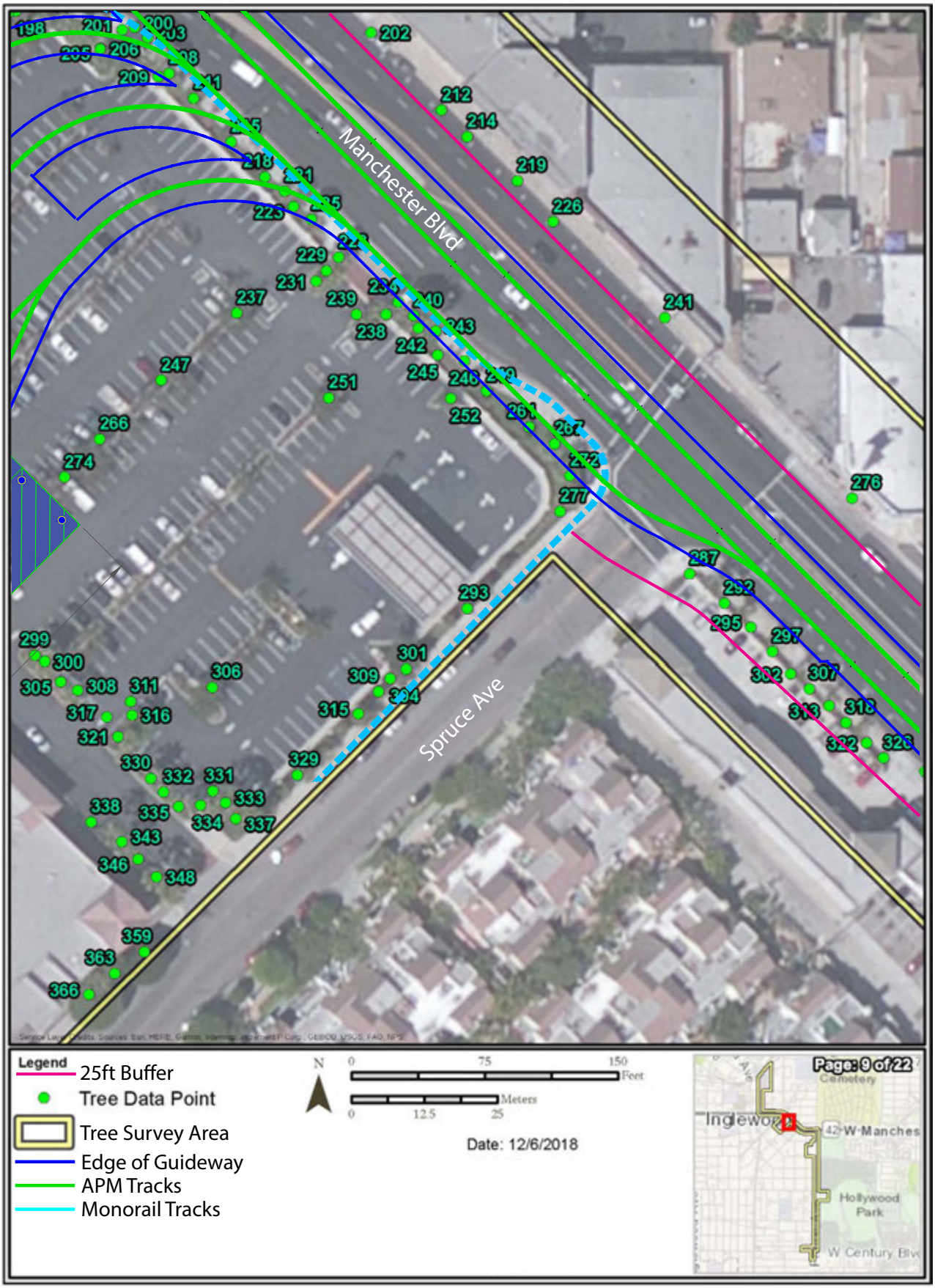


SOURCE: Pax Environmental, Inc. – December 2018; Meridian Consultants - 2020

FIGURE **4.3-27**

Potential Tree Impacts – MSF Site

208-001-18

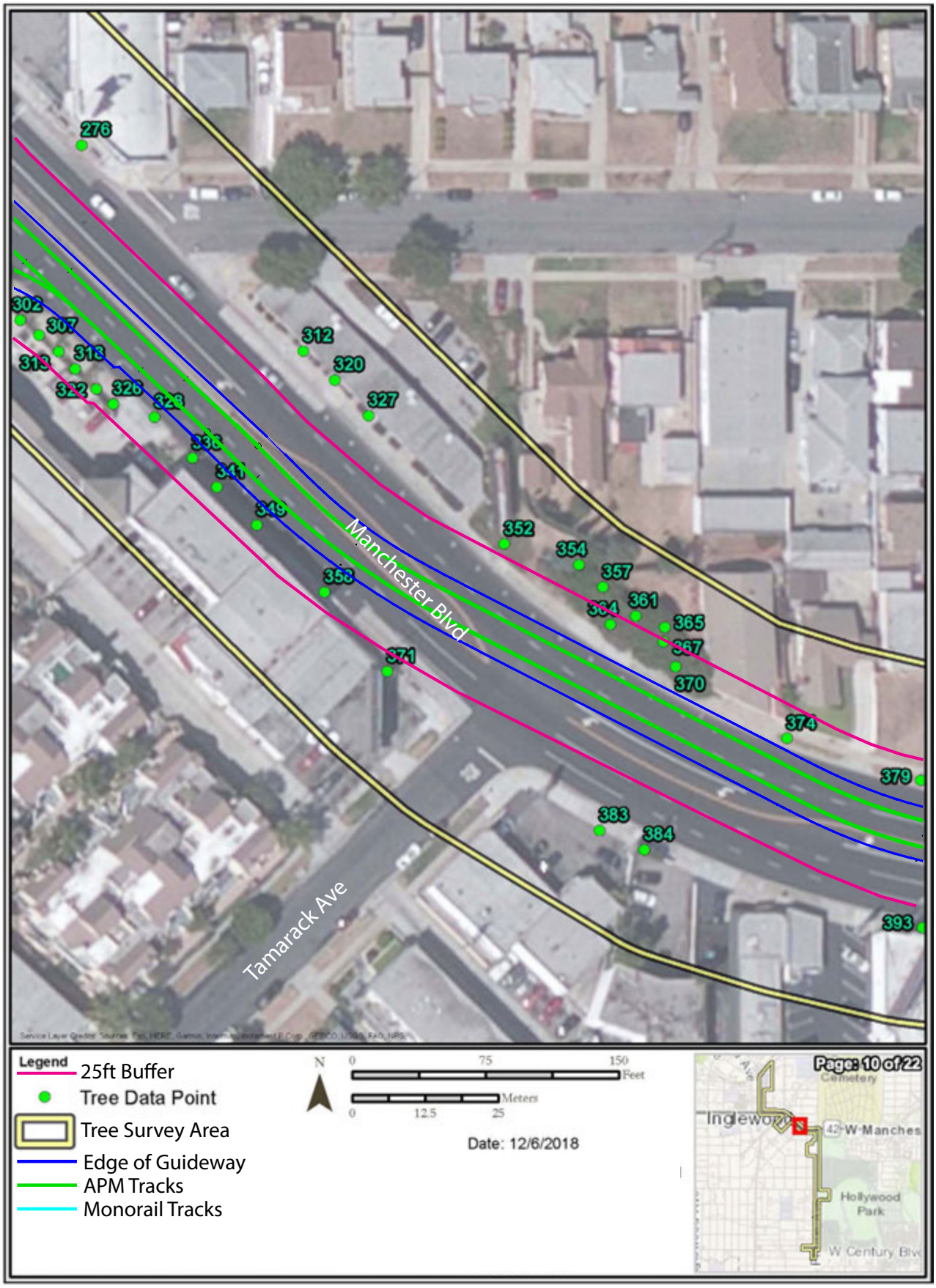


SOURCE: Pax Environmental, Inc. – December 2018; Meridian Consultants - 2020

FIGURE **4.3-28**

Potential Tree Impacts – Manchester Blvd/MSF Site(b)

208-001-18

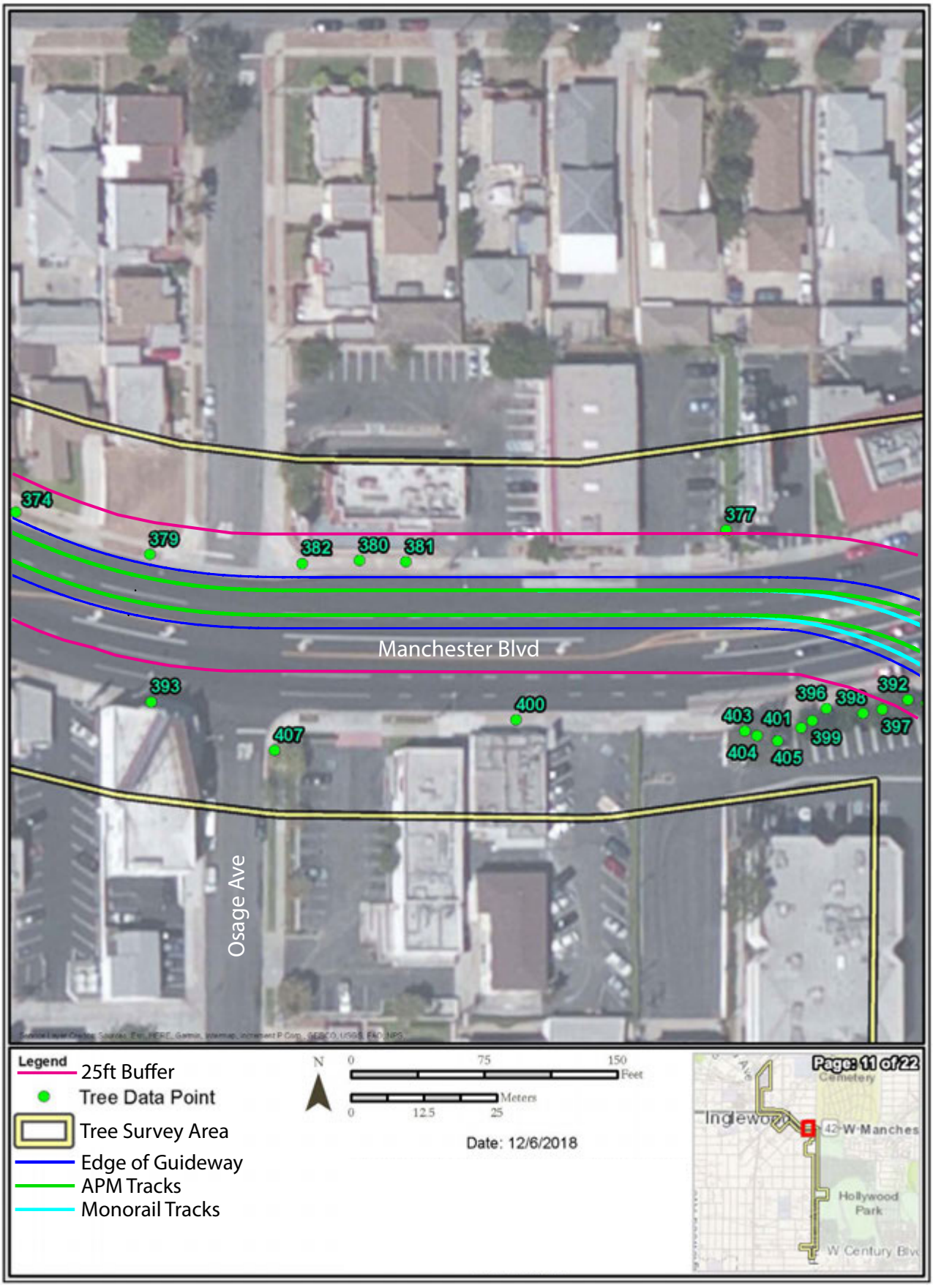


SOURCE: Pax Environmental, Inc. - December 2018; Meridian Consultants - 2020

FIGURE **4.3-29**

Potential Tree Impacts – Manchester Boulevard(b)

208-001-18

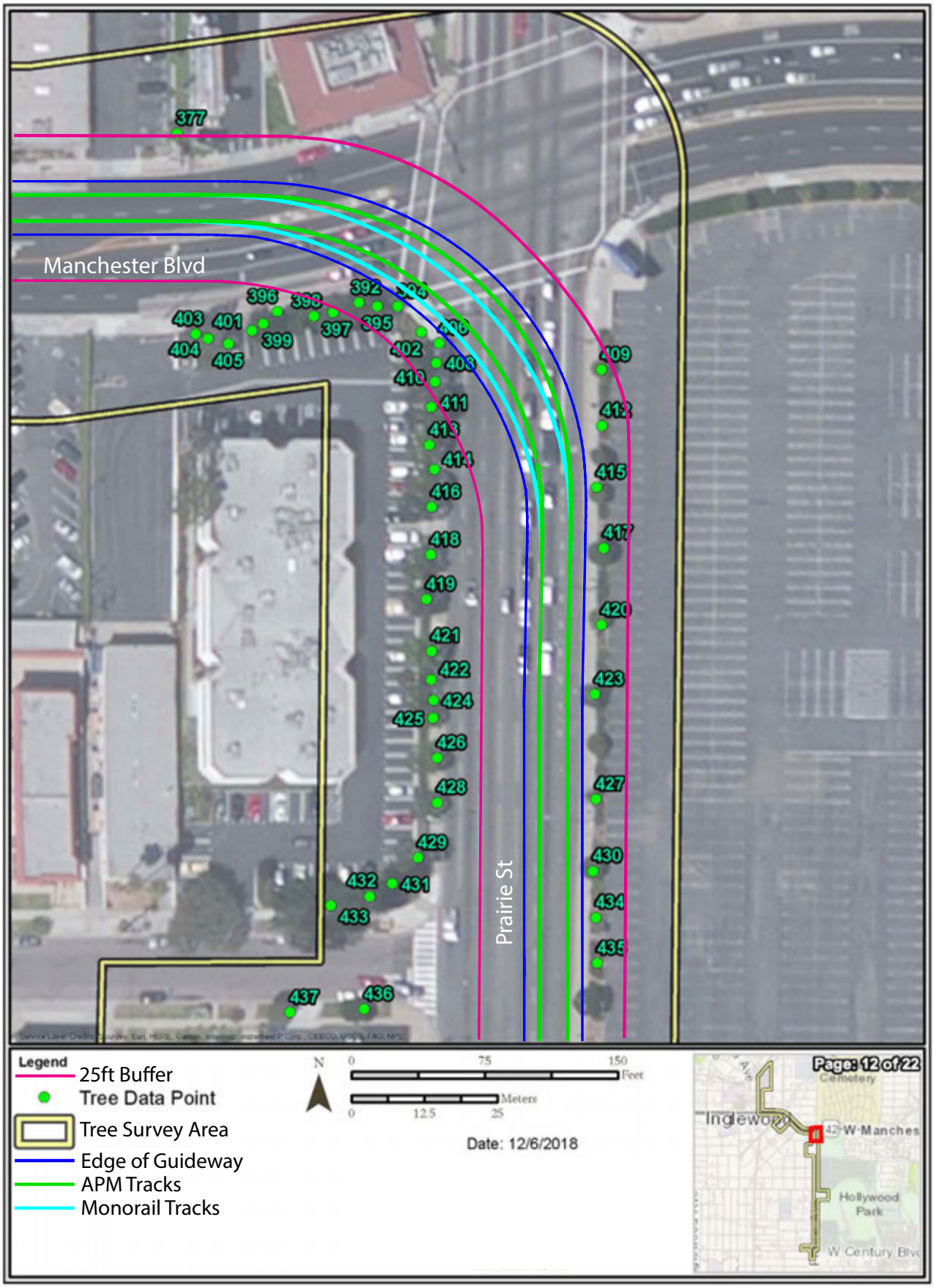


SOURCE: Pax Environmental, Inc. – December 2018; Meridian Consultants - 2020

FIGURE **4.3-30**

Potential Tree Impacts – Manchester Boulevard(c)

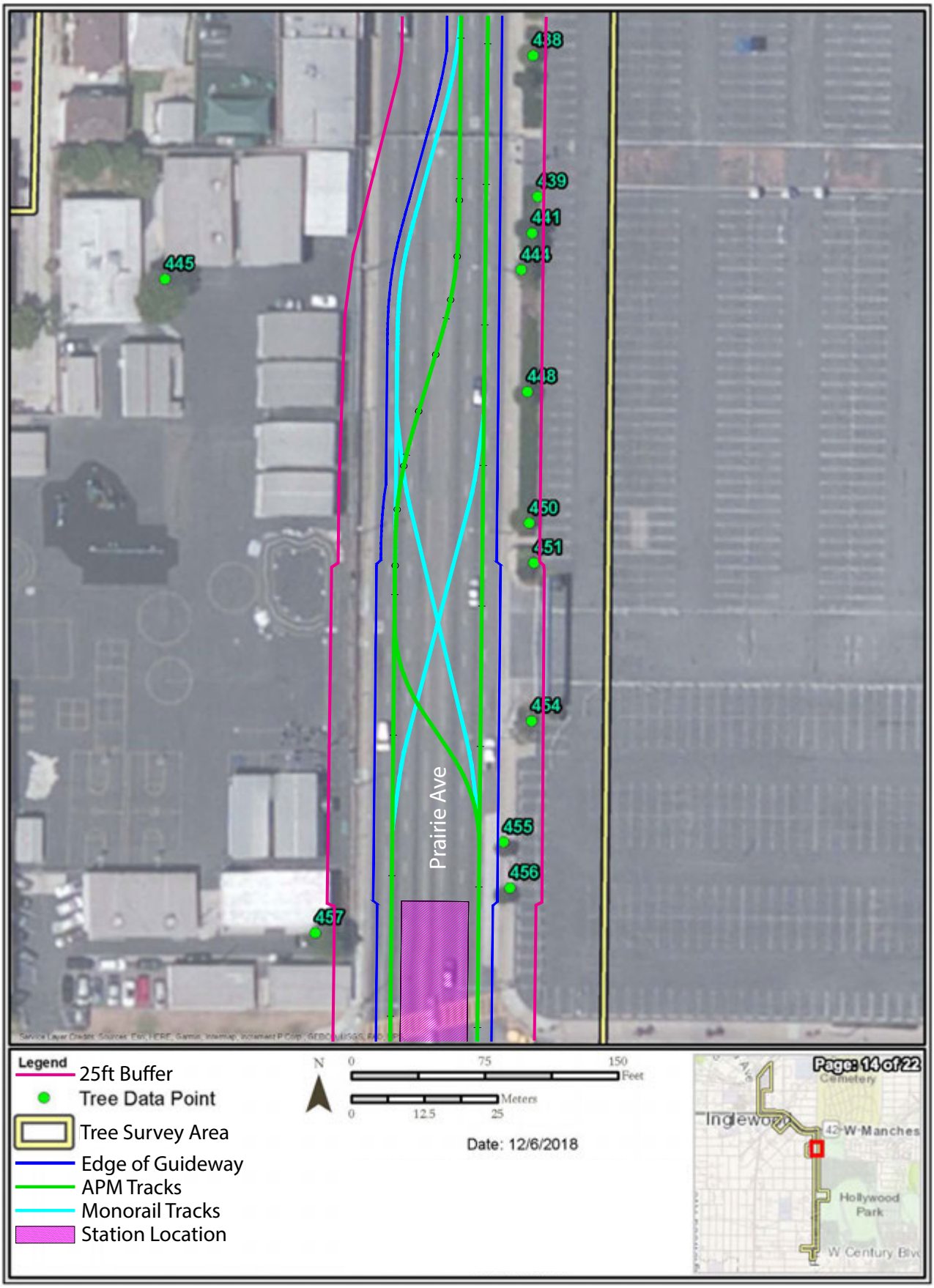
208-001-18



SOURCE: Pax Environmental, Inc. – December 2018; Meridian Consultants - 2020

FIGURE **4.3-31**

Potential Tree Impacts – Manchester Boulevard/Prairie Avenue

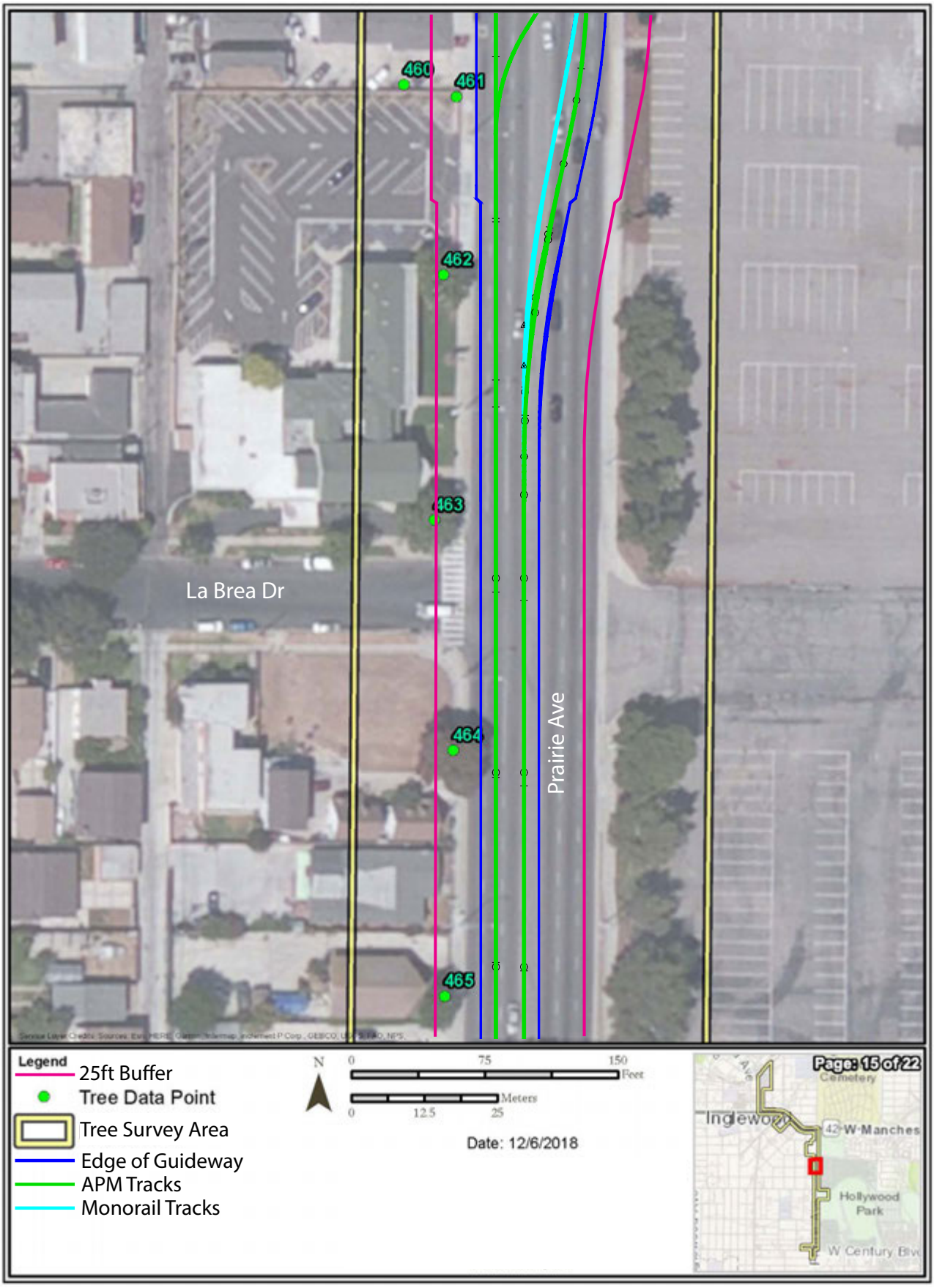


SOURCE: Pax Environmental, Inc. – December 2018; Meridian Consultants - 2020

FIGURE **4.3-32**

Potential Tree Impacts – Prairie Avenue(a)

208-001-18

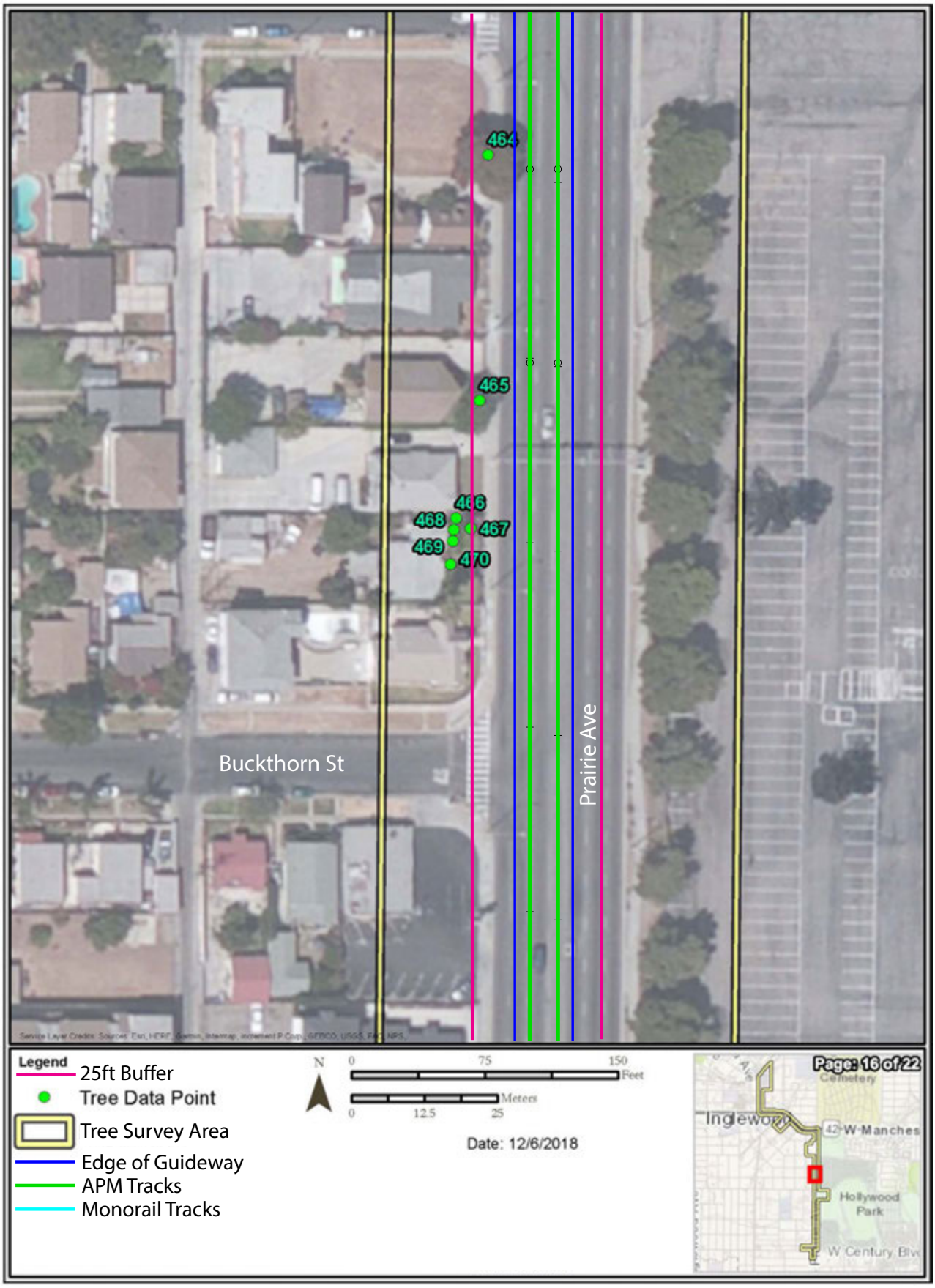


SOURCE: Pax Environmental, Inc. – December 2018; Meridian Consultants - 2020

FIGURE **4.3-33**

Potential Tree Impacts – Prairie Avenue(b)

208-001-18

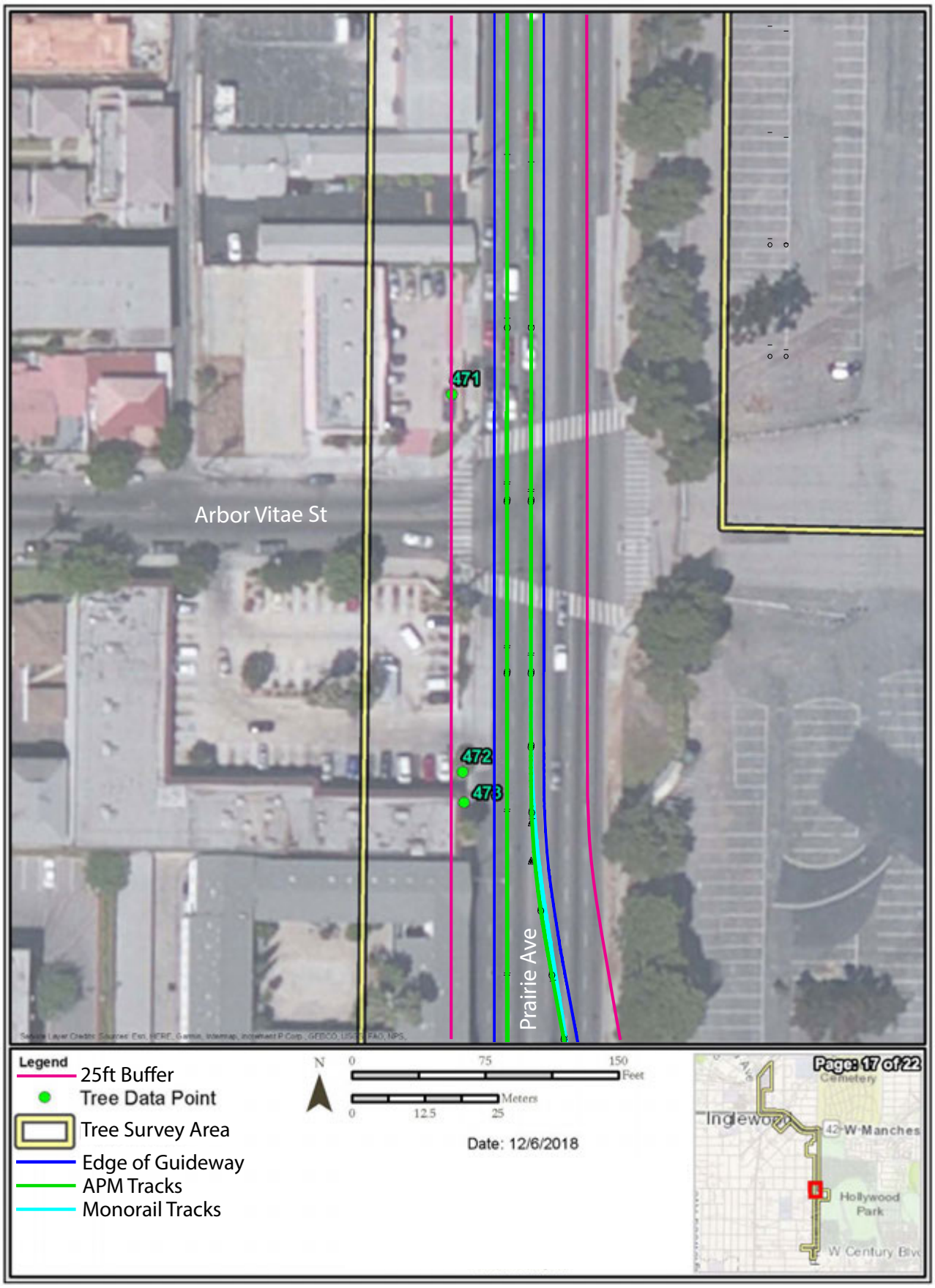


SOURCE: Pax Environmental, Inc. – December 2018; Meridian Consultants - 2020

FIGURE **4.3-34**

Potential Tree Impacts – Prairie Avenue(c)

208-001-18

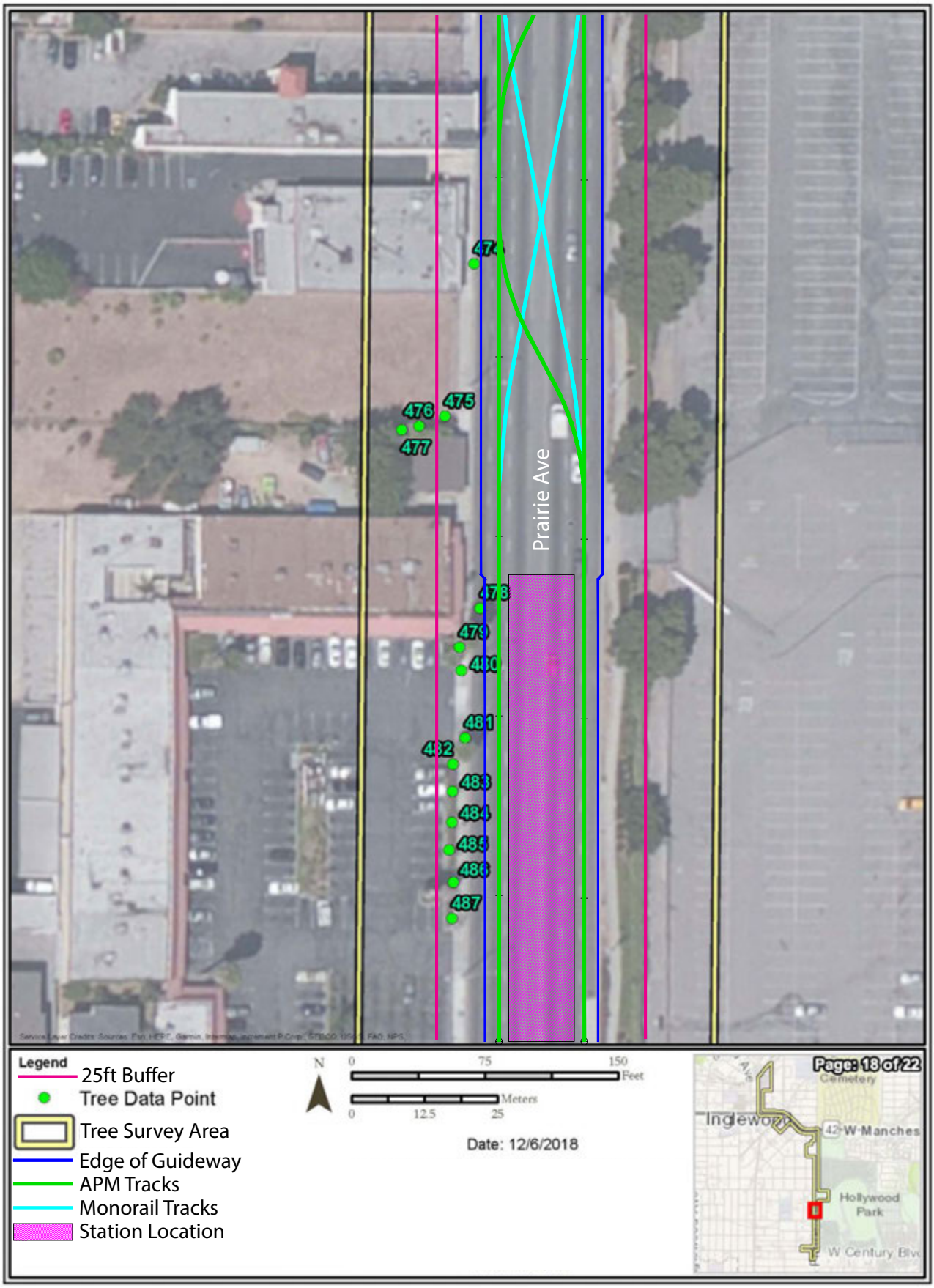


SOURCE: Pax Environmental, Inc. – December 2018; Meridian Consultants - 2020

FIGURE **4.3-35**

Potential Tree Impacts – Prairie Avenue(d)

208-001-18



SOURCE: Pax Environmental, Inc. – December 2018; Meridian Consultants - 2020

FIGURE **4.3-36**

Potential Tree Impacts – Prairie Avenue(e)

208-001-18

In particular, the HPSP includes tree location and species recommendations for the HPSP area and surrounding roadways. The HPSP calls for large columnar evergreen trees such as Afghan pine (*Pinus eldarica*) or Canary Island pine (*Pinus canariensis*) along Prairie Avenue north of Hardy Street.

As the Project will comply with the City's Tree Preservation ordinance, and the supplemental standards in the ITC CCP will also be implemented, impacts will be less than significant.

Summary of Construction Impacts

As discussed above, the Project will comply with the City's Tree Preservation ordinance, and the supplemental standards in the ITC CCP related to the removal and replacement of trees will also be implemented. Impacts from the removal of trees to construct the Project will be less than significant.

Operation

Guideway and Stations

Operation of the proposed Project, including the guideway and the three proposed stations, support facility sites, including trains using the guideway and stations, would be within a developed site within an urbanized area. The operation of the guideway and stations would introduce different land uses within the public rights-of-way and adjacent properties co-located with the proposed Project. The guideway and stations would introduce new ornamental landscaping, as well as new lighting associated with the guideway, stations, and passenger access areas. The new ornamental trees and landscaping could be illuminated by nighttime lighting and would be located in highly urbanized, active locations. Because the proposed Project is located in a highly urbanized area with existing light, noise, and activity, increased lighting, noise, and activity associated with the guideway and stations would not significantly affect the activities of birds within the area. Additionally, birds that occur within the existing area are highly adapted to living within urbanized areas; the guideway and stations would be consistent with the urbanized developments in the vicinity.

As previously noted, the City of Inglewood Tree Preservation Ordinance governs the removal or modification of protected trees within the City.[100] The proposed Project would follow the applicable program (Downtown TOD, HPSP, and IMC as applicable) for the area the guideway and stations it is under. Operation of the guideway and stations would require landscaping maintenance activities; however, no additional tree and/or ornamental vegetation removals are planned. As such, no significant impacts regarding conflict with local policies or ordinances protecting biological resources would occur from the operation of the guideway and stations.

100 City of Inglewood Tree Preservation Ordinance (IMC Section Chapter 12, Article 32).

Support Facilities

Maintenance and Storage Facility

Operation of the maintenance and operations facility sites would be within a developed site within an urbanized area. The operation of the MSF site would introduce different land uses within the public rights-of-way and adjacent properties along Manchester Boulevard. The MSF site would introduce new ornamental landscaping, as well as new lighting associated with passenger access areas and support facilities. The new ornamental trees and landscaping could be illuminated by nighttime lighting and would be located in highly urbanized, active locations. Because the proposed Project is located in a highly urbanized area, increased lighting, noise, and activity associated with MSF site would not significantly affect the activities of birds within the area. Additionally, birds that occur within the existing area are highly adapted to living within urbanized areas; the MSF would be consistent with the urbanized developments in the vicinity.

As discussed previously, the City of Inglewood Tree Preservation Ordinance governs the removal or modification of protected trees within the City.[101] Operation of the MSF site would require landscaping maintenance activities similar to existing uses; however, no additional tree and/or ornamental vegetation removals are planned. As such, no significant impacts regarding conflict with local policies or ordinances protecting biological resources would occur from the operation of the MSF site.

Traction Power Substations

The proposed Project would include two TPSS sites, One TPSS would be located within the MSF site which is analyzed above; the second TPSS would be located within the existing Civic Center site. The operation of the TPSSs would introduce different land uses within the public rights-of-way and adjacent properties along Prairie Avenue.

The TPSS sites could introduce new ornamental landscaping, as well as new lighting associated with p access areas and support facilities. The new ornamental trees and landscaping could be illuminated by nighttime lighting and would be located in highly urbanized, active locations. Because the proposed Project is located in a highly urbanized area, increased lighting, noise, and activity associated with TPSS sites would not significantly affect the activities of birds within the area. Additionally, birds that occur within the existing area are highly adapted to living within urbanized areas; the TPSS sites would be consistent with the urbanized developments in the vicinity.

101 City of Inglewood Tree Preservation Ordinance (IMC Section Chapter 12, Article 32).

As previously noted, the City of Inglewood Tree Preservation Ordinance governs the removal or modification of protected trees within the City.[102] Operation of the TPSS sites would require landscaping maintenance activities similar to existing uses; however, no additional tree and/or ornamental vegetation removals are planned. As such, no significant impacts regarding conflict with local policies or ordinances protecting biological resources would occur from the operation of the TPSS sites.

Summary of Operational Impacts

Operation of the proposed Project including the guideway and stations, support facility sites, would not conflict with any existing policies or ordinances protecting biological resources including the City's Tree Preservation Ordinance, or the provisions identified in either the Downtown TOD or HPSP. Impacts would be less than significant.

Mitigation Measures

Construction

No mitigation is required due to conflicts existing policies or ordinances protecting biological resources.

Operation

No mitigation is required due to conflicts existing policies or ordinances protecting biological resources.

Level of Significance after Mitigation

Construction

Impacts due to conflicts existing policies or ordinances protecting biological resources would be less than significant.

Operation

Impacts due to conflicts existing policies or ordinances protecting biological resources would be less than significant.

4.3.8 CUMULATIVE IMPACTS

Cumulative development projects in the vicinity of the proposed Project, described in **Section 4.0: Environmental Impact Analysis**, *4.0.6: Cumulative Assumptions*, would result in potentially significant impacts to biological resources.

102 City of Inglewood Tree Preservation Ordinance (IMC Section Chapter 12, Article 32).

The City of Inglewood is located within a highly developed and urbanized area and potential biological resources are limited to a few small parks and the Inglewood Park Cemetery. These parks are primarily landscaped areas and wildlife species utilizing the parks are mostly those adapted to living in an urban environment. The geographic scope of analysis for cumulative impacts related to biological resources varies for each resource. Regarding the movement of wildlife species, which are limited to common species found in urban environments as identified above, it is considered to be the vicinity surrounding the proposed Project.

The proposed Project is located entirely in a disturbed and/or developed area and supports limited biological resources, with the exception of trees and ornamental shrubs that may provide nesting habitat for birds, including trees that are protected in accordance with the local municipal code. The geographic scope of analysis for cumulative impacts related to protected trees is the City. While migratory birds may occur within the proposed Project, including the guideway and stations, support facility sites, the quality of the habitat is low due to the absence of native habitat and open space, the level of disturbance (existing levels of urban activity and lighting from adjacent uses), and a lack of suitable habitat in the vicinity. As such, migratory bird habitat within the footprint of the proposed Project and vicinity is limited to mainly nonnative ornamental trees.

It is likely that the common, urbanized species, including migratory species, would continue to use the vegetation that exists within the urbanized areas that surround the proposed Project. Therefore, the loss of trees from demolition and construction of the proposed Project would not result in a substantial or significant decline of bird nesting habitat in the region. Implementation of mitigation measures would ensure that bird nests are avoided during the demolition or construction phases of the proposed Project. Compliance with the IMC would require that replacement trees and landscaping that would ensure that the urban habitat for birds is maintained.

The proposed Project, in conjunction with cumulative development within the vicinity of the proposed Project, demolition, construction or operational activities would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.

Therefore, the Project's potential to contribute to a significant cumulative impact related to biological resources would not be cumulatively considerable.

4.3.9 CONSISTENCY WITH CITY OF INGLEWOOD GENERAL PLAN

As discussed in the CCP, **Appendix 3.0.5**, the Project would comply with the provisions outlined in the Downtown TOD Plan and Hollywood Park Specific Plan relative to preferred species and location of tree placement.

The Conservation Element of the City's General Plan was adopted in October 1997 and addresses the conservation, development, and use of natural resource including water, soils, lakes, and mineral deposits.[103] The Conservation Element notes that resources which are typically addressed in conservation elements, including biological resources such as forests, wildlife, fisheries, shorelines, and agricultural land, are not found in Inglewood.

The Land Use Element of the City's General Plan describes tree masses as an important component the physical environment of the City.[104] The Land Use Element states that trees are not merely aesthetic elements of the urban setting, but also provide beneficial effects such as noise attenuation, amelioration of air pollution and dust, and temperature control. As such, landowners are encouraged to plant trees to realize these benefits. The General Plan does not address biological resources any further.

The proposed Project would comply with the requirements of the IMC Tree Preservation Ordinance. Implementation of incorporated features and actions of the CCP would address the removal of trees and the requirements for the replacement of the loss of protected trees at a 1:1 ratio per City requirements and those of the Downtown TOD Plan and HPSP. As such, the proposed Project would help ensure the maintenance of a robust urban forest in the City and would not conflict with any goal, objective, or policy of the City's General Plan related to biological resources.

103 City of Inglewood *General Plan*, "Conservation Element" (1997).
104 City of Inglewood *General Plan*, "Land Use Element" (adopted 1980, amended 1986, 2009, and 2016).

4.4.1 INTRODUCTION

This section of the Draft Environmental Impact Report (Draft EIR) evaluates the potential for the proposed Inglewood Transit Connector Project (Project or ITC Project) to impact cultural resources within the proposed Project area that includes the APM guideway, stations, and support facilities (MSF and TPSS sites).

Cultural resources include places, objects, and settlements that reflect group or individual religious, archaeological, architectural, or paleontological activities. Such resources provide information on scientific progress, environmental adaptations, group ideology, or other human advancements. Information from the following studies of the Project area are incorporated into this section:

- *Cultural Resource Investigation*, Roberta Thomas, M.A., RPA, and Gena Granger, M.A., RPA, PaleoWest Archaeology (PaleoWest), December 12, 2018 (**Appendix 4.4.1**);
- *Historic Resources Impact Memo*, Paul Travis, AICP, and Kari Fowler, Historic Resources Group (HRG), January 17, 2019 (**Appendix 4.4.2**); and
- *Historic Resources Technical Report,* Paul Travis, AICP, and Kari Fowler, HRG, November 19, 2020 (**Appendix 4.4.3**).

See **Section 8.0** for a glossary of terms, definitions, and acronyms used in this Draft EIR.

4.4.2 METHODOLOGY

4.4.2.1 Historic Architectural Resources

The analysis of impacts to historic architectural resources is based on the *Historic Resources Impact Memo* (**Appendix 4.4.2**) and *Historic Resources Technical Report* (**Appendix 4.4.3**) prepared by qualified personnel who meet or exceed the Secretary of the Interior's Professional Qualification Standards in history and architectural history.

Key steps in completing the assessment included a survey of historic-age buildings within the proposed Project's APM guideway, stations, and support facilities (MSF and TPSS sites), archival research, and field documentation. The Expanded Study Area evaluated in the *Historic Resources Technical Report* was defined to encompass the maximum extent within which potential impacts of the proposed Project's APM guideway, stations and support facilities (MSF and TPSS sites) would occur, and included all parcels within the proposed Project's footprint and fronting the APM alignment on both sides of the right-of-way, and parcels immediately adjacent to or across from areas where there would be substantial new construction outside of the APM alignment area (e.g. locations for potential support facilities).

The historic resource assessment was based upon field observation of the Project alignment and immediate surrounding properties on June 4, 2018; review of previous historic resource assessments, surveys, and other studies; review of property-specific research, including building permits, Sanborn Fire Insurance maps, tax assessor records, historic photographs, etc.; and review of published histories of the City of Inglewood.

The *Historic Resources Technical Report* included both desktop-level review and field investigation completed on June 4, 2018 and an additional field survey on February 21, 2019. Properties were evaluated for their eligibility for listing in the National Register and the California Register. Similar to the Historic Resources Impact Memo, the report used primary and secondary sources related to the history and development of the City with an emphasis on the early 20th-century, central business district that comprises much of the Project footprint and Expanded Study Area. Documents that were consulted included previous historical resources surveys and assessments; previous environmental reviews; the City's historical building permits; Los Angeles County Tax Assessor records; Sanborn Fire Insurance maps; historical photographs and aerial images; historical newspapers and other periodicals; local histories and historic context statements; and the California State Historic Resources Inventory, Los Angeles County.

The California State Historic Resources Inventory for Los Angeles County, records housed at the California Historic Resources Information System (CHRIS) South Central Coastal Information Center (SCCIC), was consulted to identify any previous evaluations of potential historic resources on, or immediately adjacent to, the Project alignment. There are two National and California Register-listed architectural historical resources within one block radius of the proposed Project's APM guideway, stations, and support facilities, one of which is the former Fox Theater on Market Street and the other is The Forum located at the intersection of Manchester Boulevard and Prairie Avenue.

The field surveys were supplemented by property-specific and contextual research to identify additional properties that are eligible for listing or designation and therefore may be considered historical resources under CEQA. Through this process, five additional properties were evaluated as appearing eligible for listing in the National Register of Historic Places (Nation Register or NR) and/or California Register of Historic Places (California Register or CR), and are added to properties considered as historical resources for the purposes of this EIR.

The City of Inglewood does not have a historic preservation ordinance and does not maintain a local designation program.

The *Historic Resources Technical Report* (**Appendix 4.4.3**) consists of a two-part inquiry: (1) a determination of whether the proposed Project's APM guideway, stations, and support facilities (MSF and

TPSS sites) contain or are adjacent to any historic resources that may be impacted by the proposed Project; and, if any such resources exist, (2) a determination of whether the Project would result in a "substantial adverse change" to the significance of any such resources, as required by CEQA.

The *Historic Resources Technical Report* contains the following:

- A review of the existing buildings, structures, objects, and landscape areas located within the Project area and Expanded Study Area;
- A review of previous evaluations within the Project area and Expanded Study Area through historic survey, environmental review, or other official actions;
- Identification and evaluation of historical resources within the Project area and Expanded Study Area; and
- Analysis of potential impacts to historical resources within the Project footprint and Expanded Study Area.

Under CEQA, the evaluation of impacts to historic resources consists of a two-part inquiry: (1) a whether there are any objects, buildings, structures, sites, areas, places, records, or manuscripts, which may be impacted by the Project, that are "historic" within the meaning of CEQA; and, if any such resources exist, (2) a determination of whether the Project would result in a "substantial adverse change" to the significance of any such resources.

4.4.2.2 Archaeological Resource Investigation

A *Cultural Resource Investigation* (see **Appendix 4.4.1**) was performed for the area for the proposed Project consisting of both desktop-level review and a field investigation. This investigation effort included the Project footprint and a half-mile radius beyond the footprint. The objective of this investigation was to identify prehistoric or historical cultural and archaeological resources that have been previously recorded within the study area during prior cultural resource investigations and through field investigation.

As part of the *Cultural Resource Investigation*, a literature and records search was conducted at the SCCIC housed at California State University, Fullerton on June 20, 2018. The objective of this records search was to identify prehistoric or historical cultural resources that have been previously recorded within the study area during prior cultural resource investigations. The research component of the investigation was also used to describe the development history of the City and its surrounding area. Additional sources consulted during the literature review and records search included published local histories, previous environmental review documents for the City and region, the National Register of Historic Places, the Office of Historic Preservation Archaeological Determinations of Eligibility, and the Office of Historic Preservation Directory of Properties in the Historic Property Data File.

The *Cultural Resource Investigation* also included a windshield/reconnaissance field survey conducted by a qualified PaleoWest archaeologist on July 20, 2018. The purpose of the survey was to observe and note the conditions of the area, including the extent of the hardscape, the overall degree of ground disturbance, and the character and nature of the area. This included a survey along the length of the APM alignment to identify any areas of open ground surface and inspected any areas likely to contain or exhibit archaeologically or historically sensitive cultural resources and inspected to ensure that if any visible, potentially significant archaeological resources were discovered that they were documented. The area of the proposed Project was recorded with digital photographs and a photo log was maintained to include, at a minimum, photo number, date, orientation, photo description, and comments.

As part of the *Cultural Resource Investigation*, the Native American Heritage Commission (NAHC) was contacted on June 15, 2018 for a review of the Sacred Lands File (SLF) in addition to five Native American individuals and/or tribal groups to elicit information regarding cultural resource issues related to the proposed Project. Detailed information describing the City's formal tribal consultation process and the proposed Project's potential impacts to tribal cultural resources are discussed in **Section 4.13: Tribal Cultural Resources** of this Draft EIR.

4.4.3 REGULATORY FRAMEWORK

Cultural historic resources are regulated at the Federal, State, and local levels of government. Federal laws establish broad frameworks for cultural historic resource identification and protection, while State and local jurisdictions actively identify, document, and protect resources within their boundaries. The National Historic Preservation Act of 1966,[1] the California Register, the California PRC (Sections 5020-5029.5,[2] 5079-5079.65,[3] and 5097.9-5097.998),[4] and CEQA are the primary federal and State laws regulating the preservation of cultural historic resources of national and State significance.

4.4.3.1 Federal Regulations

National Historic Preservation Act

The National Historic Preservation Act of 1966 (NHPA) authorized formation of the National Register and coordinates public and private efforts to identify, evaluate, and protect the nation's historic and archaeological resources. The National Register includes districts, sites, buildings, structures, and objects that are significant in American history, architecture, archaeology, engineering, and culture.[5]

1 US Code, Title 54, Section 300101 et seq., National Historic Preservation Act of 1966, Sections 106 and 110.
2 California Public Resources Code (PRC), Sections 5020-5029.5, Historic Resources.
3 California PRC, Sections, 5079-5079.65. Parks and Monuments.
4 California PRC, Sections 5097.9-5097.998, Native American Historical, Cultural, and Sacred Sites.
5 US Code, Title 54, Section 300101 et seq., National Historic Preservation Act of 1966, Sections 106 and 110.

Section 106 (Protection of Historic Properties) of the NHPA requires federal agencies to take into account the effects of their undertakings on historic properties. A Section 106 review refers to the federal review process designed to ensure that historic properties are considered during federal project planning and implementation. The Advisory Council on Historic Preservation, an independent federal agency, administers the review process, with assistance from State Historic Preservation Offices (SHPOs). If any impacts are identified, the agency undergoing the project must identify the appropriate SHPO to consult with during the process.[6]

National Register of Historic Places

The National Register of Historic Places (NRHP)[7] is the official list of the Nation's historic places worthy of preservation. Authorized by the National Historic Preservation Act of 1966, the National Park Service's National Register of Historic Places is part of a national program to coordinate and support public and private efforts to identify, evaluate, and protect America's historic and archeological resources.

Section 106 of the NHPA requires federal agencies to take into account the effects of an undertaking on historic properties, which are defined as cultural resources included in or eligible for listing in the National Register. Determination of National Register eligibility for cultural resources is made according to the following criteria:

The quality of significance in American history, architecture, archaeology, engineering, and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association, and

a. that are associated with events that have made a significant contribution to the broad patterns of our history; or
b. that are associated with the lives of persons significant in our past; or
c. that embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
d. that have yielded, or may be likely to yield, information important in prehistory or history.[8]

If cultural resources do not meet the above criteria, they are not historic properties and are not further considered in the Section 106 process. In addition to having significance, resources must have integrity for

6 US Code, Title 54, Section 300101 et seq., National Historic Preservation Act of 1966, Section 106
7 U.S. Department of the Interior, National Park Service (NPS), *Nation Register of Historic Places.* https://www.nps.gov/subjects/nationalregister/what-is-the-national-register.htm
8 US Code, Title 54, Section 300101 et seq., National Historic Preservation Act of 1966, Section 106

the period of significance. The period of significance is the date or span of time within which significant events transpired or significant individuals made their important contributions.

Secretary of the Interior's Standards

The Secretary of the Interior's Standards for the Treatment of Historic Properties (Standards) are intended to promote responsible preservation practices that help protect irreplaceable cultural resources.[9] They cannot be used to make essential decisions about which features of the historic building should be saved and which should be changed. Choosing the appropriate treatment Standard, or approach, requires careful decision making and depends on a number of considerations, including level of historical significance, physical condition, proposed use, and code or regulatory requirements. Once the Standard is selected—whether it is preservation, rehabilitation, restoration, or reconstruction—the Standards provide philosophical consistency when treatment work is undertaken.

Rehabilitation, the most common treatment approach, is the process of making possible a compatible use for a property through repair, alterations, and additions while preserving those portions or features which convey its historical, cultural, or architectural values. The Standards for Rehabilitation are as follows:

1. A property shall be used for its historic purpose or be placed in a new use that requires minimal change to the defining characteristics of the building and its site and environment.
2. The historic character of a property shall be retained and preserved. The removal of historic materials or alteration of features and spaces that characterize a property shall be avoided.
3. Each property shall be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features or architectural elements from other buildings, shall not be undertaken.
4. Most properties change over time; those changes that have acquired historic significance in their own right shall be retained and preserved.
5. Distinctive features, finishes, and construction techniques or examples of craftsmanship that characterize a property shall be preserved.
6. Deteriorated historic features shall be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature shall match the old in design, color, texture, and other visual qualities and, where possible, materials. Replacement of missing features shall be substantiated by documentary, physical, or pictorial evidence.
7. Chemical or physical treatments, such as sandblasting, that cause damage to historic materials shall not be used. The surface cleaning of structures, if appropriate, shall be undertaken using the gentlest means possible.

9 U.S. Department of the Interior, National Park Services, *Technical Preservation Services,* The Secretary of The Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring & Reconstructing Historic Buildings, 2017, accessed June 2018 at https://www.nps.gov/tps/standards/treatment-guidelines-2017.pdf.

8. Significant archeological resources affected by a project shall be protected and preserved. If such resources must be disturbed, mitigation measures shall be undertaken.
9. New additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property. The new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment.
10. New additions and adjacent or related new construction shall be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

4.4.3.2 State Regulations

Office of Historic Preservation

The California Office of Historic Preservation (OHP) administers federally and State-mandated historic preservation programs to further the identification, evaluation, registration, and protection of California's irreplaceable resources.[10] As an office of the California Department of Parks and Recreation, the OHP implements the policies of the NHPA on a Statewide level. OHP works to preserve California's heritage resources by ensuring that projects and programs carried out or sponsored by federal, State, and local agencies comply with federal and State historic preservation laws.

California Register of Historical Resources

The State Historical Resources Commission has designed the California Register of Historic Places (California Register) for use by State and local agencies, private groups, and citizens to identify, evaluate, register, and protect California's historical resources. The California Register is the authoritative guide to the State's significant historical and archeological resources.[11]

The California Register program encourages public recognition and protection of resources of architectural, historical, archeological, and cultural significance, identifies historical resources for State and local planning purposes, determines eligibility for State historic preservation grant funding and affords certain protections under the California Environmental Quality Act.

The California Register is the authoritative guide to the State's significant archaeological and historical resources. It closely follows the eligibility criteria of the National Register but deals with State and local-level resources. The California Register serves to identify, evaluate, register, and protect California's historical resources. For purposes of CEQA, a historical resource is any building, site, structure, object, or

10 State of California, Office of Historic Preservation. https://ohp.parks.ca.gov/.
11 State of California, Office of Historic Preservation, *California Register of Historic Places,* https://ohp.parks.ca.gov/?page_id=21238.

historic district listed in or eligible for listing in the California Register.[12] A resource is considered eligible for listing in the California Register if it meets any of the following criteria:

a. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.
b. Is associated with the lives of persons important in our past.
c. Embodies the distinctive characteristics of type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.
d. Has yielded, or may be likely to yield, information important in prehistory or history [PRC Section 5024.1(c)].

Historical resources meeting one or more of the criteria listed above are eligible for listing in the California Register. In addition to significance, resources must have integrity for a period of significance-the date or span of time within which significant events transpired or significant individuals made important contributions. Important archaeological resources are required to be at least 50 years old to be considered. "Integrity is the authenticity of a historical resource's physical identity evidenced by the survival of characteristics that existed during the resource's period of significance." Simply put, resources must "retain enough of their historic character or appearance to be recognizable as historical resources and to convey the reasons for their significance."

CEQA also requires the lead agency to consider whether there is a significant effect on unique archaeological resources that are not eligible for listing in the California Register. As defined in CEQA, a unique archaeological resource is:

> *an archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:*
>
> 1. *Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information.*
> 2. *Has a special and particular quality such as being the oldest of its type or the best available example of its type.*
> 3. *Is directly associated with a scientifically recognized important prehistoric or historic event or person.*[13]

If an archaeological resource is found eligible for listing in the California Register, then it is considered under CEQA to be a historic resource that needs to be protected. This may also apply to unique archaeological resources. If a historic resource may be impacted by activity, under CEQA, avoidance and

12 California PRC, *Division 13. Environmental Quality*, Section 21084.1.
13 California PRC, *Division 13. Environmental Quality*, Section 21083.2.

preservation in place is the preferred alternative. If that is not possible, then a data recovery plan would need to be created and enacted to lessen impacts to the environment to a less than significant level. If the archaeological resource is not eligible for listing in the California Register, and it is not a unique archaeological resource, then no further action is required to protect or mitigate possible impacts to it.

California Health and Safety Code

The discovery of human remains is regulated per California Health and Safety Code,[14] which addresses dead bodies and requires the County Coroner to be notified in the event of the discovery of human remains. If the human remains discovered are determined to be Native American in origin, the Coroner would contact the Native American Heritage Commission (NAHC) within 24 hours.

California Public Resources Code Sections 5020-5029.5 – Historical Resources

The California PRC[15] addresses the protection of archaeological, paleontological, and historical sites. In addition, cultural and paleontological resources are recognized as a nonrenewable resource and, therefore, receive protection under the statue as follows:

- *California Public Resources Code* Sections 5020-5029.5 established the Historical Landmarks Advisory Committee as the State Historical Resources Commission (SHRC). The SHRC oversees the administration of the California Register of Historical Resources and is responsible for the designation of State Historical Landmarks and Historical Points of Interest.
- Defines the functions and duties of the OHP. OHP is responsible for the administration of federally and State mandated historic preservation programs in California and the California Heritage Fund.
- Provides protection to Native American historical and cultural resources and sacred sites and identify the powers and duties of NAHC. These sections also require notification of discoveries of Native American human remains, descendants and provide for treatment and disposition of human remains and associated grave goods.

California Environmental Quality Act

The State CEQA Guidelines[16] requires that environmental protection be given significant consideration in the decision-making process. Historical resources are included under environmental protection. Thus, any project or action which constitutes a substantial adverse change in the significance of a historical resource also has a significant effect on the environment and shall comply with the State CEQA Guidelines.

14 California, *Health and Safety Code* sec. 7050.5, "Dead Bodies."

15 California PRC, Sections 5020-5029.5, *Historic Resources.* https://leginfo.legislature.ca.gov/faces/codes_displayText.xhtml?lawCode=PRC&division=5.&title=&part=&chapter=1.&article=2.

16 State CEQA Guidelines, Section 15064.5. *Determining the Significance of Impacts to Archaeological and Historical Resources.*

CEQA clarifies which cultural resources are significant, as well as which project impacts are considered to be significantly adverse. A "substantial adverse change" means "demolition, destruction, relocation, or alteration such that the significance of a historical resource would be impaired."

CEQA defines a historical resource as a resource listed in, or determined eligible for listing, in the California Register of Historical Resources. All properties on the California Register are to be considered under CEQA. However, because a property does not appear on the California Register does not mean it is not significant and therefore exempt from CEQA consideration. All resources determined eligible for the California Register are also to be considered under CEQA.

The courts have interpreted CEQA to create three categories of historical resources:

- Mandatory historical resources are resources "listed in, or determined to be eligible for listing in, the California Register of Historical Resources."
- Presumptive historical resources are resources "included in a local register of historical resources, as defined in subdivision (k) of Section 5020.1, or deemed significant pursuant to criteria set forth in subdivision (g) of Section 5024.1" of the Public Resources Code, unless the preponderance of the evidence demonstrates that the resource is not historically or culturally significant.
- Discretionary historical resources are those resources that are not listed but determined to be eligible under the criteria for the California Register of Historical Resources.[17]

To simplify the first three definitions provided in the CEQA statute, a historical resource is a resource that is:

- Listed in the California Register of Historical Resources;
- Determined eligible for the California Register by the State Historical Resources Commission; or
- Included in a local register of historical resources.

The State CEQA Guidelines provide two additional definitions of historical resources, which may be simplified in the following manner. A historical resource is a resource that is:

- Identified as significant in a historical resource survey meeting the requirements of Public Resources Code 5024.1(g);
- Determined by a Lead Agency to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals

17 League for the Protection of Oakland's Architectural and Historic Resources vs. City of Oakland, 52 Cal. App. 4th 896, 906-7 (1997).

of California. Generally, this category includes resources that meet the criteria for listing on the California Register (Pub. Res. Code SS5024.1, Title 14 CCR, Section 4852).

The fact that a resource is not listed in, or determined eligible for listing in, the California Register, not included in a local register of historical resources, or not deemed significant pursuant to criteria set forth in subdivision (g) of Section 5024.1, does not preclude a lead agency from determining that the resource may be an "historical resource" for purposes of CEQA.

Properties formally determined eligible for listing in the National Register of Historic Places are automatically listed in the California Register. Properties designated by local municipalities can also be considered historical resources. A review of properties that are potentially affected by a project for historic eligibility is also required under CEQA.

City of Inglewood General Plan

The City's General Plan Land Use Element presents a long-range plan for the distribution and future use of land within the City. The Land Use Element analyzes population, existing and future land use requirements, and proposed implementation techniques. It provides a framework upon which the development of public and privately owned land can be based.[18]

Land Use Element

The City's Land Use Element[19] was adopted in 1980 and subsequently amended in 1986, 2009, 2016, and 2020. Applicable goals to the Cultural Resources section were added in 2016 to the Land Use Element with the adoption of the New Downtown and Fairview Heights Transit Oriented Development Plan and Design Guidelines described below.

New Downtown and Fairview Heights Transit Oriented Development Plan and Design Guidelines

The New Downtown and Fairview Heights Transit Oriented Development Plan and Design Guidelines[20] (Downtown TOD Plan) covers the Downtown Inglewood and Fairview Heights neighborhoods of the City and works to implement the City's vision for transforming the quality of the environment within these areas. The Downtown TOD Plan area consists of approximately 585 acres located in the center of Inglewood along the Metro Crenshaw/LAX line just east of the Florence Avenue/La Brea Avenue

18 City of Inglewood, *General Plan- Related Documents,* https://www.cityofinglewood.org/209/General-Plan. Accessed June 12, 2020

19 City of Inglewood. *Land Use Element.* https://www.cityofinglewood.org/DocumentCenter/View/132/Land-Use-Element-1980-Amended-1986-2009-2016-PDF. Accessed July 22, 2020.

20 City of Inglewood, New Downtown and Fairview Heights Transit Oriented Development Plan and Design Guidelines, November 1, 2016.

intersection. This Downtown planning and zoning area extends approximately one-half mile in all directions from the Metro Downtown Inglewood Station.

The Downtown TOD Plan planning goals were incorporated into the Land Use Element with its 2016 update. Relevant goals and policies in the Downtown TOD are listed as follows:

Goal 1*:* Downtown is a place to live, work, shop, recreate, and be entertained.

Policy 1.2: Ground Floor Uses and Storefronts. Require uses that activate pedestrian activity such as retail on major streets and plaza frontages. Require that storefronts be historically-sensitive, attractive, and transparent in the Historic Downtown.

Goal 2: Downtown is a revitalized yet forward-looking gathering place for the community.

Policy 2.3: Preservation of Historic Fabric. Require the preservation of buildings that have been designated as historic and encourage the reuse of other historic buildings. Maintain the sense of place in areas with historic fabric and/or meaning such as Market Street between Regent Street and Hillcrest Avenue and the Hillcrest neighborhood east of Locust Street.

Goal 6: Downtown expresses the unique culture of Inglewood.

Policy 6.1: Districts. Define the following unique districts within the Downtown TOD area, each with their own unifying character or identity that should be preserved and enhanced: Historic Downtown, Civic Center, TechTown, Beach Avenue, Fairview West, Hillcrest and Queen Street.

Additionally, the Downtown TOD states that the Historic Downtown is the heart of Downtown Inglewood, characterizing it as pedestrian-oriented and human scaled. The element further states that Downtown Inglewood is intended to function as a regional destination and gathering space for all in the City that links residents with the community's past, present, and future. The district should include public space, restaurants, entertainment, residential uses, hotel, and office uses.

City of Inglewood Municipal Code

The City of Inglewood's General Plan does not identify any goals or policies related specifically to cultural or historical resources. Permitted uses in the Historic Core Zone are those identified in the Downtown TOD.[21]

4.4.4 EXISTING CONDITIONS

4.4.4.1 Regional Ethnographic Setting

Pre-History

In the pre-historical period, the fertile coastal plain between present-day Los Angeles and Long Beach was enriched by the periodic flooding of the Los Angeles River over millennia. It was home to the Tongva people, also referred as the Gabrieleño, Fernandeño, or Nicoleño, the names given to the region's indigenous people by California's Spanish missionaries. The Tongva occupied the area now encompassed by the Los Angeles basin, San Fernando Valley, San Gabriel Valley, San Bernardino Valley, and the local California coastline. The South Bay region was home to a number of small Tongva (Gabrieleño) villages, with notable settlements at Suangna near the present-day city of Carson, near Point Fermin in San Pedro, and near Malaga Cove in Palos Verdes.[22]

Spanish Colonial and Mexican Periods

In 1542, Spanish explorer Juan Rodriguez Cabrillo led the first European expedition to explore what is now the west coast of North America. Explorers with Cabrillo's expedition encountered native people on land and sea voyages, making what is thought to be the first known contact with Alta California's indigenous tribes, including the Tongva of the Suangna area.[23] While Cabrillo claimed California for the Spanish Crown at this time, Spanish settlement would not reach this territory for another two hundred years.

On July 14, 1769, Don Gaspar de Portolá, governor and military leader of Baja California, led the first expedition to colonize Alta California. Accompanied by Franciscan friars Junípero Serra and Juan Crespí, Portolá took a group of 64 men northward from San Diego toward Monterey. On August 2, the expedition camped along the east bank of the Los Angeles River just south of where it is joined by the Arroyo Seco. Fr. Crespí named the spot "El Pueblo de Nuestra Señora la Reina de los Ángeles del Río Porciúncula (translating as "town of Our Lady the Queen of Angels of the River Porciúncula"). As the expedition crossed the river and continued to the south and west approximately one mile, they encountered the Tongva village of *Yang-na*, believed to be near the current site of *El Pueblo de Los Angeles*.

21 City of Inglewood, Municipal Code, Section 12-31.46 (Ord. 17-01 11-01-16).
22 Sam Gnerre, "The Suangna Native American Village in Carson," South Bay Daily Breeze, January 17, 2015.
23 Sam Gnerre, "The Suangna Native American Village in Carson," South Bay Daily Breeze, January 17, 2015.

On September 8, 1771, Spanish colonists established Mission San Gabriel, the fourth of an eventual 21 Spanish missions in California, and the first in this area. Much of the area's native population would be recruited to work the San Gabriel Mission lands. Seven years later, in 1778, Governor Felipe de Neve received approval for the creation of a civil pueblo along the *Río la Porciúncula*. Persuaded by Crespi's earlier descriptions of a well-watered valley with good soils for growing crops and an ample native population to work the land, the Spanish colonial government ordered Governor Neve to establish a settlement at this location and name the new pueblo *La Reina de los Angeles* ("Queen of the Angels").

In 1821, Mexico won its independence from Spain and Alta California became a territory of the new Mexican Republic, marking an end to Spanish colonial rule in the region. The political and social control of the military and religious leadership began to shift toward the secular and private sector, and to native-born Californios. The new Mexican government sought to diminish the influence of Spain in the region, as the Spanish missions largely remained loyal to the Roman Catholic Church in Spain. At the same time, there was a need for more grazing lands to increase commerce in the hide and tallow trade. Thus, beginning in 1834, the Mexican government began to secularize the missions, confiscating mission lands to be distributed in large land grants called "ranchos." Pío Pico, the last governor of Alta California, subdivided the former mission lands into large tracts, granting them to various prominent "Californios."

American Period

United States troops began occupying Alta California in 1846, at the advent of the Mexican-American War, and soon gained possession of Los Angeles itself. However, Alta California would not officially come under American rule until February 2, 1848, with the signing of the Treaty of Guadalupe Hidalgo, which ceded the California territory to the United States and ended the war. Importantly, the treaty also provided that the existing land grants would be honored.

4.4.4.2 History of Inglewood

The origin of today's City of Inglewood dates back to the mid-1800s and a dispute between two prominent California families: the Ávilas and the Machados. José Manuel Orchado Machado was a Spanish soldier and mule tender who was sent west of Los Angeles in 1781 to graze his livestock. He found the area around the Centinela Springs to be excellent grazing lands and settled there with a group of ranchers.[24] In 1834, Machado's son Ygnacio built the Centinela Adobe.[25] During this same period, Francisco Ávila and his family had established grazing lands near the Centinela. As the claims of the two families clashed, they took their dispute to the local council in 1837, which gave official title of the area around Centinela Springs to the

24 The site of Centinela Springs is today's Edward Vincent Junior Park, just northeast of the Project Area.

25 The Centinela Adobe is located in the Los Angeles community of Westchester and is the oldest building in the area. Considered the "birthplace of Inglewood," it is operated as a house museum by the Historical Society of Centinela Valley.

Machado family as the 2,219-acre Rancho Aguaje de la Centinela. The Ávila family was granted the much larger Rancho Sausal Redondo. At 22,458 acres, this land encompassed much of what is now the South Bay region of Los Angeles County. In 1845, Bruno Ygnacio Ávila arranged a trade with the Machados: a small tract in the Pueblo de Los Ángeles for Rancho Aguaje de la Centinela. The grant for Rancho Sausal Redondo was officially patented to Antonio Ygnacio Ávila in 1855; Rancho Aguaje de la Centinela was officially granted to Bruno Ávila in 1872.

Ultimately the Ávila family would lose both of the ranchos. Bruno Ávila lost Rancho Aguaje de la Centinela through foreclosure in 1857; the property was subsequently acquired by Scotsman Sir Robert Burnett in 1860. In 1868, the heirs of Antonio Ávila were forced to sell Rancho Sausal Redondo to pay probate costs, and it was also acquired by Burnett. By 1872, Burnett combined the total area of some 25,000 acres into the Centinela Ranch, thus reuniting the extent of the original land grant. This ranch included what would ultimately become the coastal communities of Playa del Rey, El Segundo, Manhattan Beach, Hermosa Beach, and Redondo Beach; as well as the inland communities of Westchester, Inglewood, Hawthorne, and Lawndale.

In 1873, Burnett returned to his native Scotland, leasing the combined rancho lands to Canadian attorney Daniel Freeman and his wife, Catherine, with an agreement that they could eventually purchase the property outright.[26] The Freeman family moved to the ranch, which Burnett had been using to graze sheep and cattle. Daniel Freeman continued to graze the stock, while also planting more than 10,000 fruit and nut trees. Following a drought that led to the death of some 22,000 of his sheep, Freeman turned to dry farming, eventually producing a million barrels of barley annually. Ultimately Freeman would amass a fortune farming barley, olives, citrus fruits, and almonds. He named his ranch "Inglewood," after his birthplace in Ontario.

Following Catherine's death, Daniel Freeman began to pursue the commercial development of his expansive holdings. He first established the Centinela Land Company, which proved unsuccessful. Then in 1887, as the California Central Railway laid tracks to Redondo Beach, Freeman sold some 11,000 acres of his ranch to the Centinela-Inglewood Land Company, which would subdivide the extent into small parcels for the settlement of the new town of Inglewood. The parcels sold quickly and attracted crowds traveling in from far and wide to make land purchases.

In 1888, Freeman began work on a large mansion for himself and his family, with bricks provided by his own newly-established Continuous Brick Kiln Company of Inglewood, and lumber from the recently-acquired local planning mill.[27] In 1889, he built the Land Company office next to the train depot, moving

26 The Freeman family officially acquired this land from Burnett in 1885.

27 Gladys Waddingham, The History of Inglewood *(Inglewood, CA: Historical Society of Centinela Valley, 1994),* 8.

it to the grounds of his estate in 1895 where it served as his office until his death in 1918.[28] Ultimately, all 25,000 acres of the Centinela Ranch would be subdivided and developed, with the only remaining portion of the ranch being the one-acre site on which the Centinela Adobe is situated.

Inglewood Townsite

The townsite of Inglewood was platted by the Centinela-Inglewood Land Company in 1888, by which time the town already had a population of 300.[29] The plan divided the town into northern and southern sections on either side of the newly completed Inglewood Division of the California Central Railroad line, a subsidiary of the Atchison Topeka & Santa Fe Railway, which ran along Florence Boulevard as it made its way from Los Angeles to Redondo Beach. The major north-south street leading into Inglewood was Grevillea Avenue. Development during this period was sparse, and most buildings were of impermanent wood-frame construction. The first few business buildings clustered on narrow uniform lots along Grevillea Avenue and Commercial Street (now La Brea Avenue) between Regent and Queen streets.

By 1892, the town of Inglewood was home to several small businesses, including a grocery, post office, a barber, a restaurant, and a large two-story hotel on Queen Street between Commercial and Market.[30] At this time, Inglewood also had a post office, a railroad depot, and a large grain storage building situated along the Redondo Branch of the AT&SF railroad, as well as a handful of single-family residences. Market Street was predominantly residential during this period, before the opening of a streetcar line along its length in 1904, which would lead to its gradual transition to a commercial corridor.

By 1907, downtown Inglewood had several dozen dwellings. Commercial establishments included a drug store, general merchandise store, grocery, meat market, tailor, print shop, and various lodging buildings and offices. Institutional properties included a public school and a Presbyterian church. Industrial uses were clustered along the rail lines and included a greenhouse, planning mill, lumber yard, cement storage,

28 Gladys Waddingham, The History of Inglewood *(Inglewood, CA: Historical Society of Centinela Valley, 1994)*, 11. Daniel Freeman is considered the founder of the City of Inglewood. Among his various pursuits, he is said to have been the first farmer to engage extensively in wheat cultivation in Southern California. Upon discovering a deposit of brick clay on his property, he established the Continuous Brick Kiln Company of Inglewood in 1888, manufacturing the building materials for many of the business blocks on Spring Street and Broadway in downtown Los Angeles, including his own building, the Freeman Block at 6th and Spring streets. He was the first president of the California Club of Los Angeles, president of the Los Angeles Chamber of Commerce in 1893-1894, and director of the Southern California Railway Co. Freeman lived in the Centinela Adobe before erecting his own residence in beginning in 1891, which was demolished 1972 to make way for the Daniel Freeman Memorial Hospital (now closed). In 1975, the Land Company office was moved from his estate to the grounds of the Centinela Adobe, where it now stands.

29 Gladys Waddingham, The History of Inglewood *(Inglewood, CA: Historical Society of Centinela Valley, 1994),* 6.

30 Sanborn Fire Insurance Maps, Inglewood CA, 1892. The Inglewood Hotel is labeled on this map as “not open” and occupied by four families as a dwelling.

gain mills and storage, and several warehouses.[31] The City of Inglewood was officially incorporated on February 14, 1908.

Also, by this time, Inglewood was home to an expansive cemetery. In 1905, a group of local businessmen formed the Inglewood Park Cemetery Association, acquiring a large plot of land just east of what would become downtown Inglewood. A total of 32 internments took place in the cemetery's first year of operation, with funerals often arriving by rail from Los Angeles in a private funeral car.[32] In 1907, the cemetery erected the Romanesque-style Grace Chapel, a three-quarters replica of a church in Edinburgh, Scotland. Within a decade, the cemetery would erect the Neoclassical-style Inglewood Mausoleum, the first community mausoleum in the State of California.[33] Many of the South Bay region's earliest settlers have been laid to rest at Inglewood Park Cemetery, including a number of Civil War veterans.[34] Other notable residents include former Los Angeles Mayor Tom Bradley, Chet Baker, Ray Charles, Ella Fitzgerald, Etta James, boxer Sugar Ray Robinson, and architect Paul Williams.[35]

By 1912, Inglewood's commercial core was beginning to take shape along Commercial Street between Los Angeles Street/Inglewood Avenue (now Florence Avenue) and Queen Street. Deep, narrow lots were being developed with various commercial uses, from restaurants and boarding houses, to plumbers and hardware stores. Market Street remained primarily residential during this period, with a few commercial buildings, including a jeweler, a milliner, a confectioner, an undertaker, a bank, and a Methodist church.[36]

By 1920, the South Bay's local economy was booming due to the region's fertile agricultural lands, productive oil fields, and emerging aviation industry. The City of Inglewood was growing exponentially, as hundreds of new homes were being built. At the same time, the city's commercial development was coalescing into a downtown business district. Commercial Street between Regent and Queen streets was now solidly commercial, boasting many of the business enterprises needed by any growing town, from banks and automobile showrooms, to furniture stores and a movie theater. South of Queen, Commercial Street was still largely undeveloped but for a few single-family residences and an apartment house. At this point, Market Street was more sparsely developed overall and displayed a combination of commercial and residential uses.[37]

31 Sanborn Fire Insurance Maps, Inglewood CA, 1907.
32 Portions of the original railroad waiting station have been incorporated into the main entrance.
33 The Inglewood Mausoleum was erected over the course of three years, from 1913 to 1915.
34 Inglewood Park Cemetery, http://www.inglewoodparkcemetery.com/heritage.html (accessed February 2019).
35 Mike Sonksen, "On Location: Inglewood," KCET: History and Society, https://www.kcet.org/history-society/on-location-inglewood (accessed February 2019).
36 Sanborn Fire Insurance Maps, Inglewood CA, 1912.
37 Sanborn Fire Insurance Maps, Inglewood CA, 1923.

The commercial structures erected in downtown Inglewood at this time were typical of those being built in downtowns throughout Southern California. These were what have since been termed "taxpayer blocks," speculative investments to generate tax benefit until more valuable development could be carried out. Early examples were multiunit two-story buildings, frequently with retail units on the ground floor and offices or apartments above. These buildings were typically unreinforced brick in construction, with applied ornament of cast stone or terra cotta at the entrance or along the parapet. Depending on the size of the building, it may contain one or more retail storefronts, with flexible interiors to accommodate the ever-changing needs of individual tenants. While many of these buildings were vernacular in design, in Southern California they were often overlaid with details of the Spanish Colonial Revival style, including tile roofs or parapet edges, arched doors and window openings, and decorative wall tile and cast-stone detailing. With the advent of the personal automobile, a single-story version of the form became popular, with surface parking behind.[38]

Inglewood also had a number of churches by this time, including the First Methodist Episcopal Church, St. John's Catholic Church, Church of the Brethren, and Christian Church.[39] The only church that survives from this period is Holy Faith Episcopal Church, located at the southeast corner of Locust Street and Grace Avenue.[40] The church was first established in 1911, with services held in the Inglewood Masonic Hall. In 1912, Grace Freeman Howland[41] and her husband Charles donated the funds to erect a religious complex consisting of a church, a rectory (the dwelling to the south), and parish hall (now a school at the rear). They hired a young architect, Philip Frohman, to design what would be hailed as "the most perfect example of true Gothic architecture in the West." Frohman would go on to become nationally renowned, particularly for his work on the National Cathedral in Washington, D.C. The church was officially consecrated on November 8, 1914, and dedicated to Catherine Freeman and Mathilda Howland, the mothers of Grace and Charles. The church lost its original bell tower in the 1933 Long Beach Earthquake, but soon thereafter gained the Stations of the Cross, imported from Italy; the pulpit, lectern and choir stalls from England; and the reredos carved and imported from Bavaria. The stained-glass windows were crafted by Judson Studios in Highland Park.[42]

On the evening of June 21, 1920, the Los Angeles Basin was rattled by an estimated 5.0 earthquake centered near Inglewood. While tremors were felt as far away as Ventura and Riverside, almost all of the damage took place in Inglewood, and specifically to the unreinforced brick buildings along Commercial

38 Lauren Weiss Bricker, Marion Mitchell-Wilson, and Janet L. Tearnen, Inglewood Downtown District Main Street Project Area, Historic Design Guidelines, report (Inglewood, CA: Main Street Inglewood, 2000), 9-10.

39 Lauren Weiss Bricker, Marion Mitchell-Wilson, and Janet L. Tearnen, Inglewood Downtown District Main Street Project Area, Historic Design Guidelines, report (Inglewood, CA: Main Street Inglewood, 2000), 9.

40 Holy Faith Episcopal Church is located at 260 N. Locust Street.

41 Grace Freeman was the daughter of Daniel Freeman, considered the founder of the City of Inglewood.

42 "Holy Faith Episcopal Church: One Hundred Years of Ministry," Holy Faith Episcopal Church, https://www.holyfaithla.org/ (accessed February 2019).

Street (now La Brea Avenue), where exterior walls fell into the street and plate glass windows shattered.[43] The Inglewood Hotel was also badly damaged and subsequently demolished. The City recovered quickly however, and the population grew from 3,286 according to the 1920 census to double of that number in two years.[44]

The 1920s was a boom period for the City, both in terms of population and development. While Commercial Street continued to be the primary artery of the downtown business district, many more businesses were being established on Market Street and its cross-streets during this period. At least seven new buildings were constructed in the 100 block of North Market Street alone. The local financial institution the People's Federal Building & Loan Association was established at this time, first in a unit of the building at 314 S. Market Street, before constructed their own building at the northeast corner of Market Street and Pimiento Street (now Manchester Boulevard) in 1927.[45] That same year, the Bank of Inglewood erected a two-story mixed-use building at the northeast corner of Market and Queen streets, at a cost of $140,000. Designed by local architect William L. Campbell in the Mediterranean Revival style, the reinforced concrete building was touted as the "first steel frame business block in this city" and as "practically fire and earthquake proof."[46]

On May 18, 1927, some 15,000 locals came out to celebrate the "Festival of Light," which marked the opening of a new ornamental lighting system installed along Market Street. In addition to providing much needed illumination, the standards also supported the trolley wires of the Los Angeles Railway, allowing for the removal of the wooden poles from the middle of the street and the sidewalk.[47] In 1928, a two-story mixed-use structure called the Professional Building was constructed at Market Street and Manchester Boulevard's northwest corner. The building was designed in the Spanish Colonial Revival style with Churrigueresque details.[48] Also constructed in downtown Inglewood during this period were a new City Hall building (1923, demolished), the Granada Theater (1923, demolished), an S.H. Kress Variety Store (1927), and a United Artists Theater (1931, demolished), as well as a number of auto-related businesses such as gas stations and repair garages.

Toward the end of the 1930s, Inglewood's economic base began to expand outside the downtown core. Mines Field just southwest of the city was purchased by the City of Los Angeles in 1937 to serve as its

43 Paul R. Spitzzeri, "Shake, Rattle and Roll: The Inglewood Earthquake of 21 June 1920," *Homestead Museum*, https://homesteadmuseum.wordpress.com/2018/06/21/shake-rattle-and-roll-the-inglewood-earthquake-of-21-june-1920/ (accessed February 2019).

44 Gladys Waddingham, The History of Inglewood *(Inglewood, CA: Historical Society of Centinela Valley, 1994),* 26.

45 The former People's Federal Building & Loan Association building is located at 150 S. Market Street. It is currently occupied by the World Hat & Boot Mart.

46 "Two-Story Business Structure: Work for Inglewood Bank Let," Los Angeles Times, May 15, 1927. The former Bank of Inglewood building is located at 100 N. Market Street/307 E. Queen Street.

47 "Inglewood Glows Under New Lights," Los Angeles Times, May 20, 1927.

48 The Professional Building is located at 149-155 S. Market Street/231-239 E. Manchester Boulevard.

municipal airport, bringing many new jobs to the region. In 1938, the Hollywood Park, an "ultra-modern" thoroughbred racetrack, opened on 314 acres just southeast of downtown, effectively making Inglewood a destination for the first time.[49] In addition to attracting the typical racing fan, Hollywood Park brought in celebrated personalities associated with the entertainment industry—from studio executives Jack Warner, Walt Disney and Samuel Goldwyn, to A-list actors like Al Jolson and Bing Crosby—many of whom were also investors in the operation.

Wartime and Postwar Growth

As the likelihood of war increased in the early 1940s, a number of aviation-related and other wartime manufacturing facilities set up shop around the Los Angeles Airport. North American Aviation, Inc. and the Northrup Company both established airplane manufacturing plants in the vicinity. Due to the emergence of these new facilities, this area would not only be important to the defense industry during World War II, but in the postwar years would evolve into a center of the nation's aerospace industry.

The presence of wartime and postwar manufacturing jobs added to the local population and financially supported a growing middle class throughout the South Bay region, including in Inglewood. In 1938, the City had a population of 26,000; by 1956, that number had grown to 64,000.[50] Housing construction responded to the increased demand, and commercial development followed, leading to a pattern of postwar decentralization. By the mid-1950s, the City had three retail business areas – in North Inglewood, Morningside Park, and Crenshaw – in addition to the downtown.

Despite this overall growth, new development in downtown Inglewood was limited during this period. In 1941 a J.C. Penney department store opened on Market Street between Queen Street and Manchester Boulevard. Originally constructed as a one-story building, in 1954 it was expanded with a second story and remodeled in its exiting Mid-Century Modern style, with a deep front canopy and glazed terra cotta tile columns.[51]

The Fox Theater opened on March 31, 1949, on Market Street between Regent and Queen streets. Erected on the site of the Granada Theater, which burned down in 1945, it was the last theater constructed by the Fox West Coast Theater chain. Designed by theater architect S. Charles Lee in the Late Modern style, it was the first theater in Inglewood to have air conditioning. Other features included automatic lobby doors,

49 Bricker, 15.
50 Bricker, 15.
51 The former J.C. Penney building is located at 129-139 S. Market Street.

CinemaScope widescreen projections, assistance for the hearing impaired, and a soundproof "crying room." The Fox Inglewood was often used for Fox Pictures' premiers and sneak previews.[52]

During this same period, two noteworthy institutions opened near downtown Inglewood. In 1948, Bank of America erected a 22,000-SF branch at the southwest corner of Manchester Boulevard and Locust Street.[53] That same year, funeral director John Flanagan opened Hardin & Flanagan Colonial Chapel & Mortuary on Prairie Avenue at La Palma Drive, across the street from Hollywood Park. Flanagan built a number of mortuaries around the Los Angeles area using the same American Colonial Revival design.

In 1959, the business was purchased by the McCormick family and renamed McCormick Mortuary.[54] The following year, the building was expanded with a two-story north wing, adding a new lobby with offices above. Today, the business is operated as Lighthouse McCormick Mortuary.[55] The other area for new development during the postwar period was La Brea Avenue, a wide auto corridor which previously served as the western border of downtown Inglewood.[56]

Despite these examples of new construction in and around downtown during this period, the primacy of the City's downtown as a commercial district was substantially diminished by increased competition from outlying commercial areas. The removal of the Market Street trolley line in 1957 added further stress to already struggling businesses. The City responded by adding municipally-owned off-street parking lots located throughout the district to draw car-dependent shoppers. The Chamber of Commerce and Downtown Inglewood Retail Merchants Association coordinated to organize various promotional activities, as well as physical improvements like tree planting in the center strip and along sidewalks, which were in place by the early 1960s.[57] However, these effects of these efforts were soon eclipsed by the continued loss of customers to new shopping malls in communities throughout Los Angeles. Inglewood considered, but ultimately rejected, plants to build a mall of its own on a large parcel at Prairie Avenue and Manchester Boulevard, a proposal largely defeated by the Market Street merchants. The site would instead become the home of the Forum.[58]

52 "Inglewood Fox Theatre," Los Angeles Historic Theatre Foundation, http://www.lahtf.org/inglewoodfox/ (accessed February 2019); "Fox Theater," Inglewood Public Art, http://www.inglewoodpublicart.org /Fox_Theater.html (accessed February 2019). The former Fox Theater is located at 115 N. Market Street.

53 The Bank of America building is located at 320-330 E. Manchester Boulevard.

54 The McCormick family operated various locations throughout the South Bay, including Westchester, Hawthorne, Redondo Beach, Manhattan Beach, Gardena, and Whittier.

55 The Lighthouse McCormick Mortuary is located at 619-635 S. Prairie Avenue.

56 Also built during this period was a Sears department store at Manchester and Hillcrest boulevards. Opened in 1947, this was an early indicator that the future of retail in Inglewood would not be downtown. Sears was demolished in 1993 and replaced by a Vons supermarket.

57 "Downtown Center of Many Activities," Los Angeles Times, March 18, 1962.

58 "The Changing Face of South Bay: Downtowns," Los Angeles Times, January 4, 1987.

By the late 1960s, downtown Inglewood was in need of reinvention. To this end, the City contemplated a wholesale redevelopment scheme for the Market Street corridor that would expand and remodel existing stores, construct two high-rise office and apartment towers, introduce a landscaped arcade, and build a four-square block parking deck above shops to quadruple parking capacity.[59] However, this plan would go unrealized. The United Bank of California at the southeast corner of Market and Regent streets would be the first new structure to be added to the Market Street corridor in nearly two decades, replacing several early 20th-century commercial buildings.[60] Constructed in 1967 in the Late Modern style, it was joined nine years later by a stand-alone drive-thru automated teller building situated across Regent Street from the bank. Both buildings are believed to have been designed by Los Angeles modernist architect Richard Dorman.[61]

Beyond Downtown

In the late 1960s, nationally prominent businessman Jack Kent Cooke selected the site of a former golf course at the southeast corner of Prairie Avenue and Manchester Boulevard to erect a new venue for his three professional sports franchises – the Los Angeles Lakers NBA basketball team, the Los Angeles Kings NHL hockey team, and the short-lived Los Angeles Wolves professional soccer team. The Forum, a multipurpose indoor arena, was designed by the prominent Los Angeles architectural firm Charles Luckman & Associates and completed in 1967.[62] Designed in the New Formalist architectural style, it was intended as a modern and highly-stylized version of the Coliseum of ancient Rome. Nicknamed "the Fabulous Forum," it would host tennis matches, boxing matches, ice shows, rodeos, the circus, award shows, and political events. In 1972, the Forum was the site of the Lakers' first NBA championship since moving to Los Angeles; five additional titles would follow in the 1980s. From the mid-1970s through the 1990s, the Forum would serve as the premier large-scale concert venue for the Los Angeles area, and would be influential in the birth of "arena rock." During the 1984 Olympics, the Forum was the venue for men's and women's basketball.[63]

By the early 1970s, Market Street had been neglected as shoppers abandoned the downtown business center for suburban malls, and key tenants like J.C. Penney closed their doors. In an effort to reinvigorate the core of the City, from 1971 to 1976 Inglewood spent about $50 million in local, County, and federal funds to erect a new civic center complex along La Brea Avenue, just one block west of downtown. This new complex combined City Hall, a courthouse, library, fire and police facilities, public health complex,

59 "$11 Million Center Assured in Inglewood," Los Angeles Times, March 31, 1968.
60 The former United Bank of California is located at 158-170 N. Market Street.
61 Although an original building permit for the 1967 bank building is not available from the City of Inglewood, the permit for the similarly-styled drive-thru automated teller building lists Richard Dorman as its architect.
62 The Forum is located at 3900 W. Manchester Boulevard.
63 "Forum," National Register of Historic Places Form. Prepared by Historic Resources Group, April 29, 2014.

and a major new parking garage onto a single super-block, surrounded by expanses of lawn and public art. As hoped, this new construction sparked a flurry of new commercial development in the larger In-Town Redevelopment Area[64]—bounded by Florence, Locust, Manchester, and Fir—the vast majority of which was office space and not retail. Several residential projects were built at this time as well, most notably the 200-unit Inglewood Meadows housing complex on Locust Street, just east of downtown.[65]

While these projects brought large numbers of people into the vicinity of Market Street, their presence did not raise the corridor's fortunes, and the vitality of the downtown business district continued to wain into the 1980s. In October 1986, Market Street merchants brought downtown business activity to a halt as they closed their shops and picketed in a City-owned parking lot in a last-ditch effort to save it from redevelopment. The parking lot at La Brea Avenue and Queen Street provided 80 metered parking spaces which local shopkeepers saw as critical to continued viability of the downtown business district, which was already suffering from a parking shortage. Ultimately, however, the protests were unsuccessful, and the parking lot was soon replaced by a five-story office building.[66] Yet another sign of downtown's economic decline, the Fox Theater, then owned by the Mann theater chain, closed its doors in 1988.

Since the late-1970s, at least four City-sponsored revitalization programs have focused on improving Market Street's commercial viability, introducing street landscaping and furniture as well as façade improvements to the existing buildings. Efforts have included a façade improvement program designed by architectural firm Kahn, Kappe, Lotery, Boccato (1979); a $250,000 façade improvement program, including signs and awnings (1984); a California Main Street Community Project (1990s); and the Market Street Renaissance program (2000). However, despite these efforts, Market Street has largely remained an underutilized asset.

Current Inglewood

In 1994, Hollywood Park underwent a $100 million expansion into Hollywood Park Casino, which extended the facility's economic viability. However, in May of 2013, it was announced that the Hollywood Park racetrack would be closing at the end of the fall racing season. In 2015, the Inglewood City Council approved a plan to build an 70,000-seat football stadium on the site in anticipation of the St. Louis Rams moving back to Los Angeles.

The Forum remained the home of the Lakers and Kings until 1999, when both teams relocated to the newly constructed Staples Center in downtown Los Angeles. Beginning in 2012, the Forum underwent a $50

64 The In-Town Redevelopment Area was one of six redevelopment project areas adopted by the Inglewood Redevelopment Agency between 1970 and 1973.

65 Dean Murphy and Michele L. Norris, "Government Money Becomes Urban Lifeblood: Innovation and Optimism Thrive on Public Funds in Inglewood, San Pedro," Los Angeles Times, January 4, 1987.

66 "Merchants Protest Proposal to Build on Parking Lot," Los Angeles Times, October 16, 1986.

million renovation, reopening in 2014. Later that year, the Forum was listed in the National Register. The venue is inextricably tied to the identity of the City, which adopted the moniker "City of Champions." The Forum is slated to host the gymnastics events for the 2028 Summer Olympics.

Over the past decade, the City of Inglewood has been acquiring select parcels throughout the City for redevelopment, including along Market Street. Various planning studies have been conducted to develop standards for transit-oriented development, mixed-use development, and parking, with the goal of revitalizing downtown Inglewood. Local advocacy organization the Inglewood Historic Preservation Alliance (IHPA, formerly the Inglewood Historic Site Preservation Committee) continues to work toward the protection of the City's historic structures and places of interest, including the Fox Theatre, which was successfully listed in the National Register in 2013.[67] Currently, the City is utilizing *The New Downtown and Fairview Heights Transit Oriented Development Plan and Design Guidelines*, adopted November 1, 2016, as the controlling document for future development activity along Market Street and downtown Inglewood.

On January 12, 2016, the National Football League (NFL) voted to move the St. Louis Rams back to Los Angeles, with the San Diego Chargers to follow. In October 2016, the last part of the former racetrack, the Casino, was demolished, and a new Hollywood Park Casino was opened next door. Construction of the new SoFi Stadium was completed in July 2020 and is the new home of the NFL Los Angeles Rams and Los Angeles Chargers. The SoFi Stadium is slated to host Super Bowl LVI in 2022, the College Football National Championship in 2023, and the opening and closing ceremonies and soccer events for the 2028 Summer Olympics. Construction at the adjacent Hollywood Park Specific Plan development area is ongoing. In September 2020, the Inglewood Basketball and Entertainment Center (IBEC) was approved by the City of Inglewood.

4.4.4.3 Project Historic Setting

The proposed Project is located entirely within the City and would connect downtown Inglewood near the Metro Crenshaw/LAX Line to the City's major activity centers, including the Forum, the Los Angeles Stadium and Entertainment District (LASED) at Hollywood Park and the Inglewood Basketball and Entertainment Center (IBEC).

Beginning on Market Street and Locust Street, land uses bordering the proposed APM system include a commercial shopping center with surface parking, single-family and multi-family residences, and vacant land. These land uses transition to one- and two-story mixed-use commercial development further south on Market Street, including the former Fox Theater, with little to no front or side setbacks. Shifting east on

67 Anne Cheeck La Rose, "Inglewood Fox Theatre: Bringing Back the Inglewood Fox Theatre," *Los Angeles Historic Theatre Foundation*, http://www.lahtf.org/inglewoodfox/ (accessed February 2019).

Manchester Boulevard, the APM system would similarly be bordered by one- and two-story mixed-use commercial/office development with little to no front or side setbacks. Proceeding further east on Manchester Boulevard, adjacent buildings include a strip mall and commercial shopping center with surface parking. Continued one- and two-story commercial and mixed-use development, surface parking, and limited areas of single- and multifamily uses round out the remainder of Manchester Boulevard. Surrounding the proposed MSF site along Manchester Boulevard are one-story commercial development to the northwest, five-story office and one-story educational uses to the southwest, and two-story multifamily uses to the southeast.

At the intersection of Manchester Boulevard and Prairie Avenue, the Inglewood Park Cemetery is located to the northeast. Turning south on Prairie Avenue until Century Boulevard, the APM system would primarily be bordered by one- and two-story mixed-use commercial, office, and multifamily development to the west, with substantial portions of single-family residences and surface parking intermixed. Kelso Elementary School and the Lighthouse McCormick Mortuary building are also located along the western side of Prairie Avenue. To the east of Prairie Avenue are major commercial and recreation venues such as the Forum, which is surrounded by surface parking, and the SoFi stadium, entertainment, retail, and residential uses under construction as part of the LASED at Hollywood Park.

4.4.4.4 Cultural and Historical Resources

Archaeological Resources

The cultural resource records search and field visit conducted in support of the *Cultural Resource Investigation* (see **Appendix 4.4.1**) did not result in identifying any prehistoric or historical archaeological resources within the Project study area.[68] The *Cultural Resource Investigation* states that the highly developed status of the Project area limits ground visibility and the ability to assess surface conditions for cultural resources. Further, the built nature of the area indicates a high degree of disturbance suggesting the likelihood of encountering intact archaeological deposits near the surface of the Project area to be very low.

Historical Resources

Listed Historical Resources

As stated in the *Historic Resources Technical Report* (see **Appendix 4.4.3**), there are two properties along the proposed Project alignment that are listed in the National Register, and are therefore automatically

68 See **Appendix 4.4.1** of this Draft EIR.

listed in the California Register. As such, these properties are considered historical resources as defined by CEQA. These resources consist of the following:

- **3900 W. Manchester Boulevard (The Forum)**. This property, located at the southeastern corner of Manchester Boulevard and Prairie Avenue, contains the Forum, a multipurpose indoor arena, surrounded by an expansive surface parking lot. It was built by nationally prominent businessman Jack Kent Cooke as a venue for his three professional sports franchises, the Los Angeles Lakers NBA basketball team, the Los Angeles Kings NHL hockey team, and the short-lived Los Angeles Wolves professional soccer team. Completed in 1967, it was designed by prominent Los Angeles architectural firm Charles Luckman & Associates in the New Formalist style. From 2012 to 2014, it underwent an extensive historic renovation. The Forum was listed in the National Register on September 24, 2014 under Criterion C as an excellent example of a 1960s New Formalist-style arena building.
- **115 N. Market Street (former Fox Theater)**. This property, located on the western side of Market Street between Regent and Queen streets, contains a 12,090-SF-neighborhood movie theater building. Originally constructed in 1949 for Fox West Coast Theaters, it was designed by prolific theater architect S. Charles Lee in the Late Modern style. The building is currently unoccupied and its storefront windows and doors are boarded up. In 2000, the property was assigned a status code of 3S (appears eligible for the National Register as an individual property through survey evaluation) under Criterion C as a very good example of a 1940s Late Modern-style movie theater building in Inglewood. The Fox Theater was listed in the National Register on January 14, 2013.

Previously Identified Historical Resources

According to the *Historic Resources Technical Report* (see **Appendix 4.4.3**), there are nine properties adjacent to the Project alignment that have been previously identified as eligible for historic listing or designation through historic resources surveys, environmental review, or other efforts. Most notably, a previous historical resources survey of Market Street was conducted as part of the Downtown TOD Plan,[69,70] Each of these properties was re-examined and re-evaluated for its eligibility for listing in the National Register or California Register.

Of the previously identified historical resources, four were re-evaluated as appearing eligible for listing in the National Register and/or California Register, and are therefore considered herein as historical resources for the purposes of CEQA. Five were found to appear ineligible for historic listing due to substantial alteration. No historic districts have been previously identified within the Project area and/or

69 City of Inglewood, New Downtown and Fairview Heights Transit Oriented Development Plan and Design Guidelines, November 1, 2016.

70 This 2000 report included a historic resources survey of the Inglewood Downtown District/Main Street project area, which was bounded by La Brea Avenue to the west, Locust Street to the east, Florence Avenue to the north, and Hillcrest Boulevard to the south. The upper portion of this survey area includes the Market Street portion of the current Project Area/Expanded Study Area. The survey identified eight individual properties within the current Project area/Expanded Study Area as eligible for historic designation; no historic district was identified.

Expanded Study Area.[71] Descriptions of previously identified historical resources appearing eligible for listing in the National Register or the California Register are described as follows:

- **320-330 E. Manchester Boulevard (Bank of America)**. This property, located at the southwestern corner of Manchester Boulevard and Locust Street, contains a 21,976-SF-bank building and a rear surface parking lot.[72] Originally constructed in 1948, the building was erected for Bank of America and designed in the Late Modern style. Bank of America continues as its current tenant. The smaller adjacent building at 320 E. Manchester Boulevard was originally constructed in 1920 and remodeled as part of the Bank of America building in 1954. In 2000, the property was assigned a status code of 3S (appears eligible for the National Register as an individual property through survey evaluation) under Criterion C as a good example of a 1940s Public Works Administration (PWA) Modern-style bank building in Inglewood.[73] HRG re-examined this property and found that it appears substantially unaltered since its original construction. The building retains the majority of its original exterior features, including its form and massing, exterior wall cladding, fenestration patterns, and decorative elements. The framing of the windows and doors may have been updated. However, the replacement material appears to be in keeping with what would have been in place historically, such that this change does not substantially diminish the building's integrity. Thus, this building retains sufficient integrity to convey its significance as a good example of its architectural style, and therefore appears eligible for listing in the California Register. As such, this property is considered a historical resource herein for the purposes of CEQA.
- **100 N. Market Street/307 E. Queen Street (former Bank of Inglewood)**. This property, located at the northeastern corner of Market and Queen streets, contains a two-story, 9,258-SF, mixed-use commercial building constructed in 1927. The building was originally constructed for the Bank of Inglewood at a cost of $140,000. Designed by local architect William L. Campbell in the Mediterranean Revival style, the reinforced concrete building was the first steel frame business block in the City. The building was sold to Bank of America National Trust & Savings Association in 1936; in 1950 it became Southwest Bank. It now serves as a retail space occupied by Vajra Books & Gifts. In 2000, the property was assigned a status code of 3S (appears eligible for the National Register as an individual property through survey evaluation) under Criterion C as an excellent example of a 1920s Mediterranean Revival-style bank building in Inglewood.[74] HRG re-examined this property and found that it appears substantially unaltered since its original construction. The building retains the majority of its original exterior features, including its form and massing, roof material, exterior wall cladding, fenestration patterns, elaborated arched main entrance and ground-story windows, upper-story windows, and various decorative elements. Alterations, such as replaced front doors and the addition of tile cladding

71 The New Downtown and Fairview Heights Transit Oriented Development Plan and Design Guidelines, adopted November 1, 2016, identifies Downtown Inglewood as "Historic Downtown." However, this appears to refer to the area's history as Inglewood's original business district, and is not an evaluation of historic eligibility.

72 The main bank building uses the address 330 E. Manchester Bl.; the smaller adjacent building is at 320.

73 Bricker, Lauren Weiss, Marion Mitchell-Wilson, and Janet L. Tearnen. Inglewood Downtown District Main Street Project Area, Historic Design Guidelines, report. Inglewood, CA: Main Street Inglewood, 2000.

74 Bricker, Lauren Weiss, Marion Mitchell-Wilson, and Janet L. Tearnen. Inglewood Downtown District Main Street Project Area, Historic Design Guidelines, report. Inglewood, CA: Main Street Inglewood, 2000.

on the ground story, are minor in relation to the building's overall appearance, and do not substantially diminish its integrity. The building remains highly intact and continues to display the characteristic features of a Mediterranean Revival bank building from the 1920s. Thus, this building retains sufficient integrity to convey its significance as a good example of its architectural style, and therefore appears eligible for listing in the National Register and the California Register. As such, this property is considered a historical resource herein for the purposes of CEQA.

- **129-139 S. Market Street (former J.C. Penney)**. This property, located on the western side of Market Street between Queen Street and Manchester Boulevard, contains a two-story, 62,583-SF commercial retail building which originally housed a J.C. Penney department store. The building was initially constructed as one story in 1941. In 1954, it was expanded with a second story and remodeled in the Mid-Century Modern style. It is currently occupied by Inglewood Marketplace.[75] In 2000, the property was assigned a status code of 5S1 (eligible for local listing) under Criterion C as a good example of a 1950s Mid-Century Modern-style department store building. HRG re-examined this property and found that it appears substantially unaltered since its 1950s remodel. The building retains the majority of its exterior features from this period, including its form and massing, exterior wall cladding, angled storefronts, recessed entry with terrazzo flooring, entry doors, canopy, upper-story ribbon windows, and applied decoration. Alterations, such as contemporary signage and the distinctive paint job, are minor in relation to the building's overall appearance, and do not substantially diminish its integrity. The building remains highly intact and continues to display the characteristic features of a Mid-Century Modern department store building from the 1950s. Thus, this building retains sufficient integrity to convey its significance as a good example of its architectural style, and therefore appears eligible for listing in the California Register. As such, this property is considered a historical resource herein for the purposes of CEQA.
- **150 S. Market Street (former People's Federal Building & Loan Association)**. This property, located at the northeastern corner of Market Street and Manchester Boulevard, contains a two-story, 16,575-SF mixed-use commercial building. The building was originally constructed in 1927 as the People's Federal Building & Loan Association. It was remodeled in the Late Modern style, likely sometime in the 1960s. It is currently occupied by World Hat & Boot Mart. In 2000, the property was assigned a status code of 5S1 (eligible for local listing) under Criterion C as a good example of a 1960s Late Modern-style commercial building.[76] HRG re-examined this property and found that it appears substantially unaltered since its 1960s remodel. The building retains the majority of its exterior features from this period, including its form and massing, exaggerated arches and elevated roof plate, exterior wall cladding, metal storefronts and entry doors, canopy, and upper-story fenestration. Alterations, such as contemporary signage and the replacement of the original entry doors with a display window, are minor in relation to the building's overall appearance, and do not substantially diminish its integrity. The building remains largely intact and continues to display the characteristic features of a Late Modern commercial building from the 1960s. Thus, this building retains sufficient

75 Bricker, Lauren Weiss, Marion Mitchell-Wilson, and Janet L. Tearnen. *Inglewood Downtown District Main Street Project Area, Historic Design Guidelines, report.* Inglewood, CA: Main Street Inglewood, 2000.

76 Bricker, Lauren Weiss, Marion Mitchell-Wilson, and Janet L. Tearnen. *Inglewood Downtown District Main Street Project Area, Historic Design Guidelines, report*. Inglewood, CA: Main Street Inglewood, 2000.

integrity to convey its significance as a good example of its architectural style, and therefore appears eligible for listing in the California Register. As such, this property is considered a historical resource herein for the purposes of CEQA.

Newly Identified Historical Resources

Field surveys conducted on June 4, 2018 and February 21, 2019, and property-specific and contextual research conducted as part of the evaluation process for the *Historic Resources Technical Report* (see **Appendix 4.4.3**) identified five additional properties along the Project alignment as appearing eligible for listing in the National Register and/or California Register. As such, these properties are considered herein as historical resources for the purposes of CEQA; no historic districts were identified. These newly identified eligible historical resources are described as follows:

- **260 N. Locust Street (Holy Faith Episcopal Church).** This property, located at the southeast corner of Locust Street and Grace Avenue, contains the Holy Faith Episcopal Church complex. The congregation was first established in 1911, with services held in the Inglewood Masonic Hall. In 1912, funds were donated to erect a complex consisting of a church, a rectory (the dwelling to the south), and parish hall (now a school at the rear). The complex of buildings was designed by architect Philip Frohman, would go on to become nationally renowned, particularly for his work on the National Cathedral in Washington, D.C. The church building was officially consecrated on November 8th, 1914. It lost its original bell tower in the 1933 Long Beach Earthquake, but continued to be improved throughout the 1930s, with the Stations of the Cross, imported from Italy; the pulpit, lectern, and choir stalls from England; and the reredos carved and imported from Bavaria. The stained glass windows were crafted by Judson Studios in Highland Park. Due to its growing congregation, in the late 1950s architect Philip Frohman returned to design an addition to the church building.[77] The church was extended to the west and an interior balcony added, doubling its capacity from 200 to 400. The newly expanded church building was dedicated in 1959. The parish hall, which now serves as a school, has been expanded multiple times from the 1950s to the 1980s, now extending nearly the full width of the lot. The rectory appears largely intact, with some windows replaced. In 2000, the property was assigned a status code of 4S1 (may become eligible for the National Register when it becomes old enough).[78]

  HRG has re-examined this property for the purpose of this report, and finds that it appears substantially intact, including the main church building, the rectory, and the school. Character-defining features of the church include its double-cruciform plan; gabled roofs with capped parapets and decorative crosses; copper steeple; stucco exterior walls with cast-stone stepped buttresses; base with cast stone molding; pointed-arch openings with decorative cast-stone surrounds; leaded stained-glass windows; cast-stone Gothic tracery and quoining; wood plank doors with exposed iron hardware; metal scuppers and downspouts; and decorative wrought-iron wall sconces. The church expansion was designed by the original architect to respect and complement the original church—

77 Bricker, 8 (Database Master Report, appendix to the Inglewood Downtown District/Main Street Project Area Historic Design Guidelines)

78 Bricker, Lauren Weiss, Marion Mitchell-Wilson, and Janet L. Tearnen. Inglewood Downtown District Main Street Project Area, Historic Design Guidelines, report. Inglewood, CA: Main Street Inglewood, 2000.

with features such as wood entry doors and stained-glass windows retained and incorporated into the expanded design—and thus is considered to have acquired significance in its own right.

Similarly, additions to the school building are compatible with yet differentiated from the original extent, which remains evident. Thus, the property as a whole retains sufficient integrity to convey its significance as an excellent and rare early 20th-century religious complex in Inglewood. Additionally, the church building appears to be an outstanding example of Late Gothic Revival architecture, representing the work of a nationally-significant architect. Therefore, the property appears eligible for listing in the National Register and the California Register under Criterion A/1 as early institutional development in Inglewood, and Criterion C/3 for its architectural merit. As such, it is considered a historical resource herein for the purposes of CEQA.

- **158-170 N. Market Street (former United Bank of California).** This property, located at the southeastern corner of the Market Street and Regent Street intersection, contains a 9,000-SF branch bank building and rear surface parking lot. Originally constructed in 1967 for United Bank of California, it was designed by noted Los Angeles architect Richard Dorman in the Late Modern style. Richard Dorman was a prolific modernist architect and designer who worked throughout the Los Angeles region from the 1950s through the 1970s. Over the course of his career he designed dozens of high-end residences, as well as various commercial and institutional buildings such as offices, churches, and banks. In 1976, the bank added a similarly-designed drive-thru automated teller building across Regent Street to the north, also designed by Dorman.[79] The building is currently occupied by Broadway Federal Bank. In 2000, the property was assigned a status code of 6Z (appears ineligible for the National Register).[80]

  HRG re-examined this property and found that it appears substantially unaltered since its original construction. Character-defining features include its cruciform roof plan; projecting trapezoidal volumes; battered walls; heavy wood beams; smooth exterior surfaces of brick and stucco; and large expanses of tinted glass.[81] Alterations, such as contemporary signage, and the addition of an in-wall ATM with an access ramp and projecting canopy, are minor in relation to the building's overall appearance, and do not substantially diminish its integrity. At the time of its previous evaluation, the bank building was well below the 50-year age threshold used in standard preservation practice for evaluating eligibility for historic designation.[82] Additionally, since the 2000 survey there has been substantial new scholarship on the built environment of the mid-20th-century, with new historic contexts developed to provide guidance for evaluating such properties. In light of this new scholarship, this property appears to be significant as a 1960s Late Modern-style bank building in Inglewood, representing the work of a noted architect. It remains highly intact and thus retains sufficient integrity to convey its significance as a good example of its architectural style. Therefore,

79 Although an original building permit for the 1967 bank building is not available from the City of Inglewood, the permit for the similarly-styled drive-thru automated teller building lists Richard Dorman as its architect.

80 Bricker, Lauren Weiss, Marion Mitchell-Wilson, and Janet L. Tearnen. Inglewood Downtown District Main Street Project Area, Historic Design Guidelines, report. Inglewood, CA: Main Street Inglewood, 2000.

81 Because the drive-thru automated teller building is situated across the street and was added nine years later, it is not considered a character-defining feature of the bank building and is not considered part of this historical resource.

82 According to National Park Service guidance, 50 years is a general estimate of time needed to develop sufficient historical perspective to evaluate historic significance.

the property appears eligible for listing in the California Register under Criterion 3 for its architectural merit. As such, it is considered a historical resource herein for the purposes of CEQA.

- **149-155 S. Market Street/231-239 E. Manchester Boulevard (Professional Building).** This property, located at the northwestern corner of the Market Street and Manchester Boulevard intersection, contains a two-story, 6,000-SF, mixed-use commercial building. Constructed in 1928 as the Professional Building, it was designed in the Spanish Colonial Revival style with cast-stone Churrigueresque details. In 2000, the property was assigned a status code of 4S7 (may become eligible for the National Register when integrity is restored).[83] HRG re-examined this property and found that despite alterations on the ground story, the upper story appears substantially unaltered since its original construction. The building retains the majority of its original exterior features, including its red clay tile shed roofs with exposed rafter tails; smooth stucco exterior cladding; wood tripartite upper-story windows; decorative cast-stone details at the roofline; and a canopy with decorative wrought-iron supports at the secondary entrance. Alterations, including replacement of ground-story storefronts and entry doors, do somewhat diminish the building's integrity. However, overall, the building remains largely intact and continues to display the characteristic features of a Spanish Colonial Revival commercial building from the 1920s. Thus, it retains sufficient integrity to convey its significance as a good example of its architectural style, and therefore appears eligible for listing in the California Register under Criterion 3 for its architectural merit. As such, this property is considered a historical resource herein for the purposes of CEQA.

- **619-635 S. Prairie Avenue (Lighthouse McCormick Mortuary).** This property, located at the northwestern corner of the Prairie Avenue and La Palma Drive intersection, contains a two-story, 9,352-SF chapel and mortuary building. Designed in the American Colonial Revival style, the building was initially constructed in 1948 as the Hardin & Flanagan Colonial Chapel & Mortuary. In 1959, the business was acquired by the McCormick family and renamed McCormick Mortuary. Around 1960, the building was expanded with a new two-story wing to the north. It is currently operated as Lighthouse McCormick Mortuary.

  HRG examined this property and found that it appears substantially unaltered since its 1960s expansion. The building retains the majority of its exterior features from this period, including its form and massing; hipped and gable roofs with boxed eaves; decorative cornice with return; two-story porticos with slender full-height columns; stucco and wood clapboard exterior cladding; fluted pilasters; divided-light double-hung wood windows with louvred wood shutters; wood paneled doors; round and rounded-arch openings; elaborated entrances including fanlights, sidelights, and decorative wood surrounds; and hanging lanterns. Alterations, such as replacement of an original window with a vinyl slider, are minor in relation to the building's overall appearance, and do not substantially diminish its integrity. The mortuary's expansion was designed to respect and complement that of the original chapel and office, and thus is considered to have acquired significance in its own right. The building remains highly intact and continues to display the characteristic features of a mid-20th-century American Colonial Revival mortuary building. Thus, it retains sufficient integrity to convey its significance as an excellent example of its architectural style, and therefore appears

83 Bricker, Lauren Weiss, Marion Mitchell-Wilson, and Janet L. Tearnen. Inglewood Downtown District Main Street Project Area, Historic Design Guidelines, report. Inglewood, CA: Main Street Inglewood, 2000.

eligible for listing in the California Register under Criterion 3 for its architectural merit. As such, this property is considered a historical resource herein for the purposes of CEQA.

- **720 E. Florence Avenue (Inglewood Park Cemetery).**[84] This property, located at the northeastern corner of the Manchester Boulevard and Prairie Avenue intersection, contains a large cemetery. In 1905, a group of local businessmen formed the Inglewood Park Cemetery Association and acquired a large plot of land just east of what would become downtown Inglewood. In 1907, the cemetery erected the Romanesque-style Grace Chapel, a three-quarters replica of a church in Edinburgh, Scotland. In these early days, funerals often arrived by rail from Los Angeles in a private funeral car; portions of the original railroad waiting station have been incorporated into the main entrance. The Neoclassical-style Inglewood Mausoleum was completed in 1915 and was the first community mausoleum in the State of California. The Mausoleum of the Golden West was built over several decades from the 1930s to the 1960s and features stained-glass representations of early California by Judson Studios. Various notable persons have been laid to rest at Inglewood Park Cemetery, including some of the South Bay region's earliest settlers, a number of Civil War veterans, and famous figures such as former Los Angeles Mayor Tom Bradley, Chet Baker, Ray Charles, Ella Fitzgerald, Etta James, boxer Sugar Ray Robinson, and architect Paul Williams. At the time of this analysis, both Grace Chapel and the Inglewood Mausoleum were undergoing renovation.

  HRG examined this property and found that it has evolved over time, but that it remains substantially intact. The property appears to retain the majority of its original features, such as its overall form and configuration, landscape design, and main entrance, as well as multiple excellent examples of cemetery architecture, including Grace Chapel, Inglewood Mausoleum, and Mausoleum of the Golden West.[85] Alterations, such as the addition of more recent buildings, do not substantially diminish the integrity of the property overall. Thus, the property as a whole retains sufficient integrity to convey its significance as an excellent and rare early 20th-century cemetery in Inglewood. Additionally, Grace Chapel, Inglewood Mausoleum, and Mausoleum of the Golden West appear to be excellent examples of their architectural style. Therefore, the property appears eligible for listing in the National Register[86] and the California Register under Criterion A/1 as early institutional development in Inglewood, and Criterion C/3 and for the quality of its architectural and landscape design. As such, this property is considered a historical resource herein for the purposes of CEQA.

Summary of Historical Resources

In summary, eleven historical resources have been identified for the proposed Project,[87] as shown in **Table 4.4-1: Summary List of Historical Resources**.

84 The parcel situated within the Expanded Study Area has no address and contains only a small portion of the Inglewood Park Cemetery property. The vast majority of the cemetery occupies the adjacent parcel at 720 E. Florence Avenue (APN 4012031027). In the interest of being inclusive, the Inglewood Park Cemetery has been included in the Expanded Study Area related to the proposed Project.

85 Due to the size and complexity of this property, identification of contributing and non-contributing features was outside the scope of this report.

86 Based upon its age, this property appears to meet National Register Criterion Consideration D for cemeteries.

87 Historical Resources Technical Report. Inglewood Transit Connector. November 19, 2020.

Table 4.4-1
Summary List of Historical Resources

Address	APN	Date	Name	Description	Current Evaluation
3900 W Manchester Boulevard	4025001002	1967	The Forum	Multipurpose indoor arena, surrounding parking lot	Listed in NR and CR
115 N Market Street	4021008006	1949	Former Fox Theater	Neighborhood movie theater	Listed in NR and CR
320-330 E Manchester Boulevard	4021013018	1948	Bank of America	Branch bank, rear parking lot	Appears eligible for listing in CR
100 N. Market St/307 E. Queen Street	4021007024	1927	Former Bank of Inglewood (now Vajra Books & Gifts)	Two-story mixed-use commercial building	Appears eligible for listing in NR and CR
129-139 S Market Street	4021009031	1941, addition and remodel 1954	Former J.C. Penney (now Inglewood Marketplace)	Two-story retail commercial building	Appears eligible for listing in CR
150 S Market Street	4021010015	1927, remodel c. 1965	Former People's Federal Building & Loan Association (now World Hat & Boot Mart)	Two-story mixed-use commercial building	Appears eligible for listing in CR
260 N Locust Street	4015026039	1914	Holy Faith Episcopal Church	Religious complex (Church, rectory and School)	Appears Eligible for listing in NR and CR
158-170 N. Market Street	4021007012	1967	Former United Bank of California (now Broadway Federal Bank)	Branch bank, rear parking lot	Appears eligible for listing in CR
149-155 S Market St/231-239 E Manchester Boulevard	4021009017	1928	Professional Building	Two-story mixed-use commercial building	Appears eligible for listing in CR

Address	APN	Date	Name	Description	Current Evaluation
619-635 S Prairie Avenue	4021038027	1948, addition c. 1960	Lighthouse McCormick Mortuary (former Hardin & Flanagan Colonial Chapel and Mortuary)	Two-story chapel and mortuary building	Appears eligible for listing in CR
720 E Florence Avenue[88]	4012031930	1905	Inglewood Park Cemetery	Cemetery	Appears eligible for listing in NR and CR

*Source: Historic Resources Technical Report, HRG, July 2019 (refer to **Appendix 4.4.3**).*

88 The parcel situated within the Expanded Study Area (APN 4012031930) has no address and contains only a small portion of the Inglewood Park Cemetery property. The vast majority of the cemetery occupies the adjacent parcel at 720 E Florence Avenue (APN 4012031027).

Of these, two are listed in the National Register and the California Register; four were previously identified as historic through historic resources surveys, environmental review, or other efforts, and have been re-evaluated as appearing eligible for listing in the National Register and/or California Register; and five were newly identified in the Historic Resource Report evaluation process as appearing eligible for listing in the National Register and/or California Register. All of these properties are considered herein as historical resources for the purposes of CEQA.

4.4.5 THRESHOLDS OF SIGNIFICANCE

Criteria outlined in Appendix G of the State CEQA Guidelines were used to determine the level of significance of cultural resource impacts. A project would have a significant impact in relation to cultural resources if it were to:

Threshold CUL-1: **Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5.**

Threshold CUL-2: **Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?**

Threshold CUL-3: **Disturb any human remains, including those interred outside of formal cemeteries**

The State CEQA Guidelines, Section 15064.5 (b) states that "a project that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment."[89] A "substantial adverse change in the significance of a historical resource" means the physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired. The CEQA Guidelines go on to state that "[t]he significance of a historical resource is materially impaired when a project ...[d]emolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources…local register of historical resources… or its identification in a historical resources survey."[90]

The significance of a historical resource may be materially impaired through both direct and indirect project impacts. Thus, the *Historic Resources Technical Report* (see **Appendix 4.4.3**) analyzed the potential for the proposed Project to impact a historical resource either directly or indirectly.

89 CEQA Guidelines, Section 15064.5(b).
90 CEQA Guidelines, Section 15064.5(b).

4.4.6 IMPACT ANALYSIS FOR THE PROPOSED PROJECT

Impact CUL-1: Would the project cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5?

Impacts

The *Historic Resources Technical Report* identified a total of eleven historical built-environment resources within the proposed Project area,[91] as shown previously in **Table 4.4-1**. Two of these are listed in the National Register and the California Register; four were previously identified as historic through historic resources surveys, environmental review, or other efforts, and have been re-evaluated as appearing eligible for listing in the National Register and/or California Register; and five were newly identified as appearing eligible for listing in the National Register and/or California Register. All of these properties are considered herein as historical resources as defined in Section 15064.5.[92]

APM Guideway and Stations

Direct Impacts

A direct adverse environmental impact would involve an immediate physical change in the built characteristics of a resource or its immediate surroundings that convey its historical significance. While the proposed Project's guideway and stations would largely be constructed within the public right-of-way, several properties along the APM alignment would be affected through the development of the APM guideway and stations on adjacent properties.

The *Historic Resources Technical Report* evaluated the anticipated footprint of the APM system including the guideway, stations and the support facilities. Part of the proposed Project would extend outside the public right-of-way and protrude into or occupy adjacent properties.

The *Historic Resources Technical Report* determined that the proposed Project's guideway would have direct physical impacts on the following two historical built-environmental resources:

- 150 S. Market Street (former People's Federal Building & Loan Association, currently World Hat and Boot Mart), AIN 4021-010-015; and
- 3900 W. Manchester Boulevard (The Forum), AIN 4025-001-002.

91 Historical Resources Technical Report. Inglewood Transit Connector. November 19, 2020
92 CEQA Guidelines, Section 15064.5.

150 S. Market Street (former People's Federal Building & Loan Association)

The property at 150 S. Market Street is situated on the northeastern corner of Market Street and Manchester Boulevard and contains a two-story, 16,575 SF mixed-use commercial building currently occupied by World Hat and Boot Mart. The building was originally constructed in 1927 as the People's Federal Building & Loan Association. It was remodeled in the Late Modern style, likely sometime in the 1960s. The building retains majority of its exterior features from this period, including its form and massing, exaggerated arches and elevated roof plate, exterior wall cladding, metal storefronts and entry doors, canopy, and upper-story fenestration. The building remains largely intact and continues to display the characteristic features of a Late Modern commercial building from the 1960s. This building retains sufficient integrity to convey its significance as a good example of its architectural style, and therefore, appears eligible for listing in the California Register.

The APM guideway would follow Market Street south and turn onto Manchester Boulevard before proceeding east. To maintain a sufficient turning radius and due to the narrowness of Market Street, the required width of the APM guideway, and the absence of front and side building setbacks, the guideway structure would partially intrude into the property at the northeastern corner of this intersection. As such, it is anticipated that this resource would need to be acquired and demolished.

Demolition of this structure would result in a significant impact to the historical resource.

3900 W. Manchester Boulevard (The Forum)

The Forum property is located at 3900 W. Manchester Boulevard and situated southeast of the intersection of Manchester Boulevard and Prairie Avenue. The property contains the Forum, a multipurpose indoor arena surrounded by an expansive surface parking lot. Completed in 1967, it was designed by prominent Los Angeles architectural firm Charles Luckman & Associates in the New Formalist style. From 2012 to 2014, it underwent an extensive historic renovation. The Forum was listed in the National Register on September 24, 2014 under Criterion C as an excellent example of a 1960s New Formalist-style arena building and is therefore automatically listed in the California Register.

Implementation of the proposed Project would not physically alter the Forum structure in any way. However, a portion of the expansive parking lot, which includes approximately 2,800 parking spots, would be affected. Specifically, an easement or partial acquisition of up to 30 feet would be required to maintain the existing number of roadway travel lanes along Prairie Avenue with the addition of APM system columns to support the APM structure. The 30 feet easement would be contained within the setback area of The Forum. An easement of approximately 75 feet would be required to accommodate the Prairie Avenue/Pincay Street station and the associated pedestrian vertical circulation and landings. This

encroachment would alter the original dimensions of the site. Easements required to accommodate for these APM system components would impact no more than 20 existing parking spots on the southwest corner of The Forum parking lot, or less than 1 percent of the total parking spots provided at venue.

The National Register nomination for the Forum identifies the surface parking lot as a character-defining feature. However, the proposed Project (station, guideway and support structures) would not alter the parking lot in any meaningful way. The surface parking lot would largely retain its original dimensions and significant features as an expansive, on-grade, asphalt-paved parking area that surrounds the Forum building on all sides.

Situated along the sidewalk, immediately adjacent to public right-of-way, the proposed Project (station, guideway, and support structures) would be away from the Forum building itself, and thus would not block or obscure important views of the building. Views of the Forum building looking south from Manchester Boulevard would remain unimpaired. Views looking east from Prairie Avenue would largely remain with only minimal impairment. The Forum site would retain its essential character as a large circular structure set at the center of a sprawling, generally open site with unobstructed views from all sides and multiple vantage points for the observation of the building.

After construction of the proposed Project, the Forum would continue to convey its historic significance as a 1960s New Formalist-style arena in Inglewood. The proposed Project would not physically alter the Forum building and would not substantially block or obscure important views of the Forum building. The proposed Project would only alter a small portion of the parking lot which would not result in a substantial adverse change in the significance of the historic resource. Thus, the proposed Project would not alter the relationship between the Forum and its setting.

Impacts would be less than significant.

Indirect Impacts

An indirect adverse environmental impact would involve a substantial alteration in how a resource is viewed and experienced by pedestrians and motorists through obscuring, interfering, or blocking the view of a resource from the public right-of-way. These indirect impacts may materially impair and adversely affect the significance of a historical resource if the historical resource can no longer convey its historical significance and justify its inclusion in the California Register, local register, or historical resource survey. Built-environmental historical resources identified along the proposed Project's footprint, including those adjacent the proposed APM guideway alignment and stations, have been determined to convey their historical significance through physical characteristics such as design, construction, and/or form.

As described previously, the proposed Project would involve construction of an APM system consisting of a guideway and three stations largely within the public right-of-way over an approximately 1.6-mile alignment. Much of the existing development adjacent to the APM guideway's alignment, including identified built-environmental historical resources, contain little to no setback areas. These existing characteristics, combined with the narrowness of roadways and the required size of the APM system, are anticipated to result in the interference of views of the listed resources. The APM guideway and support structures would be located in proximity to building façades, limiting the ability of pedestrians and motorists to view and experience these resources.

The *Historic Resources Technical Report*[93] identified indirect impacts from the proposed Project to the following six resources, discussed below:

- 158-170 N. Market Street (former United Bank of California), AIN 4021-007-012;
- 115 N. Market Street (former Fox Theater), AIN 4021-008-006;
- 100 N. Market St/307 E Queen Street (former Bank of Inglewood), AIN 4021-007-024;
- 129-139 S. Market Street (former J.C. Penney), AIN 4021-009-031;
- 149-155 S. Market Street/231-239 E Manchester Boulevard (Professional Building), AIN 4021-009-017; and
- 320-330 E. Manchester Boulevard (Bank of America), AIN 4021-013-018.

The APM guideway and stations would follow Market Street, Manchester Boulevard, and Prairie Avenue and pass directly in front of these resources. The APM guideway and support structure would not physically alter these buildings in any way and the buildings would remain in their original locations, retaining all their significant character-defining features and materials. The proposed Project would erect substantial new physical structure features in the form of the APM guideway and support structures within proximity to these buildings along Market Street and Manchester Boulevard, leading to significant indirect impact for the former Fox Theater Building. However, the guideway structure and the support columns would only obscure a limited portion of the facades for five of the six historical resources, depending on the position of the viewer. Additionally, the APM guideway would be elevated above the roadway and sidewalks, and often substantially above the top of the historic structures. As such, the proposed Project would have a less than significant indirect impact on the former United Bank of California building, former Bank of Inglewood building, former J.C. Penney building, the Professional Building, and the Bank of America building. Impacts to each of these resources is described below.

93 Historical Resources Technical Report. Inglewood Transit Connector. November 19, 2020.

Former Fox Theater

The former Fox Theater building conveys its historical significance through its only public façade on Market Street, an important vantage point from which to observe the building's primary façade. The proposed Project would be located along Market Street, with the edge of the guideway approximately 15 feet from the building's projecting theater marquee, which overhangs the sidewalk. The guideway along the frontage of the building would be carried by single columns positioned in the center of Market Street, although no columns would be located directly in front of, or immediately adjacent to the Fox Theater building.

The main volume of the Fox Theater building measures approximately 38 feet tall, with its vertical sign pylon-an important component of the building's design- rising to a height of approximately 70 feet. In contrast, the bottom of the APM guideway would be elevated approximately 40 feet above the roadway at this point in the alignment, with the top of the guideway rising to approximately 48 feet. This would place an 8-foot-tall horizontal structure directly in front of the sign pylon, visually obscuring a portion of the sign pylon, and creating a visual separation between the uppermost portion of the pylon and the lower portion of the building containing the theater marquee and public entrance.

Due to the APM guideway interrupting views of the upper portion of the Fox Theater, including obscuring its important sign pylon, the Project would block and/or obscure important views of the building's primary façade. Specifically, views of the building from the east side of Market Street—a critical vantage point from which to observe the building's overall scale, massing, and composition—would be obstructed by the APM guideway. Additionally, vantage points from which to achieve unobstructed views of the building's primary façade would largely be limited to the sidewalk directly in front of the building. Because the building is set at the sidewalk, it is difficult to appreciate the building's overall design from this perspective.

Because the proposed Project would block and/or obscure important views of the former Fox Theater building's primary façade, and would considerably limit the vantage points from which the building can be observed without obstruction, the Project would result in a substantial adverse change in the significance of the historical resource. After construction of the Project, the ability of the former Fox Theater to convey its historic significance as a 1940s Late Moderne-style movie theater building would be impaired. Therefore, indirect impacts to the former Fox Theater building as a result of the Project would be significant.

Former United Bank of California

The former United Bank of California conveys its historical significance through views to its two publicly visible facades, on Market Street (primary) and Regent Street (secondary). The proposed Project would be

located along Market Street and has the potential to interfere with views of the primary façade. The building's secondary façade along Regent Street would be unaffected. Two columns would be located in front of, or immediately adjacent to the United Bank of California Building, resulting in intermittently obscured view of the primary façade depending on the position of the viewer. The columns for the proposed Project would be approximately 6 feet by 9 feet in width. Those portions of the building's façade that would be obscured would be minor in comparison to the overall size of the building, where majority of the façade, including the façade on Regent Street, would remain visible.

The bottom of the guideway structure would be located 19 feet above the top of the structure and would not interfere with the views of the building. Overall, the proposed Project would not obscure or interfere with views of the building such that its physical form and architectural style cannot be discerned and ultimately, the building's scale, massing, and overall composition would remain readily discernable to the viewer despite some interruption of views. The ability of the United Bank of California building to convey its historic significance as a 1960s Late Modern-style bank building would not be substantially impaired by the proposed Project. Therefore, indirect impacts to the United Bank of California building would be less than significant.

Former Bank of Inglewood

The former Bank of Inglewood conveys its historical significance through its two publicly visible facades, on Market Street (primary) and Queen Street (secondary). The proposed Project would be located along Market Street and has the potential to interfere with views of the primary façade. The building's secondary façade along Queen Street would not be obscured by the proposed Project. The guideway along the frontage of the building would be carried by single columns positioned in the center of Market Street, one of which would be located in front of, or immediately adjacent to the Bank of Inglewood building. The single column would intermittently obscure a portion of the building's primary façade, depending on the position of the viewer. However, those portions of the building's façade that would be obscured would be minor in comparison to the overall size of the building, where majority of the façade, including the façade on Queen Street, would remain visible.

The bottom of the guideway structure would be located seven feet above the top of the structure and would not interfere with the views of the building. Overall, the proposed Project would not obscure or interfere with views of the building such that its physical form and architectural style cannot be discerned and ultimately, the building's scale, massing, and overall composition would remain readily discernable to the viewer despite some interruption of views. The ability of the Bank of Inglewood building to convey its historic significance as a 1920s Mediterranean Revival-style bank building would not be substantially

impaired by the proposed Project. Therefore, indirect impacts to the Bank of Inglewood building would be less than significant.

Former J.C. Penney

The former J.C. Penney building conveys its historical significance through its only public façade on Market Street, an important vantage point from which to observe the building's primary façade and main entry. The proposed Project would be located along Market Street and has the potential to interfere with views of the Market Street façade. The guideway along the frontage of the building would be carried by single columns positioned in the center of Market Street, one of which would be located in front of, or immediately adjacent to the J.C. Penney building. The single column would intermittently obscure a portion of the building's primary façade, depending on the position of the viewer. However, those portions of the building's façade that would be obscured would be minor in comparison to the overall size of the building, where majority of the façade which would remain visible.

The bottom of the guideway structure would be located approximately ten feet above the top of the structure and would not interfere with the views of the building. Overall, the proposed Project would not obscure or interfere with views of the building such that its physical form and architectural style cannot be discerned and ultimately, the building's scale, massing, and overall composition would remain readily discernable to the viewer despite some interruption of views. The ability of the J.C. Penney building to convey its historic significance as a 1950s Mid-Century Modern-style department store building would not be substantially impaired by the proposed Project. Therefore, indirect impacts to the J.C. Penney building would be less than significant.

Professional Building

The Professional Building conveys its historical significance through its two publicly visible facades, on Market Street (primary) and Manchester Boulevard (secondary). The proposed Project would be located along Market Street and has the potential to interfere with views of the primary façade. The building's secondary façade along Manchester Boulevard would not be obscured by the proposed Project. The guideway along the frontage of the building would be carried by single columns positioned on the east side of Market Street. Because no columns would be located in front of or immediately adjacent to the Professional Building, the building's primary facade would not be obscured when viewed from the east side of Market Street.

The bottom of the guideway structure would be located approximately 30 feet from the front of the Professional Building and eight feet above the top of the structure, resulting in no interference with the views of the building. Overall, the proposed Project would not obscure or interfere with views of the

building such that its physical form and architectural style cannot be discerned and the building's scale, massing, and overall composition would remain readily discernable to the viewer. The ability of the Professional Building to convey its historic significance as a 1920s Spanish Colonial Revival-style commercial building would not be substantially impaired by the proposed Project. Therefore, indirect impacts to the Professional Building would be less than significant.

Bank of America

The Bank of America building conveys its historical significance through its two publicly visible facades, on Manchester Boulevard (primary) and Locust Street (secondary). The proposed Project would be located along Manchester Boulevard and has the potential to interfere with views of the primary façade. The building's secondary façade along Locust Street would not be obscured by the proposed Project. The guideway along the frontage of the building would be carried by straddle-bent support columns positioned along Manchester Boulevard, three of which would be located in front of, or immediately adjacent to the Bank of America building. The columns would be approximately 6 feet in diameter and be spaced approximately 67 feet to 80 feet apart, leading to very limited portions of the primary façade being obstructed when viewed from Manchester Boulevard. Those portions of the building's façade that would be obscured would be minor in comparison to the overall size of the building, where majority of the façade, including the façade on Locust Street, would remain visible.

The bottom of the guideway structure would be located seven feet above the top of the structure and would not interfere with the views of the building. Overall, the proposed Project would not obscure or interfere with views of the building such that its physical form and architectural style cannot be discerned and ultimately, the building's scale, massing, and overall composition would remain readily discernable to the viewer despite some interruption of views. The ability of the Bank of America building to convey its historic significance as a 1940s Moderne style bank building would not be substantially impaired by the proposed Project. Therefore, indirect impacts to the Bank of America building would be less than significant.

Summary of Impacts

The guideway structure would partially intrude into the former People's Federal Building & Loan Association building located at 150 S. Market Street, at the northeastern corner of the Market Street and Manchester Avenue intersection. The intrusion is necessary to accommodate for the guideway's turning radius at the intersection and the significant impact cannot be avoided through a partial take of the primary façade of the property. Acquisition and demolition of the existing building on site would be unavoidable. The building was originally constructed in 1927 and remodeled in the Late Modern style in the 1960s. The building appears substantially unaltered since its 1960s remodel and retains the majority

of its exterior features from this period. As such, the building was assigned a status code of 5S1 (eligible for local listing). A significant and unavoidable impact to the People's Federal Building & Loan Association building would occur.

In order to accommodate the required width of the Prairie Avenue/Pincay Street station, a portion of the expansive parking lot surrounding the Forum would be impacted. The Prairie Avenue/Pincay Street station would involve encroachment to the east into the Forum parking lot in order to accommodate for the pedestrian vertical circulation and landings, and to maintain the existing number of roadway travel lanes along Prairie Avenue. Even though the National Register nomination for the Forum identifies the surface parking lot as a character-defining feature, the proposed Project would not alter the parking lot in any meaningful way. The surface parking lot would largely retain its original dimensions and significant features as an expansive, on-grade, asphalt-paved parking area that surrounds the Forum building on all sides. The proposed Project will not substantially block or obscure important views of the building. As such, The Forum site would retain its essential character as a large circular structure set at the center of a sprawling, generally open site with unobstructed views from all sides. Impacts to The Forum would be less than significant.

Implementation of the proposed Project would obstruct the view of the primary façade of the historic Fox Theater. The APM guideway would be located directly in front of the theater building and visually obscure a portion of the sign pylon, creating a visual separation between the uppermost portion of the pylon and the lower portion of the building containing the theater marquee and public entrance. The APM guideway would block important views of the building's primary façade and limit the views of the building's primary façade to the sidewalk directly in front of the building, making it difficult to appreciate the building's overall design. Because the ability of the former Fox Theater to convey its historic significance would be impaired following the implementation of the proposed Project, the indirect impact on the former Fox Theater is considered significant.

Lastly, the proposed Project would have a less than significant indirect impact on the former United Bank of California building, former Bank of Inglewood building, former J.C. Penney building, the Professional Building, and the Bank of America building. These buildings' scale, massing, and overall composition would remain readily discernable to the viewer despite some interruption of views by the proposed Project and retain the ability to convey its historic significance as a historic resource.

Mitigation Measures

MM CUL-1: The building located at 150 S. Market Street (the former People's Federal Building & Loan Association Building) shall be documented to Historic American Buildings Survey (HABS) Level III prior to demolition. HABS Level III documentation includes a sketch plan,

photographs with large-format negatives or exterior and interior views, and the completion of an architectural data form. Copies of the completed HABS documentation shall be archived with the South Central Coast Information Center at California State University, Fullerton, as well as with the Los Angeles Conservancy and the Inglewood Public Library. An additional archival copy of the documentation shall be offered to the Inglewood Historic Preservation Alliance.

MM CUL-2: Wherever support columns would come into close proximity to the Fox Theater building, these columns shall be situated as far away as possible from the publicly visible façades of the building as feasible; and to the extent possible, the location of the columns shall be shifted to either side of the building rather than directly in front of it, to minimize visual impacts.

MM CUL-3: Wherever APM station vertical circulation elements, such as escalators, elevators, and stairs, would come into close proximity with the Fox Theater building, these elements shall be situated with as much distance from the publicly visible façades of the building as is feasible; and to the extent possible, the placement of these elements shall be shifted to either side of the resource rather than directly in front of it, to minimize visual impacts.

Level of Significance after Mitigation

The proposed Project would require the demolition of the building at 150 S. Market Street (the former People's Federal Building & Loan Association Building) which would render the direct impacts to the historic resource significant and unavoidable. While implementation of **MM CUL-1** would reduce the significant impact by ensuring that the resource is extensively documented with information available for access by the public, impacts to this resource would remain significant and unavoidable.

As a result of the proposed Project, one Project adjacent historic resource, the Fox Theater, would be impacted indirectly by the obscured views of the proposed Project. The guideway would obscure the Fox Theater building by limiting the ability of the building to convey its historic significance. As a result, indirect impacts to the historic Fox Theater was identified to be significant.

Implementation of **MM CUL-2** and **MM CUL-3** would reduce the significant indirect impacts to the Fox Theater to the extent feasible. **MM CUL-3** and **MM CUL-4** would ensure that best efforts are made to situate the support structures for the APM guideway and station vertical circulation elements with as much distance from the Fox Theater's publicly-visible façade as is feasible, and to the extent possible, the placement of the columns and station vertical circulation elements would be shifted to either side of the resource rather than directly in front of it, to minimize visual impacts. Despite mitigation, public views of

the Fox Theater would continue to be obstructed, thus indirect impacts would remain significant and unavoidable.

Impact CUL-2: Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?

Impacts

Section 15064.5 of the CEQA Guidelines generally defines a historic or archeological resource as a resource that is (1) listed in, or determined to be eligible for listing in the California Register of Historical Resources (California Register); (2) included in a local register of historical resources (pursuant to Section 5020.1(k) of the PRC); or (3) identified as significant in an historical resources survey (meeting the criteria in Section 5024.1(g) of the PRC) in addition to maintaining a sufficient level of physical integrity.

Further, CEQA considers unique archaeological resources including archaeological artifact, object, or site which can clearly demonstrate the following criteria: (1) Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information; (2) Has a special and particular quality such as being the oldest of its type or the best available example of its type; or (3) Is directly associated with a scientifically recognized important prehistoric or historic event or person.[94] Unique archaeological resources include material evidence of past human life and culture of previous ages.

A literature review and records search was conducted at the South Central Coastal Information Center housed at California State University, Fullerton on June 20, 2018.[95] The records search included the proposed Project footprint and an area of a half-mile surrounding the Project area. The records search indicated there are no prehistoric or historical archaeological resources recorded within a half-mile radius of the area. In addition to the records search, a reconnaissance survey of the proposed Project area was conducted on July 20, 2018, also resulting in negative findings of prehistoric or historic archaeological resources identified. However, ground visibility surrounding the proposed Project footprint is very poor due to a high level of urbanization and development and any resources buried below ground would be difficult to observe.

During construction, the proposed Project would require excavation, grading, drilling, and other related construction activities that involve extensive ground disturbance that could expose undiscovered archaeological artifacts. As much of the area has experienced prior development, the potential for such

94 California PRC, Sections 21083.2, Archeological Resources.

95 *Cultural Resource Investigation*, Roberta Thomas, M.A., RPA, and Gena Granger, M.A., RPA, PaleoWest Archaeology (PaleoWest), December 12, 2018.

discoveries is considered low. Deeper ground disturbing activities, such as drilling for columns, would involve techniques that would not provide for successful recovery of any artifacts as they would be destroyed during drilling. Therefore, there is a potential significant impact for unearthing or destroying previously unknown archaeological resources during construction.

Operation of the proposed Project would not involve ground disturbing activities and, therefore, would not have the opportunity to unearth previously unknown archaeological resources. Operation of the proposed Project would have no impact on archaeological resources at or around the proposed Project area.

Mitigation Measures

Implement **MM TCR-1** to **MM TCR-4** from **Section 4.13 Tribal Cultural Resources**.

Level of Significance after Mitigation

The impacts associated with causing a substantial adverse change in the significance of an archaeological resource would be reduced to a less than significant level with the implementation of **MM TCR-1** to **MM TCR-4**. The measures would require the contractor to hire a qualified archaeologist meeting Secretary of the Interior's Professional Qualifications Standards for archaeology (US Department of the Interior, 2008) to carry out all mitigation related to cultural resources, including on-site monitoring of any ground disturbing activities. The monitor would be versed in locating and identifying archeological artifacts. This would increase the likelihood for locating archeological resources unearthed on-site and properly identifying its significance. Proper treatment of the artifacts immediately after discovery would be determined by the qualified archaeologist to minimize adverse change in the significance of the archeological resource discovered.

Prior to construction all construction personnel associated with demolition and ground disturbance activities would also be required to receive Cultural Resources Sensitivity Training, which would include training in identifying characteristics of archeological resource finds. Minimizing the possibility to cause substantial adverse change to significant archeological resources due to construction activities. In the event of the discovery of any archaeological materials during implementation of the Project, all work shall immediately cease within 50 feet of the discovery until it can be evaluated by the qualified archaeologist. Construction shall not resume until the qualified archaeologist has made a determination on the significance of the resource(s) and provided recommendations regarding the handling of the find. If the resource is determined to be significant, the qualified archaeologist will confer with the project applicant regarding recommendation for treatment and ultimate disposition of the resource(s). This process would ensure proper treatment and processing of the archeological resources found. Therefore, potential

impacts associated with causing a substantial adverse change in the significance of an archaeological resource would be reduced to a less than significant level.

Impact CUL-3: Disturb any human remains, including those interred outside of formal cemeteries.

Impacts

A significant adverse effect would occur if ground disturbing activities associated with the proposed Project were to disturb previously interred human remains. Construction of the proposed Project would require extensive construction of foundations and columns, as well as other ground-disturbing activities. Required construction activities have the potential for unearthing and destroying unknown human remains underground which were not observed during the field survey. Thus, the potential to disturb human remains exists and this potential impact would be significant.

Discovery of Native American human remains is further discussed in **Section 2.18 Tribal Cultural Resources**.

Mitigation Measures

Implement **MM TCR-1, MM TCR-3** and **MM TCR-5** from **Section 4.13 Tribal Cultural Resources**.

Level of Significance after Mitigation

The impacts associated with disturbing any undiscovered human remains would be reduced to a less than significant level with the implementation of **MM TCR-1, MM TCR-3,** and **MM TCR-5**. The measures would require the contractor to hire a qualified monitor on-site to monitor any ground disturbing activities. The monitors would be versed in locating and identifying human remains. Prior to construction all construction personnel associated with demolition and ground disturbance activities would also be required to receive Cultural Resources Sensitivity Training, which would include training in identifying human remains. In the event human remains is found, work would immediately cease within 150 feet of the discovery and the County coroner would be contacted in accordance with PRC Section 5097.98 and Health and Safety Code Section 7050.5. The City, tribal cultural resources monitor, and archaeological monitor would also be notified. Proper treatment and processing of the human remains would be carried out in compliance with PRC Section 5097.98, Health and Safety Code Section 7050.5, **MM TCR-1, MM TCR-3,** and **MM TCR-5**. Therefore, potential impacts to disturbing human remains would be reduced to a less than significant level.

4.4.7 CUMULATIVE IMPACTS

A cumulative impacts analysis for historic architectural resources evaluates whether impacts of a project and related projects, when taken as a whole, would have significant environmental impacts on historical resources. If the cumulative projects listed in **Section 4.6: Cumulative Assumption**s would result in a significant impact, then the proposed Project contribution would need to be determined. The cumulative context for historic resources can be defined by a number of factors depending on the conditions and the presence or absence of known historic resources in the area.

For the proposed Project, the cumulative context for historical resources considers impacts to significant historical resources in Inglewood. The majority of the cumulative projects identified in **Section 4.6** involve commercial and residential developments, many of which are smaller in scale, while the HPSP accounts for a large portion of the cumulative development. The HPSP EIR was certified in 2009 and concluded that the HPSP project would result in a less-than-significant impact to historic resources. Given the long history of Inglewood and large number of historic-age buildings and structures throughout the City it is possible that historical resources may be significantly impacted as a result of at least one of the identified cumulative projects that constitute the cumulative context. Therefore, the cumulative impact on historic architectural resources is considered potentially significant. Because the Project would require acquisition and demolition of the historic property at 150 S. Market Street and would block currently unobstructed views of the Fox Theatre on Market Street, the Project's incremental contribution to the potential significant cumulative impact on cultural resources would be cumulatively considerable.

4.4.8 CONSISTENCY WITH CITY OF INGLEWOOD GENERAL PLAN

Land Use Element

The City's Land Use Element[96] was adopted in 1980 and subsequently amended in 1986, 2009, 2015, 2016, and 2020. Applicable goals to the Cultural Resources section were added in 2016 to the Land Use Element with the adoption of the New Downtown and Fairview Heights Transit Oriented Development Plan and Design Guidelines described below.

New Downtown and Fairview Heights Transit Oriented Development Plan and Design Guidelines

The New Downtown and Fairview Heights Transit Oriented Development Plan and Design Guidelines[97] (Downtown TOD Plan) covers the Downtown Inglewood and Fairview Heights neighborhoods of the City

96 City of Inglewood. *Land Use Element.* https://www.cityofinglewood.org/DocumentCenter/View/132/Land-Use-Element-1980-Amended-1986-2009-2016-PDF. Accessed July 22, 2020.

97 City of Inglewood, New Downtown and Fairview Heights Transit Oriented Development Plan and Design Guidelines, November 1, 2016.

and works to implement the City's vision for transforming the quality of the environment within these areas. The Downtown TOD Plan area consists of approximately 585 acres located in the center of Inglewood along the Metro Crenshaw/LAX line just east of the Florence Avenue/La Brea Avenue intersection. This Downtown planning and zoning area extends approximately one-half mile in all directions from the Metro Downtown Inglewood Station.

The Downtown TOD Plan planning effort were incorporated into the Land Use Element with its 2016 update. Relevant goals and policies in the Downtown TOD are listed as follows:

Goal 1*:* Downtown is a place to live, work, shop, recreate, and be entertained.

Policy 1.2: Ground Floor Uses and Storefronts. Require uses that activate pedestrian activity such as retail on major streets and plaza frontages. Require that storefronts be historically-sensitive, attractive, and transparent in the Historic Downtown.

Goal 2: Downtown is a revitalized yet forward-looking gathering place for the community.

Policy 2.3: Preservation of Historic Fabric. Require the preservation of buildings that have been designated as historic and encourage the reuse of other historic buildings. Maintain the sense of place in areas with historic fabric and/or meaning such as Market Street between Regent Street and Hillcrest Avenue and the Hillcrest neighborhood east of Locust Street.

Goal 6: Downtown expresses the unique culture of Inglewood.

Policy 6.1: Districts. Define the following unique districts within the Downtown TOD area, each with their own unifying character or identity that should be preserved and enhanced: Historic Downtown, Civic Center, TechTown, Beach Avenue, Fairview West, Hillcrest and Queen Street.

The proposed Project is consistent with the Policy 1.2 and Policy 6.1 within the Downtown TOD Plan in the Land Use Element. Pedestrian facilities within the project footprint would be upgraded to ensure ADA compliance and stations would provide opportunities for safe pedestrian crossing across busy roadways along Prairie Avenue and Market Street. The design of the proposed APM system has taken into consideration storefronts and retail on major streets within the project footprint to limit its direct and indirect impact to surrounding historic resources. Resources impacted by the proposed Project would be

mitigated to the extent feasible and impacts to publicly visible facades would be minimized as allowed for by proposed Project design.

The proposed Project would be consistent with Policy 2.3 within the Downtown TOD Plan through the implementation of an amendment proposed by the Project, by adding the underlined language to the end of Policy 2.3's text:

- Policy 2.3: *Preservation of Historic Fabric*. Require the preservation of buildings that have been designated as historic and encourage the reuse of other historic buildings. Maintain the sense of place in areas with historic fabric and/or meaning such as Market Street between Regent Street and Hillcrest Avenue and the Hillcrest neighborhood east of Locust Street, <u>while also accommodating for the development of the Inglewood Transit Connector along Market Street between Regent Street and Manchester Boulevard</u>.

The amendment would allow the policy to take into account the historical significance of Inglewood Downtown while accommodating for the implementation of the APM system. Historical resources would remain recognized as an important part of the Inglewood Downtown and any impacts to historical resources would be mitigated to the extent feasible. The proposed Project would be consistent with Policy 2.3 with the proposed amendment.

4.5 ENERGY RESOURCES

4.5.1 INTRODUCTION

This section of the Draft Environmental Impact Report (Draft EIR) evaluates potential impacts associated with the proposed Inglewood Transit Connector Project (proposed Project) as it relates to energy resources, focusing on the following three resources: electricity, natural gas, and transportation-related energy (petroleum-based fuels). The existing energy conditions in the area relevant to electricity, natural gas, and petroleum-based fuels are described, along with the methodology and the regulatory framework that guided the evaluation of energy resources. Impacts to energy resources that would result from the proposed Project are identified.

Appendix F: Energy Conservation[1] of the State California Environmental Quality Act (CEQA) Guidelines identifies the suggested requirements to be considered in an EIR relative to the potential energy impacts of a proposed Project, with particular emphasis on avoiding or reducing inefficient, wasteful, and unnecessary consumption of energy. The potentially significant energy implications of a project shall be considered in an EIR to the extent relevant and applicable to the proposed Project.

This section addresses the infrastructure capacity and demand associated with the energy consumption of the proposed Project, energy conservation and sustainability measures that may be included in the proposed Project. The City of Inglewood (City) has developed a set of broad sustainability strategies to be incorporated into the design, construction, and operations of each proposed Project component. The proposed Project would incorporate a number of sustainability features as listed in **Table 3.0-5: Proposed ITC Sustainability Guidelines**. These measures align with Inglewood's commitment to sustainability Citywide, as outlined in the City's Energy and Climate Action Plan and Energy Efficiency Climate Action Plan. These sustainability guidelines serve as a mechanism to promote the City's commitment to reduce its environmental footprint and promote energy efficient design requirements, water conservation, and water quality improvement projects, natural resource protection efforts, waste reduction and recycling, and numerous air quality emissions reduction policies and programs.

For construction impacts, the City would include in bid documents for the proposed Project language specifying that the future contractors shall use Tier 4 construction equipment on the proposed Project (see **Mitigation Measure MM AQ-1** in **Section 4.2: Air Quality**). For operational impacts, the proposed Project would comply with the requirements of California Green Building Standards Code (CALGreen) and be consistent with the City Energy Efficiency Climate Action Plan policies and programs related to sustainability, energy efficiency, and reduction in GHG emissions. The City has committed to taking an

1 CEQA Guidelines, Appendix F: Energy Conservation.

active role in promoting energy conservation and environmentally-friendly initiatives to improve the environment and realize the co-benefits, which include energy independence, cost savings for energy not used, water saved, improved air quality, and public health benefits from improved air quality.

This section contains: (1) a summary of the federal, State, and local regulations related to energy demand and conservation; (2) a description of the energy consumption from the proposed Project, as well as a description of the Adjusted Baseline Environmental Setting; and (3) an analysis of the potential impacts related to energy demand associated with the implementation of the proposed Project, as well as identification of potentially feasible measures that could mitigate significant impacts.

Energy calculations for this analysis were conducted for existing uses, and proposed Project construction and operation. These calculations are detailed within the following appendices to this Draft EIR:

- **Appendix 3.0.1:** Inglewood Transit Connector EIR Operating Systems Conceptual Planning EIR Project Definition, Lea + Elliot, December 2020
- **Appendix: 4.5.1:** Existing Conditions Energy Calculations
- **Appendix: 4.5.2:** Adjusted Baseline Energy Calculations
- **Appendix: 4.5.3:** Project Construction Energy Calculations
- **Appendix: 4.5.4:** Project Construction Vehicle Fuel Calculations
- **Appendix: 4.5.5:** Project Operational Energy Calculations
- **Appendix: 4.5.6:** Project Operational Vehicle Fuel Calculations

Air quality and greenhouse gas (GHG) emissions associated with energy production—that is, production of electricity and the combustion of fuels—are discussed in the impact analyses in **Sections 4.2: Air Quality** and **4.7: Greenhouse Gas Emissions**. Potential conflicts between the proposed Project and existing utility infrastructure that would result in environmental impacts are discussed in **Section 4.14: Utilities and Service Systems**.

Please see **Section 8.0** for a glossary of terms, definitions, and acronyms used in this Draft EIR.

4.5.2 METHODOLOGY

This analysis compares energy consumption associated with the proposed Project under the Adjusted Baseline conditions as defined in **Section 4.0: Environmental Impact Analysis**, *4.0.5: Adjusted Baseline*. Energy demand for the proposed Project has been estimated based on generation factors for use type or on specifications for similar facilities at other locations and as estimated by the system design engineers

in the Draft Operating Systems Conceptual Report.[2] This analysis also considers the ability of the proposed Project to avoid or reduce energy consumption through conservation programs and efficiency features.

Specific assumptions and data sources needed to quantify energy consumption during both construction and operation are presented in **Section 3.0: Project Description**. The methods and scenarios used for the energy calculations are the same as those used for the air quality emissions calculations, as discussed in **Section 4.2: Air Quality**.

4.5.2.1 Construction

Annual energy use includes mobile sources and energy usage associated with the existing on-site structures that would be removed and replaced with construction of the proposed Project. Existing buildings within the footprint of the proposed Project include approximately 220,000 SF of commercial uses (See **Section 3.0** for a detailed discussion of the existing land uses that would be demolished as part of the proposed Project).

Construction energy consumption would result from transportation fuels (e.g., diesel and gasoline) used for haul trucks, heavy-duty construction equipment, construction workers traveling to and from the proposed Project, electricity consumed to power the construction trailers (lights, electronic equipment, and heating and cooling), and exterior uses such as lights, conveyance of water for dust control, and any electrically-driven construction equipment.

Construction activities could vary substantially from day to day, depending on the specific type of construction activity and the number of workers and vendors that would travel to the proposed Project. This analysis considered these factors and provides the estimated maximum construction energy consumption for the purposes of evaluating the associated impacts on energy resources. The anticipated construction program is discussed in *Section 3.7: Construction* of **Section 3.0**. Further details are provided in **Appendix 3.0.4: ITC Construction Scenarios for the EIR, June 2020**.

Construction fuel use was forecasted by assuming a conservative estimate of construction activities and applying mobile source emission factors. Construction activities are expected to commence in early 2022 and be completed in mid-2026 (i.e., assuming all construction occurs at the earliest feasible date)(see Construction Scenario **Appendix 3.0.4**). If, for various site planning, financial, or other reasons, the onset of construction is delayed to a later date than assumed in the analysis, construction impacts would be similar to or less than those analyzed, because more energy efficient and cleaner burning construction equipment and vehicle fleet mix would be expected in the future. This is due to the In-Use Off-Road Diesel-

2 Lea+Elliott, Inc. *Inglewood Transit Connector EIR Operating Systems Conceptual Planning EIR Project Definition* - December 2020 (See **Appendix 3.0.1**).

Fueled Fleets Regulation implemented by the California Air Resources Board (CARB) that requires construction equipment fleet operators to phase-in less polluting heavy-duty equipment and trucks over time.[3]

Construction electricity use was estimated for a temporary construction office, for construction equipment that would use electricity as an alternative to diesel fuel, and for water usage from dust control activities. The CalEEMod emissions model, described further in **Sections 4.2: Air Quality**, was used to estimate the proposed Project's emissions of criteria air pollutants, and was also used to estimate electricity, natural gas, and water use. The same model used for air quality analyses was also used for the purpose of estimating energy use.

The construction office was assumed to be two 2,500 SF trailers and was modeled using the CalEEMod land use category for "General Office." Electricity demand by construction equipment was estimated using default horsepower (hp) and load factors from CalEEMod and hours of operation per day.[4] The total horsepower-hours (hp-h) were then converted to kilowatt-hours (kWh) using a standard conversion factor.

The electricity demand under existing that will be removed was then subtracted from the construction electricity use to determine the net electricity use during construction of the proposed Project.

Natural gas would not be consumed in large quantity during construction of the proposed Project because construction offices would not be heated with natural gas, and construction equipment and vehicles would be primarily powered by either diesel, gasoline, or electricity.

Transportation fuels would be consumed for transportation of construction workers and materials to and from the proposed Project, and operation of construction equipment throughout the construction phases. Fuel consumption from on-site heavy-duty construction equipment was calculated based on the equipment mix estimated in the Construction Scenario (see **Appendix 3.0.4**). The total hp was then multiplied by fuel usage estimates per hp-h from the CARB off-road vehicle (OFFROAD) model.[5]

Fuel consumption from construction on-road worker, vendor, and delivery/haul trucks was calculated using the trip rates and distances consistent with the air quality emissions modeling worksheets and CalEEMod construction output files (see **Section 4.2**). Total vehicle miles travelled (VMT) for these on-road vehicles were then calculated for each type of construction-related trip and divided by the corresponding County-specific miles per gallon factor using the CARB EMFAC2017 model. The model was used to

3 California Air Resources Board, 2010. In-Use Off-Road Diesel-Fueled Fleets Regulation. December 2010, revised October 2016.

4 South Coast Air Quality Management District, 2017. CalEEMod® Users Guide Appendix D: Default Data Tables. October 2017.

5 California Air Resources Board, 2017. Off-Road Diesel Emission Factor Update for NO_x and PM. 2017.

calculate fuel consumed based on the total annual VMT for each vehicle type. A combination of CalEEMod assumed trip lengths and client-provided specific trip lengths were used for worker commutes, vendor and concrete trucks, and haul truck trips (see **Appendix 3.0.4**). Consistent with CalEEMod, construction worker trips were assumed to include a mix of light duty gasoline automobiles and light duty gasoline trucks. Construction vendor trucks were assumed to be a mix of medium-heavy duty and heavy duty diesel trucks and concrete and haul trucks were assumed to be heavy-duty diesel trucks.

The energy usage required for construction of the proposed Project was estimated based on the number and type of construction equipment that would be used during construction by assuming a conservative estimate of construction activities (i.e., maximum daily equipment usage levels) (see **Appendix 3.0.4**). Energy for construction-worker commuting trips was estimated based on the predicted number of workers for the various phases of construction, and the estimated VMT based on the conservative values in the CalEEMod and EMFAC2017 models. The assessment also includes a discussion of the proposed Project compliance, with relevant energy-related regulatory requirements and incorporation of design features discussed in **4.7: Greenhouse Gas Emissions**, which would minimize the amount of energy usage during construction. These measures are also discussed in **Section 3.0**.

The estimated fuel economy for heavy-duty construction equipment was based on fuel consumption factors from the CARB OFFROAD emissions model, which is a State-approved model for estimating emissions from off-road heavy-duty equipment. The estimated fuel economy for haul trucks, vendor trucks, concrete trucks, and worker commute vehicles was based on fuel consumption factors from the CARB EMFAC 2017 emissions model, which is a State-approved model for estimating emissions from on-road vehicles and trucks.

4.5.2.2 Operation

Operational energy impacts were assessed based on the increase in energy demand compared to existing conditions described. Operation of the proposed Project would include implementation of a number of sustainability measures as noted in **Table 3.0-5**.

Operational energy associated with the existing uses to be demolished were subtracted from the total operations of the proposed Project to calculate the net energy consumed. Within the CalEEMod software, building electricity and natural gas usage rates were adjusted to account for prior Title 24 Building Energy Efficiency Standards for the existing uses.[6] As stated previously, the net change in operational energy demand was based on the difference between the existing baseline condition energy demand and the energy demand of the proposed Project at full buildout. The following discusses only the methodology for

6 *California Air Resources Board, 2016. CalEEMod® Users Guide,* Appendix E, Section 5. September 2016. Factors for the prior Title 24 standard are extrapolated based on the technical source documentation.

the new operations at the proposed Project's Maintenance and Storage Facility (MSF), traction power substations (TPSSs), stations, and train operations as detailed in the Draft Operating Systems Conceptual Report.[7]

The proposed Project operational natural gas demand would be generated mainly by building heating/cooling of the MSF and stations. The proposed Project estimated natural gas demand was analyzed relative to Southern California Gas Company (SoCalGas) existing and planned energy supplies in 2026 (i.e., the proposed Project buildout year)[8] to determine whether the utility would be able to meet the proposed Project energy demands. Furthermore, natural gas demand generated by the existing uses to be demolished were calculated using demand factors provided in CalEEMod and subtracted from the proposed Project natural gas demand to obtain the net annual natural gas demand.

Mobile source fuel consumption for the proposed Project during operation would include event-day trips related to commute trips by employees and suppliers.

4.5.3 REGULATORY FRAMEWORK

4.5.3.1 Federal Regulations and Directives

Energy Policy and Conservation Acts

The Federal Energy Policy and Conservation Act of 1975,[9] the Federal Energy Policy Act of 2005,[10] and the Energy Independence and Security Act of 2007[11] require the US Department of Energy (USDOE) to set electrical efficiency standards of various appliances, fixtures, and equipment.

The Energy Independence and Security Act of 2007 includes standards for an increased Corporate Average Fuel Economy standard of 35 miles per gallon (mpg) for the combined fleet of cars and light trucks by the 2020 model year, in addition to provisions for Renewable Fuel Standard, Appliance and Lighting Efficiency Standards, and Building Energy Efficiency. The Act includes standards for general service lighting that will require lightbulbs to consume 60 percent less energy by 2020. This standard is leading to the phasing out of incandescent lightbulbs to be replaced by more efficient lighting. Additional provisions of the Act address energy savings in government and public institutions; promote research for alternative energy, carbon capture, and international energy programs; and create green jobs.

---

7 Lea+Elliott, Inc. Inglewood Transit Connector EIR Operating Systems Conceptual Planning EIR Project Definition - *December 2020* (See Appendix 3.0.1).

8 California Gas and Electric Utilities, 2018. *2018 California Gas Report, 2018.* While the estimated life of the proposed Project would be 30 years, comparison to the analyzed first full operational year of 2026 provides a conservative analysis as supply projections for electricity and natural gas increase in future years.

9 Energy and Policy Conservation Act (EPCA) (Pub. Law 94–163, 89 Stat. 871, enacted December 22, 1975).

10 42 USC §13201 et seq. (2005).

11 Public Law 110-140 (2007).

Corporate Average Fuel Economy Standards

Established by the US Congress in 1975, the Corporate Average Fuel Economy (CAFE) standards[12] reduce energy consumption by increasing the fuel economy of cars and light trucks. The National Highway Traffic Safety Administration (NHTSA) and United States Environmental Protection Agency (USEPA) jointly administer CAFE standards. The US Congress has specified that CAFE standards must be set at the "maximum feasible level" with consideration given to: (1) technological feasibility; (2) economic practicality; (3) effect of other standards on fuel economy; and (4) need for the nation to conserve energy.

Fuel efficiency standards for medium- and heavy-duty trucks have been jointly developed by USEPA and NHTSA. The Phase 1 heavy-duty truck standards apply to combination tractors, heavy-duty pickup trucks and vans, and vocational vehicles for model years 2014 through 2018, and result in a reduction in fuel consumption from 6 to 23 percent over the 2010 baseline, depending on the vehicle type. USEPA and NHTSA have also adopted the Phase 2 heavy-duty truck standards, which cover model years 2021 through 2027 and require the phase-in of a 5 to 25 percent reduction in fuel consumption over the 2017 baseline depending on the compliance year and vehicle type.[13]

US Department of Transportation, US Department of Energy, and US Environmental Protection Agency Influence on Transportation Energy

On the federal level, the US Department of Transportation (USDOT), USDOE, and USEPA are three agencies with substantial influence over energy policies related to transportation fuels consumption. Generally, federal agencies influence transportation energy consumption through establishment and enforcement of fuel economy standards for automobiles and light trucks, through funding of energy-related research and development projects, and through funding for transportation infrastructure projects.

4.5.3.2 State Regulations and Directives

California Public Utilities Commission

The California Public Utilities Commission (CPUC) has authority to set electric rates, regulate natural gas utility service, protect consumers, promote energy efficiency, and ensure electric system reliability. The CPUC has established rules for the planning and construction of new transmission facilities, distribution facilities, and substations. Utility companies are required to obtain permits to construct certain power line facilities or substations. The CPUC also has jurisdiction over the siting of natural gas transmission lines.

12 For more information on the CAFE standards, refer to https://www.nhtsa.gov/laws-regulations/corporate-averagefuel-economy.

13 US Environmental Protection Agency, 2016. Federal Register/Vol. 81, No. 206/Tuesday, Greenhouse Gas Emissions and Fuel Efficiency Standards for Medium- and Heavy-Duty Engines and Vehicles—Phase 2. October 25, 2016.

The CPUC regulates distributed energy generation policies and programs for both customers and utilities. This includes incentive programs (e.g., California Solar Initiative) and net energy metering policies. Net energy metering allows customers to receive a financial credit for power generated by their on-site system and fed back to the utility. The CPUC is involved with utilities through a variety of energy procurement programs, including the Renewable Portfolio Standard program.

In 2008, the CPUC adopted the Long Term Energy Efficiency Strategic Plan, which is a road map to achieving maximum energy savings in California through 2020.[14] Consistent with California's energy policy and electricity "loading order," the Energy Efficiency Strategic Plan indicates that energy efficiency is the highest priority resource in meeting California's energy needs. The CPUC also adopted energy goals that require all new residential construction in California to be zero net energy by 2020. The zero net energy goal means new buildings must use a combination of improved efficiency and distributed renewable energy generation to meet 100 percent of their annual energy need. In addition to the zero net energy goals for residential buildings by 2020, the CPUC has adopted goals that all new commercial construction in California will be zero net energy by 2030 and 50 percent of existing commercial buildings will be retrofit to zero net energy by 2030.

California Energy Commission

The CEC is primary energy policy and planning agency in California. Created by the California Legislature in 1974, the CEC has five major responsibilities: (1) forecasting future energy needs and keeping historical energy data; (2) licensing thermal power plants 50 MW or larger; (3) promoting energy efficiency through appliance and building standards; (4) developing energy technologies and supporting renewable energy; and (5) planning for and directing State response to energy emergencies.

Senate Bill 1389

Senate Bill (SB) 1389 requires the CEC to prepare a biennial integrated energy policy report that assesses major energy trends and issues facing the electricity, natural gas, and transportation fuel sectors in California, and provides policy recommendations to conserve resources; protect the environment; ensure reliable, secure, and diverse energy supplies; enhance the State economy; and protect public health and safety.[15]

The 2017 Integrated Energy Policy Report[16] provides the results of the CEC assessments of a variety of energy issues facing California, including energy efficiency, strategies related to data for improved

14 CPUC, *Long Term Energy Efficiency Strategic Plan.* 2008

15 SB 1389, (PRC sections 25300–25323)

16 *Final 2017 Integrated Energy Policy Report,* Adopted February 21, 2018, Accessed July 13, 2020 https://efiling.energy.ca.gov/getdocument.aspx?tn=223205.

decisions in the Existing Buildings Energy Efficiency Action Plan, building energy efficiency standards, the impact of drought on the California energy system, achieving 50 percent renewables by 2030, the California Energy Demand Forecast, the Natural Gas Outlook, the Transportation Energy Demand Forecast, Alternative and Renewable Fuel and Vehicle Technology Program benefits updates, an update on electricity infrastructure in Southern California, an update on trends in California sources of crude oil, and an update on other energy issues.

California Green Building Standards Code

Adopted in 2010, and updated annually, CALGreen is found in Part 11, Title 24 of the CCR.[17] The purpose of CALGreen is to cause a reduction in GHG emissions; promote environmentally responsible, cost effective, healthier places to live and work; and reduce energy and water consumption. CALGreen identifies mandatory building measures and voluntary measures that may be incorporated into the design of buildings. CALGreen establishes voluntary and mandatory standards pertaining to the planning and design of sustainable site development, energy efficiency, water conservation, material conservation, and interior air quality.

The 2019 CALGreen Code took effect January 1, 2020. CALGreen requires every new building constructed in California to reduce water consumption by 20 percent, divert 65 percent of construction waste from landfills, and install low-pollutant-emitting materials. It also requires separate water meters for nonresidential buildings' indoor and outdoor water use, with a requirement for moisture-sensing irrigation systems for larger landscape projects and mandatory inspections of energy systems (e.g., heat furnace, air conditioner, and mechanical equipment) for nonresidential buildings larger than 10,000 SF to ensure that all are working at their maximum capacity and according to their design efficiencies.

Senate Bill 350, Clean Energy and Pollution Reduction Act of 2015

SB 350, the Clean Energy and Pollution Reduction Act of 2015, requires that the amount of electricity generated and sold to retail customers per year from eligible renewable energy resources be increased from 33 percent to 50 percent by December 31, 2030; thereby doubling energy efficiency within the State.[18] SB 350 makes revisions to the California Renewable Portfolio Standards (RPS) Program and to certain other requirements on public utilities and publicly owned electric utilities. SB 350 also requires local, publicly owned electric utilities to establish annual targets for energy efficiency savings and demand reduction consistent with a Statewide goal established by the California Public Utilities Commission and provides incentives for electrification of rail facilities. Local utilities would be required to develop more

17 California Green Building Standards Code (CCR, Title 24, Part 11 - CALGreen)
18 SB 350, Clean Energy and Pollution Reduction Act.

detailed strategies and incentives for use of renewable energy sources, resulting in an increased demand for renewable energy generation.

SB 350 emphasizes the important role of electric vehicles in California's overall scheme to combat climate change, declaring that "[d]employing electric vehicles should assist in grid management, integrating generation from eligible renewable energy resources, and reducing fuel costs for vehicle drivers." The bill (1) promotes the development of additional electric vehicle charging infrastructure to encourage greater use of electric cars; and (2) requires electrical utilities to include expansion of electrical vehicle charging facilities as part of their strategies and incentives for reducing overall energy consumption.

Assembly Bill 32

In 2006, Governor Schwarzenegger signed Assembly Bill (AB) 32, the California Global Warming Solutions Act of 2006,[19] which focused on reducing GHG emissions in California to 1990 levels by 2020. CARB has the primary responsibility for reducing the GHG emissions in California; however, AB 32 also tasked the CEC and CPUC with providing information, analysis, and recommendations to CARB regarding strategies to reduce GHG emissions in the energy sector.

AB 1007

AB 1007[20] required the CEC to prepare a State plan (State Alternative Fuels Plan) to increase the use of alternative fuels in California. The Commission prepared the State Alternative Fuels Plan in partnership with CARB and in consultation with other State, federal, and local agencies. The final State Alternative Fuels Plan,[21] published in December 2007, attempts to achieve an 80 percent reduction in GHG emissions associated with personal transportation, even as California's population increases.

SB 1368, Performance Standard for Baseload Power Generation

SB 1368 (Chapter 598, Statutes of 2006), Performance Standard for Baseload Power Generation,[22] required the CPUC to establish a GHG emissions performance standard for "baseload" generation from investor-owned utilities of 1,100 pounds of carbon dioxide per megawatt hour (MWh). The CEC established a similar standard for local publicly owned utilities. All electricity provided to California, including imported electricity, must be generated from plants that meet or exceed this standard.

19 Assembly Bill (AB) 32, the California Global Warming Solutions Act of 2006 (codified in the California Health and Safety Code (HSC), Division 25.5.

20 AB 1007, Pavley, Chapter 37I, Statutes of 2005.

21 State Alternative Fuels Plan.

22 SB 1368 - Emission Performance Standards, Perata, Chapter 598, Statutes of 2006.

SB X1-2, Renewable Portfolio Standard

California law (SB X1-2, Statutes of 2011) requires retail suppliers of electricity to source at least 33 percent of annual retail sales from eligible renewable energy sources by 2020.[23]

Executive Order S-03-05

Executive Order S-03-05 mandates that California emit 80 percent fewer GHGs in 2050 than it emitted in 1990.[24] Energy efficiency and reduced VMT would play important roles in achieving this goal.

Executive Orders S-14-08 and S-21-09

Since 2006, California has had a mandate to increase the use of renewable generation to 20 percent of retail electricity sales by 2010. In November 2008, Governor Schwarzenegger signed Executive Order S-14-08, which raises California's renewable energy goals to 33 percent by 2020.[25] This enhanced target is intended to help California meet Statewide GHG emission reduction targets. This has been reiterated by California Executive Order S21-09 which charged CARB to establish a regulation consistent with this 33 percent target by 2020.[26] This represented an increase in RPSs over SB 1078[27] and SB 107.[28] State RPSs have since been expanded with SB 350.

Low Carbon Fuel Standard

The Low Carbon Fuel Standard (LCFS), established in 2007 through Executive Order S-1-07 and administered by CARB, requires producers of petroleum-based fuels to reduce the carbon intensity of their products, starting with 0.25 percent in 2011 and culminating in a 10-percent total reduction in 2020.[29] Petroleum importers, refiners, and wholesalers can either develop their own low carbon fuel products, or buy LCFS credits from other companies that develop and sell low carbon alternative fuels, such as biofuels, electricity, natural gas, and hydrogen.

Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling

In 2004, CARB adopted an Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling to reduce public exposure to diesel particulate matter emissions.[30] The measure applies to

23 SB X1-2, Statutes of 2011.
24 California Executive Order S-03-05, June 2005.
25 California Executive Order S-14-08, November 2008.
26 California Executive Order S-21-09, September 2009.
27 SB 1078, Chapter 516, Statues of 2002.
28 SB 107, Chapter 325, Statues of 2015.
29 California Executive Order S-01-07, January 2007.
30 CARB, *Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling,* Title 13 CCR section 2485. 2004.

diesel-fueled commercial vehicles with gross vehicle weight ratings greater than 10,000 pounds that are licensed to operate on highways, regardless of where they are registered. This measure prohibits diesel fueled commercial vehicles from idling for more than 5 minutes at any given location. While the goal of this measure is primarily to reduce public health impacts from diesel emissions, compliance with the regulation also results in energy savings in the form of reduced fuel consumption from unnecessary idling.

Airborne Toxic Control Measure for Stationary Compression Ignition (CI) Engines

In 2004, CARB adopted an Airborne Toxic Control Measure to reduce public exposure to diesel particulate matter emissions and criteria pollutant emissions from stationary diesel-fueled compression ignition (CI) engines.[31] The measure applies to any person who owns or operates a stationary CI engine in California with a rated brake horsepower greater than 50, or anyone who either sells, offers for sale, leases, or purchases a stationary CI engine. This measure outlines fuel and fuel additive requirements; emission standards; recordkeeping, reporting and monitoring requirements; and compliance schedules for CI engines.

Regulation to Reduce Emissions of Diesel Particulate Matter, Nitrogen Oxides, and Other Criteria Air Pollutants, from In-Use Heavy-Duty Diesel-Fueled Vehicles

In addition to limiting exhaust from idling trucks, in 2008, CARB approved the Truck and Bus regulation to reduce NO_X, PM10, and PM2.5 emissions from existing diesel vehicles operating in California (13 CCR section 2025). The phased regulation aims to reduce emissions by requiring installation of diesel soot filters and encouraging the retirement, replacement, or retrofit of older engines with newer emission-controlled models. The phasing of this regulation has full implementation by 2023.

California Environmental Quality Act

Under CEQA,[32] EIRs are required to include a discussion of the potential significant energy impacts of projects, with particular emphasis on avoiding or reducing inefficient, wasteful, and unnecessary consumption of energy. If the analysis of a project shows that the project may result in significant environmental effects due to wasteful, inefficient, or unnecessary use of energy, or wasteful use of energy resources, then the EIR must identify mitigation measures to address that energy use. This analysis should include the project energy use for all project phases and components, including transportation-related energy, during construction and operation. In addition to building code compliance, other relevant considerations may include, among others, the project size, location, orientation, equipment use and any renewable energy features that could be incorporated into the project.[33] CEQA Guidelines, Appendix F,

31 CARB. Airborne Toxic Control, Title 17 CCR section 93115, 2004.
32 CEQA, PRC section 21100(b)(3).
33 CEQA Guidelines section 15126.2(b).

provides a list of energy-related topics that should be analyzed in the EIR, and more specifically provides the following topics for consideration in the evaluation of energy impacts in an EIR. Appendix G of the CEQA Guidelines also addresses energy impacts.

4.5.3.3 Regional Regulations and Directives

Southern California Association of Governments

The SCAG 2020–2045 RTP/SCS[34] is a long-range visioning plan that balances future mobility and housing needs with economic, environmental, and public health goals, with a specific goal of achieving an 8 percent reduction in passenger vehicle GHG emissions on a per capita basis by 2020, 19 percent reduction by 2035, and 21 percent reduction by 2040 compared to the 2005 level. Although the RTP/SCS is not technically an energy efficiency plan, consistency with the RTP/SCS has energy implications, including the reduction of VMT which reduces GHG emissions and has the co-benefit of reducing fossil fuel consumption from travel to and from a project.

4.5.3.4 Local Regulations and Directives

Inglewood General Plan

The City General Plan does not contain any policies, regulations, or directives that specifically address energy resources.

There are no goals and policies in the General Plan that directly address energy demand and conservation. However, the following goals from the Land Use Element of the City General Plan are relevant to transportation-related energy demand and conservation.[35]

Circulation Goal: Promote and support adequate public transportation within the City and the region.

Circulation Goal: Develop a safe and adequate pedestrian circulation system which is barrier free for the handicapped.

34 Southern California Association of Governments (SCAG), *Connect SoCal: 2020-2045 Regional Transportation Plan/Sustainable Communities Strategies Draft,* "Chapter 1," https://www.connectsocal.org/Pages/Connect-SoCal-Draft-Plan.aspx, Accessed on July 10, 2020.

35 City of Inglewood, Department of Community Development and Housing, 1980. *Land Use Element of the Inglewood General Plan*. January 1980. Amended September 14, 2016.

Inglewood Energy and Climate Action Plan

The City adopted an Energy and Climate Action Plan[36] (ECAP) in 2013 to guide Citywide GHG emissions reduction efforts. The ECAP established four primary compliance paths which projects may choose to adhere to, including: ministerial and exempt project status, implementation of a combination of sustainable development standards, performance-based compliance, or payment of an in-lieu fee. These measures were developed on a points-based system, which were chosen because they have been demonstrated by various studies to directly reduce GHG emissions or support changes in activities that lead to GHG emissions reductions. Each Climate-Ready Development Standard has a point value associated with it that reflects its general effectiveness at reducing GHG emissions. The standards apply to various types of projects, and a qualifier is included denoting which types of projects may implement the standard. Applicants have discretion regarding which measures that they would want their project to comply with; however, for a project to be fully compliant with the goals of the ECAP it must incorporate features meeting the standards sufficient to accrue a total of 20 points. The ECAP contains the following:

- Emissions Inventory: Expands the City's 1990, 2005, and 2007 greenhouse gas inventory to include an inventory of 2010 emissions. The ECAP also includes a year 2010 inventory of electricity and natural gas consumed.
- Emissions Reduction Target/Goal: Establishes a 2020 emissions reduction target of 15 percent below 2005 levels and a 2035 emission reduction goal of 32.5 percent below 2005 levels.
- Emission Reduction Strategies: The ECAP contains energy and greenhouse gas emissions reduction strategies. Particular attention is provided to budget-neutral measures that will reduce the community-wide energy consumption and greenhouse gas emissions in order to meet the statewide emissions targets identified in the ARB's Scoping Plan and Executive Order S-03-05.
- Implementation Program: Identifies the timeline for implementing each strategy, relative cost, and any additional analysis and/or legislative action needed.
- Streamlined CEQA Review: The ECAP serves as a tiering document for the streamlined review of project-level greenhouse gas emissions under CEQA for projects proposed within the City's jurisdiction.

Inglewood Energy Efficiency Climate Action Plan

The City developed an Energy Efficiency Climate Action Plan[37] (EECAP) in December 2015 that evaluates both energy and GHG emissions. In addition, the Inglewood EECAP is a roadmap for achieving community-

36 City of Inglewood, *Inglewood Energy and Climate Action Plan*, March 2013, https://www.cityofinglewood.org/DocumentCenter/View/148/Inglewood-Energy-and-Climate-Action-Plan-ECAP-Adopted-2013-PDF, accessed July 30, 2020.

37 City of Inglewood, *Energy Efficiency Climate Action Plan,* December 2015, https://www.southbaycities.org/sites/default/files/EECAP_Inglewood_Final_20151218.pdf.

wide energy and GHG emissions reductions that encourages the City to grow more sustainably. The EECAP includes the following: an energy and GHG emissions inventory, reduction target/goal, reduction and efficiency strategies, and an implementation program. The EECAP sets forth six general goals for community GHG reduction: (1) increase energy efficiency in existing residential units, (2) increase energy efficiency in new residential development, (3) increase energy efficiency in existing commercial units, (4) increase energy efficiency in new commercial development, (5) increase energy efficiency though water efficiency, and (6) decrease energy demand though recuing urban heat island effect. Additionally, the EECAP sets forth four general goals for municipal GHG reduction: (1) participate in education, outreach, and planning for energy efficiency, (2) increase energy efficiency in municipal buildings, (3) increase the energy efficiency in city infrastructure, (4) reduce energy consumption in the long term.

Other Location Conservation Initiatives

The Southern California Edison Company (SCE) and SoCalGas provide several programs for energy customers in Inglewood to conserve energy. Programs include Consumer Rebate Programs, a Refrigerator Turn-In and Recycling Program, Green Power Program, Outdoor Area Lighting Program, Solar Power Incentives, Power Quality Consulting Programs, and Electric Vehicle Programs. Programs include: Commercial Lighting Efficiency Offer (CLEO), Heating, Ventilation and Air Conditioning (HVAC) Rebate Program, Customer Generation Rebate, Technical Assistance Program, Premium Efficiency Motors (PEM) Program, Chiller Efficiency Program, Energy Load Monitoring (ELM) Program, and Financing Programs. Programs for nonresidential customers include rebates on energy efficient HVAC systems and refrigeration equipment, customer generation rebates, energy-load monitoring, energy-efficiency financing, and solar power initiatives.

4.5.4 EXISTING CONDITIONS

4.5.4.1 Electricity

Electrical power within the City is supplied by SCE, which serves approximately 15 million people in a 50,000-square-mile service area.[38] The SCE service area used approximately 78,445,000 MWh of electricity in 2018.[39] SCE produces and obtains electricity from various generating sources that utilize coal, nuclear, natural gas, hydroelectric, and renewable resources to generate power.

38 Southern California Edison, "Newsroom Fact Sheet," April 29, 2019, accessed July 2020, https://newsroom.edison.com/internal_redirect/cms.ipressroom.com.s3.amazonaws.com/166/files/20193/SCE%20Service%20Area%20Fact%20Sheet_Ver2_04252019.pdf

39 Southern California Edison, "Electric Company ESG/Sustainability Quantitative Information," November 4, 2019, accessed July 2020, https://www.edison.com/content/dam/eix/documents/sustainability/2019-eix-esg-pilot-quantitative-section-sce.pdf.

In 2012, the latest year of publicly available data, the City consumed a total of approximately 434,308 MWh of electricity, an approximately 16 percent reduction from 2005.[40] Based on building type, single- and multifamily residential units consumed the most electricity at approximately 164,000 MWh, followed by industrial at 62,000 MWh, and commercial at approximately 24,000 MWh.[41] This compares with the total amount of built space for each building type, with multifamily residential units constituting the greatest square footage, followed by single-family residential, commercial, other, industrial, condominium residential, institutional, and mixed building types. The SCE estimates that electricity consumption within its planning area will be approximately 122,500 GWh annually by 2026.[42]

In Downtown Inglewood's residential neighborhoods, existing electrical facilities consist of an overhead electrical system, including poles carrying low voltage conduits along with telecommunication and cable TV facilities. In most of the commercial and industrial areas in the Inglewood Downtown area, the existing electrical networks are underground within all the streets.[43]

Southern California Edison is currently in the process of rehabilitating the 39 circuits that serve the City to ensure system reliability. The rehabilitation process includes equipment replacement, safety upgrades, and installation of alternate sources of power.[44]

4.5.4.2 Natural Gas

SoCalGas is the natural gas purveyor within the City. The SoCalGas service area reaches 21.8 million consumers through 5.9 million meters in more than 500 communities, covering an area of approximately 24,000 square miles throughout Central and Southern California.[45]

In 2012, the latest year of publicly available data, the City consumed a total of approximately 1,900 MMcf per year.[46] Based on building type, single- and multifamily residential units consumed the most natural gas at approximately 1,363 MMcf in 2012, a 4.2 percent reduction from 2005. Commercial and industrial uses consumed approximately 536 MMcf in 2012, a 16.8 percent reduction from 2005.[47] This compares with the total amount of built space for each building type, with multifamily residential units constituting

40 South Bay Cities Council of Governments, *Supplemental Energy Climate Action Plan: City of Inglewood*, 2018, accessed June 23, 2020, https://www.southbaycities.org/sites/default/files/Inglewood%20CAP.pdf.
41 City of Inglewood, *Energy Efficiency Climate Action Plan*, December 2015, accessed June 2020, http://www.southbaycities.org/sites/default/files/EECAP_Inglewood_Final_20151218.pdf.
42 CEC, Demand Analysis Office, *California Energy Demand 2018-2030 Revised Forecast*, Accessed May 2020, https://efiling.energy.ca.gov/getdocument.aspx?tn=223244.
43 John M. Cruikshank Consultants, Inglewood Planning Services for Transit Oriented Development, *Existing Infrastructure Baseline Data,* June 30, 2015.
44 Southern California Edison, *Circuit Reliability Review-Inglewood (2020)*, accessed July 16, 2020, https://library.sce.com/content/dam/sce-doclib/public/reliability/Inglewood.pdf
45 SCG, "Company Profile," Accessed May 2020, https://www.socalgas.com/about-us/company-profile.
46 City of Inglewood, *Energy Efficiency Climate Action Plan*.
47 City of Inglewood, *Energy Efficiency Climate Action Plan*.

the greatest square footage, followed by single-family residential, commercial, other, industrial, condominium residential, institutional, and mixed building types.

The SoCalGas planning area had an available natural gas capacity of 3,055 million cubic feet (MMcf) in 2018.[48] Natural gas capacity within SoCalGas' planning area is anticipated to be approximately 3,775 MMcf per day (or 1,377,875 million MMcf per year) in 2026, which is the opening year of the proposed Project.[49]

SoCalGas projects total gas demand to decline at an annual rate of 0.4 percent from 2018 to 2035.[50] This is due to the combination of a 0.9 percent annual decline in the core market and an annual decline of 0.2 percent in the noncore market. In comparison to the 2018 data, the 2016 California Gas Report estimated a declining annual average rate of 0.6 percent per year, based on a 0.3 percent annual decline in the core market and a 0.9 percent annual decline in the noncore market. The decline in demand is due to modest economic growth; mandated energy efficiency standards; regulations such as the California Green Building Code; renewable electricity goals; the decline in commercial and industrial demands; and conservation savings linked to Advanced Metering Infrastructure, which uses information technology and two-way communication to modulate price and demand activity.

4.5.4.3 Petroleum-Based Fuel (Transportation Energy)

Crude oil is a mixture of hydrocarbons that exists as a liquid in underground geologic formations and remains a liquid when brought to the surface.[51] Petroleum products are produced from the processing of crude oil and other liquids and include transportation-related fuels such as gasoline and diesel. Petroleum is a worldwide commodity. According to the US Energy Information Administration (EIA), California consumed approximately 681,272,000 barrels (28,613,424,000 gallons, or 42 gallons per barrel) in 2018, the most recent year of publicly available data.[52] The EIA forecasts the national supply and demand in its Annual Energy Outlook 2020.[53] The EIA forecasts a national oil supply of 20.0 million barrels per day

48 California Gas and Electric Utilities, *2018 California Gas Report,* Accessed May 2020, https://www.sdge.com/sites/default/files/regulatory/2018%20California%20Gas%20Report.pdf.

49 California Gas and Electric Utilities, *2018 California Gas Report,* Accessed May 2020, https://www.sdge.com/sites/default/files/regulatory/2018%20California%20Gas%20Report.pdf.

50 The California Gas and Electric Utilities, *2018 California Gas Report*, "Gas Demand," 36.

51 U.S. Energy Information Administration (EIA), "Frequently Asked Questions," Accessed May 2020, https://www.eia.gov/tools/faqs/faq.php?id=40&t=6.

52 U.S. EIA, *Independent Statistics & Analysis*, "Table F16: Total Petroleum Consumption Estimates," 2018, Accessed May 2020, https://www.eia.gov/state/seds/data.php?incfile=/state/seds/sep_fuel/html/fuel_use_pa.html&sid=US.

53 U.S. EIA, *Annual Energy Outlook 2020*, Accessed May 2020, https://www.eia.gov/outlooks/aeo/.

(mb/d) in 2026, which is the opening year for the proposed Project.[54] This equates to approximately 7,304 million barrels per year (mb/y) or 306,768 million gallons per year (mg/y).[55]

Recent data shows that the transportation sector accounts for a majority of California's petroleum consumption.[56] In 2018, the most recent year of publicly available data, California consumed approximately 583,547,000 barrels (24,508,974,000 gallons, or 42 gallons per barrel) of petroleum for transportation.[57]

According to CARB's EMFAC Web Database, the Los Angeles region on-road transportation sources consumed 4.19 billion gallons of gasoline and 0.62 billion gallons of diesel fuel in 2018.[58] During 2019, the production of gasoline in California averaged approximately 307 million gallons per week, and the production of diesel within California averaged approximately 106 million gallons per week.[59] Over the last several decades, California has implemented several policies, rules, and regulations to improve vehicle efficiency, increase the development and use of alternative fuels, reduce air pollutants and GHGs emissions from the transportation sector, and reduce vehicle travel. Incentive programs, such as the CEC's Alternative and Renewable Fuel and Vehicle Technology Program (ARFVTP), are helping the State to reduce its dependency on gasoline. The CEC predicts that the demand for gasoline will continue to decline over the upcoming years, and there will be an increase in the use of alternative fuels.[60]

4.5.4.4 Existing Energy Use Within the Project Footprint

The proposed Project is located within a developed area which utilizes energy supply for a variety of land uses. There are several existing developments which contribute to existing electricity demand that would be demolished as part of the proposed Project.

Presently, a variety of commercial, restaurant, and retail uses exist where the proposed Market Street/Florence Avenue Station would be constructed (approximately 126,912 SF of operational space) and the proposed MSF site (a 76,402 square-foot grocery store and 202 square-foot gas station). The proposed Project would also include the demolition of 16,575 SF of retail space located at 150 S. Market Street. These existing uses currently generate electricity and natural gas demand for building operation.

54 U.S. EIA, *Annual Energy Outlook 2020*, "Table 11. Petroleum and Other Liquids Supply and Disposition," Accessed May 2020, https://www.eia.gov/outlooks/aeo/data/browser/#/?id=11-AEO2020&cases=ref2020&sourcekey=0.

55 One oil barrel is equivalent to 42 gallons.

56 U.S. EIA, *Independent Statistics & Analysis*, "Table F16: Total Petroleum Consumption Estimates," 2018, Accessed May 2020, https://www.eia.gov/state/seds/data.php?incfile=/state/seds/sep_fuel/html/fuel_use_pa.html&sid=US.

57 U.S. EIA, *Independent Statistics & Analysis, "*Table F16: Total Petroleum Consumption Estimates," 2018, Accessed May 2020, https://www.eia.gov/state/seds/data.php?incfile=/state/seds/sep_fuel/html/fuel_use_pa.html&sid=US.

58 California Air Resources Board, *EMFAC2017 Web Database,* www.arb.ca.gov/emfac/2017/

59 California Energy Commission, "2019 Weekly Fuels Watch Report," accessed July 1, 2020.

60 CEC, *Final 2019 Integrated Energy Policy Report,* Accessed May 2020, https://www.energy.ca.gov/data-reports/reports/integrated-energy-policy-report/2019-integrated-energy-policy-report.

Table 4.5-1: Annual Energy Demand of Existing Uses within the Proposed Project Footprint lists the existing energy demand for the existing uses. As shown, the existing uses currently consume approximately 5,110,987 kWh of electricity per year. Moreover, the existing uses currently consume 5,412,676 thousand British thermal units (kBTU) (or 5.2 MMcf)[61] of natural gas per year.

61 The conversion of kBTU to cubic feet uses the factor of 1 cf to 1.037 kBTU.

Table 4.5-1
Annual Energy Demand of Existing Uses within the Proposed Project Footprint

Parcel No.	Property Address	Existing Use	Square Footage	Annual Energy Demand	Units
Electricity					kWh/yr
4015-027-030	310 E. Florence Ave	Restaurant	1,200 SF	43,776	kWh/yr
4015-027-031	300 E. Florence Ave	Restaurant	4,762 SF	173,645	kWh/yr
4015-027-032	254 N. Market St	Restaurant	4,608 SF	168,173	kWh/yr
4015-027-033	250 N. Market St	Auto Service	44,000 SF	371,800	kWh/yr
4015-027-038	240 N. Market St	Shopping Center	12,300 SF	140,712	kWh/yr
4015-027-040	230 N. Market St	Store	22,194 SF	253,854	kWh/yr
4015-027-041	224 N. Market St	Store	5,000 SF	84,084	kWh/yr
4015-027-049	222 N. Market St	Shopping Center	25,500 SF	189,561	kWh/yr
4015-027-050	210 N. Market St	Shopping Center	7,348 SF	57,200	kWh/yr
4021-010-015	150 S. Market St	Store	16,575 SF	291,720	kWh/yr
4021-024-015	500 E. Manchester Blvd	Supermarket	76,402 SF	2,950,570	kWh/yr
4021-024-015	510 E. Manchester Blvd	Gas Station	202 SF	1,707	kWh/yr
	—	Water Conveyance	—	384,185	kWh/yr
Electricity Total				**5,110,987**	**kWh/yr**
Natural Gas					
4015-027-030	310 E. Florence Ave	Restaurant	1,200 SF	311,184	kBTU/yr
4015-027-031	300 E. Florence Ave	Restaurant	4,762 SF	1,234,360	kBTU/yr
4015-027-032	254 N. Market St	Restaurant	4,608 SF	1,195,470	kBTU/yr
4015-027-033	250 N. Market St	Auto Service	44,000 SF	919,600	kBTU/yr
4015-027-038	240 N. Market St	Shopping Center	12,300 SF	24,600	kBTU/yr
4015-027-040	230 N. Market St	Store	22,194 SF	44,380	kBTU/yr
4015-027-041	224 N. Market St	Store	5,000 SF	10,000	kBTU/yr
4015-027-049	222 N. Market St	Shopping Center	25,500 SF	51,000	kBTU/yr
4015-027-050	210 N. Market St	Shopping Center	7,348 SF	14,700	kBTU/yr
4021-010-015	150 S. Market St	Store	16,575 SF	33,140	kBTU/yr
4021-024-015	500 E. Manchester Blvd	Supermarket	76,402 SF	1,570,020	kBTU/yr
4021-024-015	510 E. Manchester Blvd	Gas Station	202 SF	4,222	kBTU/yr
Natural Gas Total				**5,412,676**	**kBTU/yr**

*Source: Refer to **Appendix 4.5.1** for detailed calculations.*
Notes: kWh/yr = kilowatt-hours per year; kBtu/yr = thousand British Thermal Units per year.
Electricity and natural gas for the existing uses is total yearly operational usage.

4.5.5 ADJUSTED BASELINE

This section assumes the Adjusted Baseline Environmental Setting as described in **Section 4.0**, *4.0-5: Adjusted Baseline*. Specifically, operation of land uses included in the Hollywood Park Specific Plan (HPSP) would result in the consumption of energy resources such as electricity, natural gas, and transportation fuels. Similar to the proposed Project, the HPSP would utilize SCE and SoCalGas for electricity and natural gas supplies and infrastructure. As such, SCE and SoCalGas would be responsible for providing adequate electricity and natural gas supplies for the HPSP project. Moreover, the HPSP would increase the number of vehicles traveling to and from the HPSP site, thus increase the consumption of transportation related fuels. **Table 4.5-2: Adjusted Baseline Annual Energy Demand** shows the Adjusted Baseline energy demand for electricity and natural gas. As shown, the Adjusted Baseline conditions would consume approximately 16,507,545 kWh of electricity per year and 8,883,620 kBTU (or 8.6 MMcf)[62] of natural gas per year. Vehicle fuel usage for the Adjusted Baseline is discussed further under **Impact E-1**.

Table 4.5-2
Adjusted Baseline Annual Energy Demand

Land Use	Square Footage	Annual Energy Demand	Units
Electricity			kWh/yr
General Office	466,000 SF	6,519,340	kWh/yr
Apartments	314,000 SF	1,248,240	kWh/yr
Retail	518,080 SF	5,926,840	kWh/yr
Water Conveyance	—	2,813,125	kWh/yr
Electricity Total		**16,507,545**	**kWh/yr**
Natural Gas			kBTU/yr
General Office	466,000 SF	4,259,240	kBTU/yr
Apartments	314,000 SF	3,588,220	kBTU/yr
Retail	518,080 SF	1,036,160	kBTU/yr
Natural Gas Total		**8,883,620**	**kBTU/yr**

*Source: Refer to **Appendix 4.5.2** for detailed calculations.*
Notes: kWh/yr = kilowatt-hours per year; kBtu/yr = thousand British Thermal Units per year.
Electricity and natural gas for the existing uses is total yearly operational usage.

62 The conversion of kBTU to cubic feet uses the factor of 1 cf to 1.037 kBTU.

4.5.6 THRESHOLDS OF SIGNIFICANCE

Criteria outlined in Appendix G of the State CEQA Guidelines were used to determine the level of significance of energy impacts. A project would have a significant impact in relation to energy if it were to:

Threshold E-1 **Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation.**

Threshold E-2 **Conflict with or obstruct a State or local plan for renewable energy or energy efficiency.**

4.5.7 IMPACT ANALYSIS FOR THE PROPOSED PROJECT

The environmental impact analysis presented below is based on determinations made in the Initial Study (IS) for impacts considered to be potentially significant.

Impact E-1: **Would the project result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation?**

Implementation of the proposed Project will require the consumption of energy resources during both construction and operation.

For construction impacts, the City would include in bid documents for the proposed Project language specifying that the contractors shall use Tier 4 construction equipment (see **Mitigation Measure MM AQ-1** in **Section 4.2: Air Quality**). For operational impacts, the proposed Project would comply with the requirements of CALGreen[63] and be consistent with the City Energy Efficiency Climate Action Plan[64] involving policies and programs related to sustainability, energy efficiency, and reduction in GHG emissions. In addition, the ITC Design Guidelines, contained in **Appendix 3.0.5**, include sustainability guidelines included that define a list of green measures to be incorporated into the design, construction, and operations of the ITC facilities. The ITC project will be designed and constructed to achieve Silver Award Certification under the Envision™ Sustainable Infrastructure Rating System.

Individual measures are identified in the areas of site design, energy efficiency, water efficiency, material conservation, and environmental quality. These measures illustrate the City's sustainability considerations including, but not limited to, the measures necessary to meet the certifications referenced above. These

63 *California Green Building Standards Code (CCR, Title 24, Part 11 - CALGreen).*
64 City of Inglewood, *Energy Efficiency Climate Action Plan,* December 2015.

guidelines apply to the APM guideway and stations, passenger walkways, parking areas, and all other components of the ITC.

Buildings included as part of the Project will incorporate vegetated open space area equal to 30 percent of the total project area. Projects must meet County of Los Angeles and City of Inglewood Low Impact Design (LID) requirements to treat stormwater. Preferential parking for green vehicles and provisions to accommodate electric charging stations for 10 percent of all parking spaces are included as are design treatments to reduce the heat island effect.

Energy efficiency guidelines are included that require Project elements to be 15 percent more energy efficient than applicable California Energy Efficiency Standards. For energy-using equipment not governed by California Energy Efficiency Standards, best available energy efficient technologies are to be used. The energy efficiency guidelines address lighting, incorporation of solar collectors into facilities where feasible, establishing energy budgets for each building that will be no greater than 85 percent of applicable Title 24 standards, and other aspects of facility designs.

Water efficiency and conservation opportunities are identified to reduce or eliminate potable use in landscape, and for car and train washing.

Material conservation and resource efficiency guidelines are included to reduce the environmental impact from the use of construction materials by minimizing use of virgin materials, increasing use of recycled materials, using rapidly renewable materials, using local materials, using durable materials, and looking for opportunities to reuse materials.

Construction

During construction of the proposed Project, energy would be consumed in the form of electricity for powering the construction trailers (lights, electronic equipment, and heating and cooling) and exterior uses, such as lights, water conveyance for dust control, and other construction activities. Construction would also consume energy in the form of petroleum-based fuels associated with on and off-road construction equipment and vehicles, construction workers' travel to and from the proposed Project, and delivery and haul truck trips (e.g., hauling of demolition material to off-site reuse and disposal facilities). As discussed below, construction activities, including the construction of new buildings and facilities, typically do not involve the consumption of natural gas.

Electrical Demand

During construction, electricity would be consumed to power lighting, heating, and cooling in the construction trailers, outdoor lighting of the proposed Project, electric equipment, and supply and convey water for dust control. Electricity would be supplied by SCE and would be obtained from the existing electrical lines that connect to the proposed Project TPSSs. As shown in **Table 4.5-3: Total Electricity Use During Proposed Project Construction**, a total of approximately 172,177 kWh of electricity is estimated to be consumed during construction of the proposed Project. For comparison, the average annual electricity consumption for a U.S. residence is 10,972 kWh.[65] Although there is a temporary increase in electricity consumption during construction, the electrical consumption would be within the supply and infrastructure capabilities of SCE which estimates electricity consumption within its planning area will be approximately 115,000 GWh annually by 2022, which is the first year of construction.[66]

Table 4.5-3
Total Electricity Use During Proposed Project Construction

Fuel Type	Quantity
Electricity	
Water Conveyance	102,227 kWh
Construction Trailers	69,950 kWh
Total	**172,177 kWh**

Source: Refer to **Appendix 4.5.3** for detailed calculations.

The electricity demand at any given time would vary throughout the construction period based on the construction activities being performed, and would cease upon completion of construction. Electricity use from construction would be short-term, limited to working hours, used for necessary construction-related activities, and represent a small fraction of the proposed Project's operational electricity. Furthermore, the electricity used for off-road light construction equipment would reduce the amount of harmful construction-related air pollutant and GHG emissions because they would not rely on more traditional construction-related energy in the form of diesel fuel which generates emissions. As such, the proposed Project would not result in inefficient, or unnecessary consumption of electricity resources during construction.

Electrical energy demands during construction would be less than significant.

65 U.S. EIA, *Frequently Asked Questions*, "How much electricity does an American home use?" Accessed September 2020, https://www.eia.gov/tools/faqs/faq.php?id=97&t=3.

66 CEC, Demand Analysis Office, *California Energy Demand 2018-2030 Revised Forecast*, Accessed May 2020, https://efiling.energy.ca.gov/getdocument.aspx?tn=223244.

Natural Gas

Construction activities do not typically involve the consumption of natural gas, as construction equipment and staging rely heavily on electricity and transportation fuels. Accordingly, natural gas would likely not be needed to support construction activities; thus, there would be little to no demand generated by construction. As such, the proposed Project's would not result in inefficient, or unnecessary consumption of natural gas energy resources during construction.

Natural gas energy demands during construction would be less than significant.

Transportation Fuel

Construction of the proposed Project would result in the irretrievable commitment of construction materials (e.g., steel products, cement, glass). While construction would result in the irretrievable commitment of nonrenewable energy resources, primarily in the form of fossil fuels (including fuel oil), natural gas, and gasoline for automobiles and construction equipment, the consumption of fossil fuels would occur on a temporary basis during the construction period.

As shown in **Table 4.5-4: Total Vehicle Fuel Use During Proposed Project Construction**, the Project would consume a total of 568,815,635 gallons of petroleum during the morning/evening shift construction scenario, and 523,690,244 gallons of petroleum during the morning/night shift construction scenario. The EIA forecasts a national oil supply of 20.42 mb per day in 2022, which is the first year of construction.[67] This equates to approximately 7,453 mb per year or 313,039 mg per year. Although construction would result in the consumption of petroleum-based fuels, it would be within the EIA supply forecast and would be temporary in nature.

Construction of the proposed Project would employ fuel-efficient equipment consistent with State and federal regulations, such as fuel efficiency regulations in accordance with the CARB Pavley Phase II standards,[68] the anti-idling regulation in accordance with section 2485 in Title 13 of the CCR,[69] and fuel requirements for stationary equipment in accordance with section 93115 (concerning Airborne Toxic

67 U.S. Energy Information Administration, *Annual Energy Outlook 2020: Table 11. Petroleum and Other Liquids Supply and Disposition*, Accessed July 2020, https://www.eia.gov/outlooks/aeo/data/browser/#/?id=11-AEO2020&cases=ref2020&sourcekey=0.

68 California Air Resources Board, *Low-Emissions Vehicle Program,* Accessed July 30, 2020, https://ww2.arb.ca.gov/node/2930/about.

69 Title 13 CCR, Section 2485, accessed July 30, 2020, https://ww2.arb.ca.gov/sites/default/files/classic//msprog/truck-idling/13ccr2485_09022016.pdf.

Control Measures) in Title 17 of the CCR.[70] Use of construction equipment that is compliant with these regulations would result the use of more fuel-efficient engines and associated fuel savings.

Table 4.5-4
Total Vehicle Fuel Use During Proposed Project Construction

Source	Petroleum Consumption (Gallons)	
	Morning/Evening Shift	Morning/Night Shift
Off-Road Construction Equipment	3,630,270	4,102,730
On-Road Construction Equipment	564,920,032	518,983,511
Worker Vehicles	265,333	265,333
Delivery Vehicles[a]	0	338,670
Maximum Total	**568,815,635**	**523,690,244**

Source: Refer to **Appendix 4.5.4** for detailed calculations.
[a] Delivery of construction materials would occur during the night shift.

The proposed Project would divert mixed construction and demolition debris to City-certified construction and demolition waste processors using City-certified waste haulers, consistent with State targets of 75 percent waste diversion by 2020 and consistent with achieving the USGBC LEED Gold Certification[71] level, as discussed in design features (Green Building Features) in **Section 4.7**. In addition, select building materials or products for permanent installation would be selected from sources within southern California area. The proposed Project would divert mixed construction and demolition debris to City-certified construction and demolition waste processors using City-certified waste haulers, which would reduce truck trips to landfills, and increase the amount of waste recovered (e.g., recycled, reused, etc.) at material recovery facilities, thereby further reducing transportation fuel consumption.[72]

Construction would utilize energy only for necessary on-site and off-site transportation-related activities, construction worker travel to and from the proposed Project, and to transport construction materials and demolition debris. Idling restrictions and the use of cleaner, energy-efficient equipment would result in less fuel combustion and energy consumption and thus minimize construction-related energy use. As such,

70 Airborne Toxic Control Measures, Title 17 CCR, Section 93115, Accessed July 30, 2020, https://ww2.arb.ca.gov/sites/default/files/classic//diesel/documents/finalreg2011.pdf?_ga=2.201342804.479047022.1596146954-1722362475.1583193018.

71 U.S. Green Building Council, LEED Rating System, Accessed July 30, 2020, https://www.usgbc.org/leed.

72 Energy savings result from the avoidance of needing to mine and process virgin materials and then transport those materials to the project. As shown on MS52 California Aggregates Map (https://www.conservation.ca.gov/cgs/Documents/MS_052_California_Aggregates_Report_201807.pdf) Aggregate production areas in the Los Angeles areas include Irwindale and areas further away in Upland and Temescal Canyon areas in Orange County. Irwindale is a lesser producer of virgin aggregate as most of the mines have been depleted to their permitted limits. According to LA County (https://dpw.lacounty.gov/epd/CD/cd_attachments/Recycling_Facilities.pdf) there are recycling facilities much closer that supply recycled aggregate and other construction materials to the region.

the proposed Project would not result in inefficient, or unnecessary consumption of vehicle fuels during construction.

Transportation fuel demands during construction would be less than significant.

Operation

Electrical Demand

Propulsion power (i.e., the power to run the train on a guideway) is provided via traction power substations (TPSS) located along the guideway alignment. Each TPSS includes equipment to transform the medium- to high-voltage power feed provided from the power companies to the required 750-volt direct current (VDC) needed to power the vehicles and other ancillary equipment. The proposed Project's operating components would utilize electrical energy for the operation of the related support features, such as the APM trains, stations, MSF and TPSSs via electricity from the two proposed TPSSs. For normal operations, the required load flow for power of the proposed Project would be divided between the two TPSSs (the MSF TPSS site and the TPSS at the City's Civic Center site on Prairie Avenue). This includes operation of all interior and exterior lighting features included for the proposed Project. Power requirements for each TPPS are provided in **Table 4.2-4: Proposed Project Normal Operation Load Flow**.

Table 4.2-4
Proposed Project Normal Operation Load Flow

TPSS Site	Peak Power (KW)	RMS Power (KW)	Average Power (KW)	RMS Current (A)
MSF TPSS	2,008	834	755	1,067
TPSS at the City's Civic Center site on Prairie Avenue	2,119	777	639	996

Source: Lea+Elliott, Inc. Inglewood Transit Connector EIR Operating Systems Conceptual Planning EIR Project Definition -December 2020. Table 9-1.

Notes:

KW – kilowatt

RMS –The substation load calculation output provides both per second and root mean squared (RMS) KVA loads for each substation.

As shown, the proposed MSF TPSS is estimated to have a peak power load flow of 2008 kW, and the Transit Center TPSS is estimated to have a peak power load flow of 2119 kW for a total of 4,127 kW.73 The APM

73 Lea+Elliott, Inc. *Inglewood Transit Connector EIR Operating Systems Conceptual Planning EIR Project Definition - December 2020* (See Appendix 3.0.1).

trains would operate for 18 hours per day which would generate a total electricity demand of 74,286 kWh per day or 27,114,390 kWh (27.1 GWh) per year.[74]

In the event the MSF TPSS is unable to operate, the TPSS at the City's Civic Center site on Prairie Avenue is estimated to have a peak power load of 4,152 kW which would generate a total electricity demand of 74,736 kWh per day or 27,278,640 kWh (27.3 GWh) per year. Similarly, in the event the TPSS at the City's Civic Center site on Prairie Avenue is unable to operate, the MSF TPSS is estimated to have a peak power load of 4,353 kW which would generate a total electricity demand of 78,354 kWh per day or 28,599,210 kWh (28.6 GWh) per year.

The electrical demand from the existing commercial, restaurant, and retail uses at the proposed Market Street/Florence Avenue Station site and proposed MSF site is 5,113,799 kWh per year. As shown in **Table 4.5-5: Annual Electricity Use from Proposed Project Operation**, the electricity demand for the proposed Project during normal operation would result in a net increase of 22,003,403 kWh (22.0 GWh) per year. In the event the MSF TPSS is unable to operate, the electricity demand would result in a net increase of 22,167,653 kWh (22.2 GWh) per year. In the event the TPSS at the City's Civic Center site on Prairie Avenue is unable to operate, the electricity demand would result in a net increase of 23,488,223 kWh (23.5 GWh) per year.

Table 4.5-5
Annual Electricity Use from Proposed Project Operation

Operation Scenario	Annual Electricity Usage (kWh/yr)		
	APM System[a]	Existing	Net Increase
Normal Operation	27,114,390	5,110,987	22,003,403
TPSS at the City's Civic Center site on Prairie Avenue Only	27,278,640	5,110,987	22,167,653
MSF TPSS Only	28,599,210	5,110,987	23,488,223

Notes: kWh/yr = kilowatt-hours per year.
*[a] Lea+Elliott, Inc. Inglewood Transit Connector EIR Operating Systems Conceptual Planning EIR Project Definition - December 2020 (**See Appendix 3.0.1**).*

As further discussed in **Section 4.14: Utilities and Service Systems**, SCE completed a high-level Distribution Study to determine the amount of load that SCE could accommodate and required infrastructure upgrades in order to meet the proposed Project's recommended full redundancy design.[75]

74 Lea+Elliott, Inc. Inglewood Transit Connector EIR Operating Systems Conceptual Planning EIR Project Definition - *December 2020* (See Appendix 3.0.1).

75 Lea+Elliott, Inc. *Inglewood Transit Connector EIR Operating Systems Conceptual Planning EIR Project Definition* - December 2020.

SCE's analysis assumed the use of the existing single (nonredundant) 16 kva circuit currently available along Market Street as it may be the most likely used circuit for the proposed Project.

The results of SCE's analysis found that:[76]

- The maximum load that can be accommodated at the present time is 10 MVA.
- To accommodate the 10 MVA load with full redundancy, the following upgrades would be required:
  - 1,500 feet of new civil work/duct banks,
  - 1,860 feet of new 1000 JCN cable,
  - 1,700 feet of upgrading/re-cabling the existing SCE primary cable to 1000 JCN, and
  - Two new gas switches.

The aforementioned upgrades would be completed by SCE and would be subject to its procedures and requirements for construction and environmental clearance. Further, SCE noted that these values and upgrades are based on the current projected loads for 2026. SCE also noted that their distribution system is dynamic and is subject to change prior to the 2026 opening date of the proposed Project; however, as the design is finalized, SCE can effectively plan for this new load. The proposed Project will need to be reevaluated by SCE prior to coming online as the details are finalized.

As further discussed below, the proposed Project would be designed in a manner that is consistent with relevant energy requirements, such as Title 24 and CALGreen, which are designed to encourage development that results in the efficient use of energy resources.

As such, the proposed Project would not result in inefficient, or unnecessary consumption of electricity during operation and electricity demands during operation would be less than significant.

Natural Gas

No new gas connections to serve the proposed Project elements would be required except at the proposed MSF. Natural gas would be used at the MSF to serve the pressure wash system, and for space and water heating. **Table 4.5-6: Annual Natural Gas Use During Proposed Project Operation** shows the operational natural gas estimates for the operation of the MSF and stations, as well as the net total of natural gas after taking into account the existing uses to be demolished. As shown in **Table 4.5-6**, the MSF and stations would use approximately 2,131,800 kBTU (or 2.1 MMcf)[77] of natural gas per year. Moreover, the existing

76 Lea+Elliott, Inc. *Inglewood Transit Connector EIR Operating Systems Conceptual Planning EIR Project Definition* - December 2020.

77 The conversion of kBTU to cubic feet uses the factor of 1 cf to 1.037 kBTU.

uses currently utilize 5,412,676 kBTU of natural gas per year. Therefore, the proposed Project would result in a net decrease of 3,280,876 kBTU of natural gas per year.

Table 4.5-6
Annual Natural Gas Use During Proposed Project Operation

Source	Units	Quantity
Stations	kBTU/yr	501,600
MSF	kBTU/yr	1,630,200
Project Total	kBTU/yr	**2,131,800**
Existing Natural Gas	*kBTU/yr*	5,412,676
Net Natural Gas Total	**kBTU/yr**	**(3,280,876)**

Notes: kBtu/yr = thousand British Thermal Units per year.
*Source: See **Appendix 4.5.5** for MSF operational natural gas usage.*

Further, the proposed Project would be within the service capacity of SoCalGas which is anticipated to have an available capacity of approximately 3,775 MMcf of natural gas per day (or 1,377,875 million MMcf per year) in 2026, which is the opening year of the proposed Project[78] As discussed, the proposed Project would be designed in a manner that is consistent with building efficiency requirements including Title 24 and CALGreen. Increased building efficiency would help alleviate natural gas demand. Further, the proposed Project would incorporate a number of sustainability features as listed in **Table 3.0-5: Proposed Sustainability Guidelines**. These guidelines are intended to integrate the design of new and existing facilities and to create a passenger experience that reflects the City's history and architecture, while providing design guidance. As such, the proposed Project would not result in inefficient, or unnecessary consumption of natural gas during operation.

Natural gas demands during operation would be less than significant.

Transportation Fuel

During operation, vehicle use within the proposed Project vicinity would result in the consumption of petroleum-based fuels related to vehicular travel along roadways.

The proposed Project spans approximately 1.6 miles and would be located near existing grocery store, restaurant, retail, and commercial land uses which generate vehicle trips on local roadways within the proposed Project. The proposed Project would provide direct connections between regional transit provided by Metro, specifically at the Crenshaw/LAX Line, and other transit providers as well as the City's

78 California Gas and Electric Utilities, *2018 California Gas Report,* Accessed May 2020, https://www.sdge.com/sites/default/files/regulatory/2018%20California%20Gas%20Report.pdf.

major activity centers, such as the Forum, the LASED and HPSP. Implementation of the proposed Project would increase transit mode split, reduce vehicle trips, and reduce per-capita VMT. **Table 4.5-7: Annual VMT With and Without Proposed Project** presents the annual VMTs for the Adjusted Baseline, Future (2026), and Future (2045) scenarios.

As shown in **Table 4.5-7**, implementation of the proposed Project would reduce annual VMTs under all scenarios. Specifically, under the Adjusted Baseline scenario, the proposed Project would reduce annual VMTs from 1,007,356,937 to 1,000,735,086, a decrease of 6,621,851. Under the Future (2026) Non-Event scenario, the proposed Project would reduce annual VMTs from 1,245,731,160 to 1,235,569,208, a decrease of 10,161,952. Under the Future (2026). All Event scenario, the proposed Project would reduce annual VMTs from 1,346,432,106 to 1,316,518,609, a decrease of 29,913,497. Under the Future (2045) Non-Event scenario, the proposed Project would reduce annual VMTs from 1,369,204,193 to 1,357,349,494, a decrease of 11,854,699. Under the Future (2045). All Event scenario, the proposed Project would reduce annual VMTs from 1,469,905,139 to 1,433,075,931, a decrease of 36,829,208.

Table 4.5-7
Annual VMT With and Without Proposed Project

Scenario	Annual VMT		
	Without ITC	With ITC	Reduction
Adjusted Baseline	1,007,356,937	1,000,735,086	6,621,851
Future (2026) Non-Event	1,245,731,160	1,235,569,208	10,161,952
Future (2026) All Events	1,346,432,106	1,316,518,609	29,913,497
Future (2045) Non-Event	1,369,204,193	1,357,349,494	11,854,699
Future (2045) All Events	1,469,905,139	1,433,075,931	36,829,208

*See **Section 4.12:Transportion** to this Draft EIR for further discussion.*

Petroleum usage from vehicle travel was calculated based on the projected annual VMTs provided previously. **Table 4.5-8: Annual Vehicle Fuel Use With and Without Proposed Project** below presents the annual petroleum consumption for the Adjusted Baseline, Future (2026), and Future (2045) scenarios. As shown, implementation of the proposed Project would reduce annual petroleum-based fuel under all scenarios. Specifically, under the Adjusted Baseline scenario, the proposed Project would reduce annual fuel consumption from 49,373,645 gallons to 49,049,088 gallons, a decrease of 324,557 gallons. Under the Future (2026) Non-Event scenario, the proposed Project would reduce annual fuel consumption from 46,722,216 gallons to 46,341,084 gallons, a decrease of 381,133 gallons. Under the Future (2026) All Event scenario, the proposed Project would reduce annual fuel consumption from 50,499,092 gallons to 49,377,161 gallons, a decrease of 1,121,931. Under the Future (2045) Non-Event scenario, the proposed

Project would reduce annual fuel consumption from 41,714,897 gallons to 41,353,725 gallons, a decrease of 361,172 gallons. Under the Future (2045) All Event scenario, the proposed Project would reduce annual fuel consumption from 44,782,905 gallons to 43,660,847 gallons, a decrease of 1,122,058 gallons.

Table 4.5-8
Annual Vehicle Fuel Use With and Without Proposed Project

Scenario	Annual Fuel Consumption (gal)		
	Without ITC	With ITC	Reduction
Adjusted Baseline	49,373,645	49,049,088	324,557
Future (2026) Non-Event	46,722,216	46,341,084	381,133
Future (2026) All Events	50,499,092	49,377,161	1,121,931
Future (2045) Non-Event	41,714,897	41,353,725	361,172
Future (2045) All Events	44,782,905	43,660,847	1,122,058

*Source: See **Appendix 4.5.6** for fuel calculations.*

A majority of the vehicles would consist of light-duty automobiles and light-duty trucks, which are subject to fuel efficiency standards. These vehicles would be required to comply with CAFE fuel economy standards,[79] which would result in more efficient use of transportation fuels, specifically a lower consumption. Vehicles used for project-related vehicle trips would also comply as applicable with Pavley and Low Carbon Fuel Standards[80] which are designed to reduce vehicle GHG emissions, but would also result in fuel savings, in addition to compliance with CAFE standards. The proposed Project would support Statewide efforts to improve transportation energy efficiency and reduce transportation energy consumption with respect to private automobiles for the reasons discussed below. As discussed in detail in **Section 4.9: Land Use and Planning**, the proposed Project design and characteristics would be consistent with and would not conflict with the goals of both the SCAG 2016 RTP/SCS[81] and 2020-2045 RTP/SCS.[82] SCAG's 2016 RTP/SCS and 2020-2045 RTP/SCS provide a framework for member agencies to fund and implement regional transportation infrastructure improvements that benefit the region as a whole, including transit projects such as the one analyzed herein.

Additionally, the proposed Project would include up to two stationary standby generators with an estimated total capacity rated at approximately 4,000 kilowatts (kW) to provide emergency power

79 NHTSA, *Corporate Average Fuel Economy,* Accessed July 30, 2020, https://www.nhtsa.gov/laws-regulations/corporate-average-fuel-economy.
80 California Air Resources Board, *Low-Emissions Vehicle Program*, Accessed July 30, 2020, https://ww2.arb.ca.gov/node/2930/about.
81 Southern California Association of Governments, *Final 2016 RTP/SCS,* Accessed July 30, 2020, http://scagrtpscs.net/Pages/FINAL2016RTPSCS.aspx.
82 Southern California Association of Governments, *Connect SoCal – 2020 – 2045 RTP/SCS,* Accessed July 30, 2020, https://www.connectsocal.org/Pages/What-Is-Connect-SoCal.aspx.

primarily for lighting and other emergency building systems. Emergency generators would utilize diesel fuel to operate during an emergency and for testing and maintenance. The generators would be required to comply with applicable federal emissions standards and SCAQMD Rule 1470 (Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines) which mandate emission limits and operating hour constraints. Specifically, each standby generator would operate for 2 hours per day during 25 days per year for a total of 50 hours per year. For emergency operation both generators would operate up to 2 hours each and could occur simultaneously. SCAQMD requires that all internal combustion engines (ICE) greater than 50 brake horsepower (bhp) and gas turbines greater than 2,975,000 Btu per hour obtain a permit to construct prior to installation of the engines. The estimated annual fuel usage assuming each generator operates of 50 hours per year (2 hours per day) is 27,440 gallons of diesel fuel.[83]

The Project would not result in inefficient, or unnecessary consumption of vehicle fuels during operation. Accordingly, vehicle fuel demands during operation would be less than significant.

Summary

Operation of the proposed Project would comply with all applicable building codes, including the 2019 Title 24 building energy efficiency standards,[84] CAFE fuel economy standards,[85] consistency with the SCAG 2016-40 RTP/SCS,[86] compliance with the County's Low Impact Development (LID) Development Standards Manual,[87] compliance with the City's Low Impact Development Requirements for New Development and Redevelopment, the City's Green Street Policy,[88] the City's Water Conservation and Water Supply Shortage Program,[89] the Sustainability Guidelines included in the ITC Design Guidelines as described above, as well as mitigation measures included in this Draft EIR, which would ensure that natural resources are used efficiently and conserved to the maximum extent possible.

The City has developed a set of broad sustainability strategies included as part of the Design Guidelines to be incorporated into the design, construction, and operations of each proposed Project component. These

83 Vender Specifications for Standby Generator, Accessed August 25, 2020 at: https://www.cat.com/en_US/products/new/power-systems/electric-power.html.
84 *California Green Building Standards Code (*CCR, Title 24, Part 11 - CALGreen).
85 NHTSA, *Corporate Average Fuel Economy*, Accessed July 30, 2020, https://www.nhtsa.gov/laws-regulations/corporate-average-fuel-economy.
86 Southern California Association of Governments, *Final 2016 RTP/SCS, Accessed July 30, 2020,* http://scagrtpscs.net/Pages/FINAL2016RTPSCS.aspx.
87 County of Los Angeles Department of Public Works, *Low Impact Development,* Accessed July 30, 2020, https://dpw.lacounty.gov/ldd/lib/fp/Hydrology/Low%20Impact%20Development%20Standards%20Manual.pdf.
88 *Inglewood Municipal Code,* Chapter 10 Section 208, Accessed July 2020, http://www.qcode.us/codes/inglewood/view.php?topic=10-16-10_208&frames=off.
89 City of Inglewood, Ordinance No. 15-02, Accessed July 30, 2020, https://www.cityofinglewood.org/DocumentCenter/View/1011/Ordinance-Number-15-02-PDF.

guidelines align with Inglewood's commitment to sustainability City-wide, as outlined in the City's Energy and Climate Action Plan and Energy Efficiency Climate Action Plan. These sustainability guidelines serve as a mechanism to promote the City's commitment to reduce its environmental footprint and promote energy efficient design requirements, water conservation and water quality improvement projects, natural resource protection efforts, waste reduction and recycling, and numerous air quality emissions reduction policies and programs.

For construction impacts the City would include in bid documents for the proposed Project language specifying that the contractors shall use equipment on the proposed Project that meets the most stringent emission requirements as specified in the City's standard control measures.

For operational impacts, the proposed Project would comply with the requirements of California Green Building Standards Code (CALGreen) and be consistent with the City of Inglewood Energy Efficiency Climate Action Plan involving policies and programs related to sustainability, energy efficiency, and reduction in GHG emissions. The City has committed to taking an active role in promoting energy conservation and environmentally-friendly initiatives to improve the environment and realize the cobenefits, which include energy independence, cost savings for energy not used, water saved, improved air quality, and public health benefits from improved air quality.

The City has an ongoing commitment to increasing energy efficiency and implementing energy conservation measures to reduce wasteful, inefficient, and unnecessary consumption. The proposed Project would incorporate a number of sustainability features as listed in **Table 3.0-5: Proposed Sustainability Guidelines**. These guidelines are intended to integrate the design of new and existing facilities and to create a passenger experience that reflects the City's history and architecture, while providing design guidance for new construction or modernization of the proposed Project. The City has committed to implementing, if feasible, various sustainability measures for different proposed Project elements that meet or exceed CALGreen requirements, including energy and water conservation measures, for each of the follow proposed Project components: the guideway, stations, and the MSF. The sustainability strategies relate to planning and design; energy efficiency and renewable energy; water efficiency and conservation; materials conservation and resource efficiency; and environmental quality.

Further, it is expected that over time new technologies or systems will emerge, or will become more cost-effective or user-friendly, which will further reduce the reliance upon nonrenewable natural resources. For example, future implementation of the Clean Fuel Standard and the Renewable Portfolio Standard are expected to decrease the use of nonrenewable fossil fuels.

As stated in **Section 3.0**, the goals of the proposed Project include building new efficient transportation facilities that conserve energy, water, and other resources; and reducing traffic congestion and VMT. The components of the proposed Project would be required to meet the energy efficiency and conservation requirements of the California Green Building Standards Code[90] and the City Energy Efficiency Climate Action Plan.[91] Specifically, the proposed Project would be incorporate the sustainability features included in the ITC Design Guidelines as described above.

Operation of the proposed Project would minimize the consumption of transportation fuels. Therefore, as proposed operation of the proposed Project would not result in the wasteful, inefficient, or unnecessary consumption of electricity, natural gas, and transportation fuels, the proposed Project would not result in unjustified consumption of natural resources and impacts would be less than significant.

Mitigation Measures

Construction

No mitigation is required.

Operation

No mitigation is required.

Level of Significance after Mitigation

Construction

Impacts related to energy use from implementation of the proposed Project and potential future related development would be less than significant.

Operation

Impacts related to energy use from implementation of the proposed Project and potential future related development would be less than significant.

Impact E-2: Would the project conflict with or obstruct a State or local plan for renewable energy or energy efficiency?

The Project would comply with applicable regulatory requirements for the design of new buildings, including the provisions set forth in the CALGreen Code and California's Building Energy Efficiency

90 California Green Building Standards Code (CCR, Title 24, Part 11 - CALGreen)

91 City of Inglewood, *Energy Efficiency Climate Action Plan*, December 2015, accessed June 2020, http://www.southbaycities.org/sites/default/files/EECAP_Inglewood_Final_20151218.pdf.

Standards, which have been incorporated into the County Green Building Code. Based on the below, the Project would be consistent with adopted energy conservation plans and impacts would be less than significant.

The Inglewood Energy and Climate Action Plan (ECAP)

The ECAP[92] includes a business-as-usual (BAU) forecast that estimates future emissions in 2020 and 2035 from six sectors: Transportation, Residential Energy, Commercial/Municipal Energy, Industrial Energy, Solid Waste, and Water. The BAU forecast assumes a future under regulatory conditions as they existed in 2010, and it does not include the effects of updates to Title 24,[93] the Renewables Portfolio Standard,[94] and the Pavley Clean Car Standards[95] on future GHG emissions. Under the BAU forecast, total GHG emissions in Inglewood are expected to increase approximately 14 percent from 2010 (594,273 MTCO2e) to 2035 (678,283 MTCO2e). On a per service population basis, the increase is shown to be 4.5 percent, from 4.22 MTCO2e/SP in 2010 to 4.41 MTCO2e/SP in 2035. The GHG emissions reductions realized by State and local measures would be a direct result of energy efficiency upgrades aimed at increasing building energy performance, promoting renewable energy, and increasing vehicle fuel economy.

ECAP[96] implementation is expected to reduce emissions by 18.8 percent below 2005 levels by 2020, enabling the City to meet its 2005 target. However, the City would, need to reduce emissions by an additional 111,702 MT CO2e per year by 2035 to meet its 2035 target. The ECAP identifies a number of strategies aimed at reducing emissions through increased energy efficiency, renewable energy generation, improved transit options, and reduced consumption and waste. The ECAP includes energy reductions from the following implementing strategies and actions:

Strategy 4: Improve Transportation Options and Manage Transportation Demand

- Make roadways more efficient
- Improve transit
- Improve bicycle facilities
- Make parking more efficient

92 City of Inglewood, *Energy Efficiency Climate Action Plan,* December 2015, accessed June 2020, http://www.southbaycities.org/sites/default/files/EECAP_Inglewood_Final_20151218.pdf.
93 California Green Building Standards Code (CCR, Title 24, Part 11 - CALGreen).
94 *SB 1078, Renewable Energy: California Renewables Portfolio Standard Program.*
95 AB 1493, *Clean Car Standards – Pavley, California Air Resources Board, Low-Emissions Vehicle Greenhouse Gas Program,* Accessed July 30, 2020, https://ww2.arb.ca.gov/our-work/programs/advanced-clean-cars-program/lev-program/low-emission-vehicle-greenhouse-gas.
96 *City of Inglewood, Energy Efficiency Climate Action Plan,* December 2015, accessed June 2020, http://www.southbaycities.org/sites/default/files/EECAP_Inglewood_Final_20151218.pdf.

- Reduce commute trips
- Encourage land use intensification and diversity

ECAP implementation is expected to reduce emissions by 18.8 percent below 2005 levels by 2020, enabling the City to meet its 2005 target. However, the City would, need to reduce emissions by an additional 111,702 MT CO2e per year by 2035 to meet its 2035 target. The ECAP identifies a number of strategies aimed at reducing emissions through increased energy efficiency, renewable energy generation, improved transit options, and reduced consumption and waste.

The proposed Project would provide direct connections between regional transit provided by Metro, specifically at the Crenshaw/LAX line, and other transit providers as well as the City's major activity centers, such as the Forum, the LASED, HPSP and the IBEC. Implementation of the proposed Project would increase transit mode split, reduce vehicle trips, and reduce per-capita VMT.

The proposed Project would be consistent with the City ECAP.

Impacts would be less than significant.

CALGreen Code and Title 24

The proposed Project would be designed in a manner that is consistent with relevant energy conservation plans designed to encourage development that results in the efficient use of energy resources. The proposed Project would incorporate the sustainability features as contained in the ITC Design Guidelines as described above. For example, all components of the Project will be 15 percent more energy efficient than applicable California Energy Efficiency Standards. For energy-using equipment not governed by California Energy Efficiency Standards, best available energy efficient technologies will be used. These energy efficiency guidelines address lighting, incorporation of solar collectors into facilities where feasible, establishing energy budgets for each building that will be no greater than 85 percent of applicable Title 24 standards. Newly installed outdoor lighting power would be no greater than 90 percent of the Title 24, Part 6[97] calculated value of allowed outdoor lighting power. All building projects that include indoor lighting or mechanical systems, but not both, will have an energy budget that is not greater than 90 percent of the Title 24, Part 6 Energy Budget.[98]

Water demand indoors and outdoors would be reduced through numerous measures that meet or exceed CalGreen requirements.[99] Recycled water would be used for landscape irrigation, toilet flushing, or car or

97 *California Green Building Standards Code* (CCR, Title 24, Part 6 - CALGreen)
98 *California Green Building Standards Code* (CCR, Title 24, Part 6, Section 100.1(b) - CALGreen)
99 *California Green Building Standards Code* (CCR, Title 24, Part 11 - CALGreen)

train washing, water would be filtered and reused as wash and rinse water for train cars in the MSF. Once initial plants are established, xeriscape landscape would be implemented to utilize no-water irrigation, and drought-tolerant plants would be watered via drip irrigation. Low flow faucets and low flow flush fixtures would be implemented throughout the proposed Project design, and the best available water efficiency technologies would be used for cooling towers. Drainage systems designs would manage and capture any stormwater runoff to the maximum extent feasible through, in order of priority, infiltration, evapotranspiration, capture and use, and treatment with a high removal efficiency biofiltration/ biotreatment system.

As such, the proposed Project would comply with CALGreen and Title 24 requirements[100] to reduce energy consumption by implementing energy efficient building designs, reducing indoor and outdoor water demand, and installing energy-efficient appliances and equipment.

SCAG 2016–2040 RTP/SCS & 2020-2045 RTP/SCS

The proposed Project would be consistent with the 2016-2040 RTP/SCS[101] and the recently adopted 2020-2045 RTP/SCS.[102] The SCAG RTP/SCS is designed to support development of compact communities in existing urban areas with more mixed-use and infill development, and reuse developed land that is also accessible to transit and/or served by high quality transit. The 2016-2040 RTP/SCS describes how the region can attain the GHG emission-reduction targets set by CARB by reducing VMT to achieve an 8 percent reduction in passenger vehicle emissions by 2020, 19 percent reduction by 2035, and 21 percent reduction by 2040 compared to the 2005 level on a per capita basis. The 2020-2045 RTP/SCS builds on the foundation of the 2016-2040 RTP/SCS by adapting its goals to a changing region, mainly focusing on leveraging new transportation technologies for more efficient travel, improving mobility and accessibility, and increasing the movement of people and diversification of choice within the transportation system.

Overall, the Project would be consistent with the goals and policies of the SCAG 2016 RTP/SCS because it is an infill site accessible to transit, and it supports reductions in VMT to and from the proposed Project. Although the 2016-2040 RTP/SCS and upcoming 2020-2045 RTP/SCS are not technically energy efficiency plans, consistency with the both the 2016 RPS/SCS and 2020 RTP/SCS has energy implications, including the reduction of VMT from the plan which reduces GHG emissions and reduces fossil fuel consumption from travel to and from the implementation of the proposed Project.

100 *California Green Building Standards Code* (CCR, Title 24, Part 11 - CALGreen)

101 Southern California Association of Governments, *Final 2016 RTP/SCS*, Accessed July 30, 2020, http://scagrtpscs.net/Pages/FINAL2016RTPSCS.aspx.

102 Southern California Association of Governments, *Connect SoCal – 2020 – 2045 RTP/SCS*, Accessed July 30, 2020, https://www.connectsocal.org/Pages/What-Is-Connect-SoCal.aspx.

Impacts would be less than significant.

Summary

The proposed Project would incorporate a number of sustainability features as listed in **Table 3.0-5: Proposed Sustainability Guidelines**. These guidelines are intended to integrate the design of new and existing facilities and to create a passenger experience that reflects the City's history and architecture, while providing design guidance for new construction or modernization of the proposed Project. The City has committed to implementing various sustainability measures for different proposed Project elements that meet or exceed CALGreen requirements, including energy and water conservation measures, for each of the follow proposed Project components: the guideway, stations, and the MSF. As such, it would be consistent with applicable plans, policies and regulations adopted for the purpose of promoting renewable energy and overall energy efficiency.
Impacts would be less than significant.

Mitigation Measures

Construction

No mitigation is required.

Operation

No mitigation is required.

Level of Significance after Mitigation

Construction

Implementation of the proposed Project would be consistent with the applicable plans; impacts would be less than significant.

Operation

Implementation of the proposed Project would be consistent with the applicable plans; impacts would be less than significant.

4.5.8 CUMULATIVE IMPACTS

Implementation of the proposed Project, including the related projects identified in **Section 4.0**, *4.0-6: Cumulative Assumptions* would further increase demands for energy and may require the construction or relocation of related supply facilities. Each project will require site specific assessment to determine any impacts to existing energy or conservation.

Electricity

As discussed previously, electricity within the City is supplied by SCE. The geographic scope for cumulative electricity impacts is SCE's electricity service area. There are approximately 304 related projects that would be within the same service area as the proposed Project. Development of the proposed Project and related projects could cumulatively increase demands on the existing electricity supply. However, each project will require a site-specific assessment to determine any impacts to existing and forecasted electricity supply. Specifically, all related projects would be required to assess construction and operational electricity usage and coordinate with SCE prior to project approval. Further, like the proposed Project, other related projects would be required to incorporate energy conservation features in order to comply with applicable mandatory regulations including CALGreen and State energy standards in Title 24, and incorporate mitigation measures, as necessary. Therefore, cumulative impacts related to electrical infrastructure would be less than significant.

Natural Gas

As discussed previously, SoCalGas is the natural gas purveyor within the City. The geographic scope for cumulative natural gas impacts is SoCalGas' service area. There are approximately 394 related projects that would be within the same service area as the proposed Project. Development of the proposed Project and related projects could cumulatively increase demands on the existing natural gas supply. However, each project will require a site-specific assessment to determine any impacts to existing and forecasted natural gas supply. Specifically, all related projects would be required to assess construction and operational natural gas usage and coordinate with SoCalGas prior to project approval. Further, like the proposed Project, other related projects would be required to incorporate energy conservation features in order to comply with applicable mandatory regulations including CALGreen and State energy standards in Title 24, and incorporate mitigation measures, as necessary. Therefore, cumulative impacts related to natural gas infrastructure would be less than significant.

Transportation Fuel

The geographic scope for cumulative transportation fuel impacts is the SCAG region. Buildout of the proposed Project and other transit and transit-oriented-development projects in the SCAG region would be expected to decrease overall VMT, as a result of the use of the APM trains by people, rather than using vehicles for travel to the area. The effect on transportation fuel demand by other cumulative projects would be reduced by future improvements to vehicle fuel economy pursuant to Federal and State regulations. By 2025, vehicles are required to achieve 54.5 mpg (based on USEPA measurements), which is a 54 percent increase from the 35.5 mpg standard in the 2012–2016 standards. Cumulative development projects would need to demonstrate consistency with these goals and incorporate any mitigation

measures required under CEQA, which would also ensure cumulative development projects contribute to transportation energy efficiency. Therefore, cumulative impacts related to transportation fuels would be less than significant.

4.5.9 CONSISTENCY WITH CITY GENERAL PLAN

The City General Plan does not contain any policies, regulations, or directives that specifically address energy resources. However, the following circulation goals from the Land Use Element of the City General Plan are relevant to transportation-related energy demand and conservation.[103]

Circulation Goal: Promote and support adequate public transportation within the City and the region.

Circulation Goal: Develop a safe and adequate pedestrian circulation system which is barrier free for the handicapped.

The proposed Project would promote and support adequate public transportation within the City and the region. The proposed Project is a public transit project by design, connecting future riders to the Metro Crenshaw/LAX line and solving the problem of the last mile connection to various activity centers throughout the City. The proposed Project would decrease overall VMT as a result of the ridership in lieu of automobile use to and from the City activity centers. Decrease in VMT would result in more efficient energy use and a reduction in vehicle fuel usage and GHG emissions.

The proposed Project would develop a safe and adequate pedestrian circulation system which is barrier free for the handicapped. For example, all station mezzanine levels would provide connectivity to passenger walkways for traveling over existing roadways. The passenger walkways would be designed to improve both pedestrian access and comfort between the stations and the City in addition to providing multimodal access to adjacent bus facilities, pick-up and drop-off areas, and other adjacent resources. The proposed Project would also upgrade existing sidewalks to ensure consistent ADA appliance along the transit corridor. As such, the proposed Project would be consistent with the City General Plan goals relevant to transportation-related energy demand and conservation as discussed under **Impact E-2**.

103 City of Inglewood, Department of Community Development and Housing, 1980. *Land Use Element of the Inglewood General Plan. January 1980.* Amended September 14, 2016.

4.6 GEOLOGY AND SOILS

4.6.1 INTRODUCTION

This section of the Draft Environmental Impact Report (Draft EIR) evaluates the impacts of the proposed Inglewood Transit Connector Project (proposed Project or ITC Project) related to geology, soils, and seismicity. The impacts examined include risks related to geologic hazards such as earthquakes, landslides, liquefaction, expansive soils, and environmental impacts related to soil erosion and sedimentation, as well as paleontological resources.[1] Information from the following reports are incorporated into this section:

- *Fault Rupture Hazard Evaluation in Support of Draft EIR (Fault Rupture Hazard Evaluation)*, Geosyntec Consultants, September 27, 2019 (**Appendix 4.6.1: Fault Rupture Study**);
- *Development of Seismic Design Criteria in Support of Draft EIR (Seismic Design Criteria)*, Geosyntec Consultants, June 26, 2019 (**Appendix 4.6.2: Seismic Design Criteria**); and
- *Inglewood Transit Connector, Technical Memorandum, Geology and Soils,* Geosyntec Consultants, June 25, 2018 (**Appendix 4.6.3: Technical Memorandum, Geology and Soils**).

Prior to the preparation of this Draft EIR, a Recirculated Initial Study (included in **Appendix 2.0.2a**) was prepared using the California Environmental Quality Act (CEQA) Environmental Checklist to assess potential environmental impacts associated with geology and soils. For four of these screening thresholds, the Initial Study found that the proposed Project would result in "Less than Significant Impacts," and for two of these thresholds the proposed Project would result in "No Impact"; thus, no further analysis of these topics in an EIR was required.

The following Initial Study screening criteria related to geology and soils do not require any additional analysis in this Draft EIR:

- Impacts related to the exposure of people or structure to potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction, were evaluated and determined to be less than significant in the Initial Study. The location of the proposed Project is not within an area known to be susceptible to liquefaction.[2]
- Impacts related to the exposure of people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving landslides, were evaluated and determined to have no impact in the Initial Study. The location of the proposed Project is not within a designated earthquake-induced landslide zone known to the California Geological Survey (CGS). Further, the lack

1 Paleontological Resources Assessment Report, Inglewood Basketball and Entertainment Center, City of Inglewood, California, ESA, May 2019

2 Inglewood Transit Connector*, Technical Memorandum, Geology and Soils, Geosyntec Consultants*, June 25, 2018.

of general elevation difference in the area would limit the risk of seismically induced landslides occurring, nor does the proposed Project substantially alter the existing topography of the area.[3]

- Impacts related to substantial soil erosion or the loss of topsoil evaluated and determined to be less than significant in the Initial Study. The proposed Project shall be subject to the required to implement a Storm Water Pollution Prevention Plan (SWPPP) in accordance with the National Pollutant Discharge Elimination System (NPDES). Compliance with construction-related best management practices (BMPs), as detailed in the SWPPP, would control and minimize erosion and siltation.[4]
- Impacts related to location on a geologic unit or soil that is unstable, or that would become unstable as a result of the Project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse were evaluated and determined to be less than significant in the Initial Study. United State Geological Survey (USGS) groundwater data note that nearby groundwater is at least 85 feet below ground surface. Dewatering, an activity that contributes to subsidence and ground collapse, would not be necessary for the proposed Project. The proposed Project design and construction would be required to adhere to all applicable building codes and standards would ensure that impacts related to geological failure—including lateral spreading, off-site landslides, liquefaction, or collapse.[5]
- Impacts related to location on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property were evaluated and determined to be less than significant in the Initial Study. The proposed Project's design and construction would incorporate construction practices to maintain the integrity of building and support structures and would comply with all applicable building codes and standards.[6]
- Impacts related to soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater were evaluated and determined to have no impact in the Initial Study. The proposed Project would connect to the City's existing sewer system and would not require the use of septic tanks or alternative wastewater disposal systems.[7]

Impacts found to be less than significant are further discussed in **Section 6.0: Other Environmental Considerations**.

Please see **Section 8.0** for a glossary of terms, definitions, and acronyms used in this Draft EIR.

3 Inglewood Transit Connector, *Technical Memorandum,* Geology and Soils, Geosyntec Consultants, June 25, 2018.
4 Inglewood Transit Connector, *Technical Memorandum*, Geology and Soils, Geosyntec Consultants, June 25, 2018.
5 Inglewood Transit Connector, *Technical Memorandum,* Geology and Soils, Geosyntec Consultants, June 25, 2018.
6 Inglewood Transit Connector, *Technical Memorandum*, Geology and Soils, Geosyntec Consultants, June 25, 2018.
7 Inglewood Transit Connector, *Technical Memorandum,* Geology and Soils, Geosyntec Consultants, June 25, 2018.

4.6.2 METHODOLOGY

The evaluation of potential significant impacts related to geology and soils as a result of the proposed Project is based on a review of existing conditions and a review of geotechnical reports prepared for the proposed Project alignment and sites for the support facilities. To ascertain the existing conditions, published USGS geological maps were reviewed, and readily accessible geologic and geotechnical records were obtained from publicly available online resources, including municipalities and agencies with jurisdiction near or along the Project alignment and sites for the support facilities including Los Angeles County Department of Public Works, LA Metro, Caltrans, and City of Inglewood Building and Safety Division. Various database searches were performed using United States Geological Survey (USGS) and California Geologic Survey (CGS) to compile available documents and incorporate relevant information into this assessment. No site reconnaissance, geologic mapping, subsurface, or site-specific investigations were performed as part of the evaluation for the geotechnical report.

The evaluation of the potential for the presence of paleontological resources within the within the Project Site and impacts to these resources is based on a review of existing conditions and a review of paleontological reports prepared for a project within the vicinity of the proposed Project alignment.[8]

At the beginning of this section, existing geology and soils conditions, and paleontological resources within the Project alignment and sites for the support facilities and immediate surrounding area are described, along with the methodology and the regulatory framework that guide the evaluation of the proposed Project. Direct and/or indirect impacts related to geology and soils conditions and to paleontological resources that would result from the proposed Project are then identified, along with any measures to mitigate potentially significant impacts of the Project, as necessary.

4.6.3 REGULATORY FRAMEWORK

Federal, State, and local laws, regulations, and policies pertaining to geology and soils provide the regulatory framework for addressing aspects of seismic and geotechnical conditions that would be affected by development of the proposed Project. The following is a summary of key applicable regulations related to potential seismic and geotechnical conditions.

8 DEIR Appendix I: Paleontological Resources Report, Inglewood Basketball and Entertainment Center Project, December 2019, http://ibecproject.com/I_PaleontologicalResourcesReport.pdf.

4.6.3.1 Federal Regulations

Earthquake Hazards Reduction Act

The U.S. Congress passed the Earthquake Hazards Reduction Act in 1977[9] to reduce the risks to life and property from future earthquakes in the United States through the establishment and maintenance of an effective earthquake hazards reduction program.

To accomplish this goal, the act established the National Earthquake Hazards Reduction Program (NEHRP);[10] this program was substantially amended in November 1990 by the NEHRPA,[11] which refined the description of agency responsibilities, program goals, and objectives. Focusing on research, building code standards, technical guidance, and education, NEHRP is a collaborative effort among the Federal Emergency Management Agency (FEMA), the National Institute of Standards and Technology (NIST), the National Science Foundation (NSF), and the USGS.

4.6.3.2 State Regulations

Alquist-Priolo Earthquake Fault Zoning Act

The purpose of the Alquist-Priolo Earthquake Fault Zoning Act is to identify hazards associated with surface fault ruptures and to prevent the construction of buildings on active faults.[12] Alquist-Priolo earthquake fault zones (APEFZ) are regulatory zones surrounding the surface traces of active faults in California. Wherever an active fault exists, if it has the potential for surface rupture, a structure for human occupancy cannot be placed over the fault and must be a minimum distance from the fault, generally fifty feet. Earthquake fault zones were conceived in the Alquist-Priolo Earthquake Fault Zoning Act (Alquist-Priolo Act). The intent of the Alquist-Priolo Act is to reduce property and life losses from surface fault rupture.

The State Geologist is required to establish and map zones around the surface traces of active faults, which are then distributed to county and city agencies to be incorporated into their land use planning and construction policies. Proposed development needs to be proven through geologic investigation to not be located across active faults before a city or county can permit the implementation of projects. If an active fault is found, development for human occupancy is prohibited within a 50-foot setback, or a distance demonstrated to be appropriate by the geologic investigation, from the identified fault.

9 National Earthquake Hazards Reduction Program Reauthorization Act of 2004, Public Law 95-124, 42 U.S.C. 7701 et. seq.), as amended by Public Laws 101-614, 105-47, 106-503, and 108-360.

10 Earthquake Hazards Reduction Act of 1977, As Amended by Section 5. Earthquake Hazards Reduction Program [New Section 103 in Public Law 108-360]

11 Earthquake Hazards Reduction Program Reauthorization Act of 1990 (P.L. 101-614)

12 California State Alquist-Priolo Earthquake Fault Zoning Act of 1972. California Public Resources Code, sec. 2621.5.

Seismic Hazards Mapping Act

The Seismic Hazards Mapping Act is a State law that requires delineated maps to be created by the California State Geologist to reflect where potential ground shaking, liquefaction, or earthquake-induced landslides may occur.[13] The purpose of the Seismic Hazards Mapping Act is to protect the public from the effects of nonsurface fault rupture earthquake hazards, inducing strong ground shaking, liquefaction, seismically induced landslides, or other ground failure caused by earthquakes. City, County, and State agencies are required to use seismic hazard maps in their land use decision making. Projects within seismic hazard zones are required to have site-specific geotechnical investigations and incorporate appropriate mitigation measures identified as a result. The State has published guidelines for evaluating and mitigating seismic hazards.[14]

California Building Code, California Code of Regulations

The 2019 California Building Code (CBC) was published July 1, 2019, with an effective date of January 1, 2020 is administered by the California Building Standards Commission (CBSC).[15] The CBC governs all development within the State of California, as amended and adopted by each local jurisdiction. These regulations include provisions for site work, demolition, and construction, which include excavation and grading, as well as provisions for foundations, retaining walls, and expansive and compressible soils. The CBC provides guidelines for building design to protect occupants from seismic hazards.

California Department of Transportation (Caltrans)

The California Department of Transportation (Caltrans) Division of Engineering Services (DES) is the lead project delivery organization for the design, construction, and oversight of bridge and other transportation structures. DES is a comprehensive, multidisciplinary engineering organization committed to providing quality products and services in a timely manner. DES has prepared numerous guidance documents for use the design and construction of bridges and structures to address geologic conditions. These guidance documents include the two Memorandums (Memos) to Designers described below applicable to the design of the proposed Project. These memos define the factors to be addressed in fault investigations completed as part of the structural design process.

13 California Public Resources Code, sec. 2690–2699.6 Seismic Hazards Mapping Act.

14 California Division of Mines and Geology Special Publication 117, 1997; revised and readopted in 2008 by the California Geologic Survey.

15 2019 California Building Standards Code (Cal. Code Regs., Title 24) published July 1, 2019.

Caltrans Memo to Designers 20-8 (Analysis of Ordinary Bridges that Cross Faults)

Caltrans Memo to Designers 20-8 (Analysis of Ordinary Bridges that Cross Faults) dated January 2013, provides specific guidance for the design of bridges that cross active earthquake faults.[16]

Memo to Designers (MTD) 20-8 states that although a few exceptions exist, the fault rupture hazard is only required for Holocene faults[17] identified by the California Geologic Survey in AFEPZ maps.

The memo states that when a bridge or similar structure crosses a fault that falls within a mapped APEFZ, the design is to take into account potential displacement from a fault offset, dynamic response due to ground shaking, and any other fault-induced hazards, such as creep, that may occur. MTD 20-8 defines a method for determining the potential displacement at columns and abutments at fault crossings to support designing structures to respond to these conditions without failing.

Caltrans Memo to Designers 20-10 (Fault Rupture)

Caltrans Memo to Designers 20-10 (Fault Rupture),[18] dated January 2013, provides guidance for the design of bridge type structures to address the potential fault rupture where any portion of a structure falls within an APEFZ, where any portion of a structure falls within 330 feet of well-mapped active faults, or within 1,000 feet of a fault[19] not located in an APEFZ may require further study.[20]

This memo identifies changes to design required for bridge type structures when crossing a fault to address potential fault rupture effects. MTD 20-10 supplements the defined method described in MTD 20-08 above for determining the potential displacement at columns and abutments at fault crossings and designing the structures so to slide at the abutment, bent, or hinge seats points without failing.

Public Resources Code Section 5097.5 and Section 30244

Paleontological resources are limited, nonrenewable resources of scientific, cultural, and educational value that are afforded protection under state laws and regulations. The following section summarizes the applicable federal and state laws and regulations, as well as professional standards provided by the Society of Vertebrate Paleontology (SVP).

PRC Section 5097.5 and Section 30244 include state requirements for paleontological resource management. These statutes prohibit the removal of any paleontological site or feature from public lands without permission of the jurisdictional agency, define the removal of paleontological sites or features as

16 Caltrans LRFD, Memo to Designers 20-8, Analysis of Ordinary Bridges that Cross Faults, January 2018.
17 Holocene faults are less than 10,000 years old.
18 Caltrans LRFD, Memo to Designers 20-10, Fault rupture, January 2013.
19 Holocene (<10,000 years old) or younger in age.
20 In such instances, the memo states that if further study of the fault rupture is needed, then procedures as outlined in CGS Note 49 shall be followed. https://www.conservation.ca.gov/cgs/Documents/Publications/CGS-Notes/CGS-Note-49.pdf.

a misdemeanor, and require reasonable mitigation of adverse impacts to paleontological resources from developments on public (State, county, city, district) lands.

4.6.3.3 Local Regulations

City of Inglewood General Plan Safety Element

The General Plan Safety Element[21] is designed to ensure that the citizens of Inglewood can be protected from unreasonable risks caused by natural and manmade disasters. The City's goals are to minimize the dangers associated with natural and manmade hazards by implementing standards, regulations and laws that would reduce loss of life, injuries and property damage resulting from disasters, and to provide for the continuity of government operations and civilian life during and after a major disaster.

It is a general policy of the City of Inglewood (City) to provide appropriate services and support to combat any disasters, and to protect the citizenry from significant adverse impacts arising from any disasters. Policies of the City's General Plan "Safety Element"[22] applicable to geology, soils, and seismicity include the following:

Policy 1 **Provide measures to reduce seismic impact.**

- Ensure that all potentially hazardous buildings are reinforced or demolished.
- Restrict new structures for human occupancy from being constructed across active faults.
- Require geological and soils engineering investigations in high risk fault areas.
- Use the latest State-approved edition of the Uniform Building Code and other applicable seismic design information.
- Periodically review subdivision requirements and other codes to improve requirements for safety and seismic safety as new information becomes available.
- Study the need for a seismic overlay zone to restrict certain types of development.
- Require a soils report for new buildings, as well as obtaining or utilizing, when available, geologic drillings or studies, local ground subsidence and elevation studies, geologic-seismic studies, strong motion monitoring, gathering, compiling, and interpreting local and regional geologic seismic data as it becomes available.
- Maintain the tagging system used to identify buildings damaged in an earthquake.
- Ensure that the Centinela Adobe historic site and any historical sites identified in the future be seismically reinforced.

21 *City of Inglewood General Plan,* "Safety Element" (1995).
22 *City of Inglewood General Plan, "S*afety Element" (1995).

City of Inglewood Municipal Code

Municipal Code Chapter 11, Article 2 Building Code.

The Inglewood Municipal Code[23] has incorporated the most up to date California Building Code in Chapter 11, Sections 11-2 to 11-5. These include ordinances referencing applicable standards and documentation requirements found in the California Building Code that address seismic safety and include the California Building Code, 2019 Edition, Volumes 1 and 2, based on the International Building Code, 2018 Edition, including the Appendix Chapters B, H, I, J and L, "Uniform Housing Code, 1997 Edition," and the "Uniform Code for the Abatement of Dangerous Buildings, 1997 Edition.

Municipal Code Chapter 11, Article 13 Earthquake Hazard Reduction in Existing Buildings

This section of the City's Municipal Code Chapter 11, Sections 11-130 to 11-138[24] promotes public safety and welfare by reducing the risk of death or injury that may result from the effects of earthquakes on unreinforced masonry-bearing-wall buildings constructed prior to 1934, or any unreinforced masonry building located in the City. The municipal code sets forth the minimum standards for structural seismic resistance established primarily to reduce the risk of life loss or injury and provides systematic procedures and standards or identification and classification of unreinforced masonry- bearing- wall buildings based on their present use. Priorities, time periods and standards are also established under which these buildings are required to be structurally analyzed and anchored. Where the analysis finds deficiencies, this code requires the building to be strengthened or demolished. In addition, qualified historical buildings are required to comply with the State Historical Building Code.[25]

4.6.4 EXISTING CONDITIONS

4.6.4.1 Regional Geology

The proposed Project is located within the central portion of the Los Angeles Basin, south of the Santa Monica Mountains, near the intersection of the Peninsular Ranges and Transverse Ranges geomorphic provinces of southern California. The Peninsular Ranges province is characterized by a series of northwest trending mountains and valleys separated by faults associated with, and subparallel to, the San Andreas Fault system. These rocks were intruded by Cretaceous-age (65 million years ago [mya]) granitic basement rocks, also known as the Peninsular Ranges Batholith. The Transverse Ranges are characterized by east-west trending structural features such as the Santa Monica Mountains and the Santa Monica and

23 City of Inglewood, *Municipal Code,* "Chapter 11, Article 2 Building Code, Sections 11-2 through 11-5. California Building Code. Established and Additions, Deletions and Amendments."

24 City of Inglewood, *Municipal Code*, "Chapter 11, Article 13 Earthquake Hazard Reduction in Existing Buildings, Sections 11-130 to 11-138."

25 California Administrative Code, State Historical Building Code per Part 8, Title 4.

Hollywood faults. The Santa Monica and Hollywood faults are considered the boundary between these two physiographic provinces (the Peninsular Range province and Transverse Range province).

The Los Angeles Basin is a northwest-trending alluviated lowland plain filled with thick deposits of relatively unconsolidated marine and nonmarine sediments bounded by the Santa Monica Mountains to the north; the Elysian, Repetto and Puente Hills to the east; the Santa Ana Mountains and San Joaquin Hills to the south and southeast; and the Pacific Ocean to the west. The relatively flat surface of the Los Angeles Basin slopes gently south and is interrupted by locally trending northwest alignment of low hills and mesas to the south and west that extend from Newport Beach northwest to Beverly Hills, and the Palos Verdes Peninsula at the southwest extremity.

The Los Angeles Basin began forming during the Late Miocene (approximately 7.2 mya) as a result of subsidence following compressional stresses between the right-oblique Whittier and Palos Verdes fault zones, and the left-oblique Santa Monica fault system. Sedimentary deposits within the Los Angeles Basin are estimated to range in thickness from approximately 32,000 feet to 35,000 feet within the general vicinity of the proposed Project.

Subsurface Conditions

Previous geotechnical investigations within the vicinity of the proposed Project were reviewed. These explorations along with published geologic maps indicate that recent Pleistocene-age alluvium forms the surficial cover within the vicinity, often with thin localized layers of artificial fill associated with previous development activities. The anticipated geologic materials below the Project alignment are described in the following sections.

Artificial Fill

Artificial fill was encountered during previous investigations within the vicinity of the proposed Project extending up to 2 feet below ground surface (bgs) and generally consisted of brown to dark brown sandy silt, characterized as slightly moist and soft to medium stiff. Potential fill underlying the Project alignment is likely the result of grading or construction activities associated with previous development and may vary in composition and thickness.

Alluvial Fan Deposits

Geologic maps of the area describe relatively small portions of the area as underlain by late Pleistocene-age alluvial fan sediments of granitic sand. These alluvial fan deposits (Qae) typically consist of unconsolidated to weakly consolidated sands, silts, clays, and/or mixtures thereof (sandy silts, silty sands, etc.). These materials are generally derived from material shed off the nearby Santa Monica Mountains. The thickness of the alluvial fan deposits is likely variable along the Project alignment.

Older Alluvium

Most of the Project alignment is underlain by relatively older late Pleistocene-age alluvium (Qoa). The older alluvial deposits consist of sediments that were mainly shed from the Santa Monica Mountains to the north. Composition of the older alluvial deposits primarily consists of slightly consolidated deposits of silts, clays, sands, and sandy gravel, and/or mixtures thereof (e.g., sandy silts and silty sands). Similar to the alluvial fan deposits, thickness of the older alluvium materials is likely to vary along the Project alignment but would extend to depths below the anticipated development associated with the proposed Project.

4.6.4.2 Seismic Setting

The tectonic setting of the Los Angeles Basin area is being dominated by right-lateral strike-slip faults with a general northwest by southeast trend as a result of the interaction between the Pacific and North American lithospheric plates. Numerous faults in southern California include "active," "potentially active," and "inactive" faults. Division of these major groups are based on criteria by the California Geologic Survey (CGS, formerly known as California Division of Mines and Geology, CDMG) for the Alquist-Priolo Earthquake Fault Zoning Program [Bryant and Hart, 2007]. By definition, an "active" fault is one that has had displacement within Holocene time (last 11,000 years). A "potentially active" fault has demonstrated displacement of Quaternary-age deposits (last 1.6 million years). "Inactive" faults have not exhibited displacement in the last 1.6 million years.[26]

Faults of tectonic significance mapped in the Los Angeles region and the historical earthquake epicenters in the region include the Santa Monica fault zone (SMFZ) to the north and northwest; the Newport-Inglewood fault zone (NIFZ) to the east and west; and the Cabrillo, Redondo Canyon, and Palos Verdes faults offshore to the west and southwest. Faults considered active [Bryant and Hart, 2007] and their respective distances from the Project and maximum moment magnitudes are presented in **Table 4.6-1: Significant Seismic Sources Within 100 KM of Project Alignment.**

4.6.4.3 Faults

The City contains both active and potentially active faults, several of which are located in the Project area shown in **Figure 4.6-1: Faults within the Project Area**.

Active Faults

The faults located closest to the Project area considered "active" include the following:

26 Faults are currently categorized as Holocene-active, age-undetermined, and pre-Holocene according to Earthquake Fault Zones, California Geological Survey's Special Publication 42, Section 5, rev. 2018.

Newport Inglewood Fault Zone

The Los Angeles Basin section of the NIFZ is the closest major active fault zone to the Project, with the Inglewood and Potrero fault segments located respectively at their nearest points, approximately 0.45-miles (0.75 km) east and 0.15-miles (0.25 km) west of the Project alignment. The NIFZ is composed of a series of discontinuous northwest trending En echelon faults extending from Ballona Gap southeast to the area offshore of Newport Beach.[27] This zone is reflected at the surface by a line of geomorphically young anticlinal hills and mesas formed by the folding and faulting of a thick sequence of Pleistocene-age sediments and Tertiary-age sedimentary rocks. Historical seismic activity (between 1977 and 1985) shows mostly strike-slip faulting with some reverse faulting along the northern segment (north of Dominguez Hills), and normal faulting along the southern segment (south of Dominguez Hills to Newport Beach).

Inglewood Fault

The Inglewood Fault, one local component of the Newport-Inglewood Fault, is well exposed in the Baldwin Hills, where it has been mapped by the USGS.[28] North of Centinela Creek, the fault offsets geologic units of Pleistocene age and is marked by a westerly- facing scarp which dies out to the south with only a small break in slope extending south of Centinela Creek. There was ample evidence of surface displacement along the fault line across the Baldwin Hills, north of Centinela Creek following the 1920 Inglewood earthquake.[29]

An in-depth review of available published and unpublished geologic reports and maps shows that within the geologic community there is diverse opinion as to whether the fault extends south of Centinela Creek along its established trend, or whether it is offset by the Centinela Creek Fault and becomes the Townsite Fault, which trends to the southeast across Hollywood Park.[30] The Inglewood Fault has been mapped through the Inglewood Civic Center, south of Centinela Creek, and is shown to similarly extend to the south on the Alquist-Priolo "Earthquake Fault Zones" map for the Inglewood Quadrangle.

Potrero Fault

The Potrero Fault, a major local component of the Newport-Inglewood Fault, traverses the eastern portion of the City in a northwest-southeast direction.[31] It is well defined in the subsurface by oil well data from the Potrero oil field where it consists of a zone 100 to 200 feet wide. It is also known to cut Pleistocene aquifers in the Centinela Creek area where historically it was responsible for the existence of the Centinela

27 En echelon faults are parallel or subparallel, closely-spaced, overlapping, or step-like faults that are oblique to the overall structural trend.
28 Fault Rupture Hazard Evaluation in Support of Draft EIR (Fault Rupture Hazard Evaluation), Geosyntec Consultants, September 27, 2019.
29 City of Inglewood, General Plan, Safety Element, July 1995.
30 Fault Rupture Hazard Evaluation in Support of Draft EIR (Fault Rupture Hazard Evaluation), Geosyntec Consultants, September 27, 2019.
31 City of Inglewood, *General Plan, Safety Element*, July 1995.

Spring. Prior to the development of water wells east of the fault, which have greatly depleted the aquifer and lowered the water table, the Centinela Spring once yielded in excess of 125 miner's inches of water (over one thousand gallons per minute).[32] At its intersection with the Centinela Fault, the Potrero Fault is either offset or bent so that its northern extension is displaced to the east.

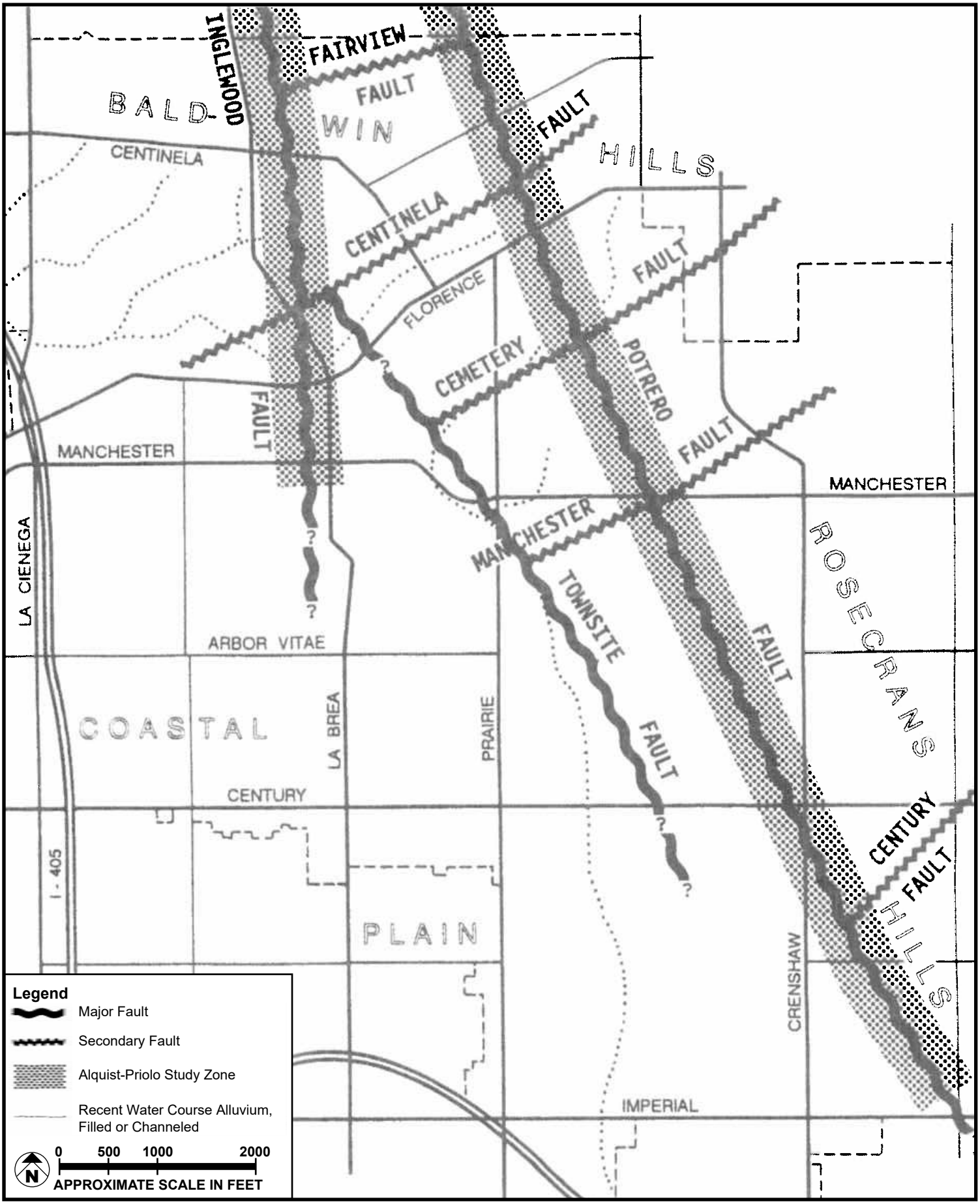
South of Centinela Creek, along the east side of the Hollywood Park Specific Plan Area, the fault is marked at the surface by an impressive westward-facing scarp about 50 feet high. Near its southern end, both topographic and subsurface evidence of its position disappear. The fault bends to the east and extends toward the Avalon-Compton Fault southeast of the City.

Table 4.6-1
Significant Seismic Sources Within 100 KM of Project Alignment

Fault or Fault Segment	Fault Type[1]	Approximate Slip Rate (mm/yr)[2]	Dip Direction[3]	Approximate Fault Length (km)[4]	Approximate Closest Distance to Project (km)[5]	Approximate Maximum Magnitude (Mw)[6]
Newport-Inglewood (onshore)	RL	1.0	—	65	0.20	7.2
Santa Monica	O/LL, R	1.0	N	28	13	6.6
Hollywood	O/LL, R	1.0	N	17	14	6.4
Raymond	O/LL, R	1.5	N	22	21	6.8
Malibu Coast	O/LL, R	0.3	N	38	36	6.7
Palos Verdes (Santa Monica Basin section)	RL	3.0	—	99	21	7.3
Sierra Madre	R	2.0	N	57	32	7.2
Whittier	RL	2.5	NE	46	31	7.0
San Andreas (Mojave section)	RL	30.0	V	99	68	7.1

Source: Geosyntec, The Inglewood Transit Connector, Technical Memorandum, Geology and Soils,2018.
Notes:
"-" Unspecified
1 - RL = Right Lateral Strike-Slip Fault; LL = Left Lateral Strike-Slip Fault; O/LL = Oblique Left-Lateral Fault; R = Reverse Fault
2 - Approximate Slip Rate millimeters per year (mm/yr) obtained from CGS (2003) and USGS (2008)
3 – N = North; S = South, V = Vertical, NE = Northeast, E = East
4 - Fault Length obtained from CGS (2003) and USGS (2008)
5 - Distances from Project noted are the closest distances to the surface trace or inferred projection of the fault as measured from the CDMG (1998), CGS (2003), or USGS (2008)
6 - Maximum Earthquake values reported at maximum moment magnitude by the CGS (2003) and USGS (2008)

32 A miner's inch is a unit of flow in terms of volume per unit of time, usually in relation to the flow of water.



SOURCE: City of Inglewood General Plan Safety Element; Meridian Consultants LLC - 2020

FIGURE **4.6-1**

Faults within the Project Area

208-001-18

Santa Monica Fault Zone

The SMFZ is considered a continuous zone comprised of five fault segments including the Malibu Coast, Santa Monica, Hollywood, and Raymond faults, with a total length of approximately 150-miles. The SMFZ exhibits both reverse and left-lateral components of slip and is located approximately 7-miles (12 km) northwest of the Project alignment at its nearest points. The SMFZ extends 25-miles from the western edge of Beverly Hills across West Los Angeles and Santa Monica to Pacific Palisades, where it trends offshore and parallels the Malibu coast near Point Dume. The SMFZ extends eastward as the Hollywood fault along the base of the Santa Monica Mountains from the West Beverly Hills Lineament in the West Hollywood-Beverly Hills area, to the Los Feliz area of Los Angeles.

The active Hollywood fault trends east-west along the southern boundary of the Santa Monica Mountains, located approximately 8.5-miles (13.5 km) north of the proposed Project.

Other significant regional faults considered "active" which have a potential for producing large magnitude (stronger shaking) events, but lie farther away from the proposed Project, include:

San Andreas Fault

The San Andreas strike-slip fault is located approximately 40-miles (65 km) to the northeast, along the northern edge of the San Gabriel Mountains at their contact with the Mojave Desert. The approximately 700-mile-long San Andreas Fault is a network of faults that collectively accommodates the majority of relative north-south motion between the North American and Pacific tectonic plates. The most recent movement on the fault is estimated to be Latest Quaternary (less than 15,000 years before present) with a slip rate of 30 millimeters per year (mm/yr) and a 100-135-year recurrence rate.

Elsinore Fault Zone

The Whittier section of the right-lateral Elsinore fault zone is approximately 17-miles (27 km) to the east of the Project. The most recent movement in the fault zone is estimated to be within late Quaternary (less than 15,000 years before present) with a slip rate of 2.5 mm/yr.

Blind Thrust Faults

Blind thrust fault zones are considered active features that do not rupture at the ground surface. Although these features present risk by generating intense seismic shaking, their respective distances to the proposed Project are not included in **Table 4.6-1** due to the uncertainty in their vertical surface projection. Known blind thrust faults within the Project vicinity along with their respective slip rates and maximum moment magnitudes are described below.

Elysian Park Thrust

The Elysian Park Thrust, previously defined as the Elysian Park Fold and Thrust Belt, is a blind thrust fault that overlies the Los Angeles and Santa Fe Springs segments of the Puente Hills Thrust. The eastern edge of the Elysian Park Thrust is defined by the northwest-trending Whittier fault zone. The closest edge of the vertical surface projection of the Elysian Park Thrust is approximately 6-miles (10 km) northeast of the proposed Project. Like other blind thrust faults in the Los Angeles area, the Elysian Park Thrust is not exposed at the surface and does not present a potential surface rupture hazard; however, should be considered an active feature capable of generating future earthquakes. An average slip rate of 1.3 mm/yr and a maximum moment magnitude (M, defined as a measurement of the size of an earthquake in terms of energy released) of 6.4 were estimated for the Elysian Park Thrust.

Compton-Los Alamitos Thrust

The Compton-Los Alamitos Thrust is an inferred blind thrust fault located within the south-central portion of the Los Angeles Basin. The closest edge of the vertical surface projection of the buried thrust fault is located approximately 8-miles (13 km) southwest of the Project alignment. Like other blind thrust faults in the Los Angeles Area, the Compton-Los Alamitos Thrust is not exposed at the surface and does not present a potential surface rupture hazard; however, should be considered an active feature capable of generating future earthquakes. An average slip rate of 1.5 mm/yr and a maximum moment magnitude M 6.8 were estimated for the Compton-Los Alamitos Thrust.

Puente Hills Blind Thrust

The Puente Hills Blind Thrust fault (PHBT) system extends eastward from downtown Los Angeles to Brea in northern Orange County. The PHBT is comprised of three north-dipping segments overlain by folds expressed at the surface as the Coyote Hills, Santa Fe Springs Anticline, and the Montebello Hills. The PHBT exhibits an estimated average slip rate of 0.7 mm/year. Postulated earthquake scenarios for the PHBT include a single segment rupture of a magnitude M 6.6, and a multiple segment rupture producing an earthquake of M 7.1. The PHBT is not exposed at the ground surface and does not present a potential for surface fault rupture. However, based on deformation of late Quaternary age sediments above this fault system and the occurrence of the Whittier Narrows earthquake, the PHBT is considered an active fault capable of generating future earthquakes beneath the Los Angeles Basin.

Potentially Active Faults

Faults considered "potentially active" located closest to the Project alignment include the following:

Overland Fault

The Overland fault located approximately 1.3-miles (2 km) southwest of the Project alignment is considered potentially active. The Overland fault trends northwest between the Charnock fault and the Newport-Inglewood fault zone, extending from the northwest flank of the Baldwin Hills to Santa Monica Boulevard in the vicinity of Overland Avenue. However, there is no evidence that the fault has offset late Pleistocene or Holocene age alluvial deposits and is considered potentially active by the State Geologist.

Charnock Fault

The potentially active Charnock fault is located approximately 3.8-miles (6 km) southwest of the Project alignment. The Charnock fault trends northwest-southeast subparallel to the Newport-Inglewood fault zone and the Overland fault. No recent evidence suggests the fault has offset late Pleistocene or Holocene age alluvial deposits and is considered potentially active by the State Geologist.

Townsite Fault

The Townsite fault extends from its intersection with the Centinela Fault in the Centinela Creek, towards the southeast across the Hollywood Park racetrack to Century Boulevard. The Townsite fault may intersect the Project alignment. Although the Townsite fault does not lie within the boundaries of an "Earthquake Fault Zone" as defined by the State of California in the Alquist-Priolo Earthquake Zoning Act (see **Appendix 4.6.3**), its location within the active NIFZ suggests it should be considered active with the potential for surface fault rupture.

Other faults in the area have potential to be active but have little description available in the published literature. These include the Manchester Fault, Inglewood Park Cemetery Fault, and the Centinela Fault. As shown in **Figure 4.6-1**, the Centinela Creek fault, Cemetery fault, and Manchester fault are perpendicular to the Townsite fault.

Surface Fault Rupture

Surface rupture or displacement occurs as a fault breaks the ground surface during a seismic event. Generally, this hazard is anticipated to occur along pre-existing faults. There has been no history of any major surface rupture on any of these fault zones.[33]

33 City of Inglewood *Technical Background Report*, August 2006.

Fault rupture hazard is evaluated to assess the exposure of people or structures to substantial adverse effects, including the risk of loss, injury, or death. The potential for fault surface rupture is generally considered to be significant along “active” faults and to a lesser degree along “potentially active” faults.

The proposed Project does not lie within the boundaries of an "Earthquake Fault Zone" as defined above. The closest Alquist-Priolo Zone to the proposed Project has been established for two portions of the Newport-Inglewood fault zone located approximately 280-feet west of the alignment along North Market Street (Inglewood fault), and approximately 2,750-feet east of the alignment from the intersection of West Manchester Boulevard and Prairie Avenue (Potrero fault).

4.6.4.4 Ground Shaking

Most of Southern California is characterized by seismic activity and is subject to some level of ground shaking as a result of movement along the major active (and potentially active) fault zones that are located in this region. Additionally, as a result of the existing faults within the City and the region, the Project area is seismically active. Ground shaking is a major cause of structural damage from earthquakes. The amount of motion expected at a building or structure site can vary from none to forceful depending upon the distance to the fault, the magnitude of the earthquake, and the local geology. Greater movement can be expected at sites located on poorly consolidated material such as alluvium located near the source of the earthquake epicenter or in response to an earthquake of great magnitude.

The City is underlain by two different types of alluvium soils, undifferentiated late Pleistocene alluvium (Qoa) that is composed of well consolidated and cemented gravel, sand, silt, and clay; and late Holocene alluvium (Qya2) that is composed of unconsolidated and uncemented gravel, sand, silt, and clay. Both of these soil types generally provide poor resistance to ground shaking.[34]

The Project alignment is situated within a seismically active region and would likely experience moderate to severe ground shaking in response to a large-magnitude earthquake occurring on a local or more distant active fault during the expected lifespan of the Project. The potential for significant seismically induced ground shaking in response to an earthquake occurring along a nearby active fault, such as the Newport-Inglewood fault zone, or a regional fault, such as the San Andreas fault zone, is relatively high within the vicinity of the proposed Project.

4.6.4.5 Liquefaction

Liquefaction occurs when vibrations or water pressure within a mass of soil cause the soil particles to lose contact with one another. As a result, the soil behaves like a liquid, has an inability to support weight, and

34 City of Inglewood *General Plan*, “Safety Element” (1995).

can flow down very gentle slopes. This condition is usually temporary and is most often caused by an earthquake vibrating water-saturated fill or unconsolidated soil. Soils that are most susceptible to liquefaction are clean, loose, saturated, and uniformly graded fine-grained sands that lie below the groundwater table within approximately 50 feet below ground surface. Lateral spreading refers to spreading of soils in a rapid fluid-like flow movement similar to water.

Groundwater levels within the City vary greatly due to the existence of the faults, which act as a barrier to water movement.[35] Both the Newport-Inglewood fault and Potrero fault act as barriers to water movement and result in differences in groundwater levels. Groundwater levels near the Project area range from 40 to 173 feet below ground surface.[36]

Based on a review of mapped liquefaction areas on the Inglewood Quadrangle, the proposed Project is not located within areas identified as having a potential for liquefaction. A small area north of Florence Avenue, which was formerly Centinela Creek, is identified as a liquefaction area on the Inglewood Quadrangle.[37] Due to the range in groundwater and previous creek soils in this area, it could be susceptible to liquefaction. However, this area is not within the Project alignment.

Additionally, based on a review of the regional geologic map and subsurface conditions reported in previous geotechnical investigations, and the absence of shallow groundwater, the Pleistocene-age sediments underlying the proposed Project (generally dense silty sand and firm silty clay silts) are not considered prone to liquefaction.

4.6.4.6 Ground Settlement

Loading settlement is associated with weak, sandy, clay unconsolidated soils near the ground surface and is generally induced by the weight of buildings or compaction of soils during earthquake shaking. The only area in the City known to have the potential for such settlement is along the course of the former Centinela Creek, which is due to the unconsolidated native soils and poorly compacted fill placed along the creek bed in the early decades of the century. Structures built in this area either require construction on pilings or require soil compaction to depths of 20 or 30 feet as determined by individual site-soil testing.[38]

35 City of Inglewood General Plan, "Safety Element" (1995).
36 County of Los Angeles, Department of Public Works, "Historical Well Measurement Data," http://dpw.lacounty.gov/general/wells/, accessed December 2020.
37 California Geological Survey, "Earthquake Zones of Required Investigation: Inglewood Quadrangle," March 25, 1999, http://gmw.conservation.ca.gov/SHP/EZRIM/Maps/INGLEWOOD_EZRIM.pdf, accessed August 2018.
38 Metis Environmental Group, Downtown Inglewood and Fairview Heights, Transit Oriented Development Plan Draft Program EIR, "4.L.3 Environmental Setting" (July 2016).

4.6.4.7 Subsidence

Subsidence is a general lowering of the ground surface over a large area that results from extraction of groundwater or oil. There is no historic evidence of subsidence in the City.[39] Groundwater levels near the Project area range from 40 to 173 feet below the ground.[40] The City obtained 26 percent of its water supply (1,764 acre-feet) in 2015[41] from groundwater pumping from the West Coast Groundwater Basin. The amount of water the City can pump from the Basin is limited by a 1961 Order of the Los Angeles Superior Court (the West Coast Basin Judgment or adjudication) to 4,450 acre-feet per year. Generally, the City is entitled to pump up to its maximum allowable extraction right along with any carryover or unused water rights from the previous year and any net leases or exchanges of water rights per agreements with other parties owning those rights.

4.6.4.8 Expansive Soils

Expansive soils contain certain types of clay minerals that shrink or swell as the moisture content changes; the shrinking or swelling can shift, crack, or break structures built on such soils. Arid or semiarid areas with seasonal changes of soil moisture experience a much higher frequency of problems from expansive soils than areas with higher rainfall and more constant soil moisture. Inglewood is in a semiarid region with marked seasonal changes in precipitation: most rain falls in winter, and there is a long dry season in summer and autumn. Therefore, the City's climate is such that a relatively high incidence of soil expansion is expected where soils contain the requisite clay minerals.

The Project alignment is underlain by two different types of alluvium soils, undifferentiated late Pleistocene alluvium (Qoa) that is composed of well consolidated and cemented gravel, sand, silt, and clay; and late Holocene alluvium (Qya^2) that is composed of unconsolidated and uncemented gravel, sand, silt, and clay. These alluvial sediments are composed granular materials (gravel and sand sand) and fine-grained materials (silts and clays). Fine-grained soils, such as silts and clays, may contain variable amounts of expansive clay minerals that can shrink or swell substantially as a result of changes in moisture content. Consequently, the expansion characteristics of soils within the Project area are highly variable.

The presence of potentially expansive clayey soil was not observed in the previous explorations performed within the proximity of the proposed Project alignment. Given the underlying geologic conditions within the area, typically silty to sandy soils, it is not anticipated expansive soils would be encountered within the limits of the proposed Project.

39 City of Inglewood General Plan, "Safety Element" (1995).
40 County of Los Angeles, Department of Public Works, "Historical Well Measurement Data," http://dpw.lacounty.gov/general/wells/, accessed December 2020.
41 City of Inglewood, 2015 Urban Water Management Plan, August 2016.

4.6.4.9 Landslides

Landslides are the downhill movement of masses of earth and rock and are often associated with earthquakes; but other factors, such as the slope, moisture content of the soil, composition of the subsurface geology, heavy rains, and improper grading can influence the occurrence of landslides.

The proposed Project alignment is relatively flat and developed. Sloping areas, such as along the north side of Florence Avenue adjacent to the Downtown Inglewood Metro station are not subject to landslides. According to the California Seismic Hazards Zones Inglewood Quadrangle, the Project alignment does not contain and is not located near any active or historic landslide areas. No historical landslides are known to exist at the proposed Project site or in the proposed Project area (see **Appendix 4.6.3**). The proposed Project alignment is not located within an "Earthquake-Induced Landslide Zone" and not identified as an area that has potential for permanent ground displacements.

4.6.4.10 Other Geologic Hazards

Other potential geologic hazards evaluated which could possibly affect the Project area include slope instability, floods, seiches, and tsunamis. Tsunamis are seismically induced waves generated by sudden movements of the ocean bottom during submarine earthquakes, landslides, or volcanic activity. Seiches are similarly generated but are oscillating waves within bodies of water such as reservoirs, lakes, or bays (see **Appendix 4.6.3**).

The proposed Project is not located within the County of Los Angeles mapped tsunami run-up zone.[42] Similarly, potential seiche inundation would not likely exceed the extent of tsunami run up and no significant reservoirs were identified up gradient within 10-miles from the proposed Project.

4.6.4.11 Groundwater

A review of the Seismic Hazard Zone Report[43] for the Inglewood Quadrangle indicates that the highest historical groundwater level in the area is greater than 50 feet bgs. Groundwater data provided in this document were collected between the early 1900's to the late 1990's.

According to previous investigations in the Project vicinity, groundwater was not encountered within exploratory borings drilled to depths ranging from 20 to 50 ft bgs. However, it is not uncommon for groundwater levels to vary seasonally or for groundwater seepage conditions to develop where none

42 California Department of Conservation, "Los Angeles County Tsunami Inundation Maps," https://www.conservation.ca.gov/cgs/tsunami/maps/los-angeles accessed June 12, 2020.

43 Inglewood Transit Connector, *Technical Memorandum*, Geology and Soils, Geosyntec Consultants, June 25, 2018 (see Appendix 4.6.3.

previously existed, especially in impermeable fine-grained soils which are heavily irrigated or after seasonal rainfall.

4.6.4.12 Paleontological Resources

Review of the scientific literature and geologic mapping, as well as the records search from Natural History Museum of Los Angeles County (LACM), were used to assign paleontological sensitivities following the guidelines of the SVP to the geologic units present within the Project area that would be subject to ground-disturbing activities as older quaternary alluvium (Qoa). Qoa is considered to have a high paleontological sensitivity. A wide variety of Ice Age fossils are known from these sediments across the Los Angeles Basin including multiple specimens belonging to ten taxa known from within two to four miles of the proposed Project vicinity.[44]

4.6.4.13 Adjusted Baseline

This section assumes the Adjusted Baseline Environmental Setting as described in **Section 4.0: Environmental Impact Analysis**, *4.0.5: Adjusted Baseline*. Related to geology and soils, the changes associated with the Adjusted Baseline projects include excavation and construction activities within the HPSP area.

There is no evidence that development in the HPSP would affect the baseline for analysis of geology and soils. No new impacts to geology and soils have been discovered or documented during construction of the Adjusted Baseline projects that would provide additional information on the presence or sensitivity of geology and soils impacts in the area.

4.6.5 THRESHOLDS OF SIGNIFICANCE

Criteria outlined in CEQA Guidelines were used to determine the level of impacts to geology and soils. Appendix G of State CEQA Guidelines indicates that a project would have a significant impact in relation to geology and soils if it were to:

Threshold GEO-1 **Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map, issued by the State Geologist for the area or based on other substantial evidence of a known fault. Refer to Division of Mines and Geology Special Publication 42.**

44 Paleontological Resources Assessment Report, Inglewood Basketball and Entertainment Center, City of Inglewood, California, ESA, May 2019

Threshold GEO-2 **Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking.**

Threshold GEO-3 **Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?**

4.6.6 IMPACT ANALYSIS FOR THE PROPOSED PROJECT

The environmental impact analysis presented below is based on determinations made in the Initial Study (IS) for impacts considered to be potentially significant.

Impact GEO-1: **Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map, issued by the State Geologist for the area or based on other substantial evidence of a known fault?**

The State of California, under the guidelines of the APEFZ, classifies faults as active, potentially active, and not active. The Alquist-Priolo Earthquake Fault Zoning Act requires that geologic investigations be prepared for development sites within Earthquake Fault Zones to demonstrate that the sites are not threatened by surface rupture from future faulting. In addition, if an active fault is found, all structures for human occupancy must be set back a minimum of 50 feet, or a distance demonstrated to be appropriate by the geologic investigation, from the fault to comply.

Further, the City contains both active and potentially active faults, several of which may traverse the proposed Project's guideway and stations.

The proposed APM guideway is approximately 1.6-miles long, would be elevated approximately 60 feet above existing grade, and primarily located within the public right-of-way along Market Street, Manchester Boulevard, and Prairie Avenue with limited encroachments outside of the public roadway for certain project components such as stairways at the planned stations. The proposed APM stations would be elevated structures that are supported by alternating segments of singular columns and dual spans, ranging in size depending on the locations, spacing and guideway configuration. The guideway is dual lane, with each lane approximately 14-feet wide. The total guideway width varies based on the lane separations to accommodate stations and turn-back switches.

The proposed Project guideway and stations do not lie within the boundaries of APEFZ delineated active or potentially active fault as defined by the State of California in the Alquist-Priolo Earthquake Zoning Act.

The nearest APEFZs to the Project include two segments of the Newport-Inglewood fault zone located approximately 280 feet west of the alignment along Market Street (the Inglewood Fault), and approximately 2,750-feet east of the Project alignment from the intersection of Manchester Boulevard and Prairie Avenue (the Potrero Fault). Therefore, a fault hazard evaluation in accordance with the Alquist-Priolo Earthquake Fault Zoning Act is not required and impacts resulting from faults within an APEFZ would be less than significant.

The Project alignment is located in a region that consists of numerous potentially active faults. These include the Townsite Fault, Centinela Creek Fault, Cemetery Fault, and Manchester Fault.

As described above in *Section 4.6.4.3: Faults*, the Townsite Fault extends from its intersection with the Centinela Fault in the Centinela Creek towards the southeast across the Hollywood Park racetrack to Century Boulevard. The Townsite Fault may intersect the Project alignment at various points along the elevated guideway, as well as the Market Street Station and along Manchester Boulevard toward Prairie Avenue in a southeastern direction as shown in **Figure 4.6-2: Location of Active Faults and the APM System**. The intersection begins starting at the northernmost point of the alignment at Market Street, then at Manchester Boulevard, and finally Prairie Avenue.

Points of intersection of the proposed APM alignment with the Townsite Fault could occur at the Market Street/Florence Avenue Station and the guideway near the Maintenance and Storage Facility (MSF) and the Prairie Avenue/Pincay Street Station. Although the Townsite fault is not presently mapped as a designated APEFZ fault, or situated within a delineated APEFZ, its location within the active Newport-Inglewood fault zone and proximity to the Project alignment suggests this fault should be considered active with the potential for fault rupture.[45]

The Market Street/Florence Avenue Station is located between the Centinela Creek Fault approximately 1,750 feet to the northwest and the Cemetery Fault approximately 1,000 feet southeast as shown in **Figure 4.6-2**. In addition, **Figure 4.6-2** shows that the Manchester Fault intersects the guideway on the northeastern side of the MSF and the southern portion of the Prairie Avenue/Pincay Street Station, perpendicular to the Townsite Fault. Although the Centinela Creek, Cemetery, and Manchester faults are not presently mapped as designated APEFZ faults, the Centinela Creek Fault intersects both the Inglewood Fault and Potrero Fault, and the Cemetery and Manchester faults intersect the Potrero Fault. As such, their location within the active Newport-Inglewood fault zone and proximity to the Project alignment suggests these faults should be considered active with the potential for fault rupture.

45 Geosyntec. Fault Rupture Hazard Evaluation in Support of Draft EIR. September 2019.

As a result of the proposed APM guideway and stations potentially overlying active or potentially active faults, impacts would be potentially significant.

The design of the APM guideway, stations, MSF, and other facilities would address the potential effects from any potentially active faults to reduce possible risk or damage. The guideway structure and columns would be designed in conformance with Caltrans MTD 20-8 and 20-10 as discussed above in *Section 4.6.3.2.* Consistent with Caltrans MTD 20-8 and 20-10, columns and other structural components will be located to avoid or minimize fault rupture zones, or designed to take into account potential displacement from a fault offset, dynamic response due to ground shaking, and any other fault-induced hazards, such as creep. Designing the Project in conformance with the 2019 CBC[46], Caltrans guidance, and applicable seismic design criteria as would be required by **Mitigation Measures (MM) GEO-1** through **MM GEO-3** would reduce potential impacts to less than significant.

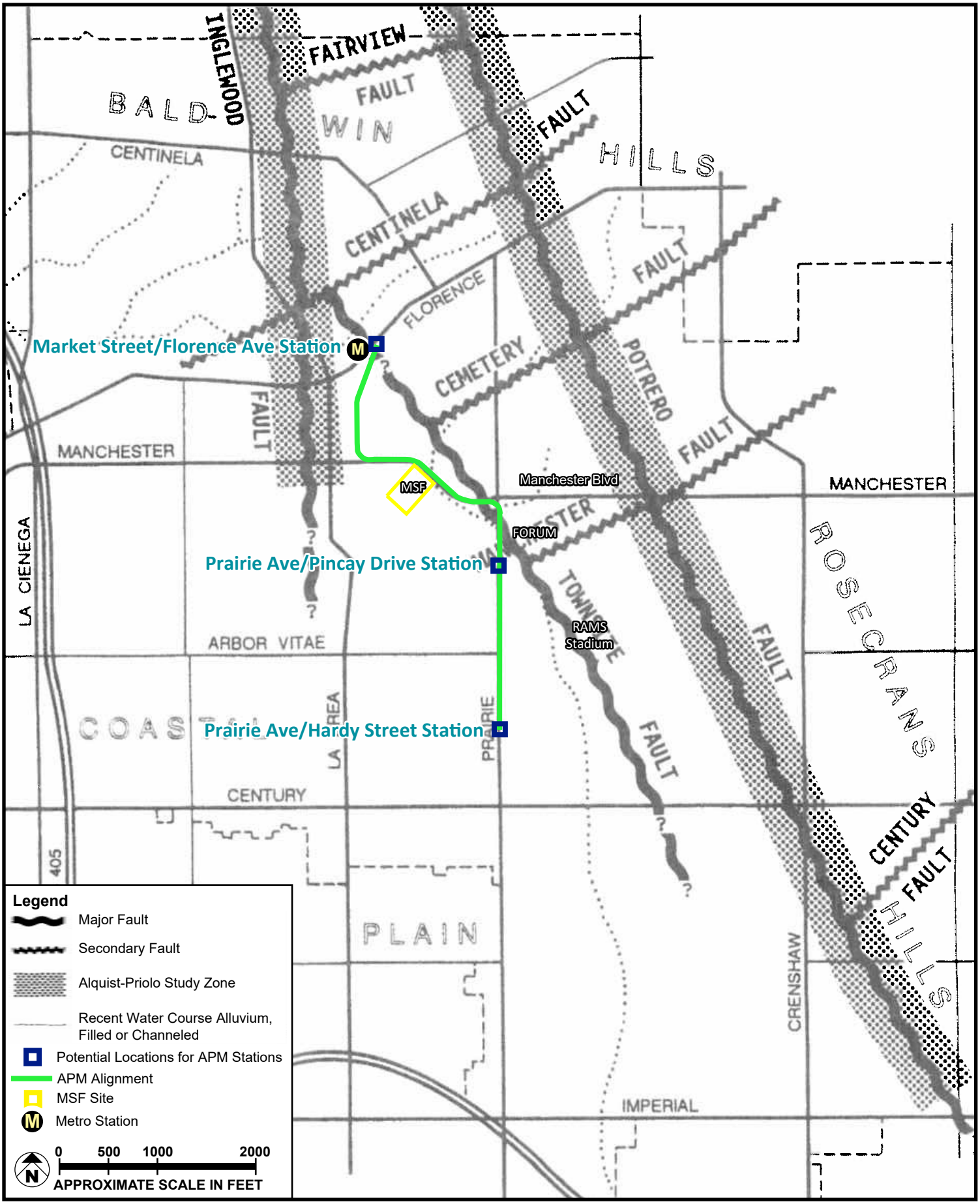
In the event of an earthquake or other natural disaster, the City's emergency evacuation plan would be implemented as an APM System requirement.

The proposed Project MSF site does not lie within the boundaries of APEFZ delineated active or potentially active fault as defined by the State of California in the Alquist-Priolo Earthquake Zoning Act.

The Townsite Fault may intersect the MSF in a southeasterly direction along Manchester Boulevard. The MSF abuts the west side of the Townsite Fault as shown in **Figure 4.6-2.** Although the Townsite fault is not presently mapped as a designated APEFZ fault, or situated within a delineated APEFZ, its location within the active Newport-Inglewood fault zone and proximity to the Project alignment suggests this fault should be considered active with the potential for fault rupture.

In addition, **Figure 4.6-2** shows the MSF is located approximately 3,750 feet south of the Centinela Creek Fault, approximately 500 feet south of the Cemetery Fault, and approximately 1,100 feet north of the Manchester Fault. As mentioned above, although the Centinela Creek, Cemetery, and Manchester faults are not presently mapped as designated APEFZ faults, their location within the active Newport-Inglewood fault zone and proximity to the Project alignment suggests these faults should be considered active with the potential for fault rupture.

46 2019 California Building Standards Code (Cal. Code Regs., Title 24) published July 1, 2019.



SOURCE: City of Inglewood General Plan Safety Element; Meridian Consultants LLC - 2020

FIGURE **4.6-2**

Location of Active Faults and the APM System

208-001-18

As a result of the proposed Project MSF potentially overlying active or potentially active faults, impacts would be potentially significant.

The design of the APM guideway, stations, MSF, and other facilities would address the potential effects from any potentially active faults to reduce possible risk or damage. The guideway structure and columns would be designed in conformance with Caltrans MTD 20-8 and 20-10 as discussed above in *Section 4.6.3.2.* Consistent with Caltrans MTD 20-8 and 20-10, columns and other structural components will be located to avoid or minimize fault rupture zones, or designed to take into account potential displacement from a fault offset, dynamic response due to ground shaking, and any other fault-induced hazards, such as creep. Designing the Project in conformance with the 2019 CBC[47], Caltrans guidance, and applicable seismic design criteria as would be required by **Mitigation Measures (MM) GEO-1** through **MM GEO-3** would reduce potential impacts to less than significant.

The traction power substations (TPSS) sites would be connected to existing power trunk lines and would be up to 20 feet high with an area up to 3,000 SF. Typical necessary equipment in each TPSS would include transformers/rectifiers and switches or breakers. Locations for the TPSS would be adjacent to other proposed components of the APM system and existing electrical trunk lines. Based on initial load requirement analysis, up to two TPSS would be required. One of potential identified TPSS locations include being collocated with the proposed MSF and collocated with the City's Civic Center site on Prairie Avenue. The proposed TPSS sites do not lie within the boundaries of APEFZ delineated active or potentially active fault as defined by the State of California in the Alquist-Priolo Earthquake Zoning Act.

The Townsite Fault would not intersect the TPSSs that are located at the proposed ITF Site. As shown in **Figure 4.6-2**, the Townsite Fault lies approximately a quarter mile northwest of the proposed TPSSs north of the Prairie Avenue/Hardy Street Station. As such, impacts to the TPSSs related to fault rupture would be less than significant with adherence to 2019 CBC[48] and Caltrans guidelines as described above.

The proposed Project would not change the capacity or alignment of the original roadway. In the event of an earthquake or other natural disaster, the City's emergency evacuation plan would be implemented to ensure compliance with all federal, state, and local regulation.

Summary

As discussed previously, the City contains both active and potentially active faults, several of which may traverse the proposed Project's guideway and stations. The proposed Project guideway and stations do not lie within the boundaries of APEFZ delineated active or potentially active fault as defined by the State

47 2019 California Building Standards Code (Cal. Code Regs., Title 24) published July 1, 2019.
48 2019 California Building Standards Code (Cal. Code Regs., Title 24) published July 1, 2019.

of California in the Alquist-Priolo Earthquake Zoning Act. As such, a Project alignment-specific fault hazard evaluation in accordance with the Alquist-Priolo Earthquake Fault Zoning Act is not required and impacts resulting from faults within an APEFZ would be less than significant. However, the Project alignment is located in a region that consists of numerous potentially active faults, including the Townsite fault, Centinela Creek Fault, Cemetery Fault, and Manchester Fault. The Townsite fault may intersect the Project alignment along the elevated guideway, stations, and near the MSF. Although the Townsite, Centinela Creek, Cemetery, and Manchester faults are not presently mapped as designated APEFZ faults, or situated within a delineated APEFZ, their location within the active Newport-Inglewood fault zone and proximity to the Project alignment suggests these faults should be considered active with the potential for fault rupture and impacts would be potentially significant. Designing the Project in conformance with the 2019 CBC[49], Caltrans guidance, and applicable seismic design criteria as would be required by **MM GEO-1** through **MM GEO-3** would reduce these potential impacts to less than significant.

4.6.6.1 Mitigation Measures

The following Mitigation Measures (MMs) are identified to reduce potential impacts related to fault rupture and seismic shaking to less than significant:

MM GEO-1: The proposed Project shall be designed to accommodate fault rupture where present in accordance with applicable Caltrans guidelines, including Memo to Designers 20-8 (Analysis of Ordinary Bridges that Cross Faults), dated January 2013; and Memo to Designers 20-10 (Fault Rupture), dated January 2013, where any portion of a structure falls within an APEFZ, or where any portion of a structure falls within approximately 100 meters (330 feet) of well-mapped active faults, or within 300 meters (1,000 feet) of an un-zoned fault (not in an APEFZ) that is Holocene or younger in age.

Stations and elevated structures for the APM Guideway shall be located to avoid the fault rupture hazard where present with refinement of station and APM Guideway placement worked into final design as needed. Bridge type structures, such as the APM Guideway, will be designed to take into account potential displacement from a fault offset, dynamic response due to ground shaking, and any other fault-induced hazards (e.g., creep) that may occur in accordance with the Caltrans Memorandum to Designers (MTD) 20-8. Caltrans MTD 20-8 defines a method for determining the potential displacement at columns and abutments at fault crossings and designing the superstructure so it can slide without falling.

49 2019 California Building Standards Code (Cal. Code Regs., Title 24) published July 1, 2019.

MM GEO-2: Prior to the start of construction, the location of the anticipated trend of the Townsite Fault shall be further defined to identify and locate active fault traces in the Project area to support adjustments to the Project's final design as needed.

The investigation shall include a fault investigation conducted along the trace of the Townsite Fault to refine its location and assess its activity level where it crosses the APM guideway and stations.

The following methods shall be included in the investigation:

- Aerial photograph analysis;
- Geophysical surveys (e.g., seismic reflection and/or seismic refraction) to refine the location of the Townsite fault and inform subsequent targeted fault hazard exploration as necessary;
- Targeted fault trenching based on the findings of additional geophysical studies to locate the potential Townsite Fault where it crosses the proposed APM alignment; and
- Exploratory drilling and sampling (e.g., hollow stem auger and CPT borings), as necessary, if the trace of the Townsite fault cannot be adequately delineated across the proposed APM alignment through the means of fault trenching.

  Based on the results of these investigations, column placements and facility designs shall be adjusted to accommodate geologic conditions identified. Further, the facilities shall be designed in accordance with applicable Caltrans guidelines including Memo to Designers 20-8 (Analysis of Ordinary Bridges that Cross Faults) and 20-10 (Fault Rupture). Stations/structures shall be located to avoid the fault rupture hazard where present.

  Columns and foundations for the guideway and stations, as well as any other APM facilities shall be located to avoid the fault rupture hazard where present.

  Probabilistic procedures shall follow those outlined in the *Fault Rupture Hazard Evaluation* (**Appendix 4.6.1: Fault Rupture Study**). If further study of the fault rupture is conducted, then procedures as outlined in CGS Note 49[50] shall be followed.

MM GEO-3: The proposed APM system facilities shall be designed in accordance with applicable Caltrans guidelines including Memo to Designers 20-8 (Analysis of Ordinary Bridges that Cross Faults) and 20-10 (Fault Rupture). The response spectra provided in the *Development of Seismic Design Criteria in Support of Draft EIR - Seismic Design Criteria*

50 California Geological Survey, Note 49: Guidelines for Evaluating the Hazard of Surface Fault Rupture, https://www.conservation.ca.gov/cgs/Documents/Publications/CGS-Notes/CGS-Note-49.pdf.

(**Appendix 4.6.2**) shall be considered applicable for both aerial guideway and ancillary structures within each segment of the alignment under the guideway and each station.

Probabilistic procedures also shall follow those outlined Caltrans memo to Designers 20-10 -Fault Rupture, dated January 2013.

Impact GEO-2: Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking?

As a result of the existing faults within the City and the region, the Project area is seismically active. Ground shaking is a major cause of structural damage from earthquakes. The amount of motion expected at a building or structure site can vary from none to forceful depending upon the distance to the fault, the magnitude of the earthquake, and the local geology. Greater movement can be expected at sites located on poorly consolidated material such as alluvium located near the source of the earthquake epicenter or in response to an earthquake of great magnitude.

The proposed Project is situated within a seismically active region and shall likely experience moderate to severe ground shaking in response to a large-magnitude earthquake occurring on a local or more distant active fault during the expected lifespan of the Project. The potential for significant seismically induced ground shaking in response to an earthquake occurring along a nearby active fault, such as the Newport-Inglewood fault zone, or a regional fault, such as the San Andreas fault zone, is relatively high within the vicinity of the proposed Project.

The City is underlain by two different types of alluvium soils, undifferentiated late Pleistocene alluvium (Qoa) that is composed of well consolidated and cemented gravel, sand, silt, and clay; and late Holocene alluvium (Qya2) that is composed of unconsolidated and uncemented gravel, sand, silt, and clay. Both of these soil types generally provide poor resistance to ground shaking.[51]

The proposed APM system (guideway and stations) and the MSF are located within a surface geologic unit designated as “older alluvium (Qoa),” which is described as stiff to hard clay and medium dense to very dense sand, silty sand, clayey sand, and silt. *The Development of Seismic Design Criteria in Support of Draft EIR - Seismic Design Criteria* (**Appendix 4.6.2**) show the distribution of the mean of the time-averaged shear wave velocity within the upper 30 meters (Vs30_mean) in the soils in the areas surrounding the ITC are generally considered to be “very dense soil and soft rock,” which is consistent with generally poor resistance to groundshaking as described above.

51 *City of Inglewood General Plan*, Safety Element, July 1995.

The proposed APM stations would be elevated structures that are supported by alternating segments of singular columns and dual spans, ranging in size from approximately 6-feet by 12-feet to 6-feet by 9-feet in diameter depending on the locations, spacing and guideway configuration. The guideway is dual lanes, with each lane approximately 14-feet wide. The total guideway width varies based on the lane separations to accommodate stations and turn-back switches.

Because the guideway and stations are elevated, these components of the Project would be susceptible to the effect of ground shaking from seismic activity.

Other public agencies, including Caltrans and Metro, have determined that when structures such as those proposed for the guideway and stations are designed, the designs should meet the requirements for "bridges and aerial guideways, the design shall not result in less seismic performance capability than that required by Caltrans." As such, ground motions developed for the ITC Project in accordance with the maximum design event (MDE) level should be compared to the Caltrans design spectrum[52] and the more critical design load should govern.

Portions of the proposed Project, including the guideway and stations would be subject to review by City building officials. Ground motions developed for the ITC Project in accordance with the MDE level should be compared to the 2019 CBC,[53] and the more critical design load should govern. In the case where commercial/residential structures are unrelated to or not connected to the ITC guideway or support buildings directly, the use of 2019 CBC[54] design response spectra may be an appropriate basis for design at the discretion of the design engineer.

Because of the potential for extreme seismic shaking, the impacts would be potentially significant.

The MSF would cover approximately 1.8 acres and would be sized to accommodate the APM rolling stock and operating equipment. The MSF building would be elevated and consist of three levels, occupying a total footprint of approximately 97,400 SF. General dimensions of the MSF building would amount to approximately 195 feet in width (northwest–southeast) and 400 feet in length (northeast–southwest). The minimum clearance for the structure would be 16 feet 6 inches feet above grade, with a maximum height from the ground of approximately 75 feet.

Again, agencies responsible for the construction and operation of transportation facilities such as Caltrans and Metro have determined that to reduce the effects of extreme seismic shaking, ancillary surface facilities, such as the planned stations and the MSF, may be subject to both the code forces normally

52 Caltrans SDC, Version 1.7, April 2013
53 2019 California Building Standards Code (Cal. Code Regs., Title 24, Part 2, Volumes I and II) published July 1, 2019.
54 2019 California Building Standards Code (Cal. Code Regs., Title 24, Part 2, Volumes I and II) published July 1, 2019.

applied to surface buildings as well as those being applied to the transit guideways. Whichever code applies the most critical set of requirements shall apply to the design.[55]

Because of the potential for extreme seismic shaking, the proposed Project's impact would be potentially significant.

The TPSS would be connected to existing power trunk lines and would be up to 20 feet high with an area up to 3,000 SF. Typical necessary equipment in each TPSS would include transformers/rectifiers and switches or breakers. Locations for the TPSS would be adjacent to other proposed components of the APM system and existing electrical trunk lines. Based on initial load requirement analysis, up to two TPSS would be required. One of potential identified TPSS locations include being collocated with the proposed MSF and with the City's Civic Center site on Prairie Avenue.

Substations would be generally be rectangular to accommodate the placement of power equipment. However, different aspect ratios can be considered provided that equipment spacing meets all applicable local codes and the National Electrical Code. The TPSS to be located at the ITF site may be either above or below ground.

Access to substations is also required for personnel to perform maintenance and testing activities. The TPSS substation design should consider parking for approximately four APM ground maintenance vehicles and a loading/unloading zone to maneuver equipment, tools, and materials for maintenance activities. Ramps providing smooth transition over curbs, as applicable, should be provided to enable efficient movement of equipment.

Similar to the MSF facility, the construction and operation of transportation facilities such as Caltrans and Metro have determined that to reduce the effects of extreme seismic shaking, ancillary surface facilities, such as the planned stations and the TPSS sites, may be subject to both the code forces normally applied to surface buildings as well as those being applied to the transit guideways. Whichever code applies the most critical set of requirements shall apply to the design.[56]

The TPSS systems could be susceptible to damage from extreme ground shaking. As such, if the TPSS site were damaged, interruptions in backup power could occur. Such an impact would be potentially significant.

55 2019 California Building Standards Code (Cal. Code Regs., Title 24) published July 1, 2019.
56 2019 California Building Standards Code (Cal. Code Regs., Title 24) published July 1, 2019.

Summary

As discussed above, the Project area is seismically active as a result of the existing faults within the City and the region. Both types of alluvium soils that underlay the City, undifferentiated late Pleistocene alluvium (Qoa) and late Holocene alluvium (Qya2), generally provide poor resistance to ground shaking.[57] The proposed APM system (guideway and stations) and the MSF are located within a surface geologic unit designated as "older alluvium (Qoa)." Because the guideway, stations, and MSF are elevated, they would be extremely susceptible to the effect of ground shaking from seismic activity and ground shaking impact resulting in loss, injury, and death would be potentially significant. Furthermore, the APM system and related support facilities are all susceptible to structural damage from extreme ground shaking events and the interruption to service or backup power could occur, resulting in a potentially significant impact for loss, injury, or death.

Impact GEO-3: Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

A direct effect on a unique paleontological resource would result in the direct damage or destruction of such a resource. Indirect impacts are not specifically caused by a development project but may be a reasonably foreseeable result of such a project. Typical indirect impacts to paleontological resources include the destruction or loss of surface fossils from increased erosion or the non-scientific or unauthorized surface collection or subsurface excavation of a fossil or paleontological site. Following the guidelines of the SVP, a review of the scientific literature and geologic mapping, as well as and the records search from Natural History Museum, were used to assign paleontological sensitivities to the geologic units present in the subsurface of the Project study area that would be subject to ground-disturbing activities.

As noted above, the site is underlain by approximately two feet of artificial fill materials before alluvial soils are encountered. The subsurface sediments of the Project alignment identified as Older Quaternary Alluvium (Qoa) are assigned high paleontological sensitivity, as there is a proven record throughout Los Angeles of containing scientifically significant fossils in this formation. Although no known resources were identified within the Project vicinity from the Natural History Museum search, this does not preclude the possibility that previously unknown buried paleontological resources within the Project alignment could be impacted during construction. The potential to encounter paleontological resources during construction was determined by reviewing the results of the records search, the depth of native versus fill

57 City of Inglewood General Plan, "Safety Element" (1995).

soils, land use history, past disturbances, and the proposed excavation parameters for the proposed Project.

A wide variety of Ice Age fossils are known from the Qoa sediments across the Los Angeles Basin, as discussed above, including multiple specimens belonging to ten taxa known from within 2 to 4 miles of the proposed Project's vicinity. Excavation during construction could impact Qoa determined to have a high sensitivity for fossils.[58] As a result, construction of the proposed Project would have the potential to directly or indirectly destroy a previously unknown unique paleontological resource not identified in the analysis conducted for the proposed Project. This is considered a potentially significant impact.

MM GEO-4. would require that prior to the City's approval of grading permits, a paleontologist meeting the SVP Standards be retained to prepare, design, and implement a paleontology monitoring and mitigation program (MMRP) for the Project consistent with SVP Guidelines. This plan would include education and sensitivity training for construction workers, guidelines for on-site paleontological monitors to issue stop-work orders if fossils are found, procedures for paleontological resource evaluation in the event of discovery, and final reporting procedure guidelines for submission to the City. With implementation of **MM GEO-4**, potential impacts related to paleontological resources would be reduced to less than significant.

4.6.6.2 Mitigation Measures

The following Mitigation Measures (MM) are identified to reduce potential impacts to paleontological resources to less than significant:

MM GEO-4: A qualified paleontologist meeting the SVP standards (SVP, 2010) shall be retained by the project applicant and approved by the City prior to the approval of grading permits. The qualified paleontologist shall:

a) Prepare, design, and implement a monitoring and mitigation program for the Project consistent with Society of Vertebrate Paleontology Guidelines. The Plan shall define pre-construction coordination, construction monitoring for excavations based on the activities and depth of disturbance planned for each portion of the Project Site, data recovery (including halting or diverting construction so that fossil remains can be salvaged in a timely manner), fossil treatment, procurement, and reporting. The Plan monitoring and mitigation program shall be prepared and approved by the City prior to the issuance of the first grading permit. If the qualified paleontologist determines

58 Paleontological Resources Assessment Report, Inglewood Basketball and Entertainment Center, City of Inglewood, California, ESA, May 2019

that the Project-related grading and excavation activity would not affect Older Quaternary Alluvium, then no further mitigation is required.

b) Conduct construction worker paleontological resources sensitivity training at the Project kick-off meeting prior to the start of ground disturbing activities (including vegetation removal, pavement removal, etc.) and would present the Plan as outlined in (a). In the event construction crews are phased or rotated, additional training shall be conducted for new construction personnel working on ground-disturbing activities. The training session shall provide instruction on the recognition of the types of paleontological resources that could be encountered within the Project Site and the procedures to be followed if they are found. Documentation shall be retained by the qualified paleontologist demonstrating that the appropriate construction personnel attended the training.

c) Direct the performance of paleontological resources monitoring by a qualified paleontological monitor (meeting the standards of the SVP, 2010). Paleontological resources monitoring shall be conducted pursuant to the monitoring and mitigation program developed under (a), above. Monitoring activities may be altered or ceased if determined adequate by the qualified paleontologist. Monitors shall have the authority to and shall temporarily halt or divert work away from exposed fossils or potential fossils and establish a 50-foot radius temporarily halting work around the find. Monitors shall prepare daily logs detailing the types of ground disturbing activities and soils observed, and any discoveries.

d) If fossils are encountered, determine their significance, and, if significant, supervise their collection for curation. Any fossils collected during Project-related excavations, and determined to be significant by the qualified paleontologist, shall be prepared to the point of identification and curated into an accredited repository with retrievable storage.

e) Prepare a final monitoring and mitigation report for submittal to the City in order to document the results of the paleontological monitoring. If there are significant discoveries, fossil locality information and final disposition shall be included with the final report which would be submitted to the appropriate repository and the City. The final monitoring report shall be submitted to the City within 90 days of completion of excavation and other ground disturbing activities that could affect Older Quaternary Alluvium.

4.6.6.3 Level of Significance after Mitigation

Implementation of **MM-GEO-1** would prevent impacts by locating the guideway columns to avoid faults where feasible and designing the guideway and columns to account for the effects that may result from fault displacement. In addition, with implementation of **MM GEO-2**, the trend of the Townsite Fault would

be determined through an investigation prior to final design of the Project with the findings dictating column placement and station location to ensure that impacts related to fault rupture would be minimized or avoided. Implementation of **MM GEO-3** would ensure design of APM support facilities to adhere to specific seismic design criteria. As such, significant impacts regarding fault rupture would be reduced to a level that is less than significant.

The compliance of the Project with 2019 CBC[59] and Caltrans advisory design measures would reduce potential impacts related to seismic ground shaking to a less than significant level. In addition, the Project alignment would be consistent with Caltrans requirements for the design of aerial guideways, bridges, and ancillary surface facilities.

Because the Project alignment is located in a seismically active region, some risk related to seismic ground shaking would remain, even with compliance with all applicable regulatory standards and design guidelines. However, compliance with the requirements of the 2019 CBC,[60]City municipal code, and Caltrans for structural design would reduce hazards from strong seismic ground shaking to less than significant.

Implementation of **MM GEO-4** would ensure that paleontological resources would be identified before they are damaged or destroyed and are properly evaluated and treated to reduce potentially significant impacts to less than significant.

4.6.7 CUMULATIVE IMPACTS

Geotechnical impacts related to future development in the City would involve hazards related to site-specific soil conditions, erosion, and ground-shaking during earthquakes. These impacts would be site-specific and would not be common to (nor shared with, in an additive sense) the impacts on other sites. Cumulative development in the area would increase the overall population for exposure to seismic hazards by increasing the number of people potentially exposed. However, with adherence to applicable State and federal regulations, building codes and sound engineering practices, geologic hazards could be reduced to less-than-significant levels. Furthermore, development of each of the related projects and the proposed Project would be subject to existing building codes, uniform site development and construction review standards that are designed to protect public safety. Therefore, cumulative geotechnical impacts would not be cumulatively considerable.

Impacts to paleontological resources related to future development in the City would involve the demolition or destruction of significant paleontological resources. This potential loss of resources is

59 2019 California Building Standards Code (Cal. Code Regs., Title 24) published July 1, 2019.
60 2019 California Building Standards Code (Cal. Code Regs., Title 24) published July 1, 2019.

considered a significant cumulative impact. The proposed Project could contribute to this impact if paleontological resources are located beneath the Project study area and are damaged or destroyed during the excavation process. In that event, the proposed Project contribution to the significant cumulative impact would be cumulatively considerable and impacts would be potentially significant.

4.6.8 CONSISTENCY WITH CITY OF INGLEWOOD GENERAL PLAN

4.6.8.1 Safety Element

Table 4.6-2: Project Consistency with General Plan Safety Element below lists the policy and measures from the City's General Plan Safety Element applicable to the proposed Project:

Table 4.6-2
Project Consistency with General Plan Safety Element

Policies and Measures	Plan Consistency
Policy 1: Provide Measures to reduce seismic impacts.	**Consistent with Mitigation.** The proposed Project is located is a seismically active area. As such, the APM system including the guideway, stations and MSF and other support facilities would be subject to seismic shaking. The Draft EIR identified Mitigation Measures **MM GEO-1**, **MM GEO-2** and **MM GEO-3** to avoid fault rupture from seismic activity and to reduce the effects of seismic shaking on built structures. Implementation of **MM GEO-1** would dictate the location of the APM system where it crosses the identified faults to prevent failure from potential fault rupture and would be consistent with Caltrans Memo to Designers 20-8 and 20-10. With implementation of **MM GEO-2**, the trend of the Townsite Fault would be specified through an investigation prior to Project construction; findings would dictate column placement and station location to ensure that impacts related to fault rupture would be minimized or avoided. Implementation of **MM GEO-3** would ensure design of APM support facilities to adhere to specific seismic design criteria. The Project's compliance with 2019 CBC and Caltrans advisory design measures would reduce potential impacts related to seismic ground shaking to a less than significant level. In addition, the Project alignment would be consistent with Caltrans requirements pertaining to aerial guideways, bridges, and ancillary surface facilities.

Policies and Measures	Plan Consistency
	However, compliance with the requirements of the 2019 CBC, City municipal code, and Caltrans for structural safety would reduce hazards from strong seismic ground shaking to a less than significant level.
Restrict new structures for human occupancy from being constructed across active faults.	**Consistent with Mitigation.** The proposed Project crosses potentially active faults (Townsite Fault). To assure compliance with this policy the Draft EIR identified mitigation measure: **MM GEO-2.** This measure is directed towards the City and would not apply to the proposed Project, as it is a transportation project with no residential component. Implementation of **MM GEO-2** would dictate the location of the APM system where it crosses the Townsite fault to prevent failure from potential fault rupture and would be consistent with Caltrans Memo to Designers 20-8 and 20-10. Implementation of **MM GEO-1**, the trend of the Townsite fault would be specified through an investigation prior to Project construction; findings would dictate column placement and station location to ensure that impacts related to fault rupture would be minimized or avoided.
Require geological and soils engineering investigations in high risk fault areas.	**Consistent with Mitigation.** The proposed Project crosses potentially active faults (Townsite Fault). To assure compliance with this policy the Draft EIR identified mitigation measure: **MM GEO-2.** Implementation of **MM GEO-2** would require the performance a geotechnical investigation prior to Project construction to evaluate localized geological and soils conditions, such as the approximate trend of the Townsite Fault.
Use the latest State-approved edition of the Uniform Building Code and other applicable seismic design information	**Consistent.** The Project's compliance with 2019 CBC and Caltrans advisory design measures would reduce potential impacts related to seismic ground shaking to a less than significant level. In addition, the Project alignment would be consistent with Caltrans requirements pertaining to aerial guideways, bridges, and ancillary surface facilities. Because the Project alignment is located in a seismically active region, some risk related to seismic ground shaking would remain, even with compliance with all applicable regulatory standards and design guidelines. The project would comply with the requirements of the

Policies and Measures	Plan Consistency
	Municipal Code Chapter 11, Article 2 Building Code, which has adopted the has incorporated the most up to date California Building Code.
Require a soils report for new buildings, as well as obtaining or utilizing, when available, geologic drillings or studies, local ground subsidence and elevation studies, geologic-seismic studies, strong motion monitoring, gathering, compiling, and interpreting local and regional geologic seismic data as it becomes available.	**Consistent.** The proposed Project would be subject to review the design by the City and subject to the requirements of the Municipal Code Chapter 11, Article 2 Building Code, which has adopted the has incorporated the most up to date California Building Code.

4.7 GREENHOUSE GAS EMISSIONS

4.7.1 INTRODUCTION

This section of the Draft Environmental Impact Report (Draft EIR) evaluates the significance of the greenhouse gas (GHG) emissions that would be generated by the proposed Inglewood Transit Connector Project (proposed Project).

The section contains: (1) a description of the local setting to establish baseline conditions; (2) a summary of the relationship between GHG emissions and global climate change; (3) an overview of applicable plans, policies, and regulations related to GHG emissions; (4) an assessment of current GHG emissions at the City, State, national, and global levels; (5) a quantitative analysis of future GHG emissions associated with construction and operation of the proposed Project; and (6) an analysis of the consistency of the proposed Project with applicable regulations, plans, and policies to reduce GHGs as set forth by the State of California, South Coast Air Quality Management District (SCAQMD), Southern California Association of Governments (SCAG) and the City of Inglewood (City).

The proposed Project's GHG emissions are considered within the context of the City's planning for the reduction of GHG emissions. The sustainable design features of the proposed Project that would reduce GHG emissions are compared to measures identified in the *Inglewood Energy and Climate Action Plan* to determine the consistency of the proposed Project with the City's plans to reduce GHG emissions.

A quantified estimate of GHG emissions is provided for both construction and operations of each phase of the proposed Project. GHG emissions were analyzed using a variety of modeling techniques and are detailed within: **Appendix 4.2.1:** *Air Quality and Heath Risk Assessment Technical Report for the Inglewood Transit Connector Project*, RCH Group, November 2020.

Please see **Section 8.0** for a glossary of terms, definitions, and acronyms used in this Draft EIR.

4.7.2 OVERVIEW OF GREENHOUSE GAS EMISSIONS

4.7.2.1 Global Context

Global climate change refers to changes in average climatic conditions on Earth as a whole, including changes in temperature, wind patterns, precipitation and storms. Historical records indicate that global climate changes have occurred in the past due to natural phenomena; however, current data increasingly indicate that the current global conditions differ from past climate changes in rate and magnitude. Global climate change attributable to anthropogenic (human) GHG emissions is currently one of the most important and widely debated scientific, economic and political issues in the United States and the world.

The extent to which increased concentrations of GHGs have caused or will cause climate change and the appropriate actions to limit and/or respond to climate change are the subject of significant and rapidly evolving regulatory efforts at the federal and State levels of government.

GHGs are global pollutants that have long atmospheric lifetimes (1 year to several thousand years). GHGs persist in the atmosphere for a long enough time to be dispersed around the globe. Although the exact lifetime of any particular GHG molecule depends on multiple variables and cannot be pinpointed, more CO_2 is currently emitted into the atmosphere than is avoided or sequestered. CO_2 sinks, or reservoirs, include vegetation and the ocean, which absorb CO_2 through photosynthesis and dissolution, respectively. These are two of the most common processes of CO_2 sequestration. Of the total annual human-caused CO_2 emissions, approximately 54 percent is sequestered within a year through ocean uptake, northern hemisphere forest regrowth, and other terrestrial sinks; the remaining 46 percent of human-caused CO_2 emissions are stored in the atmosphere.

Similarly, the effects of GHGs are borne globally (sea-level rise, hurricanes, droughts, etc.), as opposed to the localized air quality effects of criteria air pollutants and toxic air contaminants (TACs). The quantity of GHGs that it takes to ultimately result in climate change is not precisely known, but that quantity is enormous. No single project would be expected to measurably contribute to a noticeable incremental change in the global average temperature, or to global, local, or microclimates. However, it is the combined GHG contributions per project that create an impact.

Not all GHGs possess the same capacity to induce atmospheric warming; as a result, the warming contribution of a GHG is commonly quantified in the common unit of carbon dioxide equivalent (CO_2e) over a 100-year period, by applying the appropriate global warming potential (GWP) value. GHGs with lower emissions rates than carbon dioxide (CO_2) may still contribute to climate change because they are more effective at absorbing outgoing infrared radiation than carbon dioxide.[1] By using the applicable GWP for each GHG, project-related emissions can be tabulated in the common unit of metric tons per year carbon dioxide equivalent (CO_2e). GWP ratios are provided by the Intergovernmental Panel on Climate Change (IPCC). Historically, GHG emission inventories were calculated using the GWPs from the IPCC's Second Assessment Report (SAR), published in 1996. The IPCC has since updated the GWP values based

1 The measure of carbon dioxide equivalent (CO_2e) is used to account for the different potentials of GHGs to absorb infrared radiation. This potential, known as the global warming potential (GWP) of a GHG, is dependent on the lifetime, or persistence, of the gas molecule in the atmosphere.

on the latest science in its Fourth Assessment Report (AR4)[2] and Fifth Assessment Report (AR5),[3] published in 2007 and 2014, respectively. California Air Resources Board (CARB) uses the AR4 GWPs in the Statewide GHG emissions inventory,[4] in the current Climate Change Scoping Plan,[5] and in the current version of the California Emissions Estimator Model (CalEEMod)[6] that is used to calculate CO_2e values for construction as well as operations for existing and proposed Project build-out conditions.

Methane (CH_4) and nitrous oxide (N_2O) are generally much lower than those of carbon dioxide (CO_2) and are associated with anaerobic microbial activity resulting from agricultural practices, flooded soils, and landfills. Methane and nitrous oxide have approximately 23 and 296 times the GWP of carbon dioxide, respectively.

4.7.2.2 Effects of Global Climate Change

The scientific community's understanding of the fundamental processes responsible for global climate change has improved over the past decade, and its predictive capabilities are advancing. However, there remain scientific uncertainties in, for example, predictions of local effects of climate change, occurrence, frequency, and magnitude of extreme weather events, effects of aerosols, changes in clouds, shifts in the intensity and distribution of precipitation, and changes in oceanic circulation. Due to the complexity of and inability to accurately model Earth's climate system, the uncertainty surrounding climate change may never be completely eliminated. Nonetheless, the IPCC's Fifth AR5[7] states that is extremely likely that the dominant cause of the observed warming since the mid-20th century is the anthropogenic increase in GHG concentrations.[8] A report from the National Academy of Sciences concluded that 97 to 98 percent of

2 Intergovernmental Panel on Climate Change, 2007. *Synthesis Report. Contribution of Working Groups I, II and III to the Fourth Assessment Report of the Intergovernmental Panel on Climate Change*. Available: https://www.ipcc.ch/assessment-report/ar4/. Accessed August 11, 2020.

3 Intergovernmental Panel on Climate Change, 2014. *Synthesis Report. Contribution of Working Groups I, II and III to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change*. Available: www.ipcc.ch/report/ar5/syrhttps:/. Accessed August 11, 2020.

4 Intergovernmental Panel on Climate Change, 2014. *Synthesis Report. Contribution of Working Groups I, II and III to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change*. Available: www.ipcc.ch/report/ar5/syrhttps:/. Accessed August 4, 2020.

5 California Air Resources Board, 2017. *California's 2017 Climate Change Scoping Plan: The strategy for achieving California's 2030 greenhouse gas target*. Available: www.arb.ca.gov/cc/scopingplan/scoping_plan_2017.pdf. Accessed August 4, 2020.

6 California Emissions Model (CalEEMod®), http://www.aqmd.gov/caleemod/home. Accessed August 4, 2020

7 Intergovernmental Panel on Climate Change, 2014. *Synthesis Report. Contribution of Working Groups I, II and III to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change*. Available: www.ipcc.ch/report/ar5/syrhttps:/. Accessed August 11, 2020.

8 Intergovernmental Panel on Climate Change, 2014. *Synthesis Report. Contribution of Working Groups I, II and III to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change*. Available: www.ipcc.ch/report/ar5/syrhttps:/. Accessed August 4, 2020.

the climate researchers most actively publishing in the field support the tenets of the IPCC in that climate change is very likely caused by human (i.e., anthropogenic) activity.[9]

The Fourth California Climate Change Assessment (AR4),[10] found that the potential impacts in California due to global climate change include: loss in snow pack; sea-level rise; more extreme heat days per year; more high ozone days; more extreme forest fires; more severe droughts punctuated by extreme precipitation events; increased erosion of California's coastlines and sea water intrusion into the Sacramento and San Joaquin Deltas and associated levee systems; and increased pest infestation.[11] The Fourth Assessment's findings are consistent with climate change studies published by the California Natural Resources Agency (CNRA) since 2009, starting with the California Climate Adaptation Strategy 10 as a response to the Governor's Executive Order S-13-2008.[12] In 2014, the CNRA rebranded the first update of the 2009 adaptation strategy as the Safeguarding California Plan.[13] The 2018 update to Safeguarding California Plan identifies hundreds of ongoing actions and next steps State agencies are taking to safeguard Californians from climate impacts within a framework of 81 policy principles and recommendations.[14]

Temperature Increase

The primary effect of adding GHGs to the atmosphere has been a rise in the average global temperature. The impact of human activities on global temperature is readily apparent in the observational record. Since 1895, the contiguous US has observed an average temperature increase of 1.5 degrees Fahrenheit (°F) per century. The last 5-year period (2014–2018) is the warmest on record for the contiguous US,[15] while the

9 Anderegg, William R. L., J.W. Prall, J. Harold, S.H., Schneider, 2010. Expert Credibility in Climate Change, Proceedings of the National Academy of Sciences of the United States of America. 2010; 107:12107-12109.

10 Intergovernmental Panel on Climate Change, 2007. *Synthesis Report. Contribution of Working Groups I, II and III to the Fourth Assessment Report of the Intergovernmental Panel on Climate Change*. Available: https://www.ipcc.ch/assessment-report/ar4/. Accessed August 11, 2020.

11 California Governor's Office of Planning and Research, Scripps Institution of Oceanography, CEC, California Public Utilities Commission. 2018. *Statewide Summary Report. California's Fourth Climate Change Assessment*. Publication number: SUMCCCA4-2018-013. Available: http://www.climateassessment.ca.gov/state/docs/20190116-StatewideSummary.pdf. Accessed August 6, 2020.

12 California Office of the Governor, California Executive Order S-13-08 Requiring State Adaptation Strategy, November 14, 2008.

13 California Natural Resources Agency, 2014. *Safeguarding California: Reducing Climate Risk, an Update to the 2009 California Climate Adaptation Strategy*. Available: http://resources.ca.gov/climate/safeguarding/. Accessed August 4, 2020.

14 California Natural Resources Agency, 2018. *Safeguarding California Plan: 2018 Update*. Available: http://resources.ca.gov/climate/safeguarding/

15 National Oceanic and Atmospheric Association, Assessing the US Climate in 2018. https://www.ncei.noaa.gov/news/national-climate-201812. Accessed April 25, 2019. Published February 6, 2019

20 warmest years have occurred over the past 22-year period.[16] The Fourth Assessment (AR4)[17] indicates that average temperatures in California could rise 5.6°F to 8.8°F by the end of the century, depending on the global trajectory of GHG emissions. According to the Cal-Adapt website, the portion of the State in which the Project area is located could result in an average increase in temperature of approximately 4.2° to 6.9°F by 2070–2090, compared to the baseline period of 1961–1990.[18]

With climate change, extreme heat conditions and heat waves are predicted to impact larger areas, last longer, and have higher temperatures. Heat waves, defined as three or more days with temperatures above 90°F, are projected to occur more frequently by the end of the century. Extreme heat days and heat waves can negatively impact human health. Heat-related illness includes a spectrum of illnesses ranging from heat cramps to severe heat exhaustion and life-threatening heat stroke.[19]

Wildfires

The hotter and dryer conditions expected with climate change will make forests more susceptible to extreme wildfires. One study found that, if GHG emissions continue to rise, the frequency of extreme wildfires burning over approximately 25,000 acres would increase by nearly 50 percent, and the average area burned Statewide each year would increase by 77 percent, by the year 2100. In the areas that have the highest fire risk, wildfire insurance is estimated to see costs rise by 18 percent by 2055 and the fraction of property insured would decrease.[20]

Air Quality

Higher temperatures, conducive to air pollution formation, could worsen air quality in California and make it more difficult for the State to achieve air quality standards. Climate change may increase the concentration of ground-level ozone in particular, which can cause breathing problems, aggravate lung diseases such as asthma, emphysema, chronic bronchitis, and cause chronic obstructive pulmonary disease (COPD) but the magnitude of the effect, and therefore, its indirect effects, are uncertain. Emissions

16 Climate Central, 2019. Available: https://www.climatecentral.org/gallery/maps/2018-global-temp-review-land-ocean. Accessed April 25, 2019. Published February 6, 2019.

17 Intergovernmental Panel on Climate Change, 2007. *Synthesis Report. Contribution of Working Groups I, II and III to the Fourth Assessment Report of the Intergovernmental Panel on Climate Change*. Available: https://www.ipcc.ch/assessment-report/ar4/. Accessed August 11, 2020.

18 Cal-Adapt, "Climate Tools," Maps of Projected Changes, Available: https://cal-adapt.org/tools/. Accessed October 19, 2020.

19 California Environmental Protection Agency, 2013. *Preparing California for Extreme Heat: Guidance and Recommendations*. Available: https://toolkit.climate.gov/reports/preparing-california-extreme-heat-guidance-and-recommendations.

20 Westerling, Anthony LeRoy. (2018). Wildfire Simulations for the Fourth California Climate Assessment: Projecting Changes in Extreme Wildfire Events with a Warming Climate. California's Fourth Climate Change Assessment, California Energy Commission. Publication number: CCCA4-CEC-2018-014.

from wildfires can lead to excessive levels of particulate matter, ozone, and volatile organic compounds.[21] Additionally, severe heat accompanied by drier conditions and poor air quality could increase the number of heat-related deaths, illnesses, and asthma attacks throughout the State.[22]

Precipitation and Water Supply

There is a high degree of uncertainty with respect to the overall impact of global climate change on future water supplies in California. Studies indicate considerable variability in predicting precise impacts of climate change on California hydrology and water resources. Increasing uncertainty in the timing and intensity of precipitation will challenge the operational flexibility of California's water management systems. Warmer, wetter winters would increase the amount of runoff available for groundwater recharge; however, this additional runoff would occur at a time when some basins are either being recharged at their maximum capacity or are already full. Conversely, reductions in spring runoff and higher evapotranspiration because of higher temperatures could reduce the amount of water available for recharge.[23]

Hydrology and Sea-Level Rise

Climate changes could potentially affect: the amount of snowfall, rainfall and snow pack; the intensity and frequency of storms; flood hydrographs (flash floods, rain or snow events, coincidental high tide and high runoff events); sea-level rise and coastal flooding; coastal erosion; and the potential for salt water intrusion. Sea-level rise can be a product of global warming through two main processes: expansion of sea water as the oceans warm, and melting of ice over land. A rise in sea levels could result in coastal flooding and erosion and could jeopardize California's water supply. Sea level could rise as much as 2 feet along most of the US coastline. Increased storm intensity and frequency could affect the ability of flood-control facilities, including levees, to handle storm events.[24]

Agriculture

California has a massive agricultural industry that represents 11.3 percent of total US agricultural revenue. Higher carbon dioxide levels can stimulate plant production and increase plant water-use efficiency. However, a changing climate presents significant risks to agriculture due to "potential changes to water

21 Kenward, A, et al. (2013). *Wildfires and Air Pollution: The Hidden Health Hazards of Climate Change*. Climate Central. Available: http://assets.climatecentral.org/pdfs/WildfiresAndAirPollution.pdf.

22 California Environmental Protection Agency, 2013. *Preparing California for Extreme Heat: Guidance and Recommendations*. Available: https://toolkit.climate.gov/reports/preparing-california-extreme-heat-guidance-and-recommendations.

23 California Natural Resources Agency, 2014. *Safeguarding California: Reducing Climate Risk, an Update to the 2009 California Climate Adaptation Strategy*. Available: http://resources.ca.gov/climate/safeguarding/.

24 California Natural Resources Agency, 2014. *Safeguarding California: Reducing Climate Risk, an Update to the 2009 California Climate Adaptation Strategy*. Available: http://resources.ca.gov/climate/safeguarding/.

quality and availability; changing precipitation patterns; extreme weather events including drought, severe storms, and floods; heat stress; decreased chill hours; shifts in pollinator lifecycles; increased risks from weeds, pest and disease; and disruptions to the transportation and energy infrastructure supporting agricultural production."[25]

Ecosystems and Wildlife

Increases in global temperatures and the potential resulting changes in weather patterns could have ecological effects on a global and local scale. Increased concentrations of GHGs are likely to accelerate the rate of climate change. Scientists expect that the average global surface temperature could rise by 2–11.5°F (1.1–6.4°C) by 2100, with significant regional variation.[26] Soil moisture is likely to decline in many regions, and intense rainstorms are likely to become more frequent. With climate change, ecosystems and wildlife will be challenged by the spread of invasive species, barriers to species migration or movement in response to changing climatic conditions, direct impacts to species health, and mismatches in timing between seasonal life-cycle events such as species migration and food availability.[27]

4.7.2.3 Climate Change Effects for California

In 2016, the CNRA released Safeguarding California: Implementation Action Plans[28] in accordance with Executive Order B-30-15,[29] identifying a lead agency to lead adaptation efforts in each sector. In accordance with the 2009 California Climate Adaptation Strategy,[30] the California Energy Commission (CEC) was directed to develop a website on climate change scenarios and impacts that would be beneficial for local decision makers. The information provided on the Cal-Adapt website[31] represents a projection of potential future climate scenarios comprised of local average values for temperature, sea-level rise, snowpack and other data representative of a variety of models and scenarios, including potential social and economic factors.

26 National Research Council, 2010. *Advancing the Science of Climate Change*. Available: http://dels.nas.edu/resources/static-assets/materials-based-on-reports/reports-in-brief/Science-Report-Brief-final.pdf.

26 National Research Council, 2010. *Advancing the Science of Climate Change*. Available: http://dels.nas.edu/resources/static-assets/materials-based-on-reports/reports-in-brief/Science-Report-Brief-final.pdf.

27 California Natural Resources Agency, 2014. *Safeguarding California: Reducing Climate Risk, an Update to the 2009 California Climate Adaptation Strategy*. Available: http://resources.ca.gov/climate/safeguarding/.

28 California Natural Resources Agency, *Safeguarding California: Implementation Action Plans*, Available: https://resources.ca.gov/CNRALegacyFiles/docs/climate/safeguarding/Safeguarding%20California-Implementation%20Action%20Plans.pdf.

29 California Office of the Governor, California EO B-30-15: Establishing 2030 CA emissions target, Adaptation initiatives. April 29, 2015.

30 California Natural Resources Agency, 2009 *California Climate Adaptation Strategy, A Report to the Governor of the State of California in Response to Executive Order S-13-2008*. https://resources.ca.gov/CNRALegacyFiles/docs/climate/Statewide_Adaptation_Strategy.pdf

31 Cal-Adapt. Available: http://cal-adapt.org.

Climate change could affect environmental conditions in California in a variety of ways. One effect of climate change is rising sea levels. Sea levels along the California coast rose approximately 7 inches during the last century, and they are predicted to rise an additional 7 to 22 inches by 2100, depending on the future levels of GHG emissions. The effects of a rise in sea level could include increased coastal flooding, saltwater intrusion (especially a concern in the low-lying Sacramento–San Joaquin Delta, where pumps delivering potable water to Southern California could be threatened), and disruption of wetlands.

As the State's climate changes over time, the range of various plant and wildlife species could shift or be reduced, depending on the favored temperature and moisture regimes of each species. In the worst cases, some species would become extinct or be extirpated from the State if suitable conditions are no longer available. Additional concerns associated with climate change include a reduction in the snowpack, leading to less overall water storage in the mountains (the largest "reservoir" in the State), and increased risk of wildfires caused by changes in rainfall patterns and plant communities. Changes in the climate can also impact California's weather patterns and rainfall, causing droughts in certain areas and flooding in others.

4.7.2.4 Sources of Greenhouse Gas Emissions

GHGs are the result of both natural and anthropogenic activities. With respect to anthropogenic activities, motor vehicle travel, air travel, consumption of fossil fuels for power generation, industrial processes, heating and cooling, landfills, agriculture, and wildfire are the primary sources of GHG emissions. Additionally, land use decisions can affect the generation of GHG emissions from multiple sectors, resulting in direct or indirect GHG emissions. For example, electricity consumed in the lighting and heating of buildings is an indirect source of GHG emissions because it requires electricity from power plants, which emits GHGs directly into the atmosphere. Conversely, tailpipe emissions from the use of vehicles generate direct GHG emissions.

GHGs are a group of emissions that include CO_2, CH_4, N_2O, HFCs, PFCs, SF_6, and nitrogen trifluoride (NF_3). Carbon dioxide is the most abundant GHG. As Stated above, other GHGs are less abundant, but have higher global warming potential than CO_2. Thus, emissions of other GHGs are frequently expressed in the equivalent mass of CO_2; denoted as CO_2e. A general description of GHGs discussed is provided in **Table 4.7-1: Description of Identified Greenhouse Gases.**

Table 4.7-1
Description of Identified Greenhouse Gases

GHG	General Description
Carbon Dioxide (CO_2)	An odorless, colorless GHG that has both natural and anthropocentric sources. Natural sources include the following: decomposition of dead organic matter; respiration of bacteria plants, animals, and fungus; evaporation from oceans; and volcanic outgassing. Anthropogenic (human caused) sources of CO_2 are burning coal, oil, natural gas, and wood.
Methane (CH_4)	A flammable gas and is the main component of natural gas. When one molecule of CH_4 is burned in the presence of oxygen, one molecule of CO_2 and two molecules of water are released. A natural source of CH_4 is the anaerobic decay of organic matter. Geological deposits, known as natural gas fields, also contain CH_4, which is extracted for fuel. Other sources are from landfills, fermentation of manure, and cattle.
Nitrous Oxide (N_2O)	A colorless GHG. High concentrations can cause dizziness, euphoria, and sometimes slight hallucinations. N_2O is produced by microbial processes in soil and water, including those reactions which occur in fertilizer containing nitrogen. In addition to agricultural sources, some industrial processes (fossil fuel-fired power plants, nylon production, nitric acid production, and vehicle emissions) also contribute to its atmospheric load. It is used in rocket engines, race cars, and as an aerosol spray propellant.
Hydrofluorocarbons (HFCs)	Chlorofluorocarbons (CFCs) are gases formed synthetically by replacing all hydrogen atoms in CH_4 or ethane (C_2H_6) with chlorine and/or fluorine atoms. CFCs are nontoxic, nonflammable, insoluble, and chemically unreactive in the troposphere (the level of air at Earth's surface). CFCs were first synthesized in 1928 for use as refrigerants, aerosol propellants, and cleaning solvents. Because they destroy stratospheric ozone, the production of CFCs was stopped as required by the Montreal Protocol in 1987. HFCs are synthetic man-made chemicals that are used as substitute for CFCs as refrigerants. HFCs deplete stratospheric ozone, but to a much lesser extent than CFCs.
Perfluorinated Chemicals (PFCs)	PFCs have stable molecular structures and do not break down through the chemical processes in the lower atmosphere. High-energy ultraviolet rays about 60 kilometers above Earth's surface are able to destroy the compounds. PFCs have very long lifetimes, between 10,000 and 50,000 years. Two common PFCs are tetrafluoromethane and hexafluoroethane. The two main sources of PFCs are primary aluminum production and semi-conduction manufacturing.
Sulfur Hexafluoride (SF_6)	An inorganic, odorless, colorless, nontoxic, and nonflammable gas. SF_6 is used for insulation in electric power transmission and distribution equipment, in the magnesium industry, in semi-conductor manufacturing, and as a tracer gas for leak detection.
Nitrogen Trifluoride (NF_3)	An inorganic, nontoxic, odorless, nonflammable gas. NF_3 is used in the manufacture of semiconductors, as an oxidizer of high energy fuels, for the preparation of tetrafluoro hydrazine, as an etchant gas in the electronic industry, and as a fluorine source in high power chemical lasers.

[a] *GHGs identified in this table are ones identified in the Kyoto protocol and other synthetic gases recently added to the IPCC's Fifth Assessment Report.*

4.7.3 METHODOLOGY

4.7.3.1 Methodologies for Evaluating Significance

GHG impacts are exclusively cumulative impacts; there are no non-cumulative GHG emission impacts from a climate change perspective.[32]

It is the accumulation of GHGs in the atmosphere that may result in global climate change. Climate change impacts are cumulative in nature, and thus no typical single project would result in emission of such a magnitude that it, in and of itself, would be significant on a project basis. A typical single project's GHG emission will be small relative to the total global or even Statewide GHG emissions. Thus, the analysis of significance of potential impacts from GHG emissions related to a single project is already representative of long-term impacts on a cumulative basis.

As such, the assessment of significance is based on a determination of whether the GHG emissions from the proposed Project represent a cumulatively considerable contribution to global climate change. The analysis of the Project's GHG emissions consists of a quantitative analysis of the GHG emissions generated by the Project and a qualitative analysis of the Project's consistency with adopted GHG-related legislation, plans, and policies. This approach is in accordance with CEQA Guidelines Section 15064.4(a), which affirms the discretion of a lead agency to determine, in the context of a particular project, whether to use quantitative and/or qualitative methodologies to determine the significance of a project's impacts.

4.7.3.1 Emissions Inventory Modeling

Project development would generate GHG emissions from a number of individual sources during both construction and post-construction (operational) use of the proposed Project. Intermittent, short-term construction emissions that occur from activities such as demolition, site-grading, construction, paving, and architectural coatings were evaluated. Regulatory models used to estimate GHG impacts include:

- CARB's EMFAC[33] emissions inventory model. EMFAC is the latest emission inventory model that calculates emission inventories and emission rates for motor vehicles operating on roads in California. This model reflects CARB's current understanding of how vehicles travel and how much they emit. EMFAC can be used to show how California motor vehicle emissions have changed over time and are projected to change in the future.

32 California Air Pollution Control Officers Association, CEQA & Climate Change: Evaluating and Addressing Greenhouse Gas Emissions from Projects Subject to the California Environmental Quality Act, January 2008, p. 35, Accessed August 2020 at: http://www.capcoa.org/wp-content/uploads/2012/03/CAPCOA-White-Paper.pdf.

33 California Air Resources Board, *EMFAC2017 User's Guide*, March 1, 2018, Accessed July 23, 2020 at: https://ww3.arb.ca.gov/msei/downloads/emfac2017-volume-i-users-guide.pdf and https://www.arb.ca.gov/emfac/2017/.

- The California Emissions Estimator Model (CalEEMod),[34] is the CARB–approved computer program model recommended by SCAQMD for use in the quantification of air quality and GHG emissions. CalEEMod was developed by SCAQMD, with input from other California air districts. CalEEMod utilizes widely accepted models for emissions estimates combined with appropriate data that can be used if site-specific information is not available. For example, CalEEMod incorporates USEPA-developed emission factors; CARB's on-road and off-road equipment emission models, such as EMFAC and OFFROAD; and studies commissioned by other California agencies, such as the California Energy Commission and CalRecycle.

4.7.3.2 Construction

The proposed Project Construction Scenarios are provided in **Appendix 3.0.4: Construction Scenario** and were used to estimate construction GHG associated with the proposed Project.

Construction of the proposed Project would have the potential to temporarily emit GHG emissions through the use of heavy-duty construction equipment and through vehicle trips generated from workers and haul trucks traveling to and from the proposed Project carrying demolition debris, building material and soils.

Construction Schedule

Pre-construction of the proposed Project would begin in late 2021 with demolition activities starting early 2022. Construction of the proposed Project would occur over approximately 45 months, from approximately early 2022 through mid-2026. The phasing would include:

- **Phase 1** would include, but not be limited to, demolition of buildings and site improvements on properties acquired for construction of the Project and the beginning of construction of the MSF. The properties where existing buildings and site improvements will be demolished include at the existing retail commercial center at Market Street and Regent Street (CVS plaza), the commercial buildings located at 500 and 501 E. Manchester Avenue (retail commercial site and gas station buildings), and the commercial building at 150 S. Market Street on the northeast corner of Manchester and Market Street. Phase 1 would include utility relocations, if required, construction of cast-in-place (CIP) columns and slabs, foundations for the initial construction of the MSF facility. After demolition, the remaining asphalt flatwork areas at 500 E. Manchester (retail commercial site), the commercial plaza at Market Street and Regent Street (CVS Plaza) and the commercial building at 150 S. Market Street will provide suitable space for construction staging, including but not limited to, space for equipment storage, material staging and storage, contractor jobsite trailers, and on-site parking for construction staff throughout the entire project duration. The first phase of construction would occur between approximately 2022 and 2023.
- **Phase 2** would include activities to enable the construction sequence of the guideway along Prairie Avenue from the Hardy Street intersection to Manchester Boulevard including the demolition of

34 California Emissions Model (CalEEMod®), http://www.aqmd.gov/caleemod/home. Accessed August 4, 2020

sidewalks, roadways and landscaping as needed, utility relocations, if necessary, foundations, CIP columns, straddle bents and the precast trapezoidal troughs and girders, and the construction of the MSF. The second phase of construction would occur between approximately 2023 and 2025.

- **Phase 3** would include construction of an above-ground passenger access walkway from the Market Street/Florence Avenue Station to the Metro Crenshaw/LAX Line Downtown Inglewood Station, property acquisitions, building demolition, utility relocation (if necessary), foundations, CIP columns, straddle bents and the precast trapezoidal troughs and girders. This phase includes site work completion of the MSF. The third phase of construction would occur between approximately 2024 and 2026.
- **Phase 4** would include completion of the aerial guideway construction elements including the installation of the operation and control systems, track work, station platform equipment and systems, completion of the TPSSs, testing and commissioning of the APM trains, completion of all surface construction activities including electrical, mechanical and utilities energizations, and all surface parking lots. Phase 4 will also include final roadway improvements and modifications, and re-striping of streets as required. The fourth phase of construction would occur between approximately 2022 and 2026.

Construction activity would occur 24-hours a day seven days a week with primarily heavy construction activities (those involving large equipment use on site) would occur over a 16 hour/day schedule with two shifts, either a morning shift from approximately 7:00 AM to 3:00 PM and an evening shift from approximately 3:00 PM to 11:00 PM, or a morning shift from approximately 7:00 AM to 3:00 PM and a night shift from approximately 11:00 PM to 7:00 AM. The night shift would be used for material deliveries, export of soil and debris and other light construction activities.

Combinations of these shifts would be referred to "Morning/Evening" or "Morning/Night." Other minimal construction work could occur during other hours at a reduced intensity. Delivery of construction materials would occur during the night shift, as would most lane closures.

4.7.3.3 Operation

Analysis of the Project's operational emissions considers three types of sources: 1) area; 2) energy; 3) solid waste; 4) water and wastewater; and 5) mobile. A description of the proposed Project's various operational components is detailed in **Section 3.5: Project Characteristics**.

Area

The operational area emissions from the proposed Project were estimated using the CalEEMod[35] software. Area source emissions associated with normal operations for the proposed Project include on-site activities and upkeep including landscaping equipment. The emissions were estimated using

35 CalEEMod, http://www.caleemod.com/.

CalEEMod, based on the size of the proposed Project stationary uses (MSF and stations), and the GHG emission factors for fuel combustion.

Energy

The operational energy emissions from the proposed Project were estimated using the CalEEMod[36] software and Southern California Edison's (SCE) average CO2e intensity factors. Energy source emissions are generated as a result of activities associated with the MSF and stations which would utilize electricity and natural gas utility infrastructure. Moreover, electricity will be used for propulsion of the APM system. Propulsion power (i.e. the power to run the APM train on a guideway and operate the stations) is provided via two TPSS' located along the guideway.

Solid Waste

The operational emissions from solid waste associated with the proposed Project's MSF and stations were estimated using the CalEEMod[37] software. Solid waste generation and associated emissions are calculated based on building square-footage, using default data found in CalEEMod for the proposed land uses.

Water and Wastewater

The operational emissions from water consumption and wastewater generation associated with the proposed Project were estimated using the CalEEMod[38] software. California's water conveyance system is energy intensive, with electricity used to pump and treat water. The Project would result in indirect GHG emissions due to water consumption and wastewater generation. Water consumption and wastewater generation, and their associated emissions, are calculated based on building square-footage, using default CalEEMod data.

Mobile

Operation of the proposed Project would generate GHG emissions from mobile sources from Project-generated vehicle trips traveling to and from the MSF and other facilities. Mobile emissions were calculated based on the data provided in the proposed Project's Traffic Study (see **Appendix 4.12.1: Transportation Assessment Study**) which is further discussed in **Section 4.12: Transportation**. Under the Traffic Study, vehicle miles traveled (VMT) was chosen as the primary performance metric used to identify impacts. VMT's associated with trips to and from all areas within the City were included in the Traffic Study and were utilized to calculate operational GHG emissions from mobiles sources. Emissions from motor vehicles are dependent on vehicle type. Thus, the emissions were calculated using a representative motor

36 CalEEMod, http://www.caleemod.com/
37 CalEEMod, http://www.caleemod.com/
38 CalEEMod, http://www.caleemod.com/

vehicle fleet mix for the proposed Project and EMFAC2017 default fuel type. Note that mobile emission estimates did not account for the recently issued Executive Order N-79-20 which sets forth a state goal that 100 percent of in-state sales of new passenger cars and trucks will be zero-emission by 2035, among other goals.

The Adjusted Baseline Environmental Setting is described in **Section 4.0: Environmental Analysis**. Project operations are expected to commence in 2026. Consistent with the Traffic Study, six operational scenarios were analyzed to evaluate the proposed Project's indirect operational emissions, as follows:

1. Adjusted Baseline,
2. Adjusted Baseline with the proposed Project,
3. Year 2026 with Event Weekday without the proposed Project,
4. Year 2026 with Event Weekday with the proposed Project,
5. Year 2045 with Event Weekday without the proposed Project, and
6. Year 2045 with Event Weekday with the proposed Project.

Details of each of the above scenarios are provided in **Section 4.12** and in **Appendix 4.12.1.**

Backup Generators

To assure the ability to allow APM trains to reach the nearest stations to offload riders in the event of loss of electrical supply, each TPSS will be equipped with backup power generators. The proposed Project would include up to two stationary standby generators, on at each of the two TPSS sites, with an estimated total capacity rated at approximately 4,000 kilowatts (kW) to provide emergency power primarily for APM train operation, lighting and other emergency systems. Emergency generator emissions were calculated based on compliance with applicable federal emissions standards and compliance with SCAQMD Rule 1470[39] (Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines) mandated emission limits and operating hour constraints.

A standby internal combustion engines (ICEs) greater or turbine for nonutility power generation that does not operate more than 200 hours a year and is only operated in the event of an emergency power failure or for routine testing and maintenance is considered an emergency backup generator for power generation. The SCAQMD allows for the use of backup generators thru specific permits prior to installation.[40]

39 SCAQMD, *Rule 1470 - Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines.*

40 SCAQMD, *Permits, Emergency Generators. http://www.aqmd.gov/home/permits/emergency-generators.*

The proposed Project would implement the following operational equipment requirements and operation protocols for operating backup generators. These would include the following:

- All backup generators would be selected from the SCAQMD certified generators list and meet applicable federal standards for diesel emissions. For after-treatment of engine exhaust air, a diesel particulate filter would be provided to meet the emission level requirements of SCAQMD;
- The proposed Project would have two standby generators, each could operate up to two hours per day and a total of 50 hours per year for testing and maintenance (per SCAQMD Rule 1470 limit) to ensure reliability in the case of a power outage; and
- The proposed Project would conduct maintenance and/or testing on the two standby generators on separate days.

As such, each standby generators would operate for 2 hours per day during 24 days per year (twice a month) for a total of not more than 50 hours per year. Each standby generator would be tested during different days; if needed for emergency operation, both generators would operate up to 2 hours each and could occur simultaneously.

4.7.4 REGULATORY FRAMEWORK

4.7.4.1 International and Federal

International Governmental Panel on Climate Change (IPCC)

In 1988, the United Nations and the World Meteorological Organization established the IPCC to assess "the scientific, technical and socioeconomic information relevant to understanding the scientific basis of risk of human-induced climate change, its potential impacts, and options for adaption and mitigation." The initial task for the IPCC was to prepare a comprehensive review and recommendations with respect to the state of knowledge of the science of climate change; the social and economic impact of climate change, and possible response strategies and elements for inclusion in a possible future international convention on climate. Since its inception, the IPCC has delivered five comprehensive scientific reports about climate change, with the latest (the Fifth Assessment Report) released in four parts between September 2013 and November 2014.[41]

Federal Clean Air Act

The US Supreme Court ruled in *Massachusetts v. Environmental Protection Agency*[42] that CO_2 and other GHGs are pollutants under the federal Clean Air Act (CAA), which the US Environmental Protection Agency

41 Intergovernmental Panel on Climate Change (IPCC), *Climate Change 2014-Mitigation of Climate Change, Working Group III Contribution to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change*, 2014, p. 439.

42 Massachusetts v. Environmental Protection Agency, 127 S.Ct. 1438 (2007).

(USEPA) must regulate if it determines they pose an endangerment to public health or welfare.[43] The Court did not mandate that the USEPA enact regulations to reduce GHG emissions. Instead, the Court found that the USEPA could avoid taking action if it found that GHGs do not contribute to climate change or if it offered a "reasonable explanation" for not determining that GHGs contribute to climate change.

On April 17, 2009, the USEPA issued a proposed finding that GHGs contribute to air pollution that may endanger public health or welfare. On April 24, 2009, the proposed rule was published in the Federal Register under Docket ID No. EPA-HQ-OAR-2009-0171.[44] The USEPA Stated that high atmospheric levels of GHGs "are the unambiguous result of human emissions and are very likely the cause of the observed increase in average temperatures and other climatic changes." The USEPA further found that "atmospheric concentrations of greenhouse gases endanger public health and welfare within the meaning of Section 202 of the Clean Air Act." The final rule was effective on January 14, 2010.[45] While these findings alone did not impose any requirements on industry or other entities, this action was a prerequisite to regulatory actions by the EPA, including, but not limited to, GHG emissions standards for light-duty vehicles.

In response, the USEPA promulgated a regulation to require reporting of all GHG emissions from all sectors of the economy. The final rule applies to fossil fuel suppliers and industrial gas suppliers, direct greenhouse gas emitters and manufacturers of heavy-duty and off-road vehicles and engines. The rule does not require control of greenhouse gases; rather, it requires only that sources above certain threshold levels monitor and report emissions.[46]

USEPA Actions

USEPA has taken the following actions to regulate, monitor, and potentially reduce GHG emissions.

Mandatory Greenhouse Gas Reporting Rule

On September 22, 2009, the USEPA issued a rule for mandatory reporting of GHGs from large GHG emissions sources in the United States.[47] In general, this national reporting requirement provides USEPA

43 Perry W. Payne and Sara Rosenbaum, "Massachusetts et al. v Environmental Protection Agency: Implications for Public Health Policy and Practice," *Public Health Reports 122 No. 6 (2007): 817–819, Accessed April 2020, https://doi.org/10.1177/003335490712200614.*

44 Federal Register, *Endangerment and Cause or Contribute Findings for Greenhouse Gases Under Section 202(a) of the Clean Air Act*, Accessed April 2020, https://www.federalregister.gov/documents/2009/12/15/E9-29537/endangerment-and-cause-or-contribute-findings-for-greenhouse-gases-under-section-202a-of-the-clean.

45 United States Environmental Protection Agency (USEPA), *Endangerment and Cause or Contribute Findings for Greenhouse Gases under the Section 202(a) of the Clean Air Act*, Accessed April 2020, https://www.epa.gov/ghgemissions/endangerment-and-cause-or-contribute-findings-greenhouse-gases-under-section-202a-clean/.

46 Federal Register, *Mandatory Reporting of Greenhouse Gases*, Accessed April 2020, https://www.gpo.gov/fdsys/pkg/FR-2009-10-30/pdf/E9-23315.pdf.

47 United States Environmental Protection Agency, *Greenhouse Gas Reporting Program (GHGRP)*, accessed June 2020, https://www.epa.gov/ghgreporting/additional-information-2009-proposed-rule.

with accurate and timely GHG emissions data from facilities that emit 25,000 metric tons (MT) or more of CO_2 per year and allows the operators of these facilities to track their own emissions, compare them to similar facilities, and aid in identifying cost-effective opportunities to reduce emissions in the future. An estimated 85 percent of the total US GHG emissions from approximately 10,000 facilities are covered by this rule.

Endangerment and Cause or Contribute Findings for Greenhouse Gases under the CAA

On December 7, 2009, USEPA adopted its Proposed Endangerment and Cause or Contribute Findings for Greenhouse Gases under Section 202(a) of the Compliance Certification Application (Endangerment Finding).[48] These include:

- Endangerment Finding: The Administrator finds that the current and projected concentrations of the six key well-mixed GHGs—carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF_6)—in the atmosphere threaten the public health and welfare of current and future generations.
- Cause or Contribute Finding: The Administrator finds that the combined emissions of these well-mixed GHGs from new motor vehicles and new motor vehicle engines contribute to the GHG pollution, which threatens public health and welfare.

These findings do not themselves impose any requirements on industry or other entities. However, this action is a prerequisite to finalizing the proposed USEPA GHG standards for light-duty vehicles. These standards were jointly proposed by USEPA and the Department of Transportation National Highway Traffic Safety Administration (NHTSA), and the final rule became effective January 14, 2010. In collaboration with the NHTSA, USEPA finalized emission standards for light-duty vehicles (2012–2016 model years) in May 2010 and for heavy-duty vehicles (2014–2018 model years) in August 2011. Furthermore, the agencies finalized standards to extend the light-duty vehicle GHG National Program for model years 2017–2025. The standards are estimated to cut GHG emissions from cars and light trucks in half by 2025, reducing emissions by 6 billion metric tons over the life of the program—more than the total amount of CO_2 emitted by the United States in 2010.

Greenhouse Gases and Fuel Efficiency Standards

Passenger Cars and Light-Duty Trucks

In October 2012, the USEPA and NHTSA finalized the second phase of a coordinated National Program to establish GHG standards and Corporate Average Fuel Economy (CAFE) standards for new model years 2017

48 United States Environmental Protection Agency, *Endangerment and Cause or Contribute Findings for Greenhouse Gases under the Section 202(a) of the Clean Air Act,* accessed June 2020, https://www.epa.gov/ghgemissions/endangerment-and-cause-or-contribute-findings-greenhouse-gases-under-section-202a-clean.

through 2021 passenger cars, light-duty trucks, and medium-duty passenger vehicles, and issued standards for model year 2022 through 2025 following direction from the Obama Administration.[49] The agencies developed the second phase of the coordinated National Program for GHG emissions and fuel efficiency standards following the successful adoption of the first phase for model year 2012-2016 light-duty vehicles in April 2010. Under the second phase standards, CO_2 emission limits would decrease from 250 grams per mile (g/mi) in model year 2016 to 163 g/mi in model year 2025 for a combined fleet of cars and light trucks, equivalent to 54.5 mpg if this level were achieved solely through fuel efficiency improvements. If all of the necessary emission reductions were made from fuel economy improvements, then the standards would correspond to a combined fuel economy of 40.3-41 mpg in 2021 for the first phase of NHTSA rulemaking action and 48.7-49.7 mpg in 2025 for the second phase. In March 2020, the Trump Administration issued the *Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule for Model Years 2021-2026 Passenger Cars and Light Trucks* (SAFE Vehicles Rule), setting fuel economy and carbon dioxide standards that increase 1.5 percent in stringency each year from model years 2021 through 2026.[50]

Medium- and Heavy-Duty Engines and Vehicles

In October 2016, the USEPA and NHTSA announced a comprehensive Phase 2 Heavy-Duty (HD) National Program to reduce GHG emissions and to improve fuel efficiency for medium- and heavy-duty vehicles through model year 2027, with interim standards for model years 2021 and 2024.[51] The agencies developed the second phase of the HD National Program following the early success of and broad support for the first phase National Program for model years 2014-2018 new medium and heavy-duty vehicles in August 2011, which set to reduce GHG emissions by 270 million metric tons and oil consumption by 530 million barrels over the life of the affected vehicles. On October 17, 2017, USEPA announced it would revisit these standards; however, no changes to the 2016 standards have been made as of October 2020.

Federal Energy Policy and Conservation Acts

The Federal Energy Policy and Conservation Act of 1975, the Federal Energy Policy Act of 2005, and the Energy Independence and Security Act of 2007 require the U.S. Department of Energy (DOE) to set electrical efficiency standards for various appliances, fixtures, and equipment. Specifically, the Energy Independence and Security Act of 2007 includes standards for an increased CAFE standard of 35 miles per

49 U.S. Environmental Protection Agency (USEPA), *Regulations for Emissions from Vehicles and Engines,* "Final Rule for Model Year 2017 and Later Light-Duty Vehicle Greenhouse Gas Emissions and Corporate Average Fuel Economy Standards," October 15, 2012, https://www.gpo.gov/fdsys/pkg/FR-2012-10-15/pdf/2012-21972.pdf, accessed July 25, 2018.

50 National Highway Traffic Safety Administration, "The Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule for Model Years 2021–2026 Passenger Cars and Light Trucks," August 24, 2018, accessed June 2020, https://www.nhtsa.gov/corporate-average-, accessed November 11, 2018.

51 USEPA, *Regulations for Emissions from Vehicles and Engines*, "Final Rule for Greenhouse Gas Emissions and Fuel Efficiency Standards for Medium- and Heavy-Duty Engines and Vehicles - Phase 2," October 25, 2016, https://www.gpo.gov/fdsys/pkg/FR-2016-10-25/pdf/2016-21203.pdf, accessed July 25, 2018.

gallon (mpg) for the combined fleet of cars and light trucks by the 2020 model year, in addition to the following provisions: Renewable Fuel Standard (RFS) (Section 202), Appliance and Lighting Efficiency Standards (Sections 301–325), and Building Energy Efficiency (Sections 411–441). The Act includes standards for general service lighting that will require lightbulbs to consume 60 percent less energy by 2020. This standard is leading to the phasing out of incandescent lightbulbs to be replaced by more efficient lighting. Additional provisions of the Act address energy savings in government and public institutions, promote research for alternative energy, carbon capture, and international energy programs, and create green jobs.

Energy Independence and Security Act

The Energy Independence and Security Act of 2007 (EISA) facilitates the reduction of national GHG emissions by requiring the following:

- Increasing the supply of alternative fuel sources by setting a mandatory Renewable Fuel Standard (RFS) that requires fuel producers to use at least 36 billion gallons of biofuel in 2022;
- Prescribing or revising standards affecting regional efficiency for heating and cooling products, procedures for new or amended standards, energy conservation, energy efficiency labeling for consumer electronic products, residential boiler efficiency, electric motor efficiency, and home appliances;
- Requiring approximately 25 percent greater efficiency for light bulbs by phasing out incandescent light bulbs between 2012 and 2014; requiring approximately 200 percent greater efficiency for light bulbs, or similar energy savings, by 2020; and
- While superseded by USEPA and NHTSA actions described above, (i) establishing miles per gallon targets for cars and light trucks and (ii) directing the NHTSA to establish a fuel economy program for medium- and heavy-duty trucks and create a separate fuel economy standard for trucks.

Additional provisions of EISA address energy savings in government and public institutions, promote research for alternative energy, additional research in carbon capture, international energy programs, and the creation of "green jobs."[52]

52 A green job, as defined by the United States Department of Labor, is a job in business that produces goods or provides services that benefit the environment or conserve natural resources

4.7.4.2 State Regulations and Directives

Executive Orders

Executive Order S-03-05

Executive Order S-3-05, signed by Governor Arnold Schwarzenegger and issued in June 2005, proclaimed that California is vulnerable to the impacts of climate change.[53] It declared that increased temperatures could reduce the Sierra snowpack, further exacerbate California's air quality problems, and potentially cause a rise in sea levels. To combat those concerns, the Executive Order established the following total GHG emission targets:

- By 2010, reduce GHG emissions to 2000 levels;
- By 2020, reduce GHG emissions to 1990 levels; and
- By 2050, reduce GHG emissions to 80 percent below 1990 levels.

Executive Order S-3-05 also created the California Climate Action Team (CAT), an initiative of the Office of the Governor comprised of members from 14 State agencies, in order to coordinate climate policy and meeting agency targets at the State level. CAT has identified strategies that integrate transportation and land-use decisions, termed "smart land use." Such strategies generally encourage jobs/housing proximity, promote transit-oriented development (TOD), and encourage high-density residential/commercial development along transit corridors. These strategies develop more efficient land-use patterns within each jurisdiction or region to match population increases, workforce, and socioeconomic needs for the full spectrum of the population. "Intelligent transportation systems" is the application of advanced technology systems and management strategies to improve operational efficiency of transportation systems and the movement of people, goods, and service.[54]

Executive Order S-01-07

Executive Order S-1-07, the Low Carbon Fuel Standard (issued on January 18, 2007), requires a reduction of at least 10 percent in the carbon intensity of California's transportation fuels by 2020.[55] Regulatory proceedings and implementation of the Low Carbon Fuel Standard have been directed to CARB. The Low Carbon Fuel Standard has been identified by CARB as a discrete early action item in the adopted Climate Change Scoping Plan (discussed below). CARB expects the Low Carbon Fuel Standard to achieve the

53 National Resources Conservation Service, *Emerging Issues Committee Members*, https://www.nrcs.usda.gov/Internet/FSE_DOCUMENTS/nrcs143_008701.pdf.

54 California Environmental Protection Agency, *Climate Action Team Report to Governor Schwarzenegger and the Legislature* (March 2006), 58, http://s3-us-west-2.amazonaws.com/ucldc-nuxeo-ref-media/0bdec21c-ca2b-4f4d-9e11-35935ac4cf5f, accessed August 2018.

55 Office of the Governor, *Executive Order S-01-07*, (January 18, 2007), https://www.arb.ca.gov/fuels/lcfs/eos0107.pdf.

minimum 10 percent reduction goal; however, many of the early action items outlined in the Climate Change Scoping Plan work in tandem with one another. Other specific emission reduction measures included are the Million Solar Roofs Program[56] and Assembly Bill (AB) 1493 (Pavley I), Vehicle Emissions: Greenhouse Gases, which establishes motor vehicle GHG emissions standards.[57] To avoid the potential for double-counting emission reductions associated with AB 1493, the Climate Change Scoping Plan has modified the aggregate reduction expected from the Low Carbon Fuel Standard to 9.1 percent. CARB released a draft version of the Low Carbon Fuel Standard in October 2008. The final regulation was approved by the Office of Administrative Law and filed with the Secretary of State on January 12, 2010; the Low Carbon Fuel Standard became effective on the same day.

Executive Order B-30-15

Executive Order B-30-15, signed by Governor Edmund Gerald "Jerry" Brown and issued on April 29, 2015, established a new Statewide policy goal to reduce GHG emissions to 40 percent below their 1990 levels by 2030. Furthering advancing the targets of AB 32, reducing GHG emissions by 40 percent below 1990 levels in 2030, and by 80 percent below 1990 levels by 2050 (consistent with Executive Order S-3-05), aligns with scientifically established levels needed to limit global warming to less than 2 degrees Celsius.[58]

Executive Order N-79-20

On September 23, 2020 Governor Gavin Newsom issued Executive Order N-79-20 which relates to issues surrounding GHG emissions generated from vehicular transportation and fossil fuel production in California. This Executive Order builds on previous orders issued by former Governor Jerry Brown in 2012 and 2018, which set state goals, respectively of 1.5 million zero-emission vehicles by 2025 and 5 million zero-emission vehicles by 2030. Executive Order N-79-20 sets the following goals in addition to current state goals:

- 100 percent of in-state sales of new passenger cars and trucks will be zero-emission by 2035;
- 100 percent of medium- and heavy-duty vehicles in the State will be zero-emission by 2045 for all operations where feasible and by 2035 for drayage trucks; and

56 US Department of Energy, "Laying the Foundation for Solar America: The Million Solar Roofs Initiative" (October 2016), https://www.nrel.gov/docs/fy07osti/40483.pdf.

57 The standards enacted in Pavley I are the first GHG standards in the nation for passenger vehicles and took effect for model years starting in 2009 to 2016. Pavley I could potentially result in 27.7 million metric tons CO2e reduction in 2020. Pavley II will cover model years 2017 to 2025 and potentially result in an additional reduction of 4.1 million metric tons CO2e.

58 California Office of the Governor, *Governor Brown Established Most Ambitious Greenhouse Gas Reduction Target in North America,* (April 29, 2015), https://www.gov.ca.gov/2015/04/29/news18938/.

- 100 percent zero-emission off-road vehicles and equipment by 2035 where feasible.[59]

Assembly Bill 32, California Global Warming Solutions Act of 2006

AB 32, the Global Warming Solutions Act of 2006, required a sharp reduction of GHG emissions to 1990 levels by 2020. To achieve these goals, AB 32 mandated that CARB establish a quantified emissions cap and institute a schedule to meet the cap; implement regulations to reduce Statewide GHG emissions from stationary sources consistent with the California Climate Action Team strategies; and develop tracking, reporting, and enforcement mechanisms to ensure that reductions are achieved. To reach the reduction targets, AB 32 required CARB to adopt—in an open, public process—rules and regulations that achieve the maximum technologically feasible and cost-effective GHG reductions.

Assembly Bill 197 and Senate Bill 32: Statewide Reductions in GHG Emissions

On September 8, 2016, Governor Brown signed AB 197, which requires CARB to approve a Statewide GHG emissions limit equivalent to the Statewide GHG emission level in 1990 to be achieved by 2030. AB 197 requires the CARB to prepare and approve a scoping plan for achieving the maximum technologically feasible and cost-effective reductions in GHG emissions. The bill became effective on January 1, 2017.

On September 8, 2016, Governor Brown also signed SB 32, which extends AB 32 another 10 years to 2030 and updates the State's objectives. SB 32 calls for Statewide reductions in GHG emissions to 40 percent below 1990 levels by 2030. The bill became effective on January 1, 2017.[60]

Assembly Bill 1493 – Pavley

Enacted on July 22, 2002, the California's Greenhouse Gas Vehicle Emission Standards under Assembly Bill 1493 of 2002 (Pavley)[61] required CARB to develop and adopt regulations that reduce GHGs emitted by passenger vehicles and light-duty trucks. Regulations adopted by CARB apply to 2009 through 2016 vehicles. CARB estimated that the regulation would reduce GHG emissions from the light-duty and passenger vehicle fleet by an estimated 18 percent in 2020 and by 27 percent in 2030. In 2011, the U.S. Department of Transportation, USEPA, and State of California announced a single timeframe for proposing fuel and economy standards, thereby aligning the Pavley standards with the federal standards for

59 California Office of the Governor, Executive Order N-79-20, Available: https://www.gov.ca.gov/wp-content/uploads/2020/09/9.23.20-EO-N-79-20-text.pdf.

60 California Legislative Information, *Senate Bill No. 32,* Accessed April 2020, https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201520160SB32.

61 CARB, *California's Greenhouse Gas Vehicle Emission Standards under Assembly Bill 1493 of 2002* (Pavley) https://ww2.arb.ca.gov/californias-greenhouse-gas-vehicle-emission-standards-under-assembly-bill-1493-2002-pavley.

passenger cars and light-duty trucks.[62] Emission estimates included in this analysis account for the Pavley standards.

Senate Bill 375, Sustainable Communities and Climate Protection Act

SB 375, signed into law in September 2008, aligns regional transportation planning efforts, regional GHG reduction targets, and land use and housing allocations.[63] The act requires metropolitan planning organizations (MPOs) to adopt a Sustainable Communities Strategy (SCS) or Alternative Planning Strategy (APS) that prescribes land use allocation in that MPO's Regional Transportation Plan (RTP). CARB, in consultation with MPOs, provided regional reduction targets for GHGs for the years 2020 and 2035.

Senate Bill X1-2: 2020 Renewable Portfolio Standard

On April 12, 2011, California Governor Jerry Brown signed SB X1-2.[64] This bill supersedes the 33 percent by RPS created by Executive Order S-14-08, previously signed by Governor Schwarzenegger. The RPS required that all retail suppliers of electricity in California serve 33 percent of their load with renewable energy by 2020. A number of significant changes are made in SB X1-2. It extends application of the RPS to all electric retailers in the State, including municipal and public utilities, and community choice aggregators.

SB X1-2 creates a three-stage compliance period for electricity providers to meet renewable energy goals: 20 percent of retail sales must be renewable energy products by 2013, 25 percent of retail sales must be renewable energy products by 2016, and 33 percent of retail sales must be renewable energy products by 2020. The 33 percent level must be maintained in the years that follow. This three-stage compliance period requires the RPS to be met increasingly with renewable energy that is supplied to the California grid and is located within or directly proximate to California. SB X1-2 mandates that renewables from this category make up:

- At least 50 percent for the 2011–2013 compliance period;
- At least 65 percent for the 2014–2016 compliance period; and
- At least 75 percent for 2016 and beyond.

SB X1-2 sets rules for the use of Renewable Energy Credits (RECs) as follows:

62 U.S. Department of Transportation, "EPA, DOT and California Align Timeframe for Next Generation of Clean Cars," April 18, 2012, available at https://www.transportation.gov/briefing-room/epa-dot-and-california-align-timeframe-proposing-standards-next-generation-clean-cars, accessed August 7, 2018.

63 California Legislative Information, *Senate Bill No. 375,* Accessed April 2020, https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=200720080SB375.

64 California Energy Commission, Renewable Portfolio, Accessed April 2020, http://www.energy.ca.gov/portfolio.

- Establishes a cap of no more than 25 percent unbundled RECs going toward the RPS between 2011 and 2013, 15 percent from 2014 to 2016, and 10 percent thereafter;
- Does not allow for the grandfathering of tradable REC contracts executed before 2010, unless the contract was (or is) approved by the California Public Utilities Commission (CPUC);
- Allows banking of RECs for 3 years only; and
- Allows energy service providers, community choice aggregators, and investor-owned utilities with 60,000 or fewer customers to use 100 percent RECs to meet the RPS.

SB X1-2 also eliminates the Market Price Referent, which was a benchmark to assess the above-market costs of RPS contracts based on the long-term ownership, operating, and fixed-price fuel costs for a new 500-megawatt (mW) natural-gas-fired, combined-cycle gas turbine.

Senate Bill 350: Clean Energy and Pollution Reduction Act

SB 350, the Clean Energy and Pollution Reduction Act of 2015, was signed on October 7 of that year.[65] SB 350 implements some of the goals of Executive Order B-30-15 described above. The objectives of SB 350 are: (1) to increase the procurement of our electricity from renewable sources from 33 percent to 50 percent; and (2) to double the energy efficiency savings in electricity and natural gas final end uses of retail customers through energy efficiency and conservation.[66]

Senate Bill 1078 and Senate Bill 107

Established in 2002 under SB 1078, the California Renewables Portfolio Standards (RPS) were accelerated in 2006 under SB 107, which required that, by 2010, at least 20 percent of electricity retail sales come from renewable sources. In April 2016, the CEC updated the RPS pursuant to SB 350, intended to set the new target 50 percent renewables by 2030.[67]

Senate Bill 97

Senate Bill (SB) 97, signed in August 2007, acknowledged that climate change is an environmental issue requiring analysis under CEQA. This bill directed the Governor's Office of Planning and Research (OPR) to prepare, develop, and transmit to the CNRA guidelines for the feasible mitigation of GHG emissions or the effects of GHG emissions, as required by CEQA, no later than July 1, 2009. SB 97 required the CNRA to certify or adopt those guidelines by January 1, 2010. On December 30, 2009, the Natural Resources Agency

65 California Legislative Information, *Senate Bill No. 350*, Accessed April 2020, https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201520160SB350.

66 Senate Bill 350 (2015–2016 Reg, Session) Stats 2015, ch. 547.

67 California Energy Commission, *Enforcement Procedures for the Renewables Portfolio Standards for Local Publicly Owned Electric Utilities: Amended Regulations*, Accessed April 2020, http://www.energy.ca.gov/2016publications/CEC-300-2016-002/CEC-300-2016-002-CMF.pdf.

adopted amendments to the CEQA Guidelines. The CEQA Guidelines amendments provide guidance to public agencies regarding the analysis and mitigation of the effects of GHG emissions in draft CEQA documents. The amendments became effective March 18, 2010.

CEQA Guidelines

CEQA Guidelines section 15064.4 addresses the significance of GHG emissions, directing that a lead agency shall make a "good-faith effort" to "describe, calculate or estimate" GHG emissions in CEQA environmental documents.[68] Section 15064.4 further states that the analysis of GHG impacts should include consideration of (1) the extent to which the project may increase or reduce GHG emissions, (2) whether the project GHG emissions would exceed a threshold of significance that the lead agency determines applies to the project, and (3) the extent to which the project would comply with "regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions."

The CEQA Guidelines focus on the effects of GHG emissions as cumulative impacts, and direct that they should be analyzed in the context of CEQA's requirements for cumulative impact analysis.[69] CEQA Guidelines section 15064.4 states that "the lead agency should focus its analysis on the reasonably foreseeable incremental contribution of the project's emissions to the effects of climate change. A project's incremental contribution may be cumulatively considerable even if it appears relatively small compared to statewide, national or global emissions. The agency's analysis should consider a timeframe that is appropriate for the project. The agency's analysis also must reasonably reflect evolving scientific knowledge and state regulatory schemes." The CEQA Guidelines also establish that a project's incremental contribution to a cumulative effect is not cumulatively considerable if the project will comply with the requirements in a previously approved plan or mitigation program (including plans or regulations for the reduction of GHG emissions) that provides specific requirements that will avoid or substantially lessen the cumulative problem within the geographic area in which the project is located (CEQA Guidelines section 15064(h)(3)).

The CEQA Guidelines do not require or recommend a specific analytical methodology or provide quantitative criteria for determining the significance of GHG emissions, nor do they set a numerical threshold of significance for GHG emissions. Guideline 15064.7(c) clarifies that in adopting or using thresholds of significance, a lead agency may appropriately consider thresholds developed by other public

68 California Natural Resources Agency, CEQA Guidelines Amendments, Sections 15064.4, 15183.5, 15364.5. Available: http://resources.ca.gov/ceqa/docs/2018_CEQA_FINAL_TEXT_122818.pdf.

69 California Natural Resources Agency, Final Statement of Reasons for Regulatory Action, December 2009, pp. 20-26. Available: http://resources.ca.gov/ceqa/docs/Final_Statement_of_Reasons.pdf.

agencies, or recommended by experts, provided the decision of the lead agency to adopt such thresholds is supported by substantial evidence.

When GHG emissions are found to be significant, CEQA Guidelines section 15126.4(c) includes the following direction on measures to mitigate GHG emissions:

Consistent with section 15126.4(a), lead agencies shall consider feasible means, supported by substantial evidence and subject to monitoring or reporting, of mitigating the significant effects of greenhouse gas emissions. Measures to mitigate the significant effects of greenhouse gas emissions may include, among others:

(1) Measures in an existing plan or mitigation program for the reduction of emissions that are required as part of the lead agency's decision;
(2) Reductions in emissions resulting from a project through implementation of project features, project design, or other measures;
(3) Off-site measures, including offsets that are not otherwise required, to mitigate a project's emissions;
(4) Measures that sequester greenhouse gases; and
(5) In the case of the adoption of a plan, such as a general plan, long range development plan, or plans for the reduction of greenhouse gas emissions, mitigation may include the identification of specific measures that may be implemented on a project-by project basis. Mitigation may also include the incorporation of specific measures or policies found in an adopted ordinance or regulation that reduces the cumulative effect of emissions.

In late 2018, the CNRA finalized amendments to the CEQA Guidelines, including changes to CEQA Guidelines section 15064.4, which addresses the analysis of GHG emissions. The amendments were approved by the Office of Administrative Law and filed with the Secretary of State. The amendments became effective on December 28, 2018. The revision of CEQA Guidelines section 15064.4 clarified several points, including the following:

- Lead agencies must analyze the GHG emissions of proposed projects.
- The focus of the lead agency's analysis should be on the project's effect on climate change, rather than simply focusing on the quantity of emissions and how that quantity of emissions compares to statewide or global emissions.
- The impacts analysis of GHG emissions is global in nature and thus should be considered in a broader context. A project's incremental contribution may be cumulatively considerable even if it appears relatively small compared to statewide, national or global emissions.
- Lead agencies should consider a timeframe for the analysis that is appropriate for the project.

- A lead agency's analysis must reasonably reflect evolving scientific knowledge and state regulatory schemes.
- Lead agencies may rely on plans prepared pursuant to section 15183.5 (Plans for the Reduction of Greenhouse Gases) in evaluating a project's greenhouse gas emissions.
- In determining the significance of a project's impacts, the lead agency may consider a project's consistency with the state's long-term climate goals or strategies, provided that substantial evidence supports the agency's analysis of how those goals or strategies address the project's incremental contribution to climate change and its conclusion that the project's incremental contribution is consistent with those plans, goals, or strategies.
- The lead agency has discretion to select the model or methodology it considers most appropriate to enable decision makers to intelligently take into account the project's incremental contribution to climate change. The lead agency must support its selection of a model or methodology with substantial evidence. The lead agency should explain the limitations of the particular model or methodology selected for use.

Senate Bill 862 (Transit and Intercity Rail Capital Program)

The Transit and Intercity Rail Capital Program (TIRCP) was created by Senate Bill (SB) 862 (Chapter 36, Statutes of 2014) and modified by Senate Bill 9 (Chapter 710, Statutes of 2015) to provide grants from the Greenhouse Gas Reduction Fund to fund transformative capital improvements that will modernize California's intercity, commuter, and urban rail systems, and bus and ferry transit systems to reduce emissions of greenhouse gases by reducing congestion and vehicle miles traveled throughout California. The goal of the TIRCP is to provide monies to fund transformative capital improvements that modernize California's intercity rail, bus, ferry and rail transit systems to achieve the following objectives:

- Reduction in greenhouse gas emissions;
- Expand and improve rail service to increase ridership;
- Integrate the rail service of the State's various rail operations, including integration with the high-speed rail system; and
- Improve safety

Climate Change Scoping Plan

CARB approved a Climate Change Scoping Plan (Scoping Plan) on December 11, 2008, as required by AB 32. The Scoping Plan proposed a "comprehensive set of actions designed to reduce overall carbon GHG emissions in California, improve our environment, reduce our dependence on oil, diversify our energy

sources, save energy, create new jobs, and enhance public health."[70] The Scoping Plan had a range of GHG reduction actions, including direct regulations; alternative compliance mechanisms; monetary and nonmonetary incentives; voluntary actions; market-based mechanisms, such as a cap-and-trade system; and an AB 32 implementation regulation to fund the program.

The Scoping Plan called for a "coordinated set of strategies" to address all major categories of GHG emissions.[71] Transportation emissions were to be addressed through a combination of higher standards for vehicle fuel economy, implementation of the Low Carbon Fuel Standard,[72] and greater consideration to reducing trip length and generation through land use planning and transit-oriented development. Buildings, land use, and industrial operations were encouraged and, sometimes, required to implement energy efficiency practices. Utility energy supplies will change to include more renewable energy sources through implementation of the Renewables Portfolio Standard. This will be complemented with emphasis on local generation, including rooftop photovoltaics and solar hot water installations. Additionally, the Scoping Plan emphasized opportunities for households and businesses to save energy and money through increasing energy efficiency. It indicated that substantial savings of electricity and natural gas would be accomplished through improving energy efficiency.

CARB updated the Scoping Plan in May 2014 (2014 Scoping Plan). The 2014 Scoping Plan[73] adjusted the 1990 GHG emissions levels to 431 million metric tons of carbon dioxide equivalents ($MMTCO_2e$); the updated 2020 GHG emissions forecast is 509 $MMTCO_2e$, which credited for certain GHG emission reduction measures already in place (e.g., the RPS). The 2014 Scoping Plan also recommended a 40 percent reduction in GHG emissions from 1990 levels by 2030, and a 60 percent reduction in GHG emissions from 1990 levels by 2040.

The 2017 Scoping Plan,[74] approved on December 14, 2017, builds on previous programs and takes aim at the 2030 target established by the SB 32 (Pavley), which is further discussed below. The 2017 Scoping Plan outlines options to meet California's aggressive goals to reduce GHGs by 40 percent below 1990 levels by 2030. In addition, the plan incorporates the State's updated RPS requiring utilities to procure 50 percent of their electricity from renewable energy sources by 2030. It also raises the State's Low Carbon Fuel

70 CARB, *Climate Change Scoping Plan: A Framework for Change*, Accessed April 2020, https://www.arb.ca.gov/cc/scopingplan/document/adopted_scoping_plan.pdf.
71 CARB, *Climate Change Scoping Plan*, p. ES-7.
72 Office of the Governor, Executive Order S-01-07, (January 18, 2007), https://www.arb.ca.gov/fuels/lcfs/eos0107.pdf.
73 CARB, *First Update to the Climate Change Scoping Plan: Building on the Framework (May 2014).*
74 CARB, *California's 2017 Climate Change Scoping Plan,* Accessed April 2020, https://www.arb.ca.gov/cc/scopingplan/scoping_plan_2017.pdf.

Standard[75] and aims to reduce emissions of methane and hydrofluorocarbons by 40 percent from 2013 levels by 2030 and emissions of black carbon by 50 percent from 2013 levels.

The 2017 Scoping Plan[76] advises that absent conformity with a qualified GHG reduction plan, projects should incorporate all feasible GHG reduction measures and that achieving "no net additional increase in GHG emissions, resulting in no contribution to GHG impacts, is an appropriate overall objective for new development."

Cap-and-Trade Program

AB 32 established the goal of reducing GHG emissions Statewide to 1990 levels by 2020. To help achieve this goal, CARB adopted a regulation to establish a cap-and-trade program that places a "cap" on the aggregate GHG emissions from entities responsible for roughly 85 percent of the State's GHG emissions. As part of the cap-and-trade program, CARB conducts quarterly auctions where it sells emission allowances. Revenues from the sale of these allowances fund projects that support the goals of AB 32, including transit and rail investments.

On October 20, 2011, CARB's board adopted the final cap-and-trade regulation; the program began on January 1, 2012. The scope of GHG emission sources subject to cap-and-trade in the first compliance period (2013–2014) included all electricity generated and imported into California, and large industrial facilities emitting more than 25,000 metric tons of carbon dioxide equivalents ($MTCO_2e$) per year (e.g., oil refineries and cement manufacturers). The scope of GHG emission sources subjected to cap-and-trade during the second compliance period (2015– 2017) expands to include distributors of transportation fuels (including gasoline and diesel), natural gas, and other fuels.

California Advanced Clean Cars/Zero Emission Vehicle Program

In 2012, CARB approved the Advanced Clean Cars (ACC) program, a new emissions-control program for vehicle model years 2017–2025. The program combines the control of smog, soot, and GHGs with requirements for greater number of zero-emission vehicles. By 2025, when the rules will be fully implemented, automobiles will emit 34 percent fewer global warming gases and 75 percent fewer smog forming emissions.[77]

75 Office of the Governor, Executive Order S-01-07, (January 18, 2007), https://www.arb.ca.gov/fuels/lcfs/eos0107.pdf.
76 California Air Resources Board, 2017. *California's 2017 Climate Change Scoping Plan*. pp. 100-101.Available: www.arb.ca.gov/cc/scopingplan/scoping_plan_2017.pdf.
77 CARB, *The Advanced Clean Cars Program,* (January 18, 2017), https://www.arb.ca.gov/msprog/acc/acc.htm

California Energy Commission

California Building Energy Efficiency Standards (Title 24, Part 6)

California's Energy Efficiency Standards for Residential and Nonresidential Buildings, found in Title 24, Part 6 of the California Code of Regulations (CCR) and commonly referred to as "Title 24," were established in 1978 in response to a legislative mandate to reduce California's energy consumption. Title 24 requires the design of building shells and components to conserve energy. The standards are updated periodically to allow consideration and possible incorporation of new energy efficiency technologies and methods.[78]

An update to Title 24 was adopted by the CEC on April 23, 2008. The 2008 Title 24 standards applied to building permits for which an application was submitted on or after January 1, 2010. The CEC adopted the changes made in 2008 to the Building Energy Efficiency Standards to respond to the mandates of AB 32 and to pursue California energy policy that energy efficiency is the resource of first choice for meeting California's energy needs. The CEC adopted the Title 24 standards as well as the 2019 Title 24 standards, which became effective on January 1, 2020, and are applicable to the proposed Project.[79]

California Green Building Standards (Title 24, Part 11)

The California Green Building Standards Code, which is Part 11 of the CCR, is commonly referred to as the CALGreen Code.[80] The 2008 edition, the first edition of the CALGreen Code, contained only voluntary standards. The 2010 CALGreen Code contains mandatory requirements for State-regulated buildings and structures throughout California beginning on January 1, 2011. The 2010 CALGreen Code contains requirements for construction site selection, stormwater control during construction, construction waste reduction, indoor water use reduction, material selection, natural resource conservation, site irrigation conservation, and more. The 2010 CALGreen Code provides for design options, allowing the designer to determine how best to achieve compliance for a given site or building condition. The 2010 CALGreen Code also requires building commissioning, which is a process for verification that all building systems, such as heating and cooling equipment and lighting systems, are functioning at their maximum efficiency.

The most current version of the CALGreen building code went into effect in January 2020. The purpose is to establish minimum standards to safeguard the public health, safety, and general welfare through structural strength, means of egress facilities, and general stability by regulating and controlling the design,

78 California Energy Commission, *2019 Building Energy Efficiency Standards,* https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2019-building-energy-efficiency.

79 See California Energy Commission, *2019 Building Energy Efficiency Standards* for additional information.

80 California Buildings Standards Commission, *California Green Building Standards Code (Cal. Code Regs., Title 24, Part 11),* Accessed April 2020, http://www.bsc.ca.gov/Home/CALGreen.aspx.

construction, quality of materials, outdoor lighting standards, use and occupancy, location, and maintenance of all building and structures within its jurisdiction.

California Appliance Efficiency Regulations (Title 20, Sections 1601 through 1608)

The 2016 Appliance Efficiency Regulations, adopted by the CEC, include standards for new appliances, equipment, and lighting sold or offered for sale in California. These standards include minimum levels of operating efficiency and other cost-effective measures to promote the use of energy- and water-efficient appliances.[81]

4.7.4.3 Regional

Southern California Association of Governments

SCAG 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (2020–2045 RTP/SCS)

SCAG is the MPO for Los Angeles, Orange, Ventura, Riverside, San Bernardino, and Imperial Counties and serves as a forum for the discussion of regional issues related to transportation, the economy, community development, and the environment. As the federally-designated MPO for the Southern California region, SCAG is mandated by the federal government to research and develop plans for transportation, hazardous waste management, and air quality. Pursuant to California Health and Safety Code Section 40460(b),[82] SCAG has the responsibility for preparing and approving the portions of the AQMP relating to regional demographic projections and integrated regional land use, housing, employment, and transportation programs, measures, and strategies. SCAG is also responsible under the CAA for determining conformity of transportation projects, plans, and programs with applicable air quality plans.

With regard to GHG emissions, SCAG has prepared and adopted the 2020–2045 RTP/SCS,[83] which includes a Sustainable Communities Strategy that addresses regional development and growth forecasts. The SCAG 2020–2045 RTP/SCS is a long-range visioning plan that balances future mobility and housing needs with economic, environmental, and public health goals, with a specific goal of achieving an 8 percent reduction in passenger vehicle GHG emissions on a per capita basis by 2020, 19 percent reduction by 2035, and 21 percent reduction by 2040 compared to the 2005 level.

---

81 California Energy Commission, *2016 Appliance Efficiency Regulations,* Accessed April 2020. http://www.energy.ca.gov/2017publications/CEC-400-2017-002/CEC-400-2017-002.pdf.

82 California Health and Safety Code, *Division 26. Air Resources, PART 3. Air Pollution Control Districts, Chapter 5.5. South Coast Air Quality Management District, ARTICLE 5. Plan, Section 40460(b).* https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?sectionNum=40460.&lawCode=HSC.

83 Southern California Association of Governments (SCAG), *Connect SoCal: 2020-2045 Regional Transportation Plan/Sustainable Communities Strategies Draft,* "Chapter 1," https://www.connectsocal.org/Pages/Connect-SoCal-Draft-Plan.aspx, Accessed on July 10, 2020.

South Coast Air Quality Management District

Policy on Global Warming and Stratospheric Ozone Depletion and General Guidance

In October 2008, the South Coast Air Quality Management District (SCAQMD) released draft guidance regarding interim CEQA GHG significance thresholds. SCAQMD proposed the use of a percent emission reduction target to determine significance for commercial/residential projects that emit greater than 3,000 MT of GHG per year. On December 5, 2008, the SCAQMD Governing Board adopted the staff proposal for an interim GHG significance threshold for stationary source/industrial projects where SCAQMD is the Lead Agency.[84]

However, SCAQMD has yet to adopt a GHG significance threshold for land use development projects (e.g., residential/commercial projects). While it formed a GHG Significance Threshold Working Group to evaluate potential GHG significance thresholds, it failed to reach consensus; as a result, the SCAQMD has never adopted a formal threshold of significance.

SCAQMD adopted a "Policy on Global Warming and Stratospheric Ozone Depletion" on April 6, 1990.[85] The policy commits the SCAQMD to consider global impacts in rulemaking and in drafting revisions to the Air Quality Management Plan (AQMP). In March 1992, the SCAQMD Governing Board reaffirmed this policy and adopted amendments to the policy to include the following directives:

- Phase out the use and corresponding emissions of chlorofluorocarbons, methyl chloroform (1,1,1-trichloroethane or TCA), carbon tetrachloride, and halons by December 1995;
- Phase out the large quantity use and corresponding emissions of hydrochlorofluorocarbons by the year 2000;
- Develop recycling regulations for hydrochlorofluorocarbons (e.g., SCAQMD Rules 1411 and 1415);
- Develop an emissions inventory and control strategy for methyl bromide; and
- Support the adoption of a California GHG emission reduction goal.

California Air Pollution Control Officers Association (CAPCOA) Guidance

CAPCOA published a white paper to provide a common platform of information and tools to address climate change in CEQA analyses, including the evaluation of mitigation of GHG emissions from proposed Projects and identifying significance thresholds options. The white paper addresses issues inherent in

84 SCAQMD, *Greenhouse Gases: CEQA Significance Thresholds,* Accessed April 2020, http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/ghg-significance-thresholds.

85 SCAQMD*, SCAQMD's Historical Activity on Climate Change,* Accessed April 2020, http://www.aqmd.gov/nav/about/initiatives/climate-change.

establishing CEQA thresholds, evaluates tools, catalogues mitigation measures, and provides air districts and lead agencies with options for incorporating climate change into their programs.[86]

4.7.4.4 Local

City General Plan

General Plan

California State law requires every city and county to adopt a comprehensive General Plan to guide its future development. The proposed Project is located entirely within the City. The City General Plan[87] includes the following elements: Land Use, Circulation, Safety, Noise, Housing, Open Space, Conservation, and Environmental Justice.

Land Use Element

The following goal from the Land Use Element[88] of the City General Plan are relevant to air pollutant emissions.

Circulation Goal: Promote and support adequate public transportation within the City and the region.

Circulation Goal: Develop a safe and adequate pedestrian circulation system which is barrier free for the handicapped.

Conservation Element

The City's General Plan Conservation Element addresses the conservation, development, and use of natural resources.[89] Five specific areas of conservation and/or protection that are identified in the Conservation Element include (1) oil and gas production, (2) water production and provision for domestic use, (3) storm water runoff and waste water, (4) hazardous waste and solid waste disposal, and (5) air pollution. The Conservation Element notes the following pollution-reducing measures:

- Reducing volatile emissions from factories and refineries;
- Reducing airborne particulate matter from factories and construction sites;

86 California Air Pollution Control Officers Association, CEQA & Climate Change: Evaluating and Addressing Greenhouse Gas Emissions from Projects Subject to the California Environmental Quality Act, January 2008, Available: http://www.capcoa.org/wp-content/uploads/2012/03/CAPCOA-White-Paper.pdf.

87 City of Inglewood, Department of Community Development and Housing, General Plan. January 1980

88 City of Inglewood, Department of Community Development and Housing, 1980. Land Use Element of the Inglewood General Plan. January 1980. Amended September 14, 2016.

89 City of Inglewood General Plan, "Conservation Element" (1997), General Plan. January 1980.

- Reducing numbers of vehicles being driven while increasing the utilization of high occupancy vehicles and alternative transportation;
- Requiring improvements to engine efficiency to decrease emissions; and
- Increasing the use of clean fuel vehicles.

Inglewood Energy and Climate Action Plan

The City adopted an Energy and Climate Action Plan[90] (ECAP) in 2013 to guide Citywide GHG emissions reduction efforts. The ECAP established four primary compliance paths which projects may choose to adhere to, including: ministerial and exempt project status, implementation of a combination of sustainable development standards, performance-based compliance, or payment of an in-lieu fee. These measures were developed on a points-based system, which were chosen because they have been demonstrated by various studies to directly reduce GHG emissions or support changes in activities that lead to GHG emissions reductions. Each Climate-Ready Development Standard has a point value associated with it that reflects its general effectiveness at reducing GHG emissions. The standards apply to various types of projects, and a qualifier is included denoting which types of projects may implement the standard. Applicants have discretion regarding which measures that they would want their project to comply with; however, for a project to be fully compliant with the goals of the ECAP it must incorporate features meeting the standards sufficient to accrue a total of 20 points.

The ECAP quantifies GHG reductions from the following five implementing strategies and actions:

- Strategy 1: Lead by Example with Municipal Government Actions
  - Continue Building and Facility Energy Upgrades to reduce energy use
  - Replace all City-owned street, park, and traffic lights with light-emitting diode (LED) lights
  - Accelerate city vehicle fleet replacement
  - Continue commute trip reduction program
  - Planning for electric vehicle infrastructure
- Strategy 2: Increase Energy Efficiency
  - Make commercial buildings more efficient
  - Increase the energy efficiency of residential buildings
  - Increase the energy efficiency of street and traffic lights

90 City of Inglewood, *Inglewood Energy and Climate Action Plan,* March 2013, https://www.cityofinglewood.org/DocumentCenter/View/148/Inglewood-Energy-and-Climate-Action-Plan-ECAP-Adopted-2013-PDF, accessed July 30, 2020.

- Strategy 3: Support Renewable Energy Generation
  - Remove barriers to renewable energy generation
  - Make renewable energy generation more affordable
  - Educate potential customers
- Strategy 4: Improve Transportation Options and Manage Transportation Demand
  - Make roadways more efficient
  - Improve transit
  - Improve bicycle facilities
  - Make parking more efficient
  - Reduce commute trips
  - Encourage land use intensification and diversity
- Strategy 5: Reduce Consumption and Waste
  - Use less water
  - Produce less waste
  - Promote local food production

City Green Building Code

In December 2019, the Inglewood City Council approved Ordinance No. 20-05, which amended Chapter 11-2 of the Municipal Code.[91] As such, the City's Green Building Code adopted by reference the 2019 CALGreen[92] and associated standards.

Envision Inglewood

The City, through Envision Inglewood,[93] is developing a comprehensive transportation infrastructure plan and multimodal improvement program to connect the City's activity centers directly to the regional Metro Rail and Bus System, implement state-of-the-art transportation technologies and traffic demand management strategies to improve both daily and event commutes, and overall traffic management, reduce vehicular trips and enhance pedestrian, bike, and other transit amenities designed to improve air

91 City of Inglewood, Municipal Code, Article 2, Section 11-2 California Building Code. Established. Ordinance No. 20-05 approved December 2019.

92 California Code of Regulations (CCR), Title 24, Part 11 - CALGreen, 2019 California Green Building Standards Code, Effective January 1, 2020.

93 Envision Inglewood. http://envisioninglewood.org/.

quality, and reduce overall greenhouse gas emissions, and support the economic revitalization already underway while simultaneously developing neighborhood protection programs.

As noted in the City's plan,[94] Inglewood is committed to providing world class transportation connections to its new State-of-the-art sports and entertainment centers and is working diligently to define and propose a last-mile fixed guideway transit connector. Mobility and direct transit access to the City's new activity centers are critical top priorities, especially given local and regional goals to increase transportation choices, reduce greenhouse gas emissions, improve air quality and human health, and encourage sustainable development patterns.

Transit and Intercity Rail Capital Program

The City applied for and received a Transit and Intercity Rail Capital Improvement Program (TIRCP) grant [95] from the California State Transportation Agency (CALSTA). The application required that the City demonstrate the effectiveness to reduce GHG emissions using the TIRCP Benefits Calculator.[96] The CARB developed the TIRCP Benefits Calculator Tool to estimate the GHG emissions and selected co-benefits of eligible grant applications. The Benefits Calculator Tool estimates GHG emissions using methods described in CARB's Co-Benefit Assessment Methodologies, and utilizes motor vehicle emission factors (in grams per mile) to estimate GHG emissions (reported as carbon dioxide or CO_2 in metric tons). The emission factors are based on the CARB's EMFAC2017[97] emissions inventory model. Emission factors are based on information associated with the Los Angeles County and the City within the South Coast Air Basin.

The goal of the TIRCP is to provide monies to fund transformative capital improvements that modernize California's intercity rail, bus, ferry and rail transit systems to achieve the following objectives:

- Reduction in greenhouse gas emissions;
- Expand and improve rail service to increase ridership;
- Integrate the rail service of the State's various rail operations, including integration with the high-speed rail system; and
- Improve safety.

94 City of Inglewood, Envision Inglewood, 2018, http://envisioninglewood.org/wp-content/uploads/2018/07/Envision-.
95 City of Inglewood, Transit and Intercity Rail Program (TIRCP) Application for the City of Inglewood Transit Connector Project, January 16, 2020.
96 CALSTA, 2020 Transit and Intercity Rail Capital Program Formal Draft Guidelines, TIRCP Quantification Methodology and Calculator Tool, https://calsta.ca.gov/subject-areas/transit-intercity-rail-capital-prog
97 California Air Resources Board, EMFAC2017 User's Guide, March 1, 2018, Accessed July 6, 2020 at: https://ww3.arb.ca.gov/msei/downloads/emfac2017-volume-i-users-guide.pdf and https://www.arb.ca.gov/emfac/2017/

4.7.5 EXISTING CONDITIONS

4.7.5.1 Existing Greenhouse Gas Emissions

In 2018, the United States emitted about 6,677 million metric tons of CO_2. Emissions increased from 2017 to 2018 by 3.1 percent. Greenhouse gas emissions in 2018 (after accounting for sequestration from the land sector) were 10.2 percent below 2005 levels. This increase was largely driven by an increase in emissions from fossil fuel combustion, which was a result of multiple factors, including more electricity use due to greater heating and cooling needs due to a colder winter and hotter summer in 2018 in comparison to 2017.[98]

State Emissions

California is the second largest contributor of GHGs in the United States and the 16th largest in the world.[99] In 2018, California produced 425.4 million metric tons of carbon dioxide equivalents ($MMTCO_2e$), including imported electricity and excluding combustion of international fuels and carbon sinks or storage. The major source of GHGs in California is transportation, contributing to 40 percent of the State's total GHG emissions. The Statewide inventory of GHGs by sector is shown in **Table 4.7-2: California GHG Inventory 2010-2018.**

Table 4.7-2
California GHG Inventory 2010–2018

	Emissions ($MMTCO_2e$)								
Main Sector	**2010**	**2011**	**2012**	**2013**	**2014**	**2015**	**2016**	**2017**	**2018**
Transportation[a]	165.1	161.8	161.4	161.2	162.6	166.2	169.8	171.0	169.5
Electric Power	90.3	89.2	98.2	91.4	88.9	84.8	68.6	62.1	63.1
Industrial[b]	91.0	89.3	88.9	91.6	92.4	90.1	88.9	88.7	89.2
Commercial and Residential	45.9	46.0	43.5	44.2	38.2	38.8	40.6	41.3	41.4
Agriculture	33.7	34.4	35.5	33.8	34.8	33.4	33.2	32.3	32.6
High GWP[c,d]	13.5	14.5	15.5	16.8	17.7	18.6	19.3	20.0	20.5
Recycled and waste	8.7	8.7	8.7	8.7	8.8	8.8	8.9	9.0	9.1
Total Emissions	**448.2**	**443.9**	**451.7**	**447.7**	**443.4**	**440.7**	**429.3**	**424.4**	**425.4**

Source: CARB, GHG Current California Emission Inventory Data, Accessed November 2020, https://ww2.arb.ca.gov/ghg-inventory-data
[a] Includes equipment used in construction, mining, oil drilling, industrial and airport ground operations.
[b] Reflects emissions from combustion of natural gas, diesel, and lease fuel plus fugitive emissions.
[c] These categories are listed in the Industrial sector of CARB's GHG Emission Inventory sectors.
[d] This category is listed in the Electric Power sector of CARB's GHG Emission Inventory sectors.
Note: $MMTCO_2e$ - million metric tons of carbon dioxide equivalent emissions

98 United States Environmental Protection Agency, *Inventory of U.S. Greenhouse Gas Emissions and Sinks,* Accessed July 6, 2020 at https://www.epa.gov/ghgemissions/inventory-us-greenhouse-gas-emissions-and-sinks.

99 California Energy Commission*, Inventory of California Greenhouse Gas Emissions and Sinks: 1990 to 2004, Staff Final Report,* CEC-600-2006-013-SF (December 2006).

Local Emissions

City Greenhouse Gas Emissions Inventory

The South Bay Cities Council of Governments (SBCCOG) received funding from SCE's 2013-2014 Local Government Partnership Strategic Plan Pilots Program[100] to assist local governments within the South Bay sub-region to prepare inventories of local GHG emissions and develop GHG reduction programs and policies. As a member of the SBCCOG, the City collaborated with the SBCCOG to develop inventories of community-wide GHG emissions for the years 2005 and 2007.[101] Additionally, the City developed a community-wide inventory for 2010 as reported in the 2013 Inglewood ECAP.[102]

The ECAP includes a business-as-usual (BAU) forecast that estimates future emissions in 2020 and 2035 from six sectors: Transportation, Residential Energy, Commercial/Municipal Energy, Industrial Energy, Solid Waste, and Water. The BAU forecast assumes GHG emissions that would occur in the future under regulatory conditions as they existed in 2010; the BAU forecast does not include the effects of updates to Title 24,[103] the Renewables Portfolio Standard,[104] and the Pavley Clean Car Standards[105] on future GHG emissions.

The City's GHG inventories and forecasts are summarized in **Table 4.7-3**: **City of Inglewood Community GHG Emissions by Sector**. Under the ECAP's BAU forecast,[106] Inglewood's total GHG emissions are expected to increase approximately 14 percent from 2010 (594,273 $MTCO_2e$) to 2035 (678,283 $MTCO_2e$). On a per-service population (SP) basis, the increase is shown to be just 4.5 percent, from 4.22 $MTCO_2e$/SP in 2010 to 4.41 $MTCO_2e$/SP in 2035.

ECAP establishes an emissions reduction target of 15 percent below 2005 levels by 2020 and an emissions reduction goal of 32.5 percent below 2005 levels by 2035. As shown, State-level actions, such as the Pavley

100 *Southern California Edison's (SCE) 2013-2014 Local Government Partnership Strategic Plan Pilots Program* https://www.sce.com/partners/partnerships

101 South Bay Cities Council of Governments, 2011. *City of Inglewood Community Greenhouse Gas Emissions Inventory Report.* http://www.southbaycities.org/sites/default/files/documents/inventories/Inglewood_Community_Inventory.pdf.

102 City of Inglewood, 2013, *Inglewood Energy and Climate Action Plan.* Available: https://www.cityofinglewood.org/225/Sustainability

103 California Buildings Standards Commission, *California Green Building Standards Code (Cal. Code Regs., Title 24, Part 11),* Accessed April 2020, http://www.bsc.ca.gov/Home/CALGreen.aspx.

104 California Energy Commission*, Enforcement Procedures for the Renewables Portfolio Standards for Local Publicly Owned Electric Utilities: Amended Regulations*, Accessed April 2020, http://www.energy.ca.gov/2016publications/CEC-300-2016-002/CEC-300-2016-002-CMF.pdf.

105 California's Greenhouse Gas Vehicle Emission Standards under Assembly Bill 1493 of 2002 (Pavley).

106 City of Inglewood, 2013*, Inglewood Energy and Climate Action Plan.* Available: https://www.cityofinglewood.org/225/Sustainability

Clean Cars legislation,[107] the Low Carbon Fuel Standard,[108] the Renewables Portfolio Standard,[109] and Title 24[110] upgrades are expected to reduce community emissions by 121,139 $MTCO_2e$ per year by 2020, and 160,002 $MTCO_2e$ by year 2035.

Table 4.7-3
City of Inglewood Community GHG Emissions by Sector
($MTCO_2e$)

Sector	2005	2007	2010	2020	2035
Transportation	320,245	311,853	322,042	327,998	337,552
Residential Energy	124,872	123,062	122,429	134,843	156,574
Commercial/Municipal Energy	97,176	99,458	95,261	106,041	124,749
Industrial Energy	34,940	31,272	26,100	26,376	26,830
Solid Waste	19,855	16,841	16,448	16,782	17,555
Water	13,813	13,272	11,993	14,707	15,044
Total	**610,910**	**595,758**	**594,273**	**626,748**	**678,284**
Target/Goal (change from 2005)				**519,273** (-15%)	**412,364** (-32.5%)
Reductions from State-level actions				-121,139	-160,002
Forecasts with implementation of State-level actions				**505,609**	**518,282**
Reductions from Local Actions				-9,803	-10,994
Forecasts with ECAP Implementation				495,806	499,208
Resulting Change from 2005				-18.8%	-18.3%
Meet target/goal?				**Yes**	**No**

Source: City, 2013. Inglewood Energy and Climate Action Plan.
Note: $MTCO_2e$ = metric tons of carbon dioxide equivalent emissions

Local measures in the CAP are expected to reduce community emissions an additional 9,803 $MTCO_2e$ per year by 2020, and 10,994 $MTCO_2e$ per year by year 2035.

The City's Community-wide emissions were categorized in six sectors:

- **Transportation** includes emissions from vehicles traveling (wholly or partially) within the City, and emissions from operating off-road vehicles and equipment (e.g., lawn and garden equipment, construction equipment, industrial equipment, and light commercial equipment).

107 California's Greenhouse Gas Vehicle Emission Standards under Assembly Bill 1493 of 2002 (Pavley).
108 Office of the Governor, *Executive Order S-01-07, (January 18, 2007),* https://www.arb.ca.gov/fuels/lcfs/eos0107.pdf.
109 California Energy Commission, *Enforcement Procedures for the Renewables Portfolio Standards for Local Publicly Owned Electric Utilities: Amended Regulations*, Accessed April 2020, http://www.energy.ca.gov/2016publications/CEC-300-2016-002/CEC-300-2016-002-CMF.pdf.
110 California Buildings Standards Commission, *California Green Building Standards Code (Cal. Code Regs., Title 24, Part 11),* Accessed April 2020, http://www.bsc.ca.gov/Home/CALGreen.aspx.

- **Residential Energy** includes emissions from electricity and natural gas consumption in residential buildings.
- **Commercial/Municipal Energy** includes emissions from electricity and the on-site combustion of natural gas and fuel use in nonresidential buildings and city facilities (including outdoor lighting).
- **Industrial Energy** includes emissions from electricity and the on-site combustion of natural gas and fuel use in industrial buildings and facilities.
- **Solid Waste** includes emissions from solid waste that is generated in the community and sent to landfills.
- **Water** includes emissions from the electricity used to source, treat, and deliver imported water in the community that is not accounted for in the community utility data.

As shown, the transportation sector was the largest contributor to the most recent inventory (2010) at over 54 percent of the total. Residential Energy consumption is the second-largest contributor to emissions at 20.6 percent of the total, followed by Commercial/Municipal Energy (16 percent), Industrial Energy (4.4 percent), Solid Waste (2.8 percent), and Water (2 percent).

Existing Uses

The proposed Project includes approximately 7.7 acres of land with a total of 19 parcels that are currently out of the public right-of-way and will be converted to Project-related uses. Presently, a variety of commercial, restaurant, and retail uses that exist at the northwest corner of Market Street and Regent Avenue at an existing commercial center (CVS plaza - approximately 126,912 SF) and at 500 E. Manchester (retail commercial site - 76,402 square-foot grocery store and 202 square-foot gas station) will be removed prior to construction of the proposed Project. The proposed Project would also include the demolition of 16,575 SF of retail space located at 150 S. Market Street. These existing uses currently generate greenhouse gas emissions from building operation.

Existing operations at the current uses that will be removed as part of the proposed Project generate GHG emissions from energy (electricity and natural gas), on-road motor vehicles (mobile), solid waste, water and wastewater, and area sources, as described further below.

The existing operations consume energy (electricity and natural gas) for multiple purposes including, but not limited to, building heating and cooling, lighting, and electronics. These existing buildings were built before 2005. Thus, building energy consumption for these facilities was based on CalEEMod historical (pre-2005) electricity and natural gas usage rates per CalEEMod instructions.[111] For pre-2005 buildings,

111 California Air Pollution Control Officers Association, *California Emissions Estimator Model User's Guide,* 2017. http://www.aqmd.gov/docs/default-source/caleemod/01_user-39-s-guide2016-3-2_15november2017.pdf?sfvrsn=4,

CalEEMod bases its energy usage estimates on the CEC's California Commercial End-Use Survey (CEUS), which lists energy demand by building type based on data from 2002.[112]

For on-site existing land uses, electricity is supplied by SCE and natural gas is supplied by Southern California Gas Company (SoCal Gas). CalEEMod provides default CO_2e intensity factors for natural gas and for SCE-supplied electricity. The CalEEMod default CO_2e intensity factor for SCE-provided electricity, 705 pounds CO_2e/MWh (0.320 $MTCO_2e$/MWh), is based on the SCE portfolio in 2012.[113] However, California's Renewables Portfolio Standard, mandates that publicly owned electric utilities procure an increasing percentage of their total sales from renewable power sources, with a 2020 goal of 33 percent qualifying renewables. SCE's average power mix in 2017 included 32 percent qualified as renewable under the RPS.[114] SCE's progress in meeting its 2020 RPS obligation is reflected in its decreasing average CO_2e intensity factor since 2012. For 2016 and 2017, SCE reports average CO_2e intensity factors for its total electricity mix as 0.259 and 0.232 $MTCO_2e$/MWh, respectively.[115] Thus, the analysis of on-site existing operations emissions used SCE's 2017 CO_2e intensity factor for electricity rather than the CalEEMod default, because that was the most recent SCE emission factor available.

Table 4.7-4: Existing Uses Greenhouse Gas Emissions identifies the existing emissions from the existing uses within the area of the proposed Project that will be converted. As shown, the existing uses currently generate 58,890 $MTCO_2e$ per year.

Table 4.7-4
Existing Uses Greenhouse Gas Emissions (Metric Tons per Year)

Source	$MTCO_2e$
Area (Consumer Products, Landscaping)	<1
Energy (Natural Gas)	291
Energy (Electrical)	1,511
Solid Waste	485
Water and Waste Water	155
Motor Vehicles	54,819
Total	**57,262**

Source: RCH Group, 2020, ***Appendix 4.2.1.***
Notes:
$MTCO_2e$ = metric tons of carbon dioxide equivalent emissions
Area sources, water, waste, and energy (Natural Gas and electrical) values based on CalEEMod calculations. Motor vehicle values based EMFAC calculations.

112 California Energy Commission, *California Commercial End-Use Survey,* http://capabilities.itron.com/CeusWeb/ChartsSF/Default2.aspx.
113 Southern California Edison, 2012. 2012 Corporate Responsibility and Sustainability Report. Available: https://www1.sce.com/wps/wcm/connect/68145014-2eba-40c2-8587-6482ce056977/CRR_08202013.pdf?MOD=AJPERES&ContentCache=NONE.
114 California Energy Commission, 2017. 2017 Power Content Label. Available: https://www.energy.ca.gov/pcl/.
115 Southern California Edison, 2018. ESG/Sustainability Template. Report date: September 27, 2018. Available: https://www.edison.com/content/dam/eix/documents/sustainability/eix-esg-pilot-quantitative-section-sce.pdf.

4.7.5.2 Adjusted Baseline

The Air Quality and Transportation analyses, including the analysis of VMT, assume the Adjusted Baseline Environmental Setting as described in **Section 4.0: Environmental Analysis**; see **Table 4.0-1** for the details of the Adjusted Baseline. Analysis of GHG emissions is cumulative in nature because global climate change effects are caused by cumulative global emissions. Although the Hollywood Park Specific Plan (HPSP) project will be constructed and in operation prior to opening of the proposed Project, its potential impact on global emissions would not affect the the impact analysis regarding GHG emissions from the proposed Project. No other changes to the existing environmental setting related to GHG emissions would occur under the Adjusted Baseline.

4.7.6 THRESHOLDS OF SIGNIFICANCE

Criteria outlined in CEQA Guidelines were used to determine the level of significance of greenhouse gas emissions impacts. Appendix G of State CEQA Guidelines indicates that a project would have a significant impact in relation to greenhouse gas emissions if it were to:

Threshold GHG-1 **Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.**

Threshold GHG-2 **Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.**

Pursuant to State CEQA Guidelines Section 15064.4,[116] the methods suitable for analysis of GHG emissions are:

1. Use a model or methodology to quantify greenhouse gas emissions resulting from a project. The Lead Agency has discretion to select the model it considers most appropriate provided it supports its decision with substantial evidence. The Lead Agency should explain the limitation of the particular model or methodology selected for use.
2. Rely on a qualitative analysis or performance-based standards.

The City has not adopted a numerical significance threshold for assessing impacts related to GHG emissions and has not formally adopted a qualified local plan for reducing GHG emissions. Nor have SCAQMD, OPR, CARB, CAPCOA, or any other State or regional agency adopted a numerical significance threshold for assessing GHG emissions that is applicable to the proposed Project. Assessing the significance of a project's contribution to cumulative global climate change involves: (1) developing

116 California Code of Regulations Title 14, *Section15064.4. Determining the Significance of Impacts from Greenhouse Gas Emissions.*

pertinent inventories of GHG emissions, and (2) considering project consistency with applicable emission reduction strategies and goals, such as those set forth in the ECAP.

4.7.7 IMPACT ANALYSIS FOR THE PROPOSED PROJECT

Impact GHG-1: Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

For the purposes of this impact discussion, the Project would generate GHG emissions that may have a significant impact on the environment if the Project's GHG emissions would exceed a net-zero threshold.

The proposed Project is a new electrically powered APM system that will expand the regional Metro Rail system's transit access by providing three new stations with direct connectivity to one of the highest growing housing and employment centers in LA County, new regionally serving sports and entertainment venues in the City, new plan areas with adopted land use policies/zoning promoting greater housing density and transit-oriented developments, and new planned bicycle/pedestrian infrastructure connections.

The following analysis of the impact on climate change focuses on the proposed Project's contribution to cumulatively significant GHG emissions.

Construction

The modeling for the proposed Project construction includes **MM AQ-1** through **MM AQ-4** from the proposed Project's Construction Commitment Program. **MM AQ-1** would require the use equipment that meets the USEPA's Final Tier 4 emissions standards for off-road diesel-powered construction equipment with 50 hp or greater, for all phases of construction activity. Additionally, **MM AQ-2** would require smaller pieces of equipment to be electric or alternative-fueled (i.e., non-diesel) to the maximum extent feasible. **MM AQ-3** would require construction vendors, contractors, and/or haul truck operators commit to using 2010 model year trucks. **MM AQ-4** would require the use of electric or alternatively fueled (e.g., natural gas) sweepers with HEPA filters.

Construction of the proposed Project would result in GHG emissions of CO_2 and smaller amounts of CH_4 and N_2O from construction equipment and mobile sources such as haul trucks and worker vehicles (see **Section 4.2: Air Quality** for construction emissions). Construction emissions were calculated for each year of construction activity using CalEEMod and applying emission factors from EMFAC2017 to calculate mobile source emissions. Construction emissions were forecasted based on an expectation that construction of the proposed Project would occur in several overlapping phases over an approximately

five year period, from 2022 through 2026. This is a conservative approach that assumes all construction occurs at the earliest feasible date.

GHG emissions from construction were amortized over the 30-year lifetime of the proposed Project.

The estimated construction GHG emissions for the proposed Project are 14,348 metric tons of CO_2e.[117] Given the five-year construction period, the annual construction GHG emissions for the proposed Project are 2,870 metric tons of CO_2e. As indicated, 30-year amortized construction related GHG emissions would be approximately 478 metric tons of CO_2e per year. The results are presented in **Table 4.7-5: Estimated Construction Greenhouse Gas Emissions for the Proposed Project**.

Table 4.7-5
Estimated Construction Greenhouse Gas Emissions for the Proposed Project (Metric Tons per Year)

Construction Year	$MTCO_2e$
2022	4,698
2023	4,328
2024	3,521
2025	1,361
2026	440
Total Construction Emissions	**14,348**
Total 30-Year Amortized Construction Emissions per Year	**478**

Source: RCH Group, 2020, ***Appendix 4.2.1.***
$MTCO_2e$ = metric tons of carbon dioxide equivalent emissions

Operation

As discussed previously, the operational life of the proposed Project is assumed to be 30 years. Operational emissions were estimated for the anticipated start of operations in late 2026 and a milestone year of 2045. It is assumed that due to advances in technology and regulations to reduce GHG emissions, that operational emissions would continue to decline by 2056, and thereafter. CalEEMod and EMFAC 2017 were used to estimate GHG emissions from area, energy, solid waste, water and wastewater, and mobile sources.

The normal operation of the proposed Project would generate GHG emissions from the operation of the MSF, stations, and other facilities. **Table 4.7-6: Estimated Annual GHG Emissions for Proposed Project**

117 Fuel usage is estimated using the output for CO_2 and a 10.15 kg-CO_2/gallon conversion factor, as cited in the U.S. Energy Information Administration Voluntary Reporting of Greenhouse Gases Program, https://www.eia.gov/environment/pdfpages/0608s(2009)index.php

Components presents the annual GHG emissions to operate these facilities. As shown, emissions from normal operations would be 7,742 $MTCO_2e$ per year.

As discussed previously, each TPSS will be equipped with backup power generators. The proposed Project would include up to two stationary standby generators, one at each of the two TPSS sites, with an estimated total capacity rated at approximately 4,000 kilowatts (kW) to provide emergency power primarily for APM train operation, lighting and other emergency systems. As shown in **Table 4.7-6**, GHG emissions for the backup generators are estimated to be 311 $MTCO_2e$ per year, bringing total operations to 8,053 $MTCO_2e$ per year. The backup generators would only run for emergency conditions when the main electrical power is not available, and for regular testing. The emissions would be limited to only those periods and would not be an ongoing operational activity.

Table 4.7-6
Estimated Annual GHG Emissions for Proposed Project Components

Source	Annual GHG $MTCO_2e$
Employee Trips	559
Deliveries	90
Area (Consumer Products, Landscaping)	<1
Energy (Natural Gas)	114
Energy (Electrical)[a]	6,800
Solid Waste	49
Water and Waste Water	130
Total Project (Typical Operations)	**7,742**
Backup Generators	311
Total Project (Typical Operations + Backup Generators)	**8,053**

Source: RCH Group, 2020, ***Appendix 4.2.1.***
$MTCO_2e$ = metric tons of carbon dioxide equivalent emissions
[a] Based on CalEEMod for MSF plus APM usage of 27,114,390 kWh along with an SCE emission factor of 535 pounds per MWh.

Vehicle GHG Emissions

The proposed Project has been designed to reduce VMTs for local and regional travel by shifting demand from the general public from autos to public transit. As discussed **Section 3.0: Project Description** this includes connection to regional rail and light rail transit and other means. Mobility, connectivity, and VMT reduction benefits of the proposed Project include:

- The proposed Project would provide direct connections for passengers throughout the region to the City's housing and employment centers, and new sports and entertainment venues;

- The proposed Project would help manage and support the City's projected growth by providing transit within a safe and accessible walking distance to thousands of new residents, housing units and jobs, including the new residents, housing units, and jobs at the LASED property in Hollywood Park;
- The proposed Project will provide a direct connection to the regional Metro Rail system and would close the "last mile" gap of approximately 1.5-miles from Metro's Downtown Inglewood station to the City's major activity centers; and
- The proposed Project would be located within close proximity to bus lines serving the area and would provide new opportunities to increase bus service ridership.

See **Section 4.12** for further discussion of transit opportunities within the proposed Project vicinity.

Mobile GHG emissions from fleetwide shifts from auto use to public transit were calculated based on EMFAC2017 data and Project-specific VMT data which is presented in **Section 4.12** and is provided in **Appendix 4.12.1**.

Table 4.7-7: Daily and Annual VMT for the Six Operational Scenarios presents the daily and annual VMT for the Adjusted Baseline and the operational scenarios for 2026 and 2045 with and without the proposed Project.

Table 4.7-7
Daily and Annual VMT for the Six Operational Scenarios

Scenario	Daily VMT	Annual VMT
Adjusted Baseline	3,159,055	1,007,356,937
Adjusted Baseline with proposed Project	3,138,289	1,000,735,086
Year 2026 with Event Weekday without proposed Project	5,275,088	1,346,432,106
Year 2026 with Event Weekday with proposed Project	5,047,349	1,316,518,609
Year 2045 with Event Weekday without proposed Project	5,662,297	1,469,905,139
Year 2045 with Event Weekday with proposed Project	5,365,217	1,433,075,931

Source: Raju Associates, Inc., 2020, ***Appendix 4.2.1***
VMT – vehicle miles traveled

As shown, the proposed Project daily and annual VMT are less than the daily and annual VMT in each "Build" scenario than without the proposed Project. For the Adjusted Baseline, the reduction for VMT with and without the proposed Project the VMT decrease is 20,766 VMT daily and 6,621,851 VMT annually. For the 2026 opening year, the reduction in VMT with and without the proposed Project is 227,739 VMT daily and 29,913,497 VMT annually. For the 2045 future year, the reduction for VMT with and without the proposed Project is 297,080 VMT daily and 36,829,208 VMT annually.

Table 4.7-8: Estimated Annual Operational GHG Emissions for Proposed Project for Motor Vehicles presents the annual GHG emissions for the Adjusted Baseline and the operational scenarios for 2026 and 2045 with and without the proposed Project.

As shown, annual $MTCO_2e$ would be reduced by 2,831 $MTCO_2e$ when compared to the Adjusted Baseline without proposed Project, 9,809 $MTCO_2e$ when compared to the 2026 opening year without proposed Project, and 9,778 $MTCO_2e$ when compared to the 2045 future year without proposed Project.

Table 4.7-8
Estimated Annual Operational Emissions for Proposed Project for Motor Vehicles

Scenario	$MTCO_2e$
Adjusted Baseline (2016)	430,621
Adjusted Baseline (2016) with proposed Project	427,791
Year 2026 with Event Weekday without proposed Project	441,490
Year 2026 with Event Weekday with proposed Project	431,682
Year 2045 with Event Weekday without proposed Project	390,262
Year 2045 with Event Weekday with proposed Project	380,484
Incremental Change	**$MTCO_2e$**
Adjusted Baseline with proposed Project vs Adjusted Baseline	-2,831
Year 2026 with Event Weekday with proposed Project vs Year 2026 with Event Weekday without proposed Project	-9,809
Year 2045 with Event Weekday with proposed Project vs Year 2045 with Event Weekday without proposed Project	-9,778

Source: RCH Group, 2020, ***Appendix 4.2.1.***
Numbers may not add up due to rounding
$MTCO_2e$ = metric tons of carbon dioxide equivalent emissions

Combined Source Proposed Project GHG Emissions

Table 4.7-9: Estimated Annual GHG Emission Reductions for Proposed Project presents the GHG emissions under normal operations including the directly emissions from employee trips, deliveries, area sources, energy sources (natural gas), while accounting for the reduction in motor vehicle as a result of the demolition of existing development. The GHG emissions account for the normal operations of the proposed Project and also provide consideration for use of the backup generators and construction emissions amortized over a 30-year period. The total annual GHG emissions of the normal operations of the proposed Project would be 8,220 $MTCO_2e$.

When the reduction in 2026 vehicle emissions of -9,809 $MTCO_2e$ and the existing uses to be removed of -57,262 $MTCO_2e$ is considered, the result of the proposed Project is a net reduction of 58,540 $MTCO_2e$ annually. When the reduction in 2045 vehicle emissions of -9,778 $MTCO_2e$ and the existing uses to be

removed of -57,262 $MTCO_2e$ is considered, the result of the proposed Project is a net reduction of 58,509 $MTCO_2e$ annually.

Finally, the City will publish annual performance reviews to demonstrate progress toward the benefits enabled by the TIRCP program, as defined by the CalSTA Call for Project Guidelines. The annual performance review will include tracking metrics and will be conducted by the City. This will include annual reports for GHG reductions measured by $MTCO_2e$ and decrease in criteria pollutants.

Table 4.7-9
Estimated Annual GHG Emissions for Proposed Project

Source	Annual GHG Emissions ($MTCO_2e$)	
	2026	**2045**
Employee Trips	559	559
Deliveries	90	90
Area (Consumer Products, Landscaping)	0	0
Energy (Natural Gas)	114	114
Energy Source (Electrical)	6,800	6,800
Solid Waste	49	49
Water and Wastewater	130	130
Construction (30-Year Annual Amortized Rate)	478	478
Subtotal Project (Typical Operations)	**8,220**	**8,220**
Emergency Generators	311	311
Subtotal Project (Typical Operations + O&M)	**8,531**	**8,531**
Motor Vehicle GHG Emissions[a]	-9,809	-9,778
Subtotal (Project with Motor Vehicle Reductions)	**-1,278**	**-1,247**
Existing Conditions GHG Emissions[b]	-57,262	-57,262
Grand Total (Project)	**-58,540**	**-58,509**

Source: RCH Group, 2020, ***Appendix 4.2.1***
Notes:
a – See ***Table 4.7-8***
b – see ***Table 4.7-3***
$MTCO_2e$ = metric tons of carbon dioxide equivalent emissions

As such, the proposed Project would not generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment, and impacts would be less than significant.

Mitigation Measures

Construction

Mitigation measures that have been identified for air quality **Impact AQ-2** (**MM AQ-1** to **MM AQ-4**) have been accounted for in the estimate of construction-related GHG emissions. In addition, implementation

of mitigation measures **MM AQ-7** through **MM AQ-11** would be applied to the proposed Project and would further reduce fuel combustion-related criteria pollutants that generate GHG emissions.

Operation

No mitigation is required.

Level of Significance after Mitigation

The proposed Project will generate a net GHG emission reduction of 58,540 $MTCO_2e$ annually by 2026, and 58,509 $MTCO_2e$ annually by 2045.[118] These net reductions in GHG emissions are consistent with the net-zero significance thresholds established in this analysis. As a result, operational GHG emissions would not be cumulatively considerable and impacts would be considered beneficial.

Impact GHG-2: Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

A significant impact would occur if the proposed Project would conflict with applicable regulations, plans and policies that were adopted to reduce GHG emissions that contribute to global climate change. For the proposed Project, this analysis considers the proposed Project's consistency with the following applicable plans, policies and regulations to reduce GHG emissions:

- The 2017 Climate Change Scoping Plan Update, CARB's plan for achieving a 40 percent reduction on GHG emissions from 1990 levels by 2030, Statewide, as mandated by SB 32;
- SCAG's 2020-2045 RTP/SCS, the regional plan for achieving sustainable land use patterns that reduce passenger vehicle GHG emissions, as mandated by SB 375;
- The City General Plan; and
- The City's ECAP.

CARB 2017 Scoping Plan Update

As directed by Executive Order B-30-15, CARB's 2017 Scoping Plan Update[119] describes how the State plans to achieve the 2030 GHG emission reduction goal for California of 40 percent below 1990 levels by 2030, as mandated by SB 32. The 2017 Scoping Plan Update strategy for meeting the 2030 GHG target incorporates the full range of legislative actions and State-developed plans that have relevance to the year

118 CEQA Guideline, Section 15064.3(b), *Determining Significant Impacts of Transportation Projects.*
119 CARB, California's 2017 Climate Change Scoping Plan, Accessed April 2020, https://www.arb.ca.gov/cc/scopingplan/scoping_plan_2017.pdf.

2030, including the LCFS, SB 350, the 2016 Mobile Source Strategy, the Sustainable Freight Action Plan, SB 1383, and the Cap-and-Trade Program (AB 398).

The proposed Project would be consistent with key State plans and regulatory requirements referenced in the 2017 Scoping Plan Update designed to reduce Statewide emissions. According to the 2017 Scoping Plan Update, reductions needed to achieve the 2030 target are expected to be achieved by increasing the RPS to 50 percent of the State's electricity by 2030, greatly increasing the fuel economy of vehicles and the number of zero-emission or hybrid vehicles, reducing the rate of growth in VMT, supporting high-speed rail and other alternative transportation options, and increasing the use of high-efficiency appliances, water heaters, and HVAC systems. The proposed Project would provide direct connections between regional transit provided by Metro, specifically at the Crenshaw/LAX line, and other transit providers as well as the City's major activity centers, such as the Forum, the LASED and HPSP including SoFi stadium, and IBEC. Implementation of the proposed Project would increase transit mode split, reduce vehicle trips, and reduce per-capita VMT. For these reasons, the proposed Project would not conflict with CARB's 2017 Scoping Plan Update.

Executive Order S-3-05

Executive Order No. S3-05 established a long-term goal of reducing California's GHG emissions to 80 percent below the 1990 level by the year 2050. The proposed Project GHG emissions would result in a net decrease of over 60,000 $MTCO_2e$ of GHG annually starting in 2026.

Even though the State has not provided a clear regulatory and technological roadmap to achieve the 2050 goal, it has demonstrated the potential pace at which emission reductions can be achieved through new regulations, technology deployments, and market developments. In developing the 2017 Scoping Plan Update, CARB, CEC, CPUC, and the California Independent System Operator (CAISO) commissioned a study to evaluate the feasibility and cost of meeting the 2030 target along the way to reaching the State goal of reducing GHG emissions to 80 percent below 1990 levels by 2050. With input from the agencies, the California State Agencies' PATHWAYS Project explores scenarios for meeting the State long-term GHG emissions targets, encompassing the entirety of California economy with detailed representations of the buildings, industry, transportation, and electricity sectors.[120] While acknowledging the inherent uncertainty associated with its modeling assumptions, the PATHWAYS study emphasizes the need for significant action and continued policy development by the State to support low-carbon technologies and markets for energy efficiency, building electrification, renewable electricity, zero emission vehicles, and renewable liquid fuels. The study underscores the need for a periodic review of State policies and

120 Energy + Environmental Economics (E3), 2015. Summary of the California State Agencies' PATHWAYS Project: Long-term Greenhouse Gas Reduction Scenarios. Available: https://www.ethree.com/public_proceedings/summary-california-state-agencies-pathways-project-long-term-greenhouse-gas-reduction-scenarios/.

programs for reducing GHG emissions, as was anticipated by AB 32 in its directive to update the Scoping Plan at least every 5 years.

Statewide efforts are underway to facilitate the achievement of the EO S-3-05 goals. As discussed herein, the proposed Project GHG would provide net benefits in GHG reductions. Given the net reduction GHG emissions that would result from the proposed Project, it would not conflict with the ability of the State to achieve the 2050 horizon-year goal of EO S-3-05.

SCAG 2020-2045 RTP/SCS

A detailed consistency analysis for proposed Project with the RTP/SSCS is provided in **Section 4.9: Land Use and Planning**. The SCAG RTP/SCS[121] is the primary planning document for regional transportation infrastructure in the greater Los Angeles area. With a horizon year of 2045, this long-range plan, required by the federal government, is updated by SCAG every four years as demographic, economic, and policy circumstances change.

Although demographic growth in the six-county SCAG region is slowing, the overall regional population is expected to exceed 22.5 million by 2045 - an increase of nearly 4 million people from the 2016 baseline. According to SCAG, population, housing and employment growth are expected to be particularly strong in the cities of Los Angeles, Culver City, unincorporated areas of Los Angeles County, portions of the South Bay Cities, and Inglewood. The SCAG region is projected to experience a household growth rate of approximately 24 percent, and an employment growth rate of 23 percent. Currently, the City contains roughly 8,900 housing units and 14,414 employees within a ½ mile of the proposed Project's three stations. By 2040, these areas are projected to increase to roughly 12,875 households, and 38,326 employees. These increases represent a growth rate of approximately 45 percent in households and 166% in employment. In comparison to the SCAG region, these projections translate into the City (within a ½ mile of the proposed Project's three stations) experiencing almost twice as much growth rate in housing, and more than seven times as much growth rate in employment by 2040.[122]

As discussed in **Section 4.2** of this Draft EIR, the SCAQMD AQMPs includes land use and transportation strategies from the SCAG RTP/SCS[123] that are intended to reduce VMT and resulting regional mobile source emissions. The applicable land use strategies include planning for growth around livable corridors;

121 Southern California Association of Governments (SCAG), Connect SoCal: 2020-2045 Regional Transportation Plan/Sustainable Communities Strategies Draft, "Chapter 1," https://www.connectsocal.org/Pages/Connect-SoCal-Draft-Plan.aspx, Accessed on July 10, 2020.

122 City of Inglewood, *Transit and Intercity Rail Program (TIRCP) Application for the City of Inglewood Transit Connector Project,* January 16, 2020.

123 Southern California Association of Governments (SCAG), *Connect SoCal: 2020-2045 Regional Transportation Plan/Sustainable Communities Strategies Draft*, "Chapter 1," https://www.connectsocal.org/Pages/Connect-SoCal-Draft-Plan.aspx, Accessed on July 10, 2020.

providing more options for short trips/neighborhood mobility areas; supporting electric vehicles and expanding vehicle charging stations; supporting local sustainability planning.

The proposed Project spans the length of approximately 1.6 miles and would be located near existing restaurant, retail, and commercial land uses which generate vehicle trips on local roadways within the area of the proposed Project. The proposed Project would provide direct connections between regional transit provided by Metro, specifically at the Crenshaw/LAX line, and other transit providers as well as the City's major activity centers, such as the Forum, the LASED and HPSP including SoFi stadium, and IBEC. Implementation of the proposed Project would increase transit mode split, reduce vehicle trips, and reduce per-capita VMT. A reduction in VMTs would result in reduced GHG emissions from mobile sources.

According to SCAG 2020-2045 RTP/SCS, approximately 8,389,000 jobs were available in 2016 across industries in the region and the number of jobs available will increase to 10,050,000 by 2045, an increase of approximately 0.62 percent or approximately 52,700 annually in jobs.[124] Similarly, SCAG projects the population in the region will increase from approximately 18,832,418 in 2016 to 22,507,188 in 2045, resulting in an increase of approximately 0.61 percent or approximately 115,290 population annually.

The proposed Project would generate approximately 150 full-time jobs for the operation and maintenance of the APM trains, tracks, and stations. This results in a net decrease of 343 jobs at the proposed Project from the existing workforce of 493 employees. However, the reduction of jobs at existing commercial and retail uses to accommodate the proposed Project would not result in a reduction in jobs in the local job market.

Other ongoing and proposed developments and construction in downtown Inglewood and the nearby area, such as the HPSP and the LASED, which are both adjacent to the proposed Project, would provide additional job and employment opportunities. As such, the net loss of jobs resulting from the proposed Project can be absorbed by adjacent development.

An adequate workforce exists and is projected to remain in existence, creating capacity to meet the employment needs of the proposed Project during operation. Further, with the current development of new employment opportunities in the City as well as the region, displacement of any existing workers can be absorbed. Therefore, this growth would not conflict with the 2020-2014 RTP/SCS.

The proposed Project would be consistent with a number of SCAG's goals including the following: 1) improving mobility, accessibility, reliability, and travel safety for people and goods; 2) increasing person

124 SCAG. *Draft 2020-2045 ConnectSoCal Demographics And Growth Forecast.* https://www.connectsocal.org/Documents/Draft/dConnectSoCal_Demographics-And-Growth-Forecast.pdf. Accessed July 27, 2020.

and goods movement and travel choices within the transportation system; 3) reducing GHG emissions and improving air quality; and 4) encouraging development of diverse housing types in areas that are supported by multiple transportation options. In addition, the proposed Project is a prime example of one of SCAG's primary strategies which is to link future growth with more transportation choices, specifically around high-quality transit areas (i.e. the ½ mile surrounding rail transit stops or bus stops/corridors that have peak headways of 15 minutes or less), such as the proposed Project's stations.

As part of its vision, the 2020-2045 RTP/SCS includes Connect SoCal;[125] Connect SoCal charts a path toward a more mobile, sustainable and prosperous region by making connections between transportation networks, between planning strategies and between the people whose collaboration can improve the quality of life for Southern Californians. Connect SoCal builds upon and expands land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern. To augment the Core Vision of the plan, Connect SoCal includes new initiatives at the intersection of land use, transportation and technology to close the gap and reach our greenhouse gas reduction goals. As part of the planning vision, Connect SoCal looks to complete "last mile" mobility as part of its sustainability goals. Connect SoCal builds upon with regional initiatives that link the built environment and transportation system with policies, projects and programs that strengthen and enhance each other beyond what each would accomplish in isolation.[126]

As part of the State's mandate to reduce per-capita GHG emissions from automobiles and light trucks, Connect SoCal presents strategies and tools that are consistent with local jurisdictions' land use policies and incorporate best practices for achieving the State-mandated reductions in GHG emissions at the regional level through reduced per-capita VMT. These strategies identify how the SCAG region can implement Connect SoCal and achieve related GHG reductions. SCAG works to support local jurisdictions and partnerships by identifying ways to implement SCS in a way that fits the vision and needs of each local community.

The following Connect SoCal strategies are intended to be supportive of implementing the regional Sustainable Communities Strategy and are applicable to the proposed Project:

125 *Southern California Association of Governments (SCAG), Connect SoCal, The 2020-2045 Regional Transportation Plan/Sustainable Community Strategy of the Southern California Association of Governments,* https://www.connectsocal.org/Pages/Connect-SoCal-Final-Plan.aspx, Accessed on July 10, 2020.

126 Southern California Association of Governments (SCAG), Connect SoCal, The 2020-2045 Regional Transportation Plan/Sustainable Community Strategy of the Southern California Association of Governments, p. 4 https://www.connectsocal.org/Pages/Connect-SoCal-Final-Plan.aspx, Accessed on July 10, 2020.

Focus Growth Near Destinations & Mobility Options

- Focus on a regional jobs/housing balance to reduce commute times and distances and expand job opportunities near transit and along center-focused main streets.
- Encourage design and transportation options that reduce the reliance on and number of solo car trips.

Support Implementation of Sustainability Policies

- Pursue funding opportunities to support local sustainable development implementation projects that reduce greenhouse gas emissions.

The proposed Project's is approximately 1.6 miles in length and would be located near existing residential, office, retail, and commercial land uses which generate vehicle trips on local roadways within the City. The proposed Project would provide direct connections between regional transit provided by Metro, specifically at the Crenshaw/LAX line, and other transit providers as well as the City's major activity centers, such as The Forum, the LASED and HPSP. Implementation of the proposed Project would provide an alternate mode of transportation within the City and decrease vehicle ridership and thereby VMTs.

The 2020-2045 RTP/SCS States that expanding the transit network is central to the region's plan for meeting mobility and sustainability goals while continuing to grow the regional economy.[127] The proposed Project connects transit and achieves the last mile/first mile goals of the 2020-2045 RTP/SCS. Further, the proposed Project is consistent with and assists in achieving Connect SoCal strategies and incorporates best practices for achieving the State-mandated reductions in GHG emissions at the regional level through reduced per-capita VMT.

For these reasons, the proposed Project would not conflict with SCAG's 2020-2045 RTP/SCS.

City ECAP

ECAP[128] implementation is expected to reduce emissions by 18.8 percent below 2005 levels by 2020, enabling the City to meet its 2005 target. However, the City would need to reduce emissions by an additional 111,702 $MTCO_2e$ per year by 2035 to meet its 2035 emissions reduction goal. The ECAP includes the following strategies and actions that are applicable to the proposed Project:

- Strategy 1: Lead by Example with Municipal Government Actions

127 Southern California Association of Governments (SCAG), Connect SoCal, The 2020-2045 Regional Transportation Plan/Sustainable Community Strategy of the Southern California Association of Governments, Chapter 3. https://www.connectsocal.org/Pages/Connect-SoCal-Final-Plan.aspx, Accessed on July 10, 2020.

128 City of Inglewood, Inglewood Energy and Climate Action Plan, March 2013, https://www.cityofinglewood.org/DocumentCenter/View/148/Inglewood-Energy-and-Climate-Action-Plan-ECAP-Adopted-2013-PDF, accessed July 30, 2020.

  - Continue Building and Facility Energy Upgrades to reduce energy use
  - Replace all City-owned street, park, and traffic lights with light-emitting diode (LED) lights
  - Accelerate city vehicle fleet replacement
  - Continue commute trip reduction program
  - Planning for electric vehicle infrastructure
- Strategy 3: Support Renewable Energy Generation
  - Remove barriers to renewable energy generation
  - Make renewable energy generation more affordable
  - Educate potential customers
- Strategy 4: Improve Transportation Options and Manage Transportation Demand
  - Make roadways more efficient
  - Improve transit
  - Improve bicycle facilities
  - Make parking more efficient
  - Reduce commute trips
  - Encourage land use intensification and diversity

As discussed previously, the proposed Project would provide direct connections between regional transit provided by Metro, specifically at the Crenshaw/LAX line, and other transit providers as well as the City's major activity centers, such as the Forum, the LASED and HPSP including SoFi stadium and IBEC. Implementation of the proposed Project would increase transit mode split, reduce vehicle trips, and reduce per-capita VMT. The proposed Project would be consistent with the City's ECAP.

The proposed Project's connection from the City's new housing and employment centers, and sports and entertainment venues, to the Metro Crenshaw/LAX Line and larger regional and State rail system will result in significant benefits for both the City and southern California region, including significant reductions in VMT and GHG emissions.

As a transit connector project, the proposed Project will generates a significant amount of ridership from throughout the region with nearly half of the trips originating from Metro's regional light-rail transit system including the Crenshaw Line/LAX and its connection to South Los Angeles, the Metro Green Line and its connections to the South Bay region and Norwalk, the Expo Line and its connections to Santa Monica, Union Station (connection to California High-Speed Rail), East Los Angeles, Pasadena, and the San Gabriel

and San Fernando Valleys. The proposed Project will attract passengers throughout the region by providing a direct transit connection to the City's housing and employment centers, and new sports and entertainment venues.

In addition to rail integration, the proposed Project provides opportunities to increase bus service ridership. Rail and bus integration are symbiotic – bus service is enhanced by urban transit and vice versa. The proposed Project will be located within close proximity to twenty-two municipal bus lines serving the area, including eighteen bus lines operated by Metro, one line operated by Santa Monica Big Blue, one operated by Culver City Bus, one operated by Los Angeles County, and other operated by the Los Angeles Department of Transportation (LADOT).

The ECAP also reflects a commitment to increasing energy efficiency and implementing energy conservation measures to reduce wasteful, inefficient, and unnecessary consumption. The proposed Project would incorporate a number of sustainability features as listed in **Table 3.0-5: Proposed Sustainability Guidelines**. The City has committed to implementing, if feasible, various sustainability measures for different proposed Project elements that meet or exceed CALGreen requirements, including energy and water conservation measures.

As a result, the benefits of completing the proposed Project will generate significant GHG emission reductions. Without the proposed Project, these VMT reductions and air quality improvements would not be realized.

City General Plan

The City General Plan[129] includes the following elements: Land Use, Circulation, Safety, Noise, Housing, Open Space, and Conservation.

Land Use Element

The following goal from the Land Use Element[130] of the City General Plan are relevant to GHG emissions.

Circulation Goal: Promote and support adequate public transportation within the City and the region.

Circulation Goal: Develop a safe and adequate pedestrian circulation system which is barrier free for the handicapped.

129 City of Inglewood, Department of Community Development and Housing, General Plan. January 1980

130 City of Inglewood, Department of Community Development and Housing, 1980. Land Use Element of the Inglewood General Plan. January 1980. Amended September 14, 2016.

Conservation Element

The City's General Plan Conservation Element addresses the conservation, development, and use of natural resources.[131] Five specific areas of conservation and/or protection that are identified in the Conservation Element include (1) oil and gas production, (2) water production and provision for domestic use, (3) storm water runoff and waste water, (4) hazardous waste and solid waste disposal, and (5) air pollution.[132] The Conservation Element notes the following pollution-reducing measures, which would also reduce GHGs:

- Reducing numbers of vehicles being driven while increasing the utilization of high occupancy vehicles and alternative transportation;
- Requiring improvements to engine efficiency to decrease emissions; and
- Increasing the use of clean fuel vehicles.

As discussed previously, the proposed Project would comply with **MM AQ-1** through **MM AQ-4** from the proposed Project's Construction Commitment Program. **MM AQ-1** would require the use equipment that meets the USEPA's Final Tier 4 emissions standards for off-road diesel-powered construction equipment with 50 hp or greater, for all phases of construction activity. Additionally, **MM AQ-2** would require smaller pieces of equipment to be electric or alternative-fueled (i.e., non-diesel) to the maximum extent feasible. **MM AQ-3** would require construction vendors, contractors, and/or haul truck operators commit to using 2010 model year trucks. **MM AQ-4** would require the use of electric or alternatively fueled (e.g., natural gas) sweepers with HEPA filters. Furthermore, the proposed Project would comply with fleet rules to reduce on-road truck emissions under CARBs Truck and Bus regulation.[133] Compliance with these measures and requirements would be consistent with the goals and policies of the Conservation Element.

Once in operation, the proposed Project would result in a decrease in GHG emissions pollutants (see **Impact GHG-1**). As shown on **Table 4.7-3**, the GHG emissions would result in net reductions under normal operations.

As discussed previously, the proposed Project would provide direct connections between regional transit provided by Metro, specifically at the Crenshaw /LAX line, and other transit providers as well as the City's major activity centers, such as the Forum, the LASED and HPSP. Implementation of the proposed Project would increase transit mode split, reduce vehicle trips, and reduce per-capita VMT.

131 City of Inglewood General Plan, "Conservation Element" (1997), General Plan. January 1980.
132 City of Inglewood General Plan, "Conservation Element" (1997), General Plan. January 1980.
133 California Air Resources Board, Truck and Bus Regulation. https://ww2.arb.ca.gov/our-work/programs/truck-and-bus-regulation/about

For these reasons, the proposed Project would not conflict with Inglewood General Plan policies related to GHG emissions.

Summary

The proposed Project would be consistent with and implement the goals, policies and regulations to reduce GHG emissions of the following:

- The 2017 Climate Change Scoping Plan Update, CARB's plan for achieving a 40 percent reduction on GHG emissions from 1990 levels by 2030, Statewide, as mandated by SB 32;
- SCAG's 2026-2045 RTP/SCS, the regional plan for achieving sustainable land use patterns that reduce passenger vehicle GHG emissions, as mandated by SB 375;
- The City General Plan; and
- The City's ECAP.

Impacts would be less than significant.

Mitigation Measures

No mitigation is required.

Level of Significance after Mitigation

As discussed, the proposed Project would be consistent with and implement the goals, policies, and regulations of the applicable plans to reduce GHG emissions.[134]

Impacts would be less than significant.

4.7.8 CUMULATIVE IMPACTS

As discussed previously in *Section 4.7.3* above, GHG impacts are exclusively cumulative impacts, hence an evaluation of cumulative GHG impacts is already provided above and no further analysis in necessary.

4.7.9 CONSISTENCY WITH CITY GENERAL PLAN

As discussed above under **Impact GHG-2**, the proposed Project would provide direct connections between regional transit provided by Metro, specifically at the Metro Crenshaw/LAX line, and other transit providers as well as the City's major activity centers, such as the Forum, the LASED and HPSP. Implementation of the proposed Project would increase transit mode split, reduce vehicle trips, and reduce per-capita VMT. For these reasons, the proposed Project would not conflict with Inglewood General Plan policies related to GHG emissions.

134 CEQA Guidelines, Section 15064.3(b), *Determining Significant Impacts of Transportation Projects.*

4.8 HAZARDS AND HAZARDOUS MATERIALS

4.8.1 INTRODUCTION

This section of the Draft EIR describes and evaluates potential impacts related to hazards and hazardous materials that could result from construction and operation of the proposed Project. The section contains: (1) a description of the existing land uses within the footprint of the proposed Project and surrounding areas as they pertain to hazardous materials use, as well as a description of the Adjusted Baseline Environmental Setting; (2) a summary of the federal, State, and local regulations related to hazards or hazardous materials; and (3) an analysis of the potential impacts related to hazards and hazardous materials associated with the implementation of the proposed Project, as well as identification of potentially feasible measures that could mitigate significant impacts.

Information from the following preliminary hazard investigations conducted for the proposed Project were used in part to prepare this section:

- *Hazardous Material Assessment*, Geosyntec Consultants, July 3, 2018 (included in **Appendix 4.8.1** of this Draft EIR),
- *Hazards and Hazardous Materials*, Geosyntec, July 3, 2018 (included in **Appendix 4.8.2** of this Draft EIR), and
- EDR Radius Map Report (included in **Appendix 4.8.3** of this Draft EIR).

Prior to the preparation of this Draft EIR, a Revised Initial Study (included in **Appendix 2.0.2** of this Draft EIR) was prepared using the California Environmental Quality Act (CEQA) Guidelines Environmental Checklist Form to assess potential environmental impacts associated with hazardous materials. For three of the CEQA Environmental Checklist Form thresholds related to this topic area, the Revised Initial Study found that the proposed Project would result in "no impact," and for four thresholds were found to have "less than significant impacts." However, one threshold, outlined in *Section 4.8.5: Thresholds of Significance* below, was reviewed further and included in this section on the Draft EIR.

The following impacts are considered to be less than significant:

- Potential impacts related to the routine transport, use, or disposal of hazardous materials were evaluated and determined to have a "Less than Significant Impact" in the Initial Study. As discussed therein, construction and operation of the proposed Project would comply with existing federal, State, and local regulations and routine precautions would reduce the potential for accidental releases of a hazardous material or substance to occur and would minimize the impact of an accident should one occur. As such, the proposed Project would not create a significant hazard to the public or environment through the routine transport, use, or disposal of hazardous materials and substances. Therefore, this issue is not addressed any further within this section.

- Potential impacts related to the emittance of hazardous emissions or handling of hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school were evaluated and determined to have a "Less than Significant Impact" in the Initial Study. As discussed therein, although the proposed Project is within a quarter mile of several existing schools, including Kelso Elementary School, and hazardous materials have the potential to be transported and therefore emitted near these locations, impacts would be less than significant. No new emittances of hazardous materials would occur during proposed Project construction or operation. As discussed below, the proposed Project would comply with the Hazardous Materials portion of the Construction Commitment Plan. The routes used for material transport will be along designated truck routes in the City of Inglewood (City), including Florence Avenue, Manchester Boulevard, Prairie Avenue, and Century Boulevard. These routes have been identified by the City as "Designated Truck Routes" in the Inglewood Municipal Code;1 as such, use of these routes by the proposed project will limit impacts on adjacent uses. Further, the proposed Project will restrict haul route traffic to after hours from 10 PM to 7 AM when classes are not in session and students, staff, and faculty are not present. All activities associated with the proposed Project would comply with existing regulations governing the storage and handling of such chemicals as they relate to hazardous materials. Even though potential impacts were determined to have a less than significant impact, notices were sent to the four schools within the vicinity of the proposed Project and responses were integrated into the discussion below. Therefore, this issue is not addressed any further within this section.[2]
- Potential impacts related to being located within an airport land use plan, or within two miles of a public airport, public use airport, or private airstrip, resulting in a safety hazard for people residing or working in the area were evaluated and determined to have "No Impact" in the Initial Study. Los Angeles International Airport (LAX) is located more than 2 miles southwest and Hawthorne Municipal Airport is located approximately 2.75 miles southeast of the proposed Project. The proposed Project would not construct any buildings or structures to a height that would interfere with or obstruct any local airport operations. Therefore, this issue is not addressed any further within this section.[3]
- Potential impacts related to the exposure of people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fire were evaluated and determined to have "No Impact" in the Initial Study. The City is highly developed and entirely urbanized and is without an urban/wildland interface. The proposed Project is not within a Moderate, High, or Very High Fire Hazard Severity Zone as designated by the California Department of Forestry and Fire Protection (CAL FIRE). Therefore, this issue is not addressed any further within this section.[4]

Impacts found to be less than significant are further discussed in **Section 6.0: Other Environmental**

1 Inglewood Municipal Code. Chapter 3 – Motor vehicles and traffic, Article 3 – Truck Route regulations.
2 *Hazardous Material Assessment Technical Memorandum*, Geosyntec Consultants, July 3, 2018.
3 *Hazardous Material Assessment Technical Memorandum*, Geosyntec Consultants, July 3, 2018.
4 *Hazardous Material Assessment Technical Memorandum*, Geosyntec Consultants, July 3, 2018.

Considerations.

Please see **Section 8.0** for a glossary of terms, definitions, and acronyms used in this Draft EIR.

4.8.2 METHODOLOGY

In the analysis contained in this Draft EIR, hazardous materials refer generally to hazardous substances, hazardous waste, and other materials that exhibit corrosive, poisonous, flammable, and/or reactive properties and have the potential to harm human health and/or the environment. Hazardous materials are used in products (e.g., household cleaners, industrial solvents, paint, pesticides, etc.) and in the manufacturing of products (e.g., electronics, newspapers, plastic products, etc.). Hazardous materials can include petroleum products, natural gas, synthetic gas, acutely toxic chemicals, and other toxic chemicals that are used in agriculture, commercial and industrial uses, retail businesses, hospitals, and households. Accidental releases of hazardous materials can result from a variety of incidents, including highway incidents, warehouse fires, train derailments, shipping accidents, and industrial incidents.

The term "hazardous materials" as used in this section includes all materials defined in the California Health and Safety Code as follows:

> *A material that, because of its quantity, concentration, or physical or chemical characteristics, poses a significant present or potential hazard to human health and safety or to the environment if released into the workplace or the environment. 'Hazardous materials' include, but are not limited to, hazardous substances, hazardous waste, and any material that a handler or the unified program agency has a reasonable basis for believing that it would be injurious to the health and safety of persons or harmful to the environment if released into the workplace or the environment.*

The term includes chemicals regulated by the United States Department of Transportation (USDOT), the United States Environmental Protection Agency (USEPA), the California Department of Toxic Substances Control (DTSC), the California Governor's Office of Emergency Services, and other agencies as hazardous materials, wastes, or substances.

Analysis in this section is focused on the use or management of hazardous or potentially hazardous materials resulting from construction and operational activities envisioned under the proposed Project. The severity of potential hazards to people, property, and the environment associated with the heightened interaction with hazardous materials associated with implementation of the proposed Project is also analyzed. Analysis in this section would utilize various existing databases and historical data, including California Hazardous Material Incident Report System (CHMIRS), HAZNET, HIST CORTESE, and Los Angeles County Industrial Waste and Underground Storage Tank Sites. Contaminated site locations extracted from

these databases are then delineated on the proposed Project guideway, station, MSF and TPSS locations and impacts are assessed according to the potential activities that would take place on specific sites.

Additionally, this section addresses short-term construction impacts resulting from demolition of underground storage tanks (USTs) and other existing (typically older) structures, work in the vicinity of historical oil well and pipeline activity, work in areas with previously documented soil contamination, and other subsurface construction activities, as well as operational impacts associated with the type of uses proposed and the materials that operation of these uses would entail. In determining the level of significance, the analysis recognizes that all components of the proposed Project would be required to comply with relevant federal and State laws and regulations that are designed to ensure the safety of routine transport, use, management, or disposal of hazardous materials.

4.8.3 REGULATORY FRAMEWORK

The following presents the federal, State, and local regulatory framework, laws, ordinances, and regulations governing the proposed Project as related to hazards and hazardous materials (HHM).

4.8.3.1 Federal

Occupational Safety and Health Act

The Occupational Safety and Health Act (OSHA) is intended to create a safe workplace.[5] OSHA establishes procedures and standards for the safe handling and storage of hazardous chemicals. In addition, a safety data sheet (SDS) containing specified information must be provided to customers, making them aware of chemical hazards to which they may be exposed. OSHA also establishes standards regarding the safe exposure limits for chemicals to which construction workers may be exposed. Safety and Health Regulation for Construction[6] contains Compliance Guidelines for construction activities, which include occupational health and environmental controls to protect worker health and safety. These Guidelines articulate the required health and safety plan(s) to be developed and implemented during construction, including associated training, protective equipment, evacuation plans, chains of command, and emergency response procedures.

Emergency Planning and Community Right-to-Know

The Emergency Planning and Community Right-to-Know Act (EPCRA)[7] requires facilities that store or use hazardous chemicals to submit a specified plan with copies of SDSs to the State Emergency Response Center (SERC) and the local emergency planning center (LEPC). Additionally, facilities must submit an

5 29 USC Section 651 et seq. (1970), 29 CFR Section 1910 et seq. (1999).
6 29 CFR Section 1926.65 Appendix C – Compliance Guidelines (1993).
7 42 USC Section 116 et seq. (2010), 40 CFR Section 350 et seq. (2011).

annual inventory list with details on the amount, location, and storage method of regulated chemicals present at the facility.[8]

Toxic Substances Control Act

The Toxic Substances Control Act (TSCA) enables USEPA to track industrial chemicals produced or imported into the United States.[9] USEPA screens the chemicals and can require testing to determine if any pose an environmental or human-health hazard. Any chemical that poses an unreasonable risk then can be regulated or banned from manufacturing or importation. Congress enacted major amendments to TSCA in 2016 via the Lautenberg Act,[10] which strengthened USEPA's authority to regulate chemicals.

Clean Air Act

Section 112 of the Clean Air Act requires USEPA to set air toxics standards for regulating the emissions of hazardous air pollutants.[11] The 1990 federal Clean Air Act Amendments establish a program designed to prevent the release of highly hazardous chemicals.[12]

Resource Conservation and Recovery Act

The Resource Conservation and Recovery Act (RCRA) Subtitle[13] establishes design, construction, and operational standards to prevent chemical releases from USTs. RCRA Subtitle I regulates USTs containing hazardous substances or petroleum. USEPA sets standards governing tank construction based on whether the tank is new or whether an existing tank is upgraded. USEPA also imposes operation and maintenance procedures for UST owners and operators and establishes reporting requirements from regulated tanks that release substances into the environment.

RCRA Subtitle C[14] is intended to proactively manage hazardous waste and to minimize and avoid hazardous waste contamination. RCRA Subtitle C addresses hazardous waste from cradle-to-grave, regulating the generation, transport, storage, treatment, and disposal of hazardous waste by "large-quantity generators" (1,000 kilograms/month or more). RCRA, Subtitle I, the Hazardous and Solid Waste Amendments (HSWA) of 1984, expanded and clarified RCRA Subtitle C. USEPA administers RCRA Subtitle C pursuant to regulations found at 40 CFR Section 260 et seq. and has delegated RCRA Subtitle C implementation and enforcement within California to the State. Under RCRA regulations, hazardous

8 40 CFR Section 370.20 et seq. (2002).
9 15 USC Section 2601 et seq. (1976), 40 CFR Section 700 et seq. (2012).
10 H.R. 2576 — 116th Congress, "Federal Government Advertising Equity Accountability Act," (2016).
11 Clean Air Act Title I, Section 112, USC 7412 "Hazardous Air Pollutants."
12 EPA, "The Clean Air Act – Highlights of the 1990 Amendments," United States Environmental Protection Agency, accessed June 22, 2020, https://www.epa.gov/clean-air-act-overview/clean-air-act-highlights-1990-amendments.
13 42 USC Section 6991 et seq., (1976), 40 CFR Section 280 et seq., (2014).
14 42 USC Section 6901 et seq.

wastes must be tracked from the time of generation to the point of disposal. At a minimum, each generator of hazardous waste must register and obtain a hazardous waste activity identification number. If hazardous wastes are stored for more than 90 days or treated or disposed at a facility, any treatment, storage, or disposal unit must be permitted under RCRA. Additionally, all hazardous waste transporters are required to be permitted and must have an identification number.

Hazardous Materials Transportation Act

The Hazardous Materials Transportation Act regulates transport of hazardous materials on water, rail, highways, airplanes, and pipelines.[15] The US Department of Transportation (DOT) administers the Act.[16] Title 49 of the CFR specifies additional requirements and regulations with respect to the transport of hazardous materials. Title 49 of the CFR requires that every employee who transports hazardous materials receive training to recognize and identify hazardous materials and become familiar with hazardous materials requirements. Drivers are also required to be trained in function and commodity specific requirements. In addition, vehicles transporting certain types or quantities of hazardous materials must display placards (warning) signs. Transporters of hazardous wastes must be permitted and have an identification number.

4.8.3.2 State

Department of Toxic Substances Control

At the State level, authority for the Statewide administration and enforcement of RCRA is enforced through CalEPA's DTSC. While the DTSC has primary State responsibility in regulating the generation, storage, and disposal of hazardous materials, DTSC may further delegate enforcement authority to local jurisdictions. In addition, the DTSC is responsible and/or provides oversight for contamination cleanup, and administers Statewide hazardous waste reduction programs.[17] DTSC operates programs to accomplish the following: (1) deal with the aftermath of improper hazardous waste management by overseeing site cleanups; (2) prevent releases of hazardous waste by ensuring that those who generate, handle, transport, store, and dispose of wastes do so properly; and (3) evaluate soil, water, and air samples taken at sites.

Division of Occupational Safety and Health

The California OSHA (Cal-OSHA) program is administered and enforced by the Division of Occupational Safety and Health (DOSH). The Cal-OSHA program is similar to the Federal OSHA program in that both programs contain rules and procedures related to exposure to hazardous materials during demolition and

15 49 USC Section 1801 et seq., (1975).
16 49 CFR Section 100 et seq., (2016).
17 22 CCR Division 4.5, "Environmental Health Standards for the Management of Hazardous Waste," 2020, https://govt.westlaw.com/calregs/Index?transitionType=Default&contextData=(sc.Default).

construction activities. In addition, Cal-OSHA requires employers to implement a comprehensive, written Injury and Illness Prevention Program (IIPP). An IIPP is an employee safety program for potential workplace hazards, including those associated with hazardous materials.[18]

California Highway Patrol and Department of Transportation

The California Highway Patrol and California Department of Transportation (Caltrans) are the enforcement agencies responsible for hazardous materials transportation regulations. Hazardous materials and waste transporters are responsible for complying with all applicable packaging, labeling, and shipping regulations.[19] The provisions of this section apply to the highway transportation of hazardous materials and hazardous waste and include restrictions on labeling/placards, transportation routes, and other measures to ensure safe transport of regulated materials.

Hazardous Waste Control Act

The Hazardous Waste Control Act was passed in 1972 and established the California Hazardous Waste Control Program within the Department of Health Services. California's hazardous waste regulatory effort became the model for the federal RCRA. California's program, however, was broader and more comprehensive than the federal system, regulating wastes and activities not covered by the federal program. California's Hazardous Waste Control Law[20] was followed by emergency regulations in 1973 that clarified and defined the hazardous waste program, as follows:

- Included definitions of what was a waste and what was hazardous as well as what was necessary for appropriate handling, processing, and disposal of hazardous and extremely hazardous waste in a manner that would protect the public, livestock, and wildlife from hazards to health and safety.
- The early regulations also established a tracking system for the handling and transportation of hazardous waste from the point of waste generation to the point of ultimate disposition, as well as a system of fees to cover the costs of operating the hazardous waste management program.
- Advancing the newly developing awareness of hazardous waste management issues, the program established a technical reference center, for public and private use, dealing with all aspects of hazardous waste management.

California Government Code Section 65962.5 (a), Cortese List

The Hazardous Waste and Substance Sites (Cortese) List is a planning document used by the State, local agencies, and developers to comply with the CEQA requirements in providing information about the

18 California Code of Regulations, Title 8 Section 3203, "Injury and Illness Prevention Program," 2020, https://www.dir.ca.gov/title8/3203.html.

19 California Vehicle Code Division 13, Chapter 5, Article 1, Section 31303–31309

20 Hazardous Waste Control Law, California Health and Safety Code sections 25100 et seq

location of hazardous materials release sites. Government Code Section 65962.5 requires the California Environmental Protection Agency (CalEPA) to develop at least annually an updated Cortese List. The Department of Toxic Substances Control is responsible for a portion of the information contained in the Cortese List. Other State and local government agencies are required to provide additional hazardous material release information for the Cortese List.[21]

CEQA[22] requires the lead agency to consult the lists compiled pursuant to Government Code Section 65962.5 to determine whether a project and any alternatives are identified on any of the following lists:

- **EPA NPL**: USEPA's National Priorities List includes all sites under USEPA's Superfund program, which was established to fund cleanup of contaminated sites that pose risk to human health and the environment.
- **EPA CERCLIS and Archived Sites**: USEPA's Comprehensive Environmental Response, Compensation, and Liability Information System includes a list of 15,000 sites nationally identified as hazardous sites. This would also involve a review for archived sites that have been removed from CERCLIS due to No Further Remedial Action Planned (NFRAP) status.
- **EPA RCRIS (RCRA Info)**: The Resource Conservation and Recovery Act Information System (RCRIS or RCRA Info) is a national inventory system about hazardous waste handlers. Generators, transporters, handlers, and disposers of hazardous waste are required to provide information for this database.
- **DTSC Cortese List**: DTSC maintains the Cortese list as a planning document for use by the State and local agencies to comply with the CEQA requirements in providing information about the location of hazardous materials release sites. This list includes the Site Mitigation and Brownfields Reuse Program Database (CalSites).
- **DTSC HazNet**: DTSC uses this database to track hazardous waste shipments.
- **SWRCB LUSTIS**: Through the Leaking Underground Storage Tank Information System, the SWRCB maintains an inventory of USTs and leaking USTs, which tracks unauthorized releases.

The required lists of hazardous material release sites are commonly referred to as the "Cortese List," named after Dominic L. Cortese, the California State Assemblyman who authored the legislation. Because the statute was enacted more than 20 years ago, some of the provisions refer to agency activities that are no longer being implemented and, in some cases, the information required in the Cortese List does not exist. Those requesting a copy of the Cortese Lists are now referred directly to the appropriate information resources contained on internet websites hosted by the boards or departments referenced in the statute, including DTSC's online EnviroStor database and the SWRCB's online GeoTracker database.

21 California Public Resources Code Section 65962.5
22 California Public Resources Code Section 21092.6.

Sites that are no longer considered "active" because the SWRCB, a regional board, or the County has determined that no further action is required because actions were taken to adequately remediate the release, or because the release was minor, presents no environmental risk, and no remedial action is necessary, are listed as "closed" and deleted from the list.[23]

Hazardous Materials Business Plan

Any business that handles, stores, or disposes of a hazardous substance at a given threshold quantity must prepare a hazardous materials business plan (HMBP). HMBPs are intended to minimize hazards to human health and the environment from fires, explosions, or an unplanned release of hazardous substances into air, soil, or surface water. The HMBP must be carried out immediately whenever a fire, explosion, or unplanned chemical release occurs. An HMBP includes three sections: (1) an inventory of hazardous materials, including a site map, which details their location; (2) an emergency response plan; and (3) an employee-training program. HMBPs serve as an aid to employers and employees in managing emergencies at a given facility. They also help better prepare emergency response personnel for handling a wide range of emergencies that might occur at the facility. HMBPs are submitted to the Department of Environmental Health Hazardous Materials Division. The plans must be resubmitted, reviewed, revised, or amended as necessary every 3 years. The HMBP must also be amended within 30 days whenever there are changes in the amount or location of stored hazardous chemicals on a site. The Hazardous Materials Division conducts routine inspections at businesses required to submit business plans. The purpose of these inspections is to (1) ensure compliance with existing laws and regulations concerning HMBP requirements, (2) identify existing safety hazards that could cause or contribute to an accidental spill or release, and (3) suggest preventative measures designed to minimize the risk of a spill or release of hazardous materials. After initial submission of an HMBP, the business must review and recertify the HMBP every year.[24]

Risk Management Plan

Any owner or operator of a stationary source (non-transportation) with more than a threshold quantity of a regulated substance is required to prepare a risk management plan. The State statutes and regulations combine federal- and State-program requirements for the prevention of accidental releases of listed substances into the atmosphere: the CalARP program. CalARP requires that a risk management plan include a hazard assessment program, an accidental release prevention program, and an emergency response plan. The risk management plan must be revised every 5 years or as necessary. Typical facilities or businesses that are required to prepare risk management plans include: ammonia refrigeration

23 California Environmental Protection Agency, Cortese List: Section 65962.5(c), accessed March 2019, available at https://calepa.ca.gov/sitecleanup/corteselist/section-65962-5c/.

24 California Health and Safety Code Sections 25500–25520.

facilities, water treatment and wastewater treatment plants that handle chlorine gas and facilities that store flammable chemicals such as methane and propane.[25]

Titles 14, 22, 23, and 27 of the California Code of Regulations (CCR)

Title 14 requires that gas storage fields be closely monitored by facility operators to ensure their safe operation and to establish that no damage to health, property, or natural resources occurs.[26] Titles 22 and 23 of the CCR address hazardous materials and wastes. Title 22 defines, categorizes, and lists hazardous materials and wastes including universal wastes.[27] Title 23 addresses public health and safety issues related to hazardous materials and wastes, and specifies disposal options.[28] Title 27 of the CCR addresses landfill closure standards and landfill-related public health and safety issues.[29]

Unified Hazardous Waste and Hazardous Materials Management Regulatory Program

In 1996, CalEPA adopted the Unified Hazardous Waste and Hazardous Materials Management Regulatory Program (Unified Program). The Unified Program consolidates and coordinates the six State programs that regulate business and industry use, storage, handling, and disposal of hazardous materials and wastes. The County of Los Angeles Fire Department Health and Hazardous Materials Division provides the regulatory oversight for federal, State, and local laws and regulations related to hazardous materials use and disposal within the City. This County agency protects the public health and the environment from accidental releases and improper handling, storage, transportation, and disposal of hazardous materials and wastes through coordinated efforts of inspections, emergency response, enforcement, and site mitigation oversight. In addition, the County Fire Department Health and Hazardous Materials Division (HHMD) implements the following programs that are relevant to existing and the new uses that are associated with the proposed Project:[30]

- Hazardous Materials Reporting and Response Planning (Hazardous Materials Disclosure)
- Uniform Fire Code Business Plan
- Hazardous Waste Generation and On-site Treatment
- Accidental Release Prevention Program

25 California Health and Safety Code Sections 25531–25543.3.
26 California Code of Regulations, Title 14, "Natural Resources."
27 California Code of Regulations, Title 22, "Social Security."
28 California Code of Regulations, Title 23, "Waters."
29 California Code of Regulations, Title 27, "Environmental Protection."
30 California Senate Bill 1082.

California Human Health Screening Levels

The California Human Health Screening Levels (CHHSLs or "Chisels")[31] are concentrations of 54 hazardous chemicals in soil or soil gas that CalEPA considers to be below thresholds of concern for risks to human health. The CHHSLs were developed by the Office of Environmental Health Hazard Assessment on behalf of CalEPA. The CHHSLs were developed using standard exposure assumptions and chemical toxicity values published by the EPA and CalEPA. The CHHSLs can be used to screen sites for potential human health concerns where releases of hazardous chemicals to soils have occurred. Under most circumstances, the presence of a chemical in soil, soil gas, or indoor air at concentrations below the corresponding CHHSL can be assumed to not pose a significant health risk to people who may live or work at the site. There are separate CHHSLs for residential and commercial/industrial sites.

Senate Bill 1889, Accidental Release Prevention Law/CalARP

Senate Bill (SB) 1889 required California to implement a new federally mandated program governing the accidental airborne release of chemicals promulgated under Section 112 of the Clean Air Act. Effective January 1, 1997, CalARP replaced the previous California Risk Management and Prevention Program and incorporated the mandatory federal requirements. CalARP addresses facilities that contain specified hazardous materials, known as "regulated substances," which if involved in an accidental release could result in adverse off-site consequences. CalARP defines regulated substances as chemicals that pose a threat to public health and safety or the environment because they are highly toxic, flammable, or explosive.[32]

California Emergency Services Act

The California Emergency Services Act[33] was adopted to establish the State's roles and responsibilities during human-made or natural emergencies that result in conditions of disaster and/or extreme peril to life, property, or the resources of the State. This act is intended to protect health and safety by preserving the lives and property of the people of the State.

State Fire Regulations

State fire regulations include those concerning building standards (as also set forth in the California Building Code), fire protection and notification systems, fire protection devices such as extinguishers and smoke alarms, high-rise building and childcare facility standards, and fire suppression training. The State

31 Health and Safety Code Section 57008.
32 Health and Safety Code Sections 25531 – 25534.3.
33 California Public Resources Code Section 8550 – 8669.7.

fire marshal enforces these regulations and building standards in all State-owned buildings, State-occupied buildings, and State institutions throughout California.[34]

California Fire Code (Chapter 33, Fire Safety During Construction and Demolition)

The California Fire Code, Chapter 33 related to fire safety during construction and demolition prescribes safeguards to provide reasonable safety to life and property from fire during such operations. Specific safeguards related to oil-fired heaters, gas heaters, refueling, smoking, waste disposal, welding, electrical, flammable, and combustible odors, water supply for fire protection, fire extinguishers, etc. Implementation of these safeguards are designed to reduce the potential of fire-related hazards during construction and demolition activities.[35]

State Water Resources Control Board

The State Water Resources Control Board (SWRCB) operates under the authority of CalEPA, with a mission to preserve, enhance, and restore the quality of California's water resources and drinking water for the protection of the environment, public health, and all beneficial uses, and to ensure proper water resource allocation and efficient use, for the benefit of present and future generations. There are nine regional water quality control boards (RWQCBs) that develop and enforce water quality objectives and implementation plans that will best protect the beneficial uses of the State's waters. The RWQCBs develop "basin plans" for their hydrologic areas, govern requirements/issue waste discharge permits, take enforcement action against violators, and monitor water quality. The RWQCBs have the authority to require the remediation of sites where groundwater quality may be degraded by hazardous materials or substances releases from USTs or other sources. The proposed Project is within the jurisdiction of the Los Angeles RWQCB (Region 4). The Los Angeles RWQCB issued Order No. R4-2007-0019 which provides General Waste Discharge Requirements (WDRs) relative to the groundwater remediation at petroleum hydrocarbon fuel and/or volatile organic compound (VOC) impacted sites. The Order identifies a list of materials that can be used for in-situ remediation zone treatment purposes.[36]

The State Water Board adopted a Low-Threat Underground Storage Tank Case Closure Policy.[37] The Policy applies to petroleum UST sites subject to Chapter 6.7 of the Health and Safety Code. The Policy establishes both general and media-specific criteria.

34 California Health and Safety Code Section 13000 et seq.
35 California Fire Code 2019.
36 LARWQCB Basin Plan, March 13, 2020, https://www.waterboards.ca.gov/losangeles/water_issues/programs/basin_plan/.

Both Regional Water Boards and local agencies have been directed to review all cases in the petroleum UST Cleanup Program using the framework provided in the Policy. This review shall be accomplished within existing budgets and be performed no later than 365 days from the effective date of this Policy.

These case reviews shall, at a minimum, include the following for each UST case:

1. Determination of whether or not each UST case meets the criteria in the Policy or is otherwise appropriate for closure based on a site-specific analysis.
2. If the case does not satisfy the criteria in this Policy or does not present a low-risk based upon a site-specific analysis, impediments to closure shall be identified.
3. Each case review shall be made publicly available on the State Water Board's GeoTracker web site

If both the general and applicable media-specific criteria are satisfied, then the leaking UST case is generally considered to present a low threat to human health, safety, and the environment. The Policy recognizes, however, that even if all of the specified criteria in the Policy are met, there may be unique attributes of the case or site-specific conditions that increase the risk associated with the residual petroleum constituents. In these cases, the regulatory agency overseeing corrective action at the site must identify the conditions that make case closure under the Policy inappropriate.

4.8.3.3 Regional and Local

South Coast Air Quality Management District

Remediation of contamination has the potential to expose workers to hazardous materials or substances. The South Coast Air Quality Management District (SCAQMD) regulates emissions from soil remediation activities through Rule 1166, Volatile Organic Compound Emissions from Decontamination of Soil. This rule requires development and approval of a mitigation plan, monitoring of VOC concentrations, and implementation of the mitigation plan if VOC-contaminated soil is detected.[38]

SCAQMD Rule 1403 specifies work practice requirements to limit asbestos emissions from building demolition and renovation activities, including the removal and associated disturbance of asbestos-containing materials (ACM). The rule's requirements for demolition and renovation activities include asbestos surveying, notification, ACM removal procedures and time schedules, ACM handling and cleanup procedures, and storage, disposal, and landfilling requirements for asbestos-containing waste materials (ACWM).[39]

38 Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil, AQMD, 2001, http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1166.pdf.

39 Rule 1403 – Asbestos Emissions from Demolition/Renovations Activities, AQMD, 2007, http://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1403.pdf.

Regional Water Quality Control Board

USTs are regulated under Subtitle I of RCRA and its implementing regulations, which establish construction standards for new UST installations, as well as standards for upgrading existing USTs and associated piping. After 1998, all nonconforming tanks were required to be either upgraded or closed.

The storage of hazardous materials in USTs is regulated by CalEPA's SWRCB, which has delegated authority to each of the nine RWQCBs and, typically on the local level, to the local fire department. The State's UST Program regulations include, among others, permitting USTs, installation of leak detection systems and/or monitoring of USTs for leakage, UST closure requirements, release reporting/corrective action, and enforcement. The State's Site Cleanup Program (SCP) regulates and oversees the investigation and cleanup of unauthorized discharges of pollutants and pollution-impaired sites not overseen by the UST Program.[40] The primary goal of the SCP is to direct and provide oversight of site investigation and cleanup activities that will result in restoration and/or protection of water quality, human health, and the environment.

The LACoFD administers and enforces federal and State laws and local ordinances for USTs in the City of Inglewood. Plans for the construction/installation, modification, upgrade, and removal of USTs are reviewed by LACoFD Inspectors.

County of Los Angeles Fire Department

At the local level, the County of Los Angeles Fire Department (LACoFD) monitors the storage of hazardous materials in the City for compliance with local requirements. Specifically, businesses and facilities which store more than threshold quantities of hazardous materials are required to file an Accidental Risk Prevention Program with the LACoFD. This program includes information such as emergency contacts, phone numbers, facility information, chemical inventory, and hazardous materials handling and storage locations. The LACoFD also has delegated authority to administer and enforce Federal and State laws and local ordinances for USTs. Plans for the construction/installation, modification, upgrade, and removal of USTs are reviewed by LACoFD Inspectors.[41]

City of Inglewood General Plan

The City's General Plan, Safety Element outlines the following relevant measures as means to minimize the dangerous aspects of hazardous materials:[42]

40 42 USC Section 6901 et seq.
41 California Health and Safety Code, Chapter 6.95.
42 *City of Inglewood* General Plan, "Safety Element" (1995).

- Enforcement of the State law that requires businesses involved with hazardous materials to disclose the quantities of hazardous materials, their locations, their disposal, and a management plan designed to decrease risks to the public.
- Private businesses and government agencies must continue to update and prepare the proper emergency responses in the event of a spill or explosion.
- The City must have continuous coordination among its staff to ensure that hazardous material operations are located in zones and facilities that are appropriate and safe for such use.
- The City must ensure that these uses are located safe distances from residences, schools, hospitals, large assemblages of people, etc.
- The City must inform the public of the potential perils that accompany hazardous material sites. Public awareness as acquired through public education programs will enable the citizenry to learn to protect themselves by observing and implementing safety procedures during a spill or explosion.

The City's General Plan, Safety Element identifies evacuation routes that assume worst-case displacement and surface rupture from a seismic event. Within the City, Florence Avenue, La Brea Avenue, Crenshaw Boulevard, and Imperial Highway are identified as designated evacuation routes. In addition, the Safety Element of the General Plan identifies emergency corridors that can be most readily opened immediately following a seismic event. These include Inglewood Avenue, La Brea Avenue/Hawthorne Boulevard, Prairie Avenue, Crenshaw Boulevard, La Cienega Boulevard, Van Ness Avenue, West Boulevard, Florence Avenue, Manchester Boulevard, Century Boulevard, Imperial Highway and Centinela Avenue.

City of Inglewood Multi-Hazard Mitigation Plan and Emergency Operation Plan

The City Multi-Hazard Mitigation Plan was developed by the City to reduce or eliminate long-term risk to human life and property both natural and man-made hazards.[43] The plan includes a list of mitigation measures to be implemented in order to meet identified goals and objectives related to emergency readiness and hazard reduction. In addition, the City prepared an Emergency Response Plan to comply with the California Standardized Emergency Management System and the Federal Emergency Management Agency (FEMA) National Incident Management System. The plan includes information on the Emergency Operations Organization, the roles, and responsibilities of each City division, and includes operational checklists to guide response actions. The City's Multi-Hazard Mitigation plan was adopted on August 18, 2009 with a 5-year planning horizon. The City is currently undergoing the development of a revised and updated plan subject to the securing of funding.

The City's Office of Emergency Services (OES) acts in coordination with all City departments to maximize the City's potential to prevent, prepare for, respond to, and recover from both natural and man-made

43 *City of Inglewood,* Multi-Hazard Mitigation Plan, March 23, 2010.

emergencies and disasters. The 2010 MHMP generally provides a means to prepare and maintain systems, supplies and other logistical items to support emergency/disaster response and recovery among City departments. According to the MHMP, "all future development/redevelopment projects will be constructed to current design standards and building codes and are not expected contribute to community vulnerability from natural or technological hazards."[44] The overall goals of the plan are to:

- Minimize the loss of life and property from natural hazard events
- Protect public health and safety
- Increase public awareness of risk from natural hazards
- Enhance emergency services including warning systems

City of Inglewood Municipal Code

The Inglewood Municipal Code adopts the Los Angeles County Fire Code as the Fire Code of the City.[45] Additionally, the Municipal Code designates the Los Angeles County Fire Department as the administering agency for the hazardous material inventory and emergency response program within the City, including the provisions of the California Hazardous Materials Release Response Plans and Inventory Law and other hazardous materials related regulations.[46] These sections of the Municipal Code set forth requirements to ensure fire safety of new and reconstructed buildings within Inglewood.

4.8.4 EXISTING CONDITIONS

4.8.4.1 Known Hazardous or Potentially Hazardous Materials

Underground Storage Tanks

Soils and groundwater in the City have the potential to be contaminated due to historical spills and leaking USTs. A UST is defined by law as "any one or combination of tanks, including pipes connected thereto, that is used for the storage of hazardous substances and that is substantially or totally beneath the surface of the ground" (certain exceptions apply).[47] There are nine known historical Leaking Underground Storage Tanks (LUSTs) within 500 feet of the proposed Project identified by the State Water Resources Control Board.[48] These locations are listed as follows and are arranged by proximity to each guideway segment:

44 City of Inglewood, 2010. Multi-Hazard Mitigation Plan, March 23, 2010.
45 Inglewood Municipal Code, "Chapter 6, Article 1: Fire Code and Amendments," https://www.qcode.us/codes/inglewood/view.php?topic=6-1&frames=off.
46 Inglewood Municipal Code, "Chapter 6, Article 2, Section 6-5: Hazardous Materials Disclosure Agency,"https://www.qcode.us/codes/inglewood/view.php?topic=6-2-6_5&frames=off.
47 California State Water Resources Control Board, Division of Water Quality, "Underground Storage Tank Program," accessed March 2019, available at https://www.waterboards.ca.gov/ust/.
48 California State Water Resources Control Board, GeoTracker, accessed March 2019, available at https://geotracker.waterboards.ca.gov/.

Market Street Segment

- ***317 E. Florence Avenue*** (Los Angeles County Metropolitan Transportation Authority [Metro]); RWQCB Case Number R-60173 involved potential contamination of gasoline in soil; remediation completed and case closed as of January 13, 2017;
- ***230 N. La Brea Avenue*** (Fujita Corporation); RWQCB Case Number R-37884 involved potential contamination of gasoline; case closed as of September 10, 2003;

Manchester Boulevard Segment

- ***501 E. Manchester Boulevard*** (Simon's Mini Market); RWQCB Case Number I-13094 involved potential contamination of gasoline in drinking water aquifer; remediation completed and case closed as of November 1, 2006;
- ***501 E. Manchester Boulevard*** (Simon's Mini Market); Los Angeles County Department of Public Works case number 009805-013094; remediation completed and case closed as of January 9, 2014;
- ***500 E. Manchester Boulevard*** (former Sears Auto Center); RWQCB Case Number I-09429 involved potential contamination of gasoline in soil; remediation completed and case closed as of July 19, 1996;
- ***3900 W. Manchester Boulevard*** (the Forum); RWQCB Case Number R-09447 involved potential contamination of gasoline in soil; remediation completed and case closed as of February 23, 1998;
- ***3900 W. Manchester Boulevard*** (the Forum); RWQCB Case Number R-09447A involved potential contamination of gasoline, methyl tertiary-butyl ether (MTBE)/tert-Butyl alcohol (TBA)/other fuel oxygenates, and tetrachloroethylene (PCE) in drinking water aquifer; remediation completed and case closed as of July 15, 2013;

Prairie Avenue Segment

- ***600 S. Prairie Avenue*** (former Airport Park Hotel); RWQCB Case Number R-63615 involved potential contamination of gasoline in soil; remediation completed and case closed as of April 10, 2018; and
- ***4000 W. Century Boulevard*** (former Unocal #5050); RWQCB Case Number I-09966 involved potential contamination of gasoline in drinking water aquifer; remediation completed and case closed as of October 22, 1996.

All identified LUST cases have been remediated and closed at the time of this analysis. Per the California DTSC, there are no other contaminated, State agency-monitored properties in the vicinity of the proposed Project.[49]

49 California Department of Toxic Substances Control, EnviroStor, accessed March 2019, available at https://www.envirostor.dtsc.ca.gov/public/.

Further, the SWRQCB identifies a number of permitted USTs in the vicinity of the proposed Project guideway segments, listed as follows:[50]

Market Street Segment

- ***317 E. Florence Avenue*** (Metro) facility ID not available;
- ***111 N. Locust Street*** (Senior Center Site), facility ID not available;

Manchester Boulevard Segment

- ***338 E. Manchester Street*** (Retail Boutique), facility ID not available;
- ***501 E. Manchester Boulevard*** (Simon's Market), facility ID LACoFA0017385;
- ***510 E. Manchester Boulevard*** (Vons Fuel Center #2502), facility ID LACoFA0033888;

Prairie Avenue Segment

- ***601 S. Prairie Avenue*** (Miles Mini Mart), facility ID LACoFA0021214;
- ***600 S. Prairie Avenue*** (Pincay 60-Acre Property [Hollywood Park property]), facility ID not available;
- ***1050 S. Prairie Avenue*** (Hollywood Park Race Track), facility ID LACoFA0021198; and
- ***4015 W. Century Boulevard*** (Chevron #206907), facility ID LACoFA0007105.

Of these USTs, only one facility is located within the footprint of the proposed Project: the Vons Fuel Center #2502 at 510 E. Manchester Boulevard (facility ID LACoFA0033888) is located within the site for the proposed Maintenance and Storage Facility (MSF). As part of the demolition process of the proposed Project, this UST facility would be closed and removed from the site. The site would be remediated for any contamination in accordance with the appropriate regulatory requirements pursuant to UST closure[51] and any additional regulatory requirements; closure requirements and approval would be sought from the jurisdiction having authority included the LARWQCB.[52]

Historical Oil and Gas Extraction Activities

The City is located within the southern portion of a large oil field that includes Baldwin Hills to the northwest. The oil deposits in this oil field have been explored and actively extracted for nearly a century.[53] Records indicate a substantial number of abandoned, plugged, or idle oil and gas and dry hole wells in the

50 California State Water Resources Control Board, GeoTracker, accessed March 2019, available at https://geotracker.waterboards.ca.gov/.

51 Los Angeles County Department of Public Works, Environmental Programs Division, *Underground Storage Tank Program: Closure*, accessed June 30, 2020, https://pw.lacounty.gov/epd/UST/closure.cfm.

52 Los Angeles County Department of Public Works, Environmental Programs Division, *Underground Storage Tank Program: Closure*, accessed June 30, 2020, https://pw.lacounty.gov/epd/UST/closure.cfm.

53 City of Inglewood, General Plan Update Technical Background Report, August 2006.

City.[54,55] The Potrero Oil Field traverses much of the northern and eastern portions of the City, including portions of the proposed Project including the Market Street Segment and Manchester Boulevard Segment of the guideway.[56] Contaminants frequently associated with oil and gas activities include crude oil, refined petroleum products, drilling mud, metals, polychlorinated biphenyls (PCBs), pesticides and volatile organic compound (VOCs) impacts in soil and soil vapor. Potential sources for these contaminants include oil wells, well cellars, pumps, pipes, sumps, storage tanks, separators, transformers, and application of petroleum products/crude oil (likely containing PCBs and pesticides) for dust/weed control. As commonly found near oil and gas fields, the subsurface conditions in the vicinity of the proposed Project may also include naturally occurring methane and hydrogen sulfide gas.[57]

While the City is entirely urbanized and largely precluded from future oil exploration and drilling, a number of historical oil and gas exploration and drilling activities have occurred in the vicinity of the proposed Project. These locations are listed as follows, according to their unique American Petroleum Institute (API) well number and Project guideway segment:

Manchester Boulevard Segment

- ***API 0403713694***; oil and gas well located within the Potrero Oil Field on the southeastern side of Spruce Avenue, approximately 90 southeast of the proposed MSF site across Spruce Avenue and 150 feet southwest of the Spruce Avenue and Manchester Boulevard intersection; plugged and abandoned to the satisfaction of the California Department of Natural Resources, Division of Oil and Gas (now the Department of Conservation, Division of Oil, Gas, and Geothermal Resources [DOGGR]) as of March 5, 1930;[58,59] and

Prairie Avenue Segment

- ***API 0403705654***; dry hole well located on the southern side of Nutwood Street, approximately 150 feet west of Prairie Avenue; plugged and abandoned to the satisfaction of the California Department

54 Dry hole wells are oil, water, or gas wells which are determined to not be commercially profitable.

55 California Department of Conservation, Division of Oil, Gas, and Geothermal Resources (DOGGR), Well Statewide Tracking and Reporting System (WellSTAR) database, interactive map, accessed March 2019, available at https://maps.conservation.ca.gov/doggr/wellfinder/#openModal/-118.94276/37.10257/6.

56 California Department of Conservation, DOGGR, WellSTAR, interactive map, accessed March 2019, available at https://maps.conservation.ca.gov/doggr/wellfinder/#openModal/-118.94276/37.10257/6.

57 *Hazardous Material Assessment*, Geosyntec Consultants, July 3, 2018.

58 California Department of Conservation, DOGGR, WellSTAR, Well Details for API # 03713694, accessed March 2019, available at https://secure.conservation.ca.gov/WellSearch/Details?api=03713694#main-content.

59 California Department of Natural Resources, Division of Oil and Gas (now DOGGR), WellSTAR, Well Record for API #03713694, accessed March 2019, available at https://secure.conservation.ca.gov/WellRecord/037/03713694/03713694_2018-02-27_DATA.pdf.

of Natural Resources, Division of Oil and Gas (now the Department of Conservation, DOGGR) as of March 19, 1930.[60,61]

No previously identified oil and gas or dry hole wells are located within the footprint of the proposed Project guideway, stations or parcels that will be used for support facilities.

Aged Buildings

In urbanized areas such as those in the vicinity of the proposed Project, risk from hazards and hazardous materials are associated with historical land uses involving the use of hazardous materials for building construction (lead and asbestos) or for operation for uses such as auto repair shops, medical offices, dry cleaners, and photo processing centers. Many of the existing buildings in the area were constructed from the 1920s through the 1980s. Based on their age, these older buildings may contain asbestos, lead-based paints (LBPs) and potentially toxic finishes, molds, and/or polychlorinated biphenyls (PCBs) that could be released during demolition or renovation activities. Typical hazardous materials of concern for existing older structures include the following:

- **Asbestos** is a mineral fiber that is carcinogenic and harmful to respiratory health and is considered both a hazardous air pollutant and a human health hazard. Because of its fiber strength and heat resistance, it was widely used prior to the 1980s in California in a variety of building construction materials for insulation, fire-retardation, and friction and heat-resistant products, such as ducting insulation, wallboard, shingles, ceiling tiles, floor tiles, insulation, plaster, and floor backing. Thus, buildings constructed prior to 1980 could contain asbestos-containing materials (ACM). The risk to human health is from inhalation of airborne asbestos, which commonly occurs when asbestos-containing materials are disturbed during activities such as demolition and renovation. Due to the age of the buildings within the area, it is likely that asbestos-containing materials are present.
- **Lead** is a recognized harmful environmental pollutant exposed through air, drinking water, food, soils, paint, and dust. Lead was widely used in paint, gasoline, water pipes, and many other products prior to 1977 when the U.S. Consumer Product Safety Commission banned the use of lead-based paint. Common methods of paint removal, such as sanding, scraping, and burning, create dust and the potential for lead to be absorbed into the body and pose a potential health risk. Since many of the structures located within the area were built prior to the federal regulations banning the use of lead-based paints (LDP), it is likely to exist in structures constructed prior to 1977.
- **Polychlorinated Biphenyls (PCBs)** are synthetic chemicals that were manufactured for use in various industrial and commercial applications—including oil in electrical and hydraulic equipment, and plasticizers in paints, plastics, and rubber products—because of their nonflammability, chemical

60 California Department of Conservation, DOGGR, WellSTAR, Well Details for API # 03705654, accessed March 2019, available at https://secure.conservation.ca.gov/WellSearch/Details?api=03705654.

61 California Department of Natural Resources, Division of Oil and Gas (now DOGGR), WellSTAR, Well Record for API # 03705654, accessed March 2019, available at https://secure.conservation.ca.gov/WellRecord/037/03705654/03705654_2018-02-09_DATA.pdf.

stability, high boiling point, and electrical insulation properties. When released into the environment, PCBs persist for many years, accumulate and concentrate in organisms. The USEPA has classified PCBs as probable human carcinogens. In 1979, USEPA banned the use of PCBs in new electrical equipment and began a program to phase out PCB-containing equipment. Thus, older industrial areas in the vicinity of the proposed Project could contain PCBs.

City of Inglewood Civic Center Site

As noted in **Section 3.0: Project Description**, the proposed Project includes the location of a Traction Power Substation (TPSS) on the City's approximately 4-acre Civic Center site on Prairie Avenue. The City's Civic Center site is located at the southeast corner of the Prairie Avenue and Arbor Vitae Street intersection and is intended to be developed and constructed by the City as an Intermodal Transportation Facility (ITF). The TPSS would be located either above grade or below grade within the footprint of the proposed ITF. The City's Civic Center site is adjacent to the Prairie Avenue Segment of the proposed Project guideway.

The 2009 EIR for the Hollywood Park Specific Plan (HPSP) project[62]evaluated the impacts of developing the City's four-acre Civic Center site with respect to potential hazardous materials and risk of upset. As described in the 2009 EIR, the City's four-acre Civic Center site, has undergone numerous site assessment evaluations over the past two decades; those which are relevant to the proposed Project are shown in **Table 4.8-1: Civic Center Site-Specific Investigations**. A summary of the investigative history associated with the City's Civic Center site is provided below.

Table 4.8-1
Civic Center Site-Specific Investigations

Investigation	Prepared By	Date
Phase I Environmental Site Assessment and Limited Compliance Assessment	ENVIRON International Corporation	April 11, 2005
Soil Management Plan	Erler & Kalinowski, Inc.	July 3, 2007
Technical Report and Work Plan	Erler & Kalinowski, Inc.	April 24, 2008
Field Portable X-Ray Fluorescence Spectrometry for In-Situ Screening of Arsenic in Soil	Erler & Kalinowski, Inc.	February 26, 2015

Source: City of Inglewood, Final Environmental Impact Report for the Hollywood Park Redevelopment Project, June 3, 2009.

A Soil Management Plan (SMP)[63] summarizing prior screening-level subsurface investigations was prepared in July 2007 and submitted and approved by the RWQCB, to address localized areas found to contain or suspected to contain chemicals of potential concern (COPCs) on the Hollywood Park property

62 City of Inglewood, Final Environmental Impact Report for the Hollywood Park Redevelopment Project, June 3, 2009.
63 Erler & Kalinowski, Inc., Soil Management Plan, July 3, 2007.

including the City's Civic Center site where the proposed Project may locate a TPSS facility either above or below grade. The SMP includes soil and soil gas COPCs criteria and soil management and construction risk management protocols to be implemented during planned redevelopment of the property, including soil reuse and waste disposal classification protocols.

Soil sampling revealed arsenic in shallow soil at the City's Civic Center site on Prairie Avenue.[64] All shallow arsenic-contaminated soil has been removed from the City's Civic Center site as of the summer of 2020.[65] The remaining soil on the site is below the Property-specific Soil Criteria (PSC) requirement and removal is deemed complete; no further action is recommended. The RWQCB required no further action and is currently reviewing final closure.

Oil Wells

The City has an extensive history of oil exploration and extraction activities associated with oil fields located within City limits. As such, the City may contain previously unknown or undisclosed plugged and/or improperly abandoned oil and gas or dry hole wells. Potential hazardous materials associated with these activities include methane, hydrogen sulfide, leaking oil or gas, wells not abandoned to current standards, or other contaminants. However, no previously identified oil and gas or dry hole wells are located within the footprint of the proposed Project guideway and stations, or parcels that will used for support facilities.

4.8.5 ADJUSTED BASELINE

For the purposes of the hazards and hazardous materials analysis, the Adjusted Baseline (described further in *Section 4.0.5*), includes projects that will be constructed immediately northeast of the intersection of West Century Boulevard and South Prairie Avenue which are expected to include the use, storage, and disposal of hazardous materials. Construction of these improvements will not likely have any direct effect on the hazards and hazardous materials associated with the proposed Project, as the improvements being constructed would be expected to have only site-specific hazard issues.

As described in the SMP for the HPSP project and the Adjusted Baseline projects, following completion of construction, none of the sites for related projects included in the Adjusted Baseline will contain contaminants of potential concern that are above the criteria set in the SMP. Remediation has or will occur during grading and site preparation activities. The regulatory oversight required for these types of remediation activities would be required prior to completion of construction and would require that no potential for off-site migration could adversely affect the proposed Project. Also, the Adjusted Baseline projects will not be associated with substantive routine emissions of hazardous materials or wastes and

64 Analytical Consulting Group, Inc., Post-Removal Soil Sampling Report, Removal of Arsenic-Contaminated Soil, May 21, 2020.
65 Analytical Consulting Group, Inc., Memorandum of Completion, Arsenic-contaminated Soil Removal, May 5, 2020.

any incidents such as accidental and upset conditions would likely be isolated and localized events. Therefore, while the amount of hazardous materials being transported, stored, handled, and disposed of with these new land uses will increase, they would not substantively alter the environmental setting a beyond that existing under current existing conditions.

4.8.6 THRESHOLDS OF SIGNIFICANCE

Criteria outlined in the CEQA Guidelines were used to determine the level of significance of cultural resource impacts. Appendix G of state CEQA Guidelines indicates that a project would have a significant impact in relation to hazards and hazardous materials if it were to:

Threshold HAZ-1 **Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.**

Threshold HAZ-2 **Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?**

4.8.6.1 ITC Construction Commitment Program

The proposed Project includes the ITC Construction Commitment Program (CCP) to proactively address the potential effects of the construction of the Project on the community. The CCP identifies features and actions incorporated into the Project to lessen or avoid potential impacts.

Building Demolition Plan

Prior to any demolition occurring, the contractor, will be required to conduct an evaluation of all buildings built prior to 1980 to be demolished to identify the presence of asbestos containing materials (ACMs) and lead-based paint (LBP). Remediation will be required to be implemented in accordance with the recommendations of these evaluations to ensure that no ACMs or LBP remain present on and to ensure ACMs and LBP are removed to levels established for public safety.

Hazardous Materials Contingency Plan

The contractor will be required prepare a plan addressing the potential for discovery of unidentified underground storage tanks (USTs), hazardous materials, petroleum hydrocarbons, or hazardous or solid wastes encountered during construction. This plan shall address UST decommissioning, field screening and materials testing methods, contaminant management requirements, and health and safety requirements to ensure no exposure to hazards or hazardous materials occurs on site and to ensure any

contaminated materials encountered during construction are removed to levels established for public safety.

Soils Management Plan

A Soils Management Plan (SMP) will be prepared after final construction plans are prepared showing the lateral and vertical extent of soil excavation during construction and implemented during all phases of construction. The SMP will establish soil reuse criteria, establish a sampling plan for stockpiled materials, describe the disposition of materials that do not satisfy the reuse criteria, and specify guidelines for imported materials.

Disturbed soils will be monitored for visual evidence of contamination (e.g., staining or discoloration). Soil will also be monitored for the presence of VOCs using appropriate field instruments such as organic vapor measurement with photoionization detectors or flame ionization detectors in accordance with South Coast Air Quality Management District Rule 1166. If the monitoring procedures indicate the possible presence of contaminated soil, a contaminated soil contingency plan will be implemented and will include procedures for segregation, sampling, and chemical analysis of soil. Contaminated soil will be profiled for disposal and will be transported to an appropriate hazardous or non-hazardous waste or recycling facility licensed to accept and treat the type of waste indicated by the profiling process.

In addition, a contaminated soil contingency plan will be developed and in place during all construction activities. If these processes generate any contaminated groundwater that must be disposed of outside of the dewatering/National Pollutant Discharge Elimination System process, the groundwater will be profiled, manifested, hauled, and disposed of in the same manner.

Health and Safety Plan

A Health and Safety Plan will be developed to address the potential for exposure to the constituents of concern identified in the Phase II ESA.

Worksite Traffic Control Plans

The ITC CCP includes a construction staging and traffic control plan that requires the preparation of a Worksite Traffic Control Plan and review and approval of this plan prior to construction. The Worksite Traffic Control Plan will address temporary street closures and detours needed during the construction of the Project and address the following:

- Coordination with other public infrastructure projects within the City's boundaries
- Detour impact analysis for pedestrian, business, bicycle, and traffic flow

- Coordinate closures and restricted access with all special events
- Notification of the public with use of signage and web-based media
- Coordinate with City of Inglewood and LA County police and fire personnel regarding maintenance of emergency access and response times
- Monitor and coordinate deliveries
- Establish detour routes
- Work with residential and commercial neighbors regarding upcoming construction activities and
- Analyze traffic conditions to determine the need for additional traffic signals, signs, lane restriping, signal modifications, etc.

Except as provided in the work hours permit to be issued by the City for the Project, the full number of traffic lanes in the peak direction will be required to be maintained on arterial streets affected by construction, and if feasible one traffic lane in the off-peak direction, with additional capacity provided through appropriate detour routes. The directional traffic lanes will be reversible to maintain the peak directional capacity in either direction.

The City and the Contractor will be required to meet and confer ninety (90) days prior to the planned date of any temporary full street closure to coordinate community outreach for the closure. Detour routes during temporary street closures will be subject to review and approval by the City, provided that the Contractor gives thirty (30) days' notice. Detour routes will not be allowed to include residential streets unless authorized by the City. Advance public notification of street closures in accordance with the notification process required by the City would be provided. All Lane and street closures will be conducted in accordance with the standards set forth in the Construction Commitment Plan (CCP); all Construction Staging Plans, Traffic Management Plans, and any conditions of approval included in a City-issued permit.

4.8.7 IMPACT ANALYSIS FOR THE PROPOSED PROJECT

Impact HAZ-1: Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Construction

Construction activities would involve the use of materials—including fuels, paints, oils, transmission fluids, solvents, and other acidic and alkaline solutions—that would require special handling, transport, and disposal. These materials would be transported to and from the proposed Project for use during construction activities. The improper handling and transport of hazardous materials could result in

accidental release of hazardous materials, thereby exposing the public or the environment to hazardous materials.

As discussed in *Section 4.8.3.1***,** the transport of hazardous materials is regulated by USDOT and Caltrans.[66] The transport regulations ensure safe transport of the regulated materials by addressing how hazardous materials are labeled, identifying approved transport routes, and include provisions that restrict containment during highway transportation of hazardous materials and wastes.

Use of common construction materials such as fuels, paints, cleaners, solvents, and welding materials are also expected during construction. In general, aside from refueling needs for heavy equipment, the hazardous materials typically used on a construction site would be brought onto the site by the construction contractor, packaged in consumer quantities, and used in accordance with manufacturer recommendations. The overall quantities of these materials on the site at any one time would not result in large bulk amounts that, if spilled, could cause significant soil or groundwater contamination. If a spill of hazardous materials on the construction sites were to occur, the spilled materials would be localized because of the relatively small quantities involved and would be cleaned up in a timely manner in accordance with identified BMPs. As such, release of hazards while handling hazardous construction materials to the public or the environment through reasonably foreseeable upset and accident conditions during construction would be less than significant.

Construction of the proposed Project would entail demolition, excavation, and grading activities which would disturb the existing physical landscape. As previously mentioned, areas near the proposed Project have been identified to contain former and current commercial operations and historic oil and gas exploration and production activities. Impacts to potentially contaminated locations are discussed in the following guideway and stations, MSF, and TPSS sites. The potential for hazards release would be assessed based on individual basis for each of these component's construction.

Construction activities would disturb more than one acre and, thus, would be required to implement requirements of the NPDES General Construction Permit. This permit requires implementation of best management practices (BMPs) that would include measures to address the safe handling of hazardous materials, and, in the unlikely event of an inadvertent release, would require spill response measures to contain any release of hazardous materials. The use of construction BMPs implemented as part of a Stormwater Pollution Prevention Plan as required by the NPDES General Construction Permit would minimize the potential adverse effects from accidental release of hazardous materials or wastes. These BMPs could include, but are not necessarily limited to, the following:

66 California Vehicle Code Division 13, Chapter 5, Article 1, Section 31303–31309.

- Establishment of a dedicated area for fuel storage and refueling activities that includes secondary containment protection measures and spill control supplies;
- Requirements to follow manufacturer's recommendations on use, storage and disposal of chemical products used in construction;
- Avoidance of overtopping construction equipment fuel gas tanks;
- Proper containment and removal of grease and oils during routine maintenance of construction equipment; or
- Proper disposal of discarded containers of fuels and other chemicals.

As described above, refueling activities of heavy equipment would be conducted in a dedicated and controlled area with secondary containment and protective barriers to minimize any potential hazards that might occur with an inadvertent release. Given the required protective measures (i.e., BMPs) and the quantities of hazardous materials typically needed for construction projects, such as the Proposed Project, the threat of exposure to the public or contamination to soil and/or groundwater from construction-related hazardous materials is considered a less-than-significant impact.

As discussed in *Section 4.8.3: Regulatory Framework*, transportation of hazardous materials is regulated by US DOT and Caltrans. Together, federal and State agencies determine driver-training requirements, load labeling procedures, and container specifications designed to minimize the exposure of hazardous materials. In addition, businesses that use hazardous materials, including construction companies, are required to prepare and implement HMBPs describing procedures for the handling, transportation, generation, and disposal of hazardous materials. The City will ensure compliance with these regulations including, but not limited to, the Hazardous Waste Control Act, the Hazardous Waste Generator Program, the Hazardous Materials Release Response Plans and Inventory Program, the California Accidental Release Prevention Program, and the Aboveground Storage Tank Program.

Guideway and Stations

The proposed Project would involve the construction of an elevated guideway and stations primarily within the public rights-of-way along the guideway, in addition to both MSF and TPSS uses on adjacent parcels.

Construction of the guideway and stations would involve the demolition of existing buildings at the commercial center at the northeast corner of Market Street and Regent Avenue, and at 150 S. Market Street, and the retail commercial center at 500 E. Manchester Boulevard. Due to their age, some of these buildings may have the potential release hazardous materials, such as asbestos containing material, lead-based paint, and other potentially hazardous building materials in some form as part of the building materials, such as polychlorinated biphenyl (PCBs), mercury, or chlorofluorocarbons found in fluorescent

lighting and electrical switches. Given the date of construction of the buildings, it is possible that asbestos containing materials (ACMs) may be present in building materials. In addition, it is possible that lead-based paint (LBP) was historically used on facility structures. Preparation and implementation of the Building Demolition Plan required to be prepared by the ITC CCP as described above would include an evaluation of all buildings to be demolished to be evaluated to gauge levels of possible ACMs and LBP prior to any construction activities. Remediation would be completed if presence of ACMs and LBP are confirmed.

The demolition of the structures, and subsequent removal and disposal of potential hazardous materials, has the potential to release these hazardous materials into the environment and may expose members of the public in the vicinity of the demolition activities. The removal of any ACMs would be required to comply with all applicable existing rules and regulations, including SCAQMD Rule 1403[67] and Cal/OSHA regulations regarding LBP, ACMs, PCBs, mercury, or chlorofluorocarbons.

With implementation of the Building Demolition Plan and compliance with relevant regulations and requirements, the proposed Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of ACMs, LBP, PCBs, mercury, or chlorofluorocarbons into the environment. SCAQMD Rule 1403 specifies work practice requirements to limit asbestos emissions from building demolition and renovation activities, including the removal and associated disturbance of ACM.[68] The rule's requirements for demolition and renovation activities include asbestos surveying, notification, ACM removal procedures and time schedules, ACM handling and cleanup procedures, and storage, disposal, and landfilling requirements for ACWM. Under the Lead Renovation, Repair, and Painting Rule, contractors who renovate or partially demolish pre-1978 residential buildings must be lead-safe certified by USEPA and use lead-safe practices. Lead abatement activities are regulated by the USEPA; lead abatement companies are governed by the USEPA and the USEPA requires individuals and firms that conduct lead-based paint activities, including abatement, to be licensed.

Construction of the guideway and stations could involve excavation of existing soil and disturbance of soil containing hazardous materials. Excavations of soil contaminated with petroleum hydrocarbons or dry-cleaning solvents may be encountered during construction of the guideway and stations. Workers may be exposed to contaminants during grading, loading, and transportation activities during construction of the guideway and stations. As part of the ITC CCP, as described above, a Soil Management Plan and a

67 Rule 1403 – Asbestos Emissions from Demolition/Renovations Activities, AQMD, 2007, http://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1403.pdf.

68 Rule 1403 – Asbestos Emissions from Demolition/Renovations Activities, AQMD, 2007, http://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1403.pdf.

Hazardous Materials Business Plan will be prepared before construction begins and implemented throughout construction.

The construction of the Market Street/Florence Avenue Station would involve the demolition of existing buildings at the commercial center at the northeast corner of Market Street and Regent Avenue. Historical uses of the site comprising of addresses 200 to 270 Market Street include those of gas station, automobile repair, and dry cleaner operations. The existing CVS store site is listed as a RCRA Large Quantity Generator (LQG) that generates alkaline and acidic solutions, other inorganic solid waste, unspecific solvent mixture, pharmaceutical waste, ignitable waste, chromium, mercury, selenium, m-cresol, nicotine, 2-propanone, acetone, cyclohexane, lindane, selenium sulfide and various other organic chemicals.

As described previously in *Section 4.8.4.1: Known Hazards or Potentially Hazardous Materials*, the Market Street/Florence Avenue Station would be located near the site of two previous LUST cases (RWQCB Case Number R-60173, associated with Metro and RWQCB Case Number R-37884, associated with the Fujita Corporation) involving the potential contamination of gasoline in soil. However, remediation was completed to the satisfaction of the RWQCB and the cases closed as of January 13, 1997 and September 10, 2003, respectively.

Construction of the guideway and stations would not result in an accidental release of hazardous materials into the environment due to satisfactory remediation pursuant to the RWQCB's remediation regulations for LUSTs and USTs. Remediation regulations include installation of leak detection systems and/or monitoring of USTs for leakage, UST closure requirements, release reporting and/or corrective action, and enforcement. In addition, the SCP would regulate and oversee any investigation and cleanup of any sites not overseen by the UST program.69 In addition, Hazardous Materials Contingency Plan would address UST decommissioning through its hazardous materials contingency plan implementation.

Implementation and enforcement of federal and State laws and local ordinances for USTs at within the City of Inglewood are enforced by LACoFD and plans for the construction/installation, modification, upgrade, and removal of USTs are reviewed by LACoFD Inspectors.

During guideway and station construction, use of common construction materials such as fuels, paints, cleaners, solvents, and welding materials are also expected. An accidental spill of such materials may impact the environment, on-site construction workers and possibly off-site receptors. General contractors would follow instructions available on manufacturer labels while handling hazardous materials to minimize on-site accidents and releases.

69 42 USC Section 6901 et seq.

Construction of the guideway and the Prairie Avenue/Pincay Drive station along Prairie Avenue would require use of limited quantities of hazardous materials, including fuels, oils, and lubricants for construction equipment; paints and thinners; and solvents and cleaners. There is one existing school, Kelso School, that has been identified within 0.25 miles of the proposed Project near the guideway and Prairie Avenue/Pincay Drive station; Kelso School is operated by the Inglewood Unified School District.

Hazardous materials would be transported to and from the construction areas of the proposed Project and could pass near these schools. The improper handling and transport of hazardous materials could result in accidental release of hazardous materials near schools, thereby exposing school occupants to hazardous materials. However, as discussed in the *Section 4.8.3: Regulatory Framework*, the transportation of hazardous materials is regulated by US DOT and Caltrans. Together, federal and State agencies establish driver-training requirements, load labeling procedures, and container specifications designed to minimize the risk of accidental release. No regular transport of hazardous materials would occur during proposed Project construction or operation.

Businesses that use hazardous materials, including construction companies and associated contractors, are required to prepare and implement HMBPs describing procedures for the handling, transportation, generation, and disposal of hazardous materials in accordance with the Hazardous Waste Control Act (California Health and Safety Code section 25100 et seq.), which is implemented by regulations described in CCR Title 22. Finally, construction on sites larger than one acre would be required to comply with the Construction General Permit and implement a SWPPP and its associated BMPs to control and limit any releases of hazardous materials.

A comprehensive and enforced set of laws and regulations minimize the risks associated with the transportation and management of hazardous materials, as articulated in *Section 4.8.3*. These laws and regulations would reduce potential hazards associated with construction to levels that minimize health risks.

No new emittances of hazardous materials is expected to occur during proposed Project construction. The routes used for material transport would be along designated truck routes in the City, including Florence Avenue, Manchester Boulevard, Prairie Avenue, and Century Boulevard which are City-identified "Designated Truck Routes"[70] The ITC CCP requires that detours for the general public and haul routes not include streets schools are located on wherever feasible.

70 Inglewood Municipal Code. Chapter 3 – Motor vehicles and traffic, Article 3 – Truck Route regulations.

Implementation of the ITC CCP measures related to hazards and hazardous materials and construction traffic would mitigate potential impacts to less than significant.

Impacts related to release of hazards while handling hazardous construction materials to the public or the environment through reasonably foreseeable upset and accident conditions during guideway and station construction would be less than significant.

Maintenance and Storage Facility

The proposed Project would involve construction of the MSF on parcels adjacent to the guideway which would occupy an approximately 5.5-acre site located at 500 E. Manchester Boulevard developed with a retail commercial use. The site is the location of a previous LUST case (RWQCB Case Number I-09429, associated with a former Sears Auto Center) involving the potential contamination of gasoline in soil. However, remediation was completed to the satisfaction of the RWQCB and the case closed as of July 19, 1996.[71]

One UST facility is located at the existing Vons Fuel Center #2502 at 510 E. Manchester Boulevard (facility ID LACoFA0033888) within the proposed MSF site. This UST and removed as part of the proposed Project. As discussed above, the ITC Project Hazardous Materials Contingency Plan would address UST decommissioning should any be encountered during construction. Closure of the gas station and removal of the USTs present on this site would be subject to the requirements of the RWQCB. If any contamination in accordance with the appropriate regulatory requirements. Closure by removal of an UST, piping and/or dispensers must comply with the closure conditions as directed on the Closure Permit as well as meet the requirements of California Health and Safety Code Section 25298, *Underground Storage of Hazardous Substances*,[72] California Code of Regulations Title 23, Sections 2670 through 2672, *Underground Storage Tank Closure Requirements*,[73] and the Los Angeles County Department of Public Works, Environmental Programs Division, *Underground Storage Tank Program: Closure.*[74]

Construction of the MSF would not result in an accidental or inadvertent (such as spills) release of hazardous materials into the environment due to satisfactory remediation pursuant to the RWQCB's remediation regulations for USTs, such as installation of leak detection systems and/or monitoring of USTs for leakage, UST closure requirements, release reporting and/or corrective action, and enforcement. The goal of the UST program is to protect public health and safety and the environment from releases of

71 California State Water Resources Control Board, GeoTracker, accessed March 2019, available at https://geotracker.waterboards.ca.gov/.

72 California Health and Safety Code Division 20, Chapter 6.7, Section 25298, Underground Storage of Hazardous Substances

73 California Code of Regulations, Title 23. Waters Division 3. State Water Resources Control Board and Regional Water Quality Control Boards Chapter 16. Underground Tank Regulations Article 7. *Underground Storage Tank Closure Requirements.*

74 Los Angeles County Department of Public Works, Environmental Programs Division, *Underground Storage Tank Program: Closure*, accessed June 30, 2020, https://pw.lacounty.gov/epd/UST/closure.cfm.

petroleum product and other hazardous substances from the tanks. The UST closure for the proposed Project would also comply with the State Water Board's Low Threat Underground Storage Tank Case Closure Policy, discussed in *Section 4.8.3.2.*

Under existing policy, regulatory agencies consider site-specific conditions when determining if the level of corrective action ensures the protection of human health, safety, and the environment pursuant to Health and Safety Code section 25296.10, subdivision (g). With the knowledge and experience gained over the last 25 years of investigating and remediating petroleum UST releases, site conditions and characteristics have been identified that if met, will generally ensure the protection of human health, safety, and the environment. This Policy identifies those standardized criteria, as discussed in *Section 4.8.3.2*.

In addition, the SCP would regulate and oversee any investigation and cleanup of any sites not overseen by the UST program.[75] Implementation and enforcement of federal and State laws and local ordinances for USTs at within the City of Inglewood are enforced by LACoFD and plans for the construction/installation, modification, upgrade, and removal of USTs are reviewed by LACoFD Inspectors.

Construction activities would disturb more than one acre and, thus, would be required to implement requirements of the NPDES General Construction Permit. This permit requires implementation of BMPs that would include measures to address the safe handling of hazardous materials, and in the unlikely event of an inadvertent release, also requires spill response measures to contain any release of hazardous materials. The use of construction BMPs implemented as part of a Stormwater Pollution Prevention Plan (discussed further in **Appendix 2.0.2: Initial Study**) as required by the NPDES General Construction Permit would minimize the potential adverse effects from accidental release of hazardous materials or wastes. These BMPs could include, but are not necessarily limited to, the following:

- Establishment of a dedicated area for fuel storage and refueling activities that includes secondary containment protection measures and spill control supplies;
- Requirements to follow manufacturer's recommendations on use, storage and disposal of chemical products used in construction;
- Avoidance of overtopping construction equipment fuel gas tanks;
- Proper containment and removal of grease and oils during routine maintenance of construction equipment; or
- Proper disposal of discarded containers of fuels and other chemicals.

75 42 USC Section 6901 et seq.

In general, aside from refueling needs for heavy equipment, the hazardous materials typically used on a construction site would be brought onto the site by the construction contractor, packaged in consumer quantities, and used in accordance with manufacturer recommendations. The overall quantities of these materials on the site at any one time would not result in large bulk amounts that, if spilled, could cause significant soil or groundwater contamination. If a spill of hazardous materials on the construction sites were to occur, the spilled materials would be localized because of the relatively small quantities involved and would be cleaned up in a timely manner in accordance with identified BMPs.

As described above, refueling activities of heavy equipment would be conducted in a dedicated and controlled area with secondary containment and protective barriers to minimize any potential hazards that might occur with an inadvertent release. Given the required protective measures (i.e., BMPs) and the quantities of hazardous materials typically needed for construction projects, the threat of exposure to the public or contamination to soil and/or groundwater from construction-related hazardous materials is considered a less-than-significant impact.

Impacts resulting in a substantial release of hazardous materials into the environment through accident or upset conditions on the MSF site would be less than significant.

TPSS Sites

The proposed Project would involve the construction of TPSSs in two locations along the alignment. One of the proposed TPSSs would be collocated within the MSF, and the other would be situated on the City's Civic Center site at the southeast corner of the Prairie Avenue and Arbor Vitae Street intersection, north of the Prairie Avenue/Hardy Street Station.

Each of the TPSS stations would require approximately 3,000 SF and with 14 feet of clearance above the finished floor. It is also possible that the TPSS station proposed for the City's Civic Center site on Prairie Avenue may be below grade; as such, it would be of similar size and require excavation of soils from the site.

As described in *Section 4.8.4.1*, the City's Civic Center site on Prairie Avenue has undergone numerous site assessment evaluations and has been fully remediated in accordance with regulatory requirements. Should the TPSS at this location be located below grade, soil that would be removed would be tested in accordance with the SMP[76] to assure that it did not contain any remnants of prior contamination. If

76 Erler & Kalinowski, Inc., Soil Management Plan, July 3, 2007.

contaminated soil is encountered, it will be removed and disposed of in accordance with the requirements of the SMP and RWQCB.[77]

Compliance with the SMP[78] and applicable federal, State, and local laws and regulations relating to transport, storage, disposal, and sale of hazardous materials would minimize any potential for accidental release or upset of hazardous materials during construction of the proposed Project.

Impacts would be less than significant.

Summary of Impacts

Construction activities involving the use of potential hazardous materials would adhere to regulatory requirements for handling, transport, and disposal. Construction of the guideway and stations in conjunction with the MSF and TPSSs would involve the demolition of existing buildings, which may have the potential release of hazardous materials, such as ACMs, LBP, and other potentially hazardous building materials. Preparation and implementation of the Building Demolition Plan, Hazardous Materials Business Plan, Soil Management Plan, and Health and Safety Plan required by the ITC CCP incorporation of project design features discussed in the Construction Commitment Program, and would result in potential impacts to the public or the environment through reasonably foreseeable upset and accident conditions involving hazardous materials being less than significant.

Excavations of potentially contaminated soils may occur during construction of the proposed Project as a result of prior uses on some of the sites. Removal of the existing permitted UST would be removed as part of the proposed Project at the MSF site; if contaminated soil is encountered as part of the removal the site would be remediated in accordance with the appropriate UST closure requirements.[79] Soils on the City's Civic Center site on Prairie Avenue and other areas adjacent to Prairie Avenue have been fully remediated.

Construction activities associated with the proposed Project would comply with existing regulations governing the storage and handling of such chemicals and the response to the accidental release of such chemicals.

Implementation of the Building Demolition Plan and Hazardous Materials Business would ensure potential impacts from proposed Project construction would be less than significant.

Impacts from the construction of the proposed Project would be less than significant.

---

77 Erler & Kalinowski, Inc., Soil Management Plan, July 3, 2007.

78 Erler & Kalinowski, Inc., Soil Management Plan*,* July 3, 2007.

79 Los Angeles County Department of Public Works, Environmental Programs Division, *Underground Storage Tank Program: Closure*, accessed June 30, 2020, https://pw.lacounty.gov/epd/UST/closure.cfm.

Operation

Operation of the proposed Project would involve the use of relatively small quantities of common hazardous materials including paints and thinners, cleaning solvents, fuels, oils, and lubricants. The operation of the proposed Project would not involve the types of hazardous emissions that are typical of industrial land uses and which require source regulation and permitting. Hazardous materials, including diesel fuel for backup generators would be stored within appropriate storage containers in accordance with regulatory requirements, such as the Hazardous Waste Control Act. This would ensure that there would be no unregulated emissions of hazardous materials.

The operation of the proposed Project would be subject to the requirements of programs administered by the Los Angeles County Fire Department HHMD program for storage of all hazardous materials on site, including the diesel fuel, would be required to adhere to facility-specific HMBPs. The preparation and implementation of facility-specific HMBPs would be required for the MSF and TPSSs, and the HMBPs would identify safe measures to store, handle, and dispose of hazardous materials such that accident and upset conditions are minimized. The HMBPs would also include spill response measures to ensure that in the unlikely event that a release does occur, protocols would be implemented to contain and control any accidental release in a manner that is protective of human health and the environment. Such protocols could include employee training, the location of absorbent materials to contain a release, and notification requirements to ensure that human health and the environment is protected from any exposure. The adequacy of and compliance with the HMBPs would be overseen and enforced by the HHMD. Because a comprehensive set of enforced laws and regulations govern the transportation and management of hazardous materials to reduce the potential hazards to the public and environment

During operation of the proposed Project, all potentially hazardous materials would be used and stored in accordance with the manufacturers' instructions and handled in accordance with all applicable federal, State, and local regulations, including those set forth by the federal and California Occupational Safety and Health Administration (CalOSHA), and the HHMD. The City's Fire Department (Los Angeles County Fire Department [LACFD]), as part of the design and operation conditions, will review plans to ensure proper storage of hazardous substances, accident response plans, inspections, and monitoring by the LACFD to minimize hazards to an acceptable level. Such requirements include obtaining material safety data sheets from chemical manufacturers; making these data sheets available to employees; labeling chemical containers in the workplace; developing and maintaining a written hazard communication program; and developing and implementing programs to train employees about hazardous materials.

Compliance with the regulatory requirements will ensure that hazardous materials on site are appropriately stored and handled and would not result in hazardous emissions. Because a comprehensive

and enforced set of laws and regulations govern the transportation and management of hazardous materials so as to reduce the potential hazards to levels that minimize health risks.

Only minor quantities of potentially hazardous materials commonly associated with commercial and residential uses are expected to be stored or used on the Property as part of the completed Project. No industrial operations are planned, and no substantial quantities of hazardous materials would be used, transported, or disposed of in conjunction with the routine day-to-day operations of the Project once completed. Therefore, accidental releases of hazardous materials, such as janitorial or household chemicals, could occur, but such releases would be minor.

With respect to transportation of hazardous materials, as previously discussed, such transport is regulated by US DOT and Caltrans, which together determine driver-training requirements, load labeling procedures, and container specifications designed to minimize the risk of accidental release. In addition, and as discussed in the Regulatory Setting, all businesses in the vicinity of the proposed Project that handle, generate, and dispose of hazardous materials would be required to prepare and implement facility-specific HMBPs under the auspices of the HHMD and in accordance with the Hazardous Waste Control Act.[80]

Impact would be less than significant.

Guideway and Stations

The stations would include operation of HVAC equipment and use of materials typical to an industrial setting such as cleaning solutions, solvents, pesticides for landscaping, painting supplies, and petroleum products used in normal vehicle fleet operations, coolants, absorbents, oil and fuel products, and machining waste. Compliance with federal, State, and local laws and regulations relating to transport, storage, disposal, and sale of hazardous materials would minimize any potential for accidental release or upset of hazardous materials during station operation. The proposed Project would comply with planning and emergency response regulations pertaining to the presence of such materials during operation.

Impacts would be less than significant.

Maintenance and Storage Facility and MSF TPSS

The operation of the MSF would be subject to the requirements of programs administered by the Los Angeles County Fire Department's HHMD for storage of all hazardous materials on site, including the diesel fuel, would be required to adhere to a facility-specific HMBP.

80 California Health and Safety Code section 25100 et seq., Hazardous Waste Control Act.

The MSF would require the use of equipment, tools, and materials for maintenance activities; these may also require the use of various materials and substances that could be considered hazardous. The MSF would use and store bulk quantities of hazardous materials—such as fuel, solvents, oil, transmission fluid, paints and other chemicals—that would have the potential to be released into the environment if not properly handled and stored. The proposed Project would comply with existing regulations governing the storage and handling of such chemicals, and applicable regulations to responding to accidental release of such chemicals.

The MSF would include a TPSS that would house transformers, DC rectifiers, primary and secondary switchgear, auxiliary power and other propulsion related equipment, and backup diesel generators required to provide power to the vehicle propulsion and operation of the MSF and stations. The use of common hazardous materials would occur as part of the operation of the proposed Project, primarily associated with maintenance activities as well as storage of diesel for the backup generators. If released, diesel stored for the backup generators could cause adverse effects to the public and the environment. Pursuant to the provisions of programs administered by the Los Angeles County Fire Department's HHMD, storage of all hazardous materials on site, including the diesel fuel, would be required to adhere to the facility-specific HMBPs.

Impacts would be less than significant.

City of Inglewood Civic Center TPSS

As with the MSF site TPSS, the TPSS at the City's Civic Center site on Prairie Avenue would house transformers, DC rectifiers, primary and secondary switchgear, auxiliary power and other propulsion related equipment, and backup diesel generators required to provide power to the vehicle propulsion and operation the stations. During operation, the Civic Center TPSS would require the use of equipment, tools, and materials for maintenance activities; these may also require the use of various materials and substances that could be considered hazardous.

As previously noted, the TPSS at the City's Center site on Prairie Avenue would include the storage of diesel for backup generators, which, if released, could cause adverse effects to the public and the environment. Pursuant to the provisions of programs administered by the Los Angeles County Fire Department's HHMD, storage of all hazardous materials on site, including the diesel fuel, would be required to adhere to the facility-specific HMBPs.

The proposed Project would comply with existing regulations governing the handling of any hazardous maintenance materials, and applicable regulatory requirements to responding to accidental release of such hazardous maintenance materials.

Impacts would be less than significant.

Summary of Impacts

The proposed Project would use and store hazardous materials during operation typical of those used in an industrial setting. The stations and MSF would include operation of HVAC equipment and use of industrial materials that may include some considered as hazardous. MSF operation would use and store bulk quantities of hazardous materials that would have the potential to be released into the environment if not properly handled and stored. TPSS maintenance activities may also require the use of various materials and substances that could be considered hazardous.

The proposed Project would comply with federal, State, and local regulations governing the handling of any hazardous materials, and applicable regulatory requirements to responding to accidental release of such hazardous maintenance materials.

Impacts from the operation of the proposed Project would be less than significant.

Mitigation Measures

Construction

No mitigation is required.

Operation

No mitigation is required.

Level of Significance after Mitigation

Impacts would be less than significant.

Impact HAZ-2: Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

As described in *Section 4.8.3.3*, the proposed Project would be constructed in accordance with current design standards and building codes, which is therefore consistent with the MHMP. Implementation of these standards and codes would minimize the loss of life and property from natural hazard events and protect public health and safety. As a development project, the proposed Project would not interfere or impair with the City's ability to increase public awareness or make any improvements to emergency services and warning systems.

Construction

The proposed Project is located largely within public rights-of-way. For this reason, construction activities would likely cause the temporary closure of travel lanes, roadways segments, and sidewalks along the elevated guideway and stations within the street rights-of-way.

The City of Inglewood Public Works Department, Transportation Division operates and maintains the following:

- ITS traffic management center and intersection monitoring cameras
- Traffic signals and stop signs
- Intersection design and roadway alignments
- Public parking structures and lots
- Parking meters
- Parking permit districts
- Crosswalks and roadway striping
- Street lighting
- Street and traffic signs
- Street closures and barricades

The City Department of Public Works Engineering Division are responsible for issuing permits related to street closures for construction activities including Encroachment and Excavation Permits - An encroachment or excavation permit is required for all construction work within or related to the use of any public street right-of way.

Temporary Closures of Roadways and Sidewalks

AS discussed in ***Section 3.7*: *Construction*** in **Section 3.0**, construction with the public rights-of-way including streets would result in temporary street and/or lane closures as follows:

- Phase 1 work relating to utility locations within streets may require stabilization efforts for protection in place, possible utility relocations, and new utility installation for utilities such as: electrical, water lines, gas lines, storm drains, sewer lines, temporary traffic signals and streetlights. This could require removal and disposal of existing sidewalks, roadways, landscape, medians, as well as new or temporary pavement and asphalt for road work and sidewalks. However, as described in **Section 4.14**, possible relocation of utilities is unlikely during Project construction.

- Phase 2 involves the guideway along Prairie Avenue from Hardy Street to Manchester Boulevard and the Prairie Avenue/Hardy Street and Prairie Avenue/Pincay Drive Stations. As with Phase 1, Phase 2 work relating to utility locations within streets may require stabilization efforts for protection in place, possible utility relocations, and new utility installation. This could require removal and disposal of existing sidewalks, roadways, landscape, medians, and demolition, as well as new or temporary pavement and asphalt for road work and sidewalks.

  Work would include the installation of a K-Rail system on the west side of Prairie street to delineate the construction area along Prairie Avenue from Hardy Street to Manchester Boulevard. The installation of the K-Rail system would require temporary street closures and loss of lanes. This would include closure of up to twenty-two feet of the west side of Prairie Avenue to allow for construction of foundations and columns and construction staging sections along Prairie Avenue. To minimize traffic impacts, lane reversals (or contra-flow) will be implemented to facilitate the peak hour traffic direction.

  Construction activities would then switch to the east side of Prairie Avenue to install a K-rail system to delineate the construction area, which would utilize approximately fifteen-feet of public ROW. The installation of the K-rail system on the east side of Prairie Avenue would result in temporary lane closures starting from the easterly face of the curb on the eastern side of Prairie Street, excluding sidewalk, from Hardy Street to Manchester Boulevard. If needed, a temporary easement or utility setback may be utilized to secure staging areas along Prairie Avenue. These areas would include the installation of foundation components and columns to facilitate aerial construction. To minimize traffic impacts, lane reversals (or contra-flow) will be implemented to facilitate the peak hour traffic direction.

  Phase 2 also includes aerial construction of the guideway formwork with precast trapezoidal troughs and steel girders, and completion of stations and mezzanines with vertical circulation elements. This work would include temporary closures during the following activities for safety measures as follows:

  - During the formwork phase, traffic would not be allowed to pass underneath the structure.
  - During formwork and concrete placement of the cast-in-place trapezoidal box trough and/or the uses of precast/prestressed “I” steel girders and platforms, temporary lane closures may be necessary.

- Phase 3 of construction would occur for the guideway along Manchester Boulevard from Prairie Avenue to Market Street, Market Street from Manchester Boulevard to Florence Avenue, the Market Street/Florence Station, and pedestrian crossing to the Metro Crenshaw/LAX Line Station.

  Phase 3 of construction would include, among other actions, the following:

  - Utility work, including potential relocations, and new utility installations.
  - Removal of existing sidewalks, roadways, landscaping, and demolition as needed. This work includes new or temporary pavement and asphalt for road work and sidewalks.

- The installation of a K-Rail system on the south side of Manchester Boulevard to delineate the construction area. The installation of the K-Rail system would require use of public right-of-way and temporary lane and/or street closures from southerly face of curb, excluding sidewalks, along Manchester Boulevard from Prairie Avenue to Market Street. To minimize traffic impacts, lane reversals (or contra flow) will be implemented to facilitate the peak hour traffic direction.

Construction activities would then switch to the north side of Manchester Boulevard to install the K-rail system to delineate the construction area. Installation of the K-rail system would be phased such that approximately twenty-two feet of the public right-of-way, starting from the northerly face of curb, excluding sidewalks, would be required at a time. The phased installation would begin at Prairie Avenue and move toward Market Street. To minimize traffic impacts lane reversals (or contra-flow) will be implemented to facilitate the peak hour traffic direction.

Phase 3 includes aerial construction of the guideway formwork with precast trapezoidal troughs and girders, and completion of stations and mezzanines with vertical circulation elements. This work would include temporary street and lane closures during the following activities for safety measures:

- During the formwork phase, traffic would not be allowed to pass underneath the structure.
- During formwork and concrete placement of the cast-in-place trapezoidal box trough and/or the uses of precast/prestressed "I" steel girders and platforms. temporary lane closures would be necessary.

- Phase 4 of construction would not require street closures as work would occur at the MSF and within the interior of the stations and guideway.

The closure of streets would be temporary and would be confined to the construction phase of the proposed Project and would typically occur during off-peak and/or night hours. Closures would be temporary in nature and would not last the entirety of the Project construction phase. However, the phased construction duration of the proposed Project will be approximately five years, which could adversely affect the existing emergency access routes and services.

Specifically, the proposed Project would restrict streets that are designated as evacuation routes in the Safety Element of the City's General Plan, including Florence Avenue, Prairie Avenue and Manchester Boulevard, for temporary street closures. Such closures could interfere with emergency response or evacuation plans involving the use of Florence Avenue, Prairie Avenue and Manchester Boulevard, even though the closures would be conducted in accordance with the City's permitting process and would not last the entirety of each construction phase. Adjacent collector/local streets could be used to access on either side of Florence Avenue, Prairie Avenue and Manchester Boulevard during a temporary street or lane closure.

The ITC CCP will require the contractor to coordinate with the City's Department of Public Works Transportation and Engineering Divisions regarding all potential street and/or lane closures during construction. The contractor would be required to prepare temporary street closure and traffic control plans prior to any street closure for demolition or construction activities within the public rights-of-way for any streets that would be closed or have lane restrictions; these temporary street closure and traffic plans would be reviewed and approved by the City's Public Works Department, Transportation and Engineering Divisions.

A Worksite Traffic Control Plan and Traffic Management Plans (TMPs) would be prepared with input from all applicable local agencies including fire services, police services and the City as required by the CCP. The traffic management plans would include detours and alternative routes for emergency services. The final traffic management plans would be submitted to the City's Public Works Department, Transportation and Engineering Divisions for approval. The plan would require that emergency access to the City's designated evacuation routes be maintained throughout the proposed Project's construction period. Traffic control plans would meet Federal Highway Administration (FHWA) Manual on Uniform Traffic Control Devices (MUTCD) for Streets and Highways.[81] The MUTCD is a compilation of national standards for all traffic control devices, including road markings, highway signs, and traffic signals.

Preparation and implementation of the Worksite Traffic Control Plan and TMPs required by the ITC CCP ensure that adequate access or appropriate detour routes are provided along Florence Avenue, Prairie Avenue, and Market Street. Impacts would be less than significant.

Roadway Reconfiguration and Restriping

Roadway striping and cross-sections necessary for construction and implementation of the proposed Project are shown in **Figures 3.0-10** to **3.0-24: Striping Plans**, and **Figures 3.0-25** to **3.0-32: Cross-sections**.

All roadway and restriping plans would be reviewed and approved by the City's Department of Public Works, Transportation Division as part of the proposed Project's design phase. As part of the review process, the City would identify any conflicts with adopted emergency response requirements and would consult with the fire and police departments. The final plan for roadway configuration and restriping would reflect any conditions and requirements of the City. Therefore, the proposed Project could interfere with adopted emergency response plan or emergency evacuation; impacts during construction would be potentially significant.

81 Federal Highway Administration (FHWA). Manual on Uniform Traffic Control Devices (MUTCD) for Streets and Highways. https://mutcd.fhwa.dot.gov/.

Operation

The proposed Project would not interfere or impair with the City's ability to increase public awareness or make any improvements to emergency services and warning systems during operations.

The proposed Project would operate in conformance with established safety requirements. The American Society of Civil Engineers (ASCE) Standard 21, Part 1 - Automated People Mover Standards[82] which addresses safety and performance requirements that apply to proposed Project. ASCE published a safety and security standard that included requirements that address federal and state regulations for independent safety oversight agencies. Safety and security programs should also adhere to ASCE 21, Part 4 (ASCE 21.4-08) - Automated People Mover Standards—Part 4: Security Emergency Preparedness System Verification and Demonstration Operations, Maintenance, and Training Operational Monitoring.[83]

Safety oversight of fixed guideway transit systems is required at the state government level under the Federal Transit Administration, Part 659, Rail Fixed Guideway Systems - State Safety Oversight requirements when there is a similar transit system operating within the state.[84] The proposed Project's safety and security programs would be subject to the requirements the of CPUC and State Safety Oversight of Fixed Guideway Transit Systems. In addition, the operation of the proposed Project would be required to adhere to all State and local safety requirements including those of the City's fire and police departments. With adherence to the federal, State, and local safety requirements, the proposed Project would not conflict the requirements of an emergency response plan or emergency evacuation plan.

Therefore, impact is less than significant.

Mitigation Measures

Construction

No mitigation is required.

Operation

No mitigation is required.

82 American Society of Civil Engineers (ASCE). Standard 21 - Automated People Mover Standards. Part 1, Section 3 (ASCE 21-05). https://ascelibrary.org/doi/book/10.1061/9780784408735

83 American Society of Civil Engineers (ASCE). Standard 21, Part 4 (ASCE 21.4-08) - Automated People Mover Standards—Part 4: Security Emergency Preparedness System Verification and Demonstration Operations, Maintenance, and Training Operational Monitoring. https://standards.globalspec.com/std/1147223/ASCE%2021.4-08

84 Code of Federal Regulations (CFR), Title 49. Transportation. Subtitle B. Other Regulations Relating to Transportation, Chapter VI. Federal Transit Administration, Part 659, Rail Fixed Guideway Systems; State Safety Oversight.

Level of Significance after Mitigation

Construction

Impacts would be less than significant.

Operation

Impacts would be less than significant.

4.8.8 CUMULATIVE IMPACTS

Hazardous materials and hazard impacts are generally localized to specific sites and do not combine with one another in a way to create a greater or more severe hazard. Because of the relative infrequencies and the variances in timing, the geographic scope for cumulative hazards and hazardous materials impacts varies based on the hazard and the significance threshold being analyzed. Impacts relative to hazardous materials usually depend on the nature and extent of the hazardous materials release, and existing and future soil and groundwater conditions. Hazardous materials incidents tend to be limited to a smaller more localized area surrounding the immediate location and extent of a release and could only be cumulative if two or more hazardous material releases overlapped spatially and contemporaneously.

The timeframe during which the proposed Project could contribute to cumulative hazards and hazardous materials effects includes the construction and operations phases. Similar to the geographic limitations discussed previously, it should be noted that impacts relative to hazardous materials are generally time-specific. Hazardous material events could only be cumulative if two or more hazardous material releases occurred at overlapping times.

The proposed Project in conjunction with other cumulative projects would include the use, storage, and disposal of varying quantities of hazardous materials. The proposed Project does not include any substantive emissions of hazardous materials that would be associated with industrial land uses (e.g., manufacturing, chemical processing, handling of bulk quantities of hazardous materials or wastes). Just as with the proposed Project, all commercial uses/businesses would be required to submit business information and hazardous materials inventory forms to the City Fire Department or appropriate jurisdiction having responsibility. All hazardous materials are required to be stored and handled according to the manufacturer's instructions and local, State, and federal regulations. With adherence to existing regulatory requirements, releases from routine transport, use, or disposal of hazardous materials would be minimized, and in the unlikely event of a release, would be localized in extent.

As discussed previously, adherence to the regulatory requirements would ensure that incidents at the proposed Project and other cumulative projects are infrequent, and thus unlikely to occur simultaneously

in a way that could result in the public or environment being exposed to multiple releases of hazardous materials. For the aforementioned reasons, the proposed Project, in conjunction with other cumulative projects, would not create a significant cumulative hazard impact to the public or the environment through the routine transport, use, or disposal of hazardous materials.

A cumulative impact related to transport, use, or disposal of hazardous materials could occur if there were hazards releases in the vicinity and at the same time as a release associated with the construction or operation of the proposed Project. For the purposes of this analysis, the geographic scope considered for analysis of this criterion is a 1-mile-radius area from the proposed Project. A 1-mile radius is reasonable in light of the relatively small amounts and types of hazardous materials that would be associated with construction and operation of the proposed Project.

The proposed Project in conjunction with other cumulative projects would include the use, storage, and disposal of varying quantities of hazardous materials. The proposed Project does not include any substantive emissions of hazardous materials such as might be associated with industrial land uses (e.g., manufacturing, chemical processing, handling of bulk quantities of hazardous materials or wastes). Just as with the proposed Project, all commercial uses/businesses would be required to submit business information and hazardous materials inventory forms contained in a Hazardous Materials Management Plan and Hazardous Materials Business Plan. The HHMD, as the CUPA, and other CUPA agencies for the cumulative projects outside of HHMD jurisdiction, requires all new commercial and other users to follow applicable regulations and guidelines regarding storage and handling of hazardous waste. All hazardous materials are required to be stored and handled according to manufacturer's directions and local, state, and federal regulations. With adherence to existing regulatory requirements, releases from routine transport, use or disposal of hazardous materials would be minimized, and in the unlikely event of a release, would likely be localized in extent.

As noted above, adherence to the regulatory requirements would ensure that incidents at the proposed Project and other cumulative projects within a 1-mile radius are infrequent, and thus unlikely to occur simultaneously in a way that could result in the public or environment being exposed to multiple releases of hazardous materials. For the reasons described above, the proposed Project, in conjunction with other cumulative projects, would not create a cumulatively significant hazard impact to the public or the environment through the routine transport, use, or disposal of hazardous materials. Therefore, this cumulative impact would be less than significant.

Construction and operation of the proposed Project, like the other largely residential and commercial cumulative projects identified in *Section 4.0.6*, would include the use of relatively small quantities of hazardous materials and generation of small amounts of hazardous wastes. The proposed Project and

other cumulative projects would not require the transport, storage, use, or disposal any unusually large, toxic, or explosive quantities of hazardous materials or hazardous wastes. The proposed Project and other cumulative residential and commercial projects, would use, store, handle, and dispose of relatively limited quantities of hazardous materials, such as cleaning fluids, lubricants, paints, and fuels. Similarly, these types of projects generate small quantities of hazardous wastes, including small leftover amounts of hazardous materials previously discussed, paint cans, medical wastes, and the like.

The proposed Project and cumulative projects and their associated businesses would be required to adhere to the comprehensive set of existing federal, State, and local regulatory requirements, including the HMBP programs administered by the HHMD. These programs require all users of hazardous materials to implement employee training, safe storage, and appropriate handling requirements to ensure that upset and accident conditions are minimized. In the unlikely event that an accidental release was to occur, these programs require spill response measures to ensure that incidents are quickly contained and, therefore, would not travel off site in a way that could cumulatively combine to affect large numbers of people or affect substantial parts of the environment.

The proposed Project and cumulative projects would be required to operate in conformance with established safety requirements during operation to ensure compliance with City emergency service and warning systems. The proposed Project and cumulative projects would operate in conformance with ASCE standards and Federal Transportation Administration requirements. The proposed Project's and cumulative projects' safety and security programs would be subject to the requirements the of CPUC and State Safety Oversight of Fixed Guideway Transit Systems. In addition, operation of the proposed Project and cumulative projects would be required to adhere to all State and local safety requirements including those of the City's fire and police departments. With adherence to the federal, State, and local safety requirements, the proposed Project, in conjunction with other cumulative projects, would not conflict the requirements of an emergency response plan or emergency evacuation plan.

For the reasons described above, the proposed Project, in conjunction with other cumulative projects, would not create a cumulatively considerable hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

Therefore, cumulative impacts would not be significant.

4.8.9 CONSISTENCY WITH CITY OF INGLEWOOD GENERAL PLAN

There are no specific policies within the General Plan that apply to the proposed Project regarding hazards or hazardous materials. The City's General Plan Safety Element outlines measures related to potential

hazardous materials incidents. As discussed above, compliance with federal, State, and local laws and regulations relating to transport, storage, disposal, and sale of hazardous materials would minimize any potential for accidental release or upset of hazardous materials.

There are no specific policies within the General Plan that apply to the proposed Project regarding emergency response and emergency evacuation plans. The City's General Plan Safety Element outlines measures related to disasters that require emergency evacuation plans. As discussed above, compliance with federal, State, and local laws and regulations relating to emergency response and emergency evacuation plans would ensure consistency with the General Plan Safety Element.

4.9 LAND USE AND PLANNING

4.9.1 INTRODUCTION

This section of the Draft Environmental Impact Report (Draft EIR) provides an analysis of the potential land use impacts of the proposed Inglewood Transit Connector Project (proposed Project). Specifically, this section analyzes the potential for the proposed Project to physically divide the existing community and conflict with applicable land use plans, policies, and regulations. This section describes existing land use conditions, general plan designations, and zoning as necessary to evaluate the potential land use impacts of the proposed Project.

Please see **Section 8.0** for a glossary of terms, definitions, and acronyms used in this Draft EIR.

4.9.2 METHODOLOGY

The significance of potential impacts of the proposed Project is determined based on the thresholds of significance described below in *Section 4.9.5: Thresholds of Significance*. The evaluation of land use impacts identified applicable land use plans and policies and assessed whether the proposed Project is inconsistent with those plans and policies. The study area for the land use impact analysis is the City of Inglewood, with a focus on land uses located in proximity to the proposed Project. The analysis of whether the proposed Project would physically divide an existing community considered the existing land uses near the proposed Project and the APM system's components, including the guideway, stations, and support facilities' potential to serve as a barriers between land uses. Consistency analysis for the proposed Project is also provided against existing policies, regulations, and programs. If an established program goal and/or policy is relevant to another environmental resource and has been analyzed in another section, readers are referred to the appropriate environmental resource section for the discussion.

4.9.3 REGULATORY FRAMEWORK

4.9.3.1 State Plans and Regulations

Senate Bill 535

Senate Bill 535 was signed into law on September 30, 2012. This bill directs 25 percent of the proceeds from Greenhouse Gas Reduction Fund to projects that provide a benefit to disadvantaged communities. As part of the legislation, CalEPA was assigned with the responsibility for identifying communities that are considered disadvantaged throughout California. A list of disadvantaged communities was released by

CalEPA in April 2017. The proposed Project is within or adjacent to disadvantaged communities as defined in Senate Bill 535 and identified by CalEPA.[1]

Assembly Bill 1550

Assembly Bill 1550 was signed into law on September 14, 2016. This bill builds on Senate Bill 535 by requiring the Greenhouse Gas Reduction Fund investment plan to allocate (1) a minimum of 25 percent of the available funds to projects located within, and benefiting individuals living in, disadvantaged communities, (2) an additional minimum of 5 percent of the available funds to projects that benefit low-income households or to projects located within, and benefiting individuals living in, low-income communities located anywhere in the State, and (3) an additional minimum of 5 percent of the available funds either to projects that benefit low-income households that are outside of, but within a ½ mile of, disadvantaged communities, or to projects located within the boundaries of, and benefiting individuals living in, low-income communities that are outside of, but within a ½ mile of, disadvantaged communities. The proposed Project is within or adjacent to disadvantaged communities as defined in Assembly Bill 1550.[2]

4.9.3.2 Regional Plans and Regulations

SCAG 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy

The SCAG 2020-2045 RTP/SCS was adopted in September 2020. The RTP/SCS is a long-range visioning plan that serves as an important planning document for the region that balances future mobility and housing needs with economic, environmental, and public health goals. The plan charts a course for closely integrating land use and transportation so that the region can grow smartly and sustainably. The RTP/SCS includes land use policies to guide the region's development, including economic development and land use near transit.

The proposed Project is included in the Project List under the 2020-2045 RTP/SCS program (RTP ID S1200T100)[3] in support of the RTP Framework.

1 OEHHA. *SB 535 Disadvantaged Communities*. https://oehha.ca.gov/calenviroscreen/sb535. Accessed September 15, 2020.
2 California Air Resources Board. *Priority Population Investments*. https://ww3.arb.ca.gov/cc/capandtrade/auctionproceeds/communityinvestments.htm. Accessed September 15, 2020.
3 SCAG. ConnectSoCal. Adopted Final Connect SoCal. Transportation System Project List. https://www.connectsocal.org/Documents/Adopted/fConnectSoCal_Project-List.pdf. Accessed September 15, 2020.

Applicable goals from the 2020-2045 RTP/SCS include:

Goal 2: Improve mobility, accessibility, reliability, and travel safety for people and goods

Goal 3: Enhance the preservation, security, and resilience of the regional transportation system

Goal 4: Increase person and goods movement and travel choices within the transportation system

Goal 5: Reduce greenhouse gas emissions and improve air quality

Goal 6: Support healthy and equitable communities

Goal 7: Adapt to a changing climate and support an integrated regional development pattern and transportation network

Goal 8: Leverage new transportation technologies and data-driven solutions that result in more efficient travel

Los Angeles County Airport Land Use Commission, Airport Land Use Plan

The Los Angeles County Airport Land Use Commission adopted the Los Angeles County Airport Land Use Plan in 1991 (revised 2004) in order to comply with State law and coordinate planning efforts surrounding public-use airports in the County.[4] The purpose of the Commission is to protect the public health, safety, and welfare through ensuring compatibility of land uses near public-use airports and minimizing the public's exposure to excessive noise and safety hazards within areas around public-use airports. Los Angeles International Airport (LAX) is located approximately 2 miles southwest of the proposed Project.[5]

Portions of the guideway, stations, and support facilities, including the MSF, the Prairie Avenue/Pincay Street Station, and the Prairie Avenue/Hardy Street Station,[6] are located within the LAX Planning Boundary/Airport Influence Area.[7]

4 Los Angeles County Airport Land Use Commission, *Los Angeles County Airport Land Use Plan*, adopted 1991 and revised 2004.

5 Google Maps, 2017. Available at maps.google.com.

6 Los Angeles County Airport Land Use Commission, *Los Angeles County Airport Land Use Plan*, adopted 1991 and revised 2004.

7 An airport influence area is the area which current or future airport-related noise, over flight, safety, and/or airspace protection factors may significantly affect land uses or necessitate restrictions on those uses.

4.9.3.5 Local Plans and Regulations

City of Inglewood General Plan

California State law requires every city and county to adopt a comprehensive General Plan to guide its future development. The proposed Project is located entirely within the City of Inglewood (City). The City's General Plan includes the following elements: Land Use, Circulation, Safety, Noise, Housing, Open Space, Conservation, and Environmental Justice Elements.[8,9]

Land Use Element

The Land Use Element[10] was adopted in 1980 and subsequently amended in 1986, 2009, and 2016. The Land Use Element presents a long-range plan for the general distribution and intensity of public and private land uses within the City. The goals applicable to the proposed Project are identified below:

Goals—General

- Provide for the orderly development and redevelopment of the City while preserving a measure of diversity among its parts. Allocate land in the City to satisfy the multiple needs of residents but recognize that land is a scarce resource to be conserved rather than wasted.
- Help promote sound economic development and increase employment opportunities for the City's residents by responding to changing economic conditions.
- Maximize the use and conservation of existing housing stock and neighborhoods and also facilitate development of new housing to meet community needs.
- Promote Inglewood's image and identity as an independent community within the Los Angeles metropolitan area.

Goals—Commercial

- Create and maintain a healthy economic condition within the present business community and assist new business to locate within the city.
- Protect local businessmen and encourage the importance of maintaining a strong commercial district in the downtown.
- Improve the visual appearance and economic condition of the existing arterial commercial development along Inglewood's major streets.

8 City of Inglewood *General Plan*, (1980).
9 City of Inglewood *General Plan*, "Environmental Justice Element" (April 2020).
10 City of Inglewood *General Plan*, "Land Use Element" (1980).

- Promote the development of commercial/recreational uses which would complement those which already are located in Inglewood.

Goals—Industrial

- Increase the industrial employment opportunities for the City's residents.

Goals — Circulation

- Ensure that proposed new uses can be accommodated by adequate and safe streets.
- Promote and support adequate public transportation within the City and the region.
- Develop modified traffic systems that would discourage through traffic from utilizing neighborhood streets.
- Develop a safe and adequate pedestrian circulation system which is barrier-free for the handicapped.

Goals — Community Facilities

- Maintain the present high level of police and fire services to the extent it is fiscally prudent.
- Expand opportunities for cultural and social growth for the City's residents.

As part of the Land Use Element, the City adopted the Downtown Transit Oriented District goals and policies in September 2016.[11] Analysis of goals and policies related to historic resources is provided in **Section 4.4: Cultural Resources**. Policies and goals applicable to this section include:

Downtown Transit Oriented District Goals and Policies (as amended September 2016)

Goal 1: Downtown is a place to live, work, shop, recreate, and be entertained.

Policy 1.1: Mixed Use Development. Encourage a range of residential, retail, office, recreational, and institutional uses in the Historic Downtown to create a vibrant urban district and support local business.

Policy 1.2: Ground Floor Uses and Storefronts. Require uses that activate pedestrian activity such as retail on major streets and plaza frontages. Require that storefronts be historically-sensitive, attractive and transparent in the Historic Downtown.

11 City of Inglewood *General Plan*, "Land Use Element" (1980).

Goal 2: Downtown is a revitalized yet forward-looking gathering place for the community.

Policy 2.1: Public Gathering Places. Create public spaces in key locations in the public right-of-way and on privately-owned land. In particular, create a central plaza along Market Street between Florence Avenue and Regent Street and/or in the adjacent parcels suitable for eating, resting and people watching, but also for festivals, concerts and events at special times.

Policy 2.2: Pedestrian Network. Enhance sidewalks, repurpose alleys and create mid-block passthroughs and internal courtyards to serve as pedestrian passageways and enjoyable public spaces.

Policy 2.3: Preservation of Historic Fabric. Require the preservation of buildings that have been designated as historic and encourage the reuse of other historic buildings. Maintain the sense of place in areas with historic fabric and/or meaning such as Market Street between Regent Street and Hillcrest Avenue and the Hillcrest neighborhood east of Locust Street.

Goal 3: Downtown provides a unique mix of accessibility options including light rail, pedestrians, bicycles, autos, buses, and advanced technology local transit.

Policy 3.1: Complete Streets. Accommodate all modes of transportation on streets, with particular attention to transit vehicles and pedestrians, but also design streets to serve as open spaces in the urban environment, places where people gather, communicators of the locality's culture, vision and values, and generators of development on adjacent parcels.

Policy 3.2: Green Boulevards. Create Green Boulevards that protect cyclists, infiltrate stormwater and use vegetation to create a sense of place on Florence Avenue, La Brea Avenue, Manchester Boulevard and Prairie Avenue.

Policy 3.3: Pedestrian Promenades. Emphasize Market Street and Queen Street as pedestrian promenades that may be closed to automobiles for special events or as conditions require.

Policy 3.4: Pedestrian Connections to Metro Rail. Establish high-quality at-grade and/or bridge connections from the Downtown Inglewood Metro station across Florence Avenue to the south. Make every effort to facilitate a

direct pedestrian connection from the station to Beach Avenue to the north.

Policy 3.5: Local Transit Connections to Metro Rail. Provide quality local transit connections from major destinations such as the NFL Stadium and Forum to Downtown and the Downtown Inglewood Metro station using existing or emerging technologies.

Policy 3.6: Parking District. Establish a parking district with shared parking consolidated in garages, and manage pricing

Goal 4: Downtown is a major economic engine providing jobs, sales tax, and other revenues.

Policy 4.1: Major Sites Development. Develop major sites and create new destinations at the north and south ends of Market Street, immediately north of the Metro station, and on and around the City Yard that create jobs, generate revenues for the city through sales and bed tax and provide new opportunities for residents.

Policy 4.3: Equitable Development. Implement policies such as a local hire notification requirement for large employers, Business Improvement District youth guide program and others so that the benefits of growth accrue to the current population of Inglewood. Encourage educational uses wherever possible to improve the job-readiness of the local population.

Goal 5: Downtown is a model for economic development.

Policy 5.1: Stormwater Management. Collect, clean and infiltrate stormwater runoff on streetscapes, parking lots and roofs wherever possible. Create a daylighted stream through TechTown reflecting topography and flow of water to the treatment plant.

Goal 6: Downtown expresses the unique culture of Inglewood.

Policy 6.1: Districts. Define the following unique districts within the Downtown TOD area, each with their own unifying character or identity that should be

preserved and enhanced: Historic Downtown, Civic Center, TechTown, Beach Avenue, Fairview West, Hillcrest and Queen Street.

Circulation Element

The Circulation Element, adopted in December 1995, serves as a guide for future circulation and transportation developments. The program addresses the adequacy of street access, traffic capacity for current and future land use needs, truck routes, and bicycle routes. For consistency analysis of the proposed Project and the Circulation Element see **Section 4.12: Transportation**.

Conservation Element

The Conservation Element, adopted in October 1997, contains goals, guidelines, and policies for the conservation, development, and utilization of natural resources found within the jurisdiction of the City of Inglewood. Resources addressed in the Element include water, soils, natural gas and oil. For a consistency analysis of the proposed Project and the Conservation Element see **Sections 4.2: Air Quality**, **4.3: Biological Resources**, and **4.14: Utilities and Service Systems.**

Housing Element

The City's current Housing Element[12] was adopted on January 28, 2014. The current version of the Housing Element covers the 5th Cycle Regional Housing Needs Allocation (RHNA) projections from 2013-2021. The Housing Element establishes policies to create or preserve quality residential neighborhoods while identifying current and future housing needs and establishes policies and programs to address housing deficiencies. A newly updated Housing Element would be adopted before November 2021 to account for the SCAG 6th Cycle RHNA projections as amended by the adoption of SB 375 in 2008.[13] See **Section 4.11: Population, Employment, and Housing** for consistency analysis of the proposed Project and the Housing Element.

Noise Element

The Noise Element, adopted in September 1987,[14] contains a comprehensive program regarding noise control in the planning process, including goals and policies that would guide the local planners in achieving and maintaining compatible land uses with environmental noise levels. Noise sensitive uses

12 City of Inglewood *General Plan*, "Housing Element" (2014).
13 California Government Code Section 65583 (c)(1)(A).
14 City of Inglewood *General Plan*, "Noise Element" (1987).

include residential, schools, hospitals, libraries, and parks. A consistency analysis was conducted for the Noise Element and discussed in **Section 4.10: Noise and Vibration**.

Open Space Element

The Open Space Element adopted in December 1995 addresses the current and future recreation needs of the community for park land and recreational facilities and plans for the conservation or creation of open spaces to mitigate the effects of increasing urbanization of Inglewood. See Recirculated Initial Study (**Appendix 2.0.2a**) for the no impact finding under Section 2.14: Public Services, Threshold (a) iv, Parks. The proposed Project would not have impacts on parks and would not directly generate population growth, which would require more recreational facilities.

Safety Element

The General Plan Safety Element adopted in July 1995[15] contains goals, objectives, and policies that protect the welfare and safety of the citizens of Inglewood and their properties, and the community as a whole, from risks associated with a variety of natural and man-made disasters. These disasters include, but are not limited to, earthquakes, flooding, fires, and airplane crashes. See **Section 4.6: Geology and Soils** for the consistency analysis of the proposed Project with the Safety Element.

Environmental Justice Element

The Environmental Justice Element, adopted on June 30, 2020, provides guidelines to minimize pollution and its effects on the community, and ensure that all residents have a say in decisions that may affect their quality of life. The State of California defines Environmental Justice as "the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies".[16]The goals and policies that apply to the proposed Project are presented below:

Goal 1: Residents and stakeholders who are aware of, and effectively participate in, decisions that affect their environment and quality of life.

Policy: Participation and Collaboration

15 City of Inglewood *General Plan*, "Safety Element" (1995).

16 *California Government Code §65040.12.e.*

EJ-1.11: Conduct broad outreach on public hearings that affect the environment in languages used by the community.

EJ-1.12: Inform the public on decisions that affect their environment using multiple communication methods, including traditional and online forms of communication.

EJ-1.13: Provide written notices and other announcements regarding key land use and development issues in English and Spanish where feasible. For all other materials, note that verbal translation assistance is available.

EJ-1.14: Offer interpretation services at key meetings and workshops on issues affecting the environment.

EJ-1.15: Consider offering childcare at key meetings and workshops on environmental issues affecting entire neighborhoods and the City as a whole.

EJ-1.16: Consider varying the time and date of key meetings and workshops, or holding multiple meetings and workshops, in order to ensure broad participation.

EJ-1.17: Seek feedback on public decisions through traditional and online forms of communication, such as website, email, mobile phone apps, online forums, and podcasts.

EJ-1.18: Partner with community-based organizations that have relationships, trust, and cultural competency with target communities to outreach on local initiatives and issues.

Goal 2: The community's exposure to pollution in the environment is minimized through sound planning and public decision making.

Policy: General Environmental Health

EJ-2.1: Incorporate compliance with State and federal environmental regulations in project approvals.

EJ-2.2: Work with other agencies to minimize exposure to air pollution and other hazards in the environment.

EJ-2.3: Ensure compliance with rules regarding remediation of contaminated sites prior to occupancy of new development.

EJ-2.4: Create land use patterns and public amenities that encourage people to walk, bicycle and use public transit.

EJ-2.8: Encourage new development to reduce vehicle miles traveled to reduce pollutant emissions.

EJ-2.12: Place adequate conditions on large construction projects to ensure they do not create noise, dust or other impacts on the community to the extent feasible.

EJ-2.13: Continue to reduce pollution entering the storm drain system through the incorporation of best management practices.

Goal 3: A community that promotes physical activity and opportunities for active living.

Policy: Access and Connectivity

EJ-3.4: Require the provision of on-site bicycle facilities in new large-scale development projects.

EJ-3.5: Partner with transit agencies to ensure that parks and recreational facilities are accessible to low-income and minority populations.

EJ-3.7: Encourage new specific plans and development projects be designed to promote pedestrian movement through direct, safe, and pleasant routes that connect destinations inside and outside the plan or project area.

Goal 4: Healthy, affordable and culturally appropriate food is readily available to all members of the community.

Policy: Affordable and Nutritious Food

EJ-4.4: Maximize multimodal access to fresh food by encouraging grocery stores, healthy corner stores, and outdoor markets at key transit nodes and within new transit-oriented development projects.

Goal 6: Adequate and equitably distributed public facilities are available in the community.

EJ-6.1: Ensure the City provides equitable public improvements and community amenities to all areas of the City.

EJ-6.2: Prioritize the City's capital improvement program to address the needs of disadvantaged communities.

EJ-6.3: Plan for the future public improvement and service needs of underserved communities.

EJ-6.6: Provide ongoing infrastructure maintenance in existing residential neighborhoods through the capital improvement program.

EJ-6.8: Ensure that new public facilities are well designed, energy efficient and compatible with adjacent land uses.

EJ-6.10: Coordinate with the Inglewood Unified School District, transit agencies and other public agencies to provide adequate public facilities, improvements and programs to the City of Inglewood.

New Downtown Inglewood and Fairview Heights Transit Oriented Development Plan and Design Guidelines

The Downtown and Fairview Heights Transit Oriented Development Plan and Design Guidelines (TOD Plan) address Downtown Inglewood and the Fairview Heights neighborhoods and implements the City's vision for transforming the quality of the environment within these areas.[17] The Downtown TOD Plan area consists of approximately 585 acres located in the center of Inglewood along the new Crenshaw/LAX line

17 City of Inglewood, *New Downtown and Fairview Heights Transit Oriented Development Plan and Design Guidelines*, November 1, 2016.

just east of the Florence Avenue/La Brea Avenue intersection. This Downtown TOD Plan area extends approximately one-half mile in all directions from the Metro Station. The Fairview Heights TOD Plan area consists of approximately 328 acres located near the intersection of Florence Avenue and West Boulevard. This Fairview Heights TOD Plan area also extends approximately one-half mile in all directions from the Metro Station.

The TOD Plan includes goals and policies which were incorporated into the Land Use Element goals and policies in 2016 under the Downtown Transit Oriented District Goals and Policies section. The TOD Plan further includes concept plans, zoning, development standards and design guidelines, and an implementation action plan for consideration by applicants submitting any proposals for new construction or rehabilitation within the TOD Plan area, submitting project plans for design review, as well as for consultation by City Staff when making recommendations for project approvals. The TOD Plan also addresses architectural detail, signage, public art, and civic and cultural life.

The proposed Project is located within the Historic Downtown and Hillcrest Districts as defined in this plan. The Historic Downtown District is pedestrian-oriented and human-scaled. Under the plan, the Historic Downtown District would function as a regional destination and gathering space for all in the City of Inglewood that links residents with the community's past, present and future. This district would include public space, restaurants, entertainment, residential uses and limited hotel and office uses. The goal for the Hillcrest District is to retain the District's present character and continue to be home to churches, neighborhood retail uses, as well as residences.

Hollywood Park Specific Plan

The Hollywood Park Specific Plan (HPSP) establishes development standards and design guidelines for the 298-acre Hollywood Park site at the northeast corner of the Prairie Avenue and Century Boulevard intersection and provides an overview of existing infrastructure and necessary improvements related to the site, including measures for implementation of the HPSP. The site is currently under development. SoFi Stadium was completed in August 2020 and development of a 6,000-seat entertainment venue, parks, and retail, housing, entertainment, gaming, hotel, and civic uses are also allowed by the HPSP.[18]

The HPSP includes guidelines and standards for improvements in and fronting the public right-of-way within the Plan area, which includes approximately 0.5 miles of street frontage along Prairie Avenue where the proposed Project will be located. The HPSP provides integrated and coordinated landscape design

18 City of Inglewood, Hollywood Park Specific Plan, adopted July 8, 2009, amended September 23, 2014, and further amended February 24, 2015.

guidelines for new development along the perimeter of the Plan area with the objective of promoting land use compatibility, particularly along Prairie Avenue. The HPSP includes streetscape standards in order to integrate Hollywood Park with the adjoining urban fabric, achieve a diverse urban forest, and assist in developing districts of distinctive and appropriate character.[19] Sidewalk widths provide comfortable walking routes and parkway widths are designed to provide sufficient area for urban tree growth. The streetscape will also include identity elements that will differentiate Hollywood Park from nearby developments, including unique architectural features, special landscape (such as seasonal displays of color), graphic elements (such as signs or logos), special pedestrian or automobile paving, special night lighting effects, or other similar features.

City of Inglewood Planning and Zoning Ordinance

The City of Inglewood Planning and Zoning Code (Chapter 12 of the Inglewood Municipal Code (IMC)) is the primary land use regulation in the City.[20] The purpose of the Zoning Ordinance is to protect and promote the public's health, safety, and general welfare, and to implement the policies of the comprehensive General Plan. The Zoning Ordinance describes the zoning districts and land use classifications, land use regulations, environmental standards, and developments standards relating to issues such as intensity, setbacks, height, and parking.

LAX Airport Land Use Plans

The LAX Airport Land Use Plan (LAX ALUP) is created by the Los Angeles World Airports (LAWA) and includes a LAX Plan[21] and a LAX Specific Plan.[22] The LAX ALUP addresses planning, zoning and other land use regulations as a component of Los Angeles City's General Plan. The plans provide a land use policy framework to guide implementation of the LAX Master Plan on a broad level and includes zoning and development regulations with permitted and prohibited uses for properties in the LAX Zone.

The LAX Plan and LAX Specific Plan cover land use planning in areas adjacent to the LAX airport west of La Cienega Boulevard. The proposed Project is approximately one mile east of La Cienega Boulevard and would not be included in the LAX land use framework which includes the Runway Protection Zones (RPZs)

19 City of Inglewood, Hollywood Park Specific Plan, adopted July 8, 2009, amended September 23, 2014, and further amended February 24, 2015.

20 City of IMC, Chapter 12.

21 Los Angeles International Airport. *LAX Plan*. 2017. lawa.org/-/media/lawa-web/lawa-our-lax/plan-and-ordiance/2017-lax-plan.ashx. Accessed August 16, 2020.

22 Los Angeles International Airport. *LAX Specific Plan*. 2017. file:///C:/Users/clan/Downloads/17-0276-s2_ord_185164_10-28-17.pdf. Accessed August 16, 2020.

and height restriction boundaries.[23] However, the proposed Project is located within the Airport's 65 community noise exposure level (CNEL) noise contour area. Together, the noise contour area and areas within the RPZ(s) makes up the LAX Airport Influence Area (AIA).

4.9.4 EXISTING CONDITIONS

4.9.4.1 Existing Land Uses

The City of Inglewood was historically developed as a low-density single-family community and is transitioning to include higher density development with the implementation of land use plans such as the New Downtown and Fairview Heights TOD Plan and the Hollywood Park Specific Plan. These plans allow and encourage mixed-use development focusing on walkability, density, and TOD.

As of 2016, land uses in in the City were comprised of residential (46.7 percent), right-of-way (23.5 percent), public/semi-public (20.3 percent), commercial (6.1 percent) and industrial (3.7 percent) uses.[24] Existing zoning allows 60 percent of residentially zoned land to be developed into two-family or multifamily units. Today, there are more multifamily dwelling units than single-family units in the City.

Commercial uses are typically located along major arterials in the City of Inglewood. The two major components of commercial land uses include retail service and automobile sales and service, representing 63 percent and 20 percent, respectively, of all commercial uses. The City is experiencing a growth of light industrial oriented uses focused on shipping in and out of LAX. Zoning for light industrial represents 75 percent of land zoned for industrial uses while the remaining 25 percent is zoned for heavy industrial uses. Land uses included within the City's public/semi-public areas include parks, schools, government buildings and facilities, churches, the Inglewood Cemetery, and hospitals. The City's right-of-way area includes 180 miles, or 1,337 acres, of streets and alleys. The City is primarily developed. A majority of the vacant land in the City is designated for industrial land uses with minimal vacant land designated for residential and commercial uses.[25]

Further descriptions of existing land uses along the proposed Project for the guideway is provided below. The proposed Project is described in three segments–the Market Street Segment, the Manchester

23 Los Angeles County, Airport Land Use Commission, Department of Regional Planning, *Los Angeles County Airport Land Use Plan*, adopted December 19, 1991, revised December 1, 2004, available at http://planning.lacounty.gov/view/alup/, accessed February 15, 2019.

24 City of Inglewood, *City of Inglewood General Plan, Land Use Element, Land Use Comparison table,* Inglewood Land Use, p. 54, updated 2016, https://www.cityofinglewood.org/DocumentCenter/View/132/Land-Use-Element-1980-Amended-1986-2009-2016-pdf.

25 City of Inglewood, *City of Inglewood General Plan,* Land Use Element, p. 10, updated 2016. https://www.cityofinglewood.org/DocumentCenter/View/132/Land-Use-Element-1980-Amended-1986-2009-2016-pdf.

Boulevard Segment, and the Prairie Avenue Segment. Descriptions for each segment is then broken down into descriptions of General Plan designations, followed by a description of the existing zoning, and ending with a description of existing physical uses on site (such as retail, schools, churches). Two figures are included to show the land use designations under the General Plan and IMC in the Project footprint. The figures include the following: **Figure 4.9-1: General Plan Land Use Designations**, and **Figure 4.9-2: Zoning Map.**

Market Street Segment

The Market Street Segment extends from the intersection of Market Street and Florence Avenue to the intersection of Market Street and Manchester Boulevard. As shown in **Figure 4.9-1**, the entire Market Street Segment is designated Downtown TOD in the General Plan Land Use Map. The Downtown TOD designation is a component of the New Downtown Inglewood and Fairview Heights TOD Plan,[26] which as discussed previously, was approved in 2016. The plan defines zoning to further define the allowable uses within each area.

As shown in **Figure 4.9-2**, the Market Street Segment is almost entirely designated Historic Core (HC)[27] within the General Plan on both sides of the roadway, with only two parcels directly south of Florence Avenue being outside of the HC zone and designated as TOD Mixed Use 1 (TOD MU-1). The HC zone is intended to provide for a mix of land uses, including commercial services such as retail, restaurants, and offices and civic uses, including public and quasi-public facilities. Residential uses are also allowed in the HC zone. The land use patterns and sizes of the developments in this zone are intended to be consistent with the existing historic urban fabric. The HC zone permits a maximum height of five stories or 68 feet, no minimum lot size, and public street setback of zero feet. An exception to this condition is given to parcels directly adjacent to Market Street, which is limited in height to three stories or 45 feet within 20 feet of Market Street.

The objective of the TOD MU-1 zone is to provide larger-scale transit-oriented development at a higher density. A variety of uses are allowed in the TOD MU-1 zone and the mixing of uses is encouraged. Allowable uses in the TOD MU-1 zone include ground-level retail, services, public-serving offices, and upper-level residential, office, hotel, or institutional functions. Plazas and shared parking structures are

26 City of Inglewood. *The New Downtown Inglewood & Inglewood TOD Plans*. http://inglewood.arroyogroup.com/wp-content/uploads/2017/01/The-New-Downtown-Fairview-Heights-TOD-Plan-Design-Guidelines-lo-res.pdf, accessed July 2020.

27 City of Inglewood. *New Downtown Inglewood and Fairview Heights TOD Plan*. http://inglewood.arroyogroup.com/wp-content/uploads/2017/01/The-New-Downtown-Fairview-Heights-TOD-Plan-Design-Guidelines-lo-res.pdf. Accessed September 17, 2020.

also encouraged. The TOD MU-1 zone is further divided into three separate districts: North Station, North Market Place, and South Market Place. The parcels adjacent to the proposed Project are located in the North Market Place district, with a height limit of up to eight stories or 104 feet, minimum lot size 80,000 sf, and public street setback of zero feet.

Zoning east of Locust Street and north of Regent Street, adjacent to the Market Street/Florence Avenue Station is TOD MU-1 on the north end and Residential Multifamily (R-3) to the south. In the event of a conflict between the Downtown TOD plan and the IMC designated zoning, the Downtown TOD Plan would override the requirements within the IMC designated zoning requirements.[28] However, in the event that the Downtown TOD Plan does not address a regulatory requirement, the IMC prevails.

At the north end of the segment is a commercial shopping center that includes 15 parcels and contains restaurants, an auto shop, retail stores, pharmacy, cosmetic services, and a dental office. Existing uses adjacent to Locust Street consist of single-family and multifamily residential homes to the east, adjacent to the shopping plaza. North of Florence Avenue and the shopping center are additional retail commercial uses including a grocery store, pharmacy, and cosmetic services. A senior housing project, bank, and beauty salons are located south of Regent Street and the shopping plaza. The existing land use west of the plaza is a vacant lot which is currently being developed.

Commercial uses border the street on both sides of Market Street from south of Regent Street up to the intersection with Manchester Boulevard. Uses west of Market Street, from north to south consist of a beauty salon, vacant lot, restaurants, the former Fox Theater building, a repair shop, public employment services, retail stores, and an office building. On the east side of Market Street, the existing land uses from Regent Street to Manchester Avenue include a bank, a site under development with a mixed use project, art gallery, restaurants, retail stores, and a commercial office.

Manchester Boulevard Segment

The Manchester Boulevard Segment extends from the intersection of Market Street and Manchester Boulevard to the intersection of Manchester Boulevard and Prairie Avenue. A majority of the Manchester Boulevard Segment is designated Downtown TOD on the General Plan Land Use Map as shown in **Figure 4.9-1**. The area southeast of Manchester Boulevard and Spruce Avenue is designated Commercial/Residential.

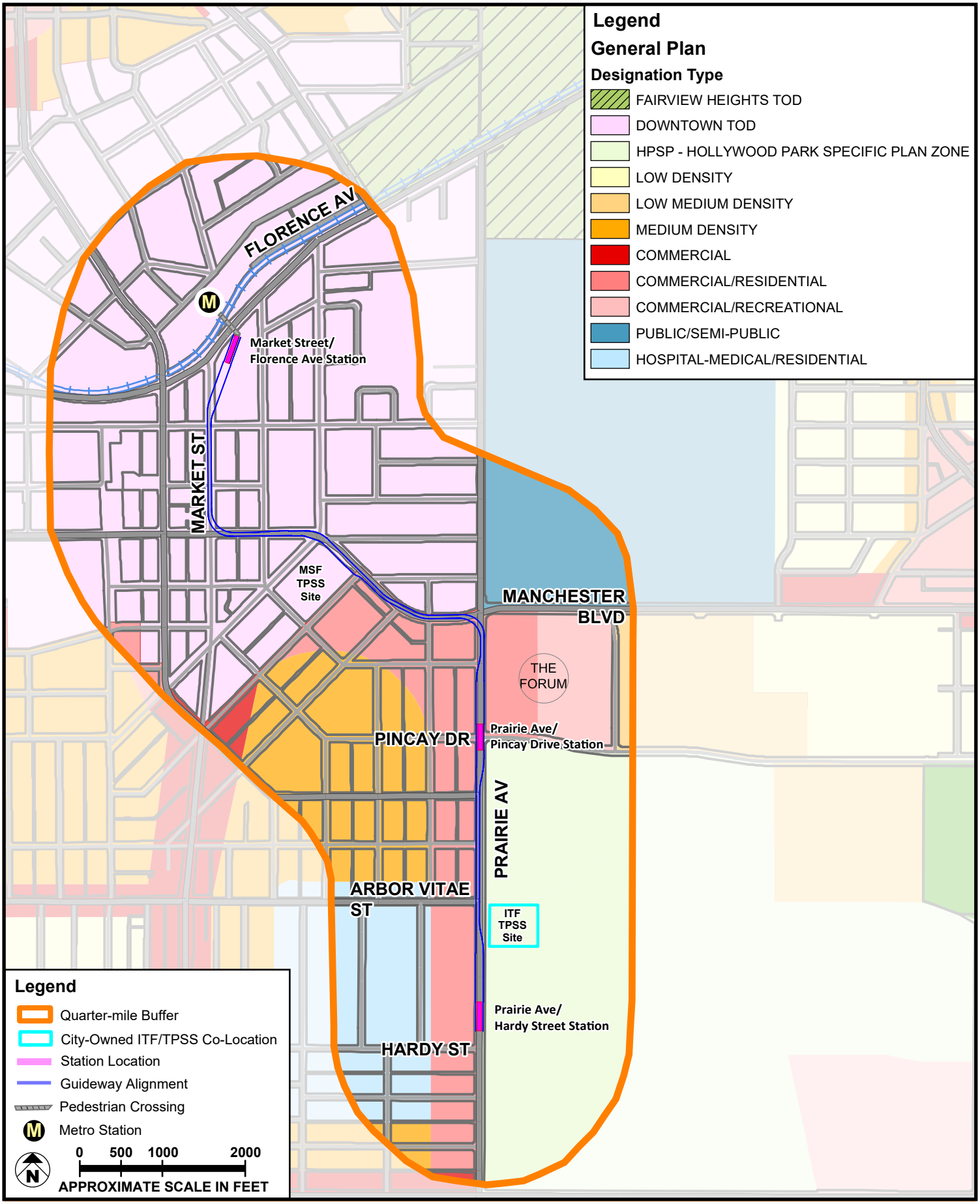
28 Inglewood Municipal Code 12-16.8.

As shown in **Figure 4.9-2**, the majority of the Manchester Boulevard Segment is zoned HC on either side of the street from the intersection with Market Street to the intersection with Hillcrest Boulevard. Starting on the south side of Manchester Boulevard, the HC zone extends past Hillcrest Boulevard all the way to Spruce Avenue, including the proposed MSF site. On the north side of Manchester Boulevard zoning is General Commercial (C-2). The height limit for the C-2 zone is 6-stories or 75 feet, with no setback requirements.

The area located south of Manchester Boulevard from Spruce Avenue to Prairie Avenue is zoned C-2. Under the IMC, the C-2 zone allows for a variety of commercial uses (e.g., retail and service businesses) and does not allow for new residential uses. The height limit for the C-2 zone is six-stories or 75 feet, with no setback requirements.

Land uses on Manchester Boulevard consist of primarily commercial uses. Land uses on the north side of Manchester Boulevard from west to east include retail stores, a dentist office, and a restaurant. Near Manchester and Hillcrest Boulevards is a gas station, a bar, a medical clinic, an advertising agency, a retail store, and a church. Near Manchester Drive and Osage Avenue is an insurance office, a church, and multifamily housing. An auto shop and a restaurant are located on Manchester Boulevard at Prairie Avenue. A cemetery is located across Prairie Avenue to the north.

On the south side of Manchester Boulevard, traveling from west to east to Hillcrest Boulevard uses include retail stores, a pharmacy, and restaurants. Between Hillcrest Boulevard and Spruce Avenue is a shopping center that includes a grocery store with a gas station. Other uses located within the grocery store shopping center include a bank branch, coffee shop, and gym. East of Spruce Avenue, the south side of the roadway is lined with retail shops, a day care facility, and a real estate office. Moving past Osage Avenue towards Prairie Avenue is a dry cleaner, a dentist office, and a commercial building.

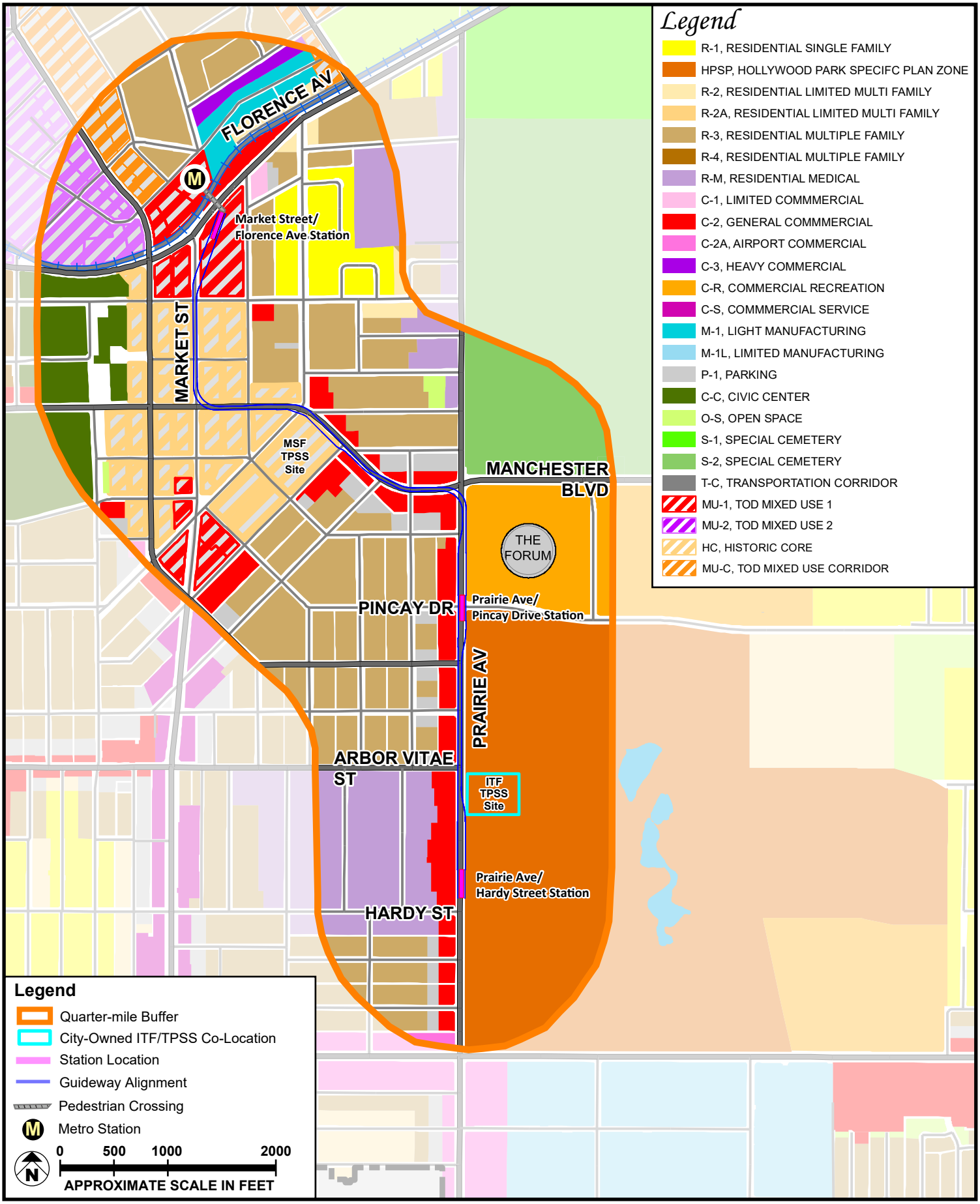


SOURCE: Google Earth - 2020; Meridian Consultants LLC - 2020

FIGURE **4.9-1**

General Plan Land Use Designations

208-001-18



SOURCE: City of Inglewood - 2017; Meridian Consultants LLC - 2020

FIGURE **4.9-2**

Zoning Map

208-001-18

Prairie Avenue Segment

The Prairie Avenue Segment extends from the intersection of Prairie Avenue and Manchester Boulevard to just south of the intersection of Prairie Avenue and Hardy Street. The entire area west of Prairie Avenue is designated Commercial/Residential by the General Plan (see **Figure 4.9-1**). East of Prairie Avenue, The Forum is designated Commercial/Recreational and Commercial/Residential. South of the Forum, the HPSP is designated Major Mixed-Use which continues until Century Boulevard.

As shown in **Figure 4.9-2**, the area west of Prairie Avenue is zoned C-2 for the entirety of the segment. Land uses west of Prairie Avenue from the north to Kelso Avenue, include an office building and school. South of Kelso Street is a restaurant and a funeral home before the land use transitions into residential uses. On either side of Buckthorn Street are retail stores and continuing south is a church and a hotel until Arbor Vitae Street. South of Arbor Vitae Street is a restaurant, convenience store, a vacant building, more restaurants, beauty salons, and a repair shop in a commercial center.

The area east of Prairie Avenue is zoned Commercial Recreation (C-R) north of Pincay Drive and HPSP south of Pincay Drive. The C-R zone allows for a variety of commercial entertainment uses including, among others, animal exhibitions, athletic events, social events, and conventions. The height limit for the C-R zone is 150 feet in height from natural grade with a 30 feet setback from the property line. The setback area can be used to accommodate landscaping or landscaped parking/subterranean parking. The HPSP is a Mixed-Use specific plan that includes SoFi Stadium and allows development of a mix of uses, including retail commercial and residential uses. Starting on the north end of Prairie Avenue, the Inglewood Park Cemetery is located on the northeast corner of Prairie Avenue and Manchester Boulevard. The Inglewood Park Cemetery is located on 200 acres of land with park-like vegetation throughout the site. South of Manchester Boulevard is the Forum, a historic commercial recreational venue built in 1967. South of Pincay Drive is the recently completed SoFi Stadium with additional development ongoing south of the stadium. The HPSP area, including SoFi Stadium, includes 298 acres east of Prairie Avenue extending to Century Boulevard.

4.9.5 ADJUSTED BASELINE CONDITIONS

This section assumes the Adjusted Baseline Environmental Setting as described in **Section 4.0: Environmental Impact Analysis**, *4.0-5: Adjusted Baseline*. Related to land use, the changes associated with the Adjusted Baseline affect the vacant land immediately east of the proposed Project across Prairie Avenue, which would be developed with retail, restaurant, commercial, and residential uses, and other entertainment and open space uses in the HPSP Specific Plan area. No other changes to the existing environmental setting related to land use and planning would occur under the Adjusted Baseline Environmental Setting.

4.9.6 THRESHOLDS OF SIGNIFICANCE

A significant land use impact would occur if the proposed Project would result in the following:

Threshold LU-1 **Physically divide an established community.**

Threshold LU-2 **Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.**

The first threshold applies to projects that would create physical barriers which would create divisions to existing connections between parts of a community. Physical divisions in a community could be created if connectivity between areas of the existing community is substantially affected. Physical division can also occur if the connectivity between areas of an existing community is reduced to the extent that one portion of a community would be physically separated from the rest of the community.

The second threshold addresses consistency with applicable land use plans and focuses on potential conflicts between the proposed Project and existing land use plan, policies, and regulations adopted to avoid or mitigate environmental effects. Determinations of significance are not based on inconsistency alone, but on instances where inconsistencies with plans, policies, and regulations would also result in physical impacts on the environment.

A project is considered to be consistent with a general plan and related planning documents if, considering all its aspects, it would further the objectives and policies of the plan or not obstruct their attainment. If a project is determined to be inconsistent with specific individual objectives or policies, but is largely consistent with the land use or the other goals and policies of that plan and would not preclude the attainment of the primary intent of the land use plan, the proposed Project would not be considered inconsistent with the plan.

Inconsistency with a land use or planning policy is not necessarily considered to be an impact under CEQA; only those inconsistencies that result in physical effects on the environment are considered a significant impact to the environment as defined by CEQA. The proposed Project is considered to be consistent with the goals of regional and local plans if it meets the general intent of the plans and would not preclude the attainment of the primary intent of the land use plan or policy. Policies that do not result in physical impacts represent factors that the Lead Agency and Responsible Agencies would consider in their planning reviews of the proposed Project.

Thresholds and analysis relevant to land use compatibility, including consistency with applicable plans, in terms of views, air quality, noise, and surface transportation are addressed in **Sections 4.1: Aesthetics**, **4.2**, **4.10**, and **4.12**, respectively.

4.9.7 IMPACT ANALYSIS FOR THE PROPOSED PROJECT

4.9.7.1 Project Characteristics

The proposed Project is an approximately 1.6-miles long, elevated APM system, and primarily located within the public right-of-way along Market Street, Manchester Boulevard, and Prairie Avenue, with limited encroachments outside of the public right-of-way. Three stations would be located along proposed Project as follows:

- Market Street/Florence Avenue station (at the site of the existing CVS retail commercial center) generally located between Florence Avenue and Regent Street that provides connections to the Metro Crenshaw/LAX Line and Downtown Inglewood;
- Prairie Avenue/Pincay Drive station generally located at the intersection of Prairie Avenue and Pincay Drive that provides connections to the Forum, and Los Angeles Stadium & Entertainment District (LASED) at Hollywood Park, including SoFi Stadium; and
- Prairie Avenue/Hardy Street station north of the intersection of Prairie Avenue and Hardy Street that provides connections to the LASED at Hollywood Park, including SoFi Stadium and the Inglewood Basketball & Entertainment Center (IBEC).

Each station is configured with center station platforms to minimize the total footprint of the station and guideways while providing ease of passenger wayfinding.

The APM guideways would consist of dual lanes, with each lane approximately 14 feet wide, and widths varying from 30 feet to 75 feet to accommodate stations and turn-back switches. The guideway is supported by columns ranging in size from approximately 6 feet by 12 feet to 6 feet by 9 feet in diameter depending on the locations, spacing and guideway configuration.

Existing roadways and infrastructure along the guideway would require some reconfiguration to accommodate new elevated transit guideway structures and stations. In addition to surface improvements, utility infrastructure under the roadway surface may need to be relocated to accommodate the guideway columns, footings, and other components. The roadway reconfigurations along Market Street, Manchester Boulevard, and Prairie Avenue are necessary to ensure that the existing number of travel lanes is maintained.

The proposed Project includes a Maintenance and Storage Facility (MSF), to provide regular and preventive maintenance for the APM trains (i.e., rolling stock and equipment), vehicle storage, and an operations control center. **Figure 4.9-3: Map of Property Acquisitions and Easements**, identifies the location of the proposed MSF. The MSF building would be approximately 97,400 SF and elevated to match the track elevation. Approximately 450 public parking spaces would be provided in a surface parking lot adjacent to the MSF.

Support facilities would include two traction power substations (TPSSs). These substations would be the service connection point and would provide the necessary power for the proposed Project including traction power, auxiliary power and housekeeping power for the stations and infrastructure. One of the TPSSs would be co-located with the MSF and another would be located at City's Civic Center site on Prairie Avenue as identified in **Figure 4.9-3.**

Additional public parking would be provided as part of the Project at three locations:

- Approximately 650 parking spaces would be provided in a surface parking lot at the Market Street/Florence Avenue Station along with pickup and drop off areas on Locust Avenue and Regent Street.
- Approximately 50 parking spaces would be provided in a surface parking lot at 150 S. Market Street.
- Approximately 450 parking spaces would be provided in a surface parking lot at the MSF Facility site at 500 E. Manchester Boulevard.

Property and Easement Acquisitions

The proposed Project is located in a highly developed urban setting containing existing residential, commercial, education, and transportation facilities. While the majority of the proposed Project would be located within the public street right of way, components of the guideway system are proposed on adjacent property which would require acquisition of property or easements. In addition, the Market Street/Florence Avenue station and the MSF would require acquisitions of properties. Property and easement acquisitions are discussed below.

Market Street Segment

The northern most station of the proposed Project is the Market Street/Florence Avenue station which would be located at 310 E. Florence Avenue, southeast of Market Street and Florence Avenue. The station would replace an existing retail commercial center containing restaurants, auto part store, cosmetology school, convenience store, and drug store. An elevated passenger walkway connecting the Market Street/Florence Avenue station with the Metro Crenshaw/LAX line Downtown would connect the Market

Street/Florence Avenue station with the Crenshaw/LAX Metro line Downtown Inglewood station north of Florence Boulevard.

As the guideway continues south on Market Street, existing commercial buildings and vacant lots would line both sides of the guideway.

Manchester Boulevard Segment

The guideway turns east onto Manchester Boulevard which would require the guideway to extend into the adjacent property occupied by a two-story commercial building at 150 S. Market Street, located on the northeast corner of the Market Street and Manchester Boulevard intersection. The existing commercial building would be replaced by the guideway and a surface parking lot providing approximately 50 public parking spaces as part of the proposed Project.

As the guideway continues east, retail commercial and restaurant uses continue on both sides of Manchester Boulevard until the intersection with Manchester Drive, where churches and residential homes line the north side of Manchester Boulevard. An additional property acquisition would be required in this segment to accommodate the MSF, which would be located south of the street between Hillcrest Boulevard and Spruce Avenue, at 500 E. Manchester Boulevard. This site is developed with a shopping center that includes a grocery store with a gas station. Other uses located within the grocery store include a bank branch, coffee shop, and gym. A TPSS in would also be located on this property.

Prairie Avenue Segment

The Prairie Avenue Segment extends from the intersection of Prairie Avenue and Manchester Boulevard to just south of the intersection of Prairie Avenue and Hardy Street. As the guideway turns south, the structure would extend into the air space of the commercial office property at 401 Prairie Avenue located at the southwestern corner of Manchester Boulevard and Prairie Avenue. An easement would be required on this property to accommodate the guideway structure.

As the guideway continues south, uses include a commercial office building and educational facilities west of Prairie Avenue, including a daycare center and Kelso Elementary School. Existing land use south of Kelso Street and west of the Prairie Avenue is a mix of commercial buildings and retail commercial centers, hotels, and residential buildings. East of Prairie Avenue are the Forum and the SoFi Stadium. South of the stadium additional development is ongoing in the HPSP area. A TPSS would be located at the City's Civic Center site on Prairie Avenue near the intersection with Arbor Vitae Street. Additionally, an approximately 30-foot easement east of Prairie Avenue would be required to accommodate the columns, guideway structure, and station components. This area required would be contained within the parking lot areas of the Forum and the setback areas of HPSP.

This segment would contain two stations—the Prairie Avenue/Pincay Drive station located at the intersection of Prairie Avenue and Pincay Drive near the Forum and the Prairie Avenue/Hardy Street station located at the intersection of Prairie Avenue and Hardy Street (See **Section 3.0: Project Description**, **Figure 3.0-10**). Both stations would be largely contained within the existing public right-of-way and setback areas, with station elements such as pedestrian access point landings extending up to 75 feet outside the existing right of way and onto properties the Forum and HPSP properties.

Table 4.9-1: Anticipated Property Acquisitions And Easements and **Figure 4.9-3: Map of Property Acquisitions and Easements** identifies parcels that would be acquired in fee or on which easements would be acquired to implement the proposed Project. A detailed list of existing parcels on and adjacent to the proposed Project is provided in **Appendix 4.9.1.**

General Plan Amendment

The proposed Project includes proposed amendments to the General Plan Land Use, Circulation, and Safety Elements as described below to reflect the addition of this transit system to the City's circulation system. No changes are proposed to the other elements of the General Plan including the Housing, Conservation, Noise, Open Space, and Environmental Justice Elements.

Land Use Element

The amendment to the General Plan Land Use Element would changes to the text and diagrams related to the three components as described below.

First, the Goals and Objectives section would be modified to incorporate the ITC Project into the subsections addressing Circulation and the Downtown Transit Oriented District. The modified objectives address integration of the APM system into the existing historic core area around Market Street, connecting the Downtown Inglewood Metro Rail station to the LASED including SoFi Stadium, the Forum, and the IBEC with the ITC Project, and supporting the City's goal to promote adequate public transportation within the City and the region by adding the ITC Project.

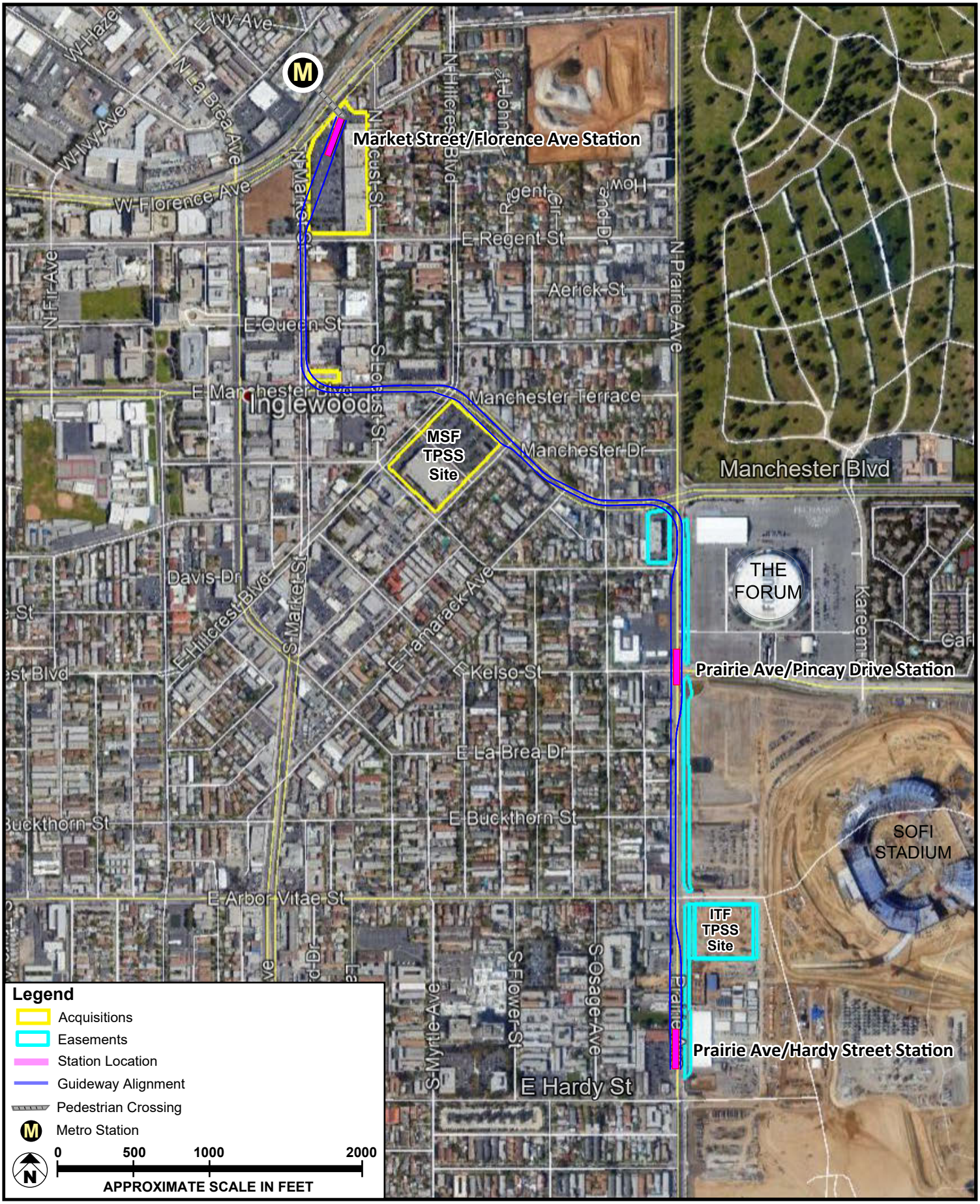
Second, a description of the proposed ITC Project would be added to the "Passenger Train Service" subsection under the "Development Factors- Transportation Network" section. The subsection provides a list of passenger train services available in the City of Inglewood.

Third, the "Downtown Transit Oriented District" subsection in the "Future Land Uses" chapter would be amended to identify the proposed Transportation Corridor Overlay Zone (TC Overlay Zone) as one of the overlay zones in Downtown Inglewood. The TC Overlay Zone would supersede all other overlay zones, including the concept plans and zoning and design guidelines outlined by the Downtown TOD Plan.

Table 4.9-1
Anticipated Project Acquisitions And Easements

APN #	Property Address	Existing Use/Primary Business	Anticipated Acquisition Type	Project Needs
4015-027-030	310 E. Florence Ave	Restaurant - Antojitos Martin (Snack & Juice Bar)	Full Acquisition	Market Street/Florence Avenue Station, vertical circulation, guideway, columns, construction staging, and future parking
4015-027-031	300 E. Florence Ave	Restaurant- Fiesta Martin Bar and Grill	Full Acquisition	Market Street/Florence Avenue Station, vertical circulation, guideway, columns, construction staging, and future parking
4015-027-032	254 N. Market St	Restaurant- House of Tacos	Full Acquisition	Market Street/Florence Avenue Station, vertical circulation, guideway, columns, construction staging, and future parking
4015-027-033	250 N. Market St	O'Reilly Auto Parts	Full Acquisition	Market Street/Florence Avenue Station, vertical circulation, guideway, columns, construction staging, and future parking
4015-027-035	236 N. Market St	Parking Lot	Full Acquisition	Market Street/Florence Avenue Station, vertical circulation, guideway, columns, construction staging, and future parking
4015-027-020	234 N. Market St	Parking Lot	Full Acquisition	Market Street/Florence Avenue Station, vertical circulation, guideway, columns, construction staging, and future parking
4015-027-042	Address Not Available	Parking Lot	Full Acquisition	Market Street/Florence Avenue Station, vertical circulation, guideway, columns, construction staging, and future parking
4015-027-022	226 N. Market St	Parking Lot	Full Acquisition	Market Street/Florence Avenue Station, vertical circulation, guideway, columns, construction staging, and future parking
4015-027-052	Address Not Available	Parking Lot	Full Acquisition	Market Street/Florence Avenue Station, vertical circulation, guideway, columns, construction staging, and future parking
4015-027-051	200 N. Market St	No Existing Business; Abandoned Building	Full Acquisition	Market Street/Florence Avenue Station, vertical circulation, guideway, columns, construction staging, and future parking
4015-027-038	240 N. Market St	Small Businesses – Silk Nails, Universal College of Beauty, Advance America, Optometric Center, Beauty Supply	Full Acquisition	Market Street/Florence Avenue Station, vertical circulation, guideway, columns, construction staging, and future parking

APN #	Property Address	Existing Use/Primary Business	Anticipated Acquisition Type	Project Needs
4015-027-040	230 N. Market St	Clothing Store - DD's Discounts Store	Full Acquisition	Market Street/Florence Avenue Station, vertical circulation, guideway, columns, construction staging, and future parking
4015-027-041	224 N. Market St	GMD Store (general department store)	Full Acquisition	Market Street/Florence Avenue Station, vertical circulation, guideway, columns, construction staging, and future parking
4015-027-049	222 N. Market St	CVS Pharmacy	Full Acquisition	Market Street/Florence Avenue Station, vertical circulation, guideway, columns, construction staging, and future parking
4015-027-050	210 N. Market St	Westchester Dental Care, Randy's Donuts To-Go	Full Acquisition	Market Street/Florence Avenue Station, vertical circulation, guideway, columns, construction staging, and future parking
4021-010-015	150 S. Market St.	World Hat and Boot Mart / Commercial	Full acquisition	Guideway, columns, construction staging, and future parking
4021-024-015	500 E. Manchester Blvd.	Retail Commercial Center with Gas Station. Starbucks, Chase Bank Branch Planet Fitness located inside retail commercial site	Full Acquisition	Maintenance and Storage Facility, guideway, traction power substation columns, construction staging, and future parking
4021-028-237	600 E. Manchester Blvd.	Various Auto Repair Shops / Commercial	Aerial easement or partial acquisition	Guideway
4021-036-049	401 S. Prairie Ave.	Commercial Office	Easements or partial acquisition	Guideway and columns
4025-001-002	3900 W. Manchester Blvd.	The Forum (parking) / Commercial Recreation	Easements or partial acquisition	Prairie Avenue/Pincay Drive Station, vertical circulation, columns, roadway, and sidewalks
4025-011-064	600 S. Prairie Ave.	Parking Lot	Easement or partial acquisition	Prairie Avenue/Pincay Drive Station, vertical circulation, columns, roadway, and sidewalks
4025-011-065	600 S. Prairie Ave.	Parking Lot	Easement or partial acquisition	Prairie Avenue/Pincay Drive Station, vertical circulation, columns, roadway, and sidewalks
4025-011-086	Address Not Available	Parking Lot / Temporary Trailers	Easement or partial acquisition	Prairie Avenue/Hardy Street Station, vertical circulation, columns, roadway, and sidewalks



SOURCE: Google Earth - 2020; Meridian Consultants LLC - 2020

FIGURE **4.9-3**

Map of Property Acquisitions and Easements

208-001-18

Circulation Element

The amendment to the General Plan Circulation Element[29] would include changes to text and diagrams related to the five components described below.

First, Market Street, between Florence Avenue to the north and La Brea Avenue to the south, would be revised from its current stated configuration to have one lane of traffic in each direction between Regent Street and Manchester Boulevard with a center island; currently this section of Market Street has two lanes in each direction with a center turn lane. The Circulation Element currently classifies Market Street as a Minor Arterial street. Minor Arterial streets contain two lanes of traffic in each direction. This section of Market Street would be reclassified as a Collector street; Collector streets have one lane of traffic in each direction.

The Circulation Element identifies typical street sections for common right-of-way widths and sections of streets planned for widening. The second component of the proposed amendment includes the addition of Prairie Avenue, between Manchester Boulevard to the north and Hardy Street to the south, to the list of streets planned for future street widening, with a maximum right-of-way of up to 132 feet.

Third, a description of the proposed Project, including its connection to the Metro Crenshaw/LAX Line, would be added to the description of light rail facilities in the City.

Fourth, changes to the descriptions of the street environment, parkways, medians, and on-street parking objectives that are to be implemented as part of the proposed Project to accommodate streetscape modifications along the proposed Project for all street segments (Market Street, Manchester Boulevard and Prairie Avenue).

Fifth, because there is insufficient right-of-way on Prairie Avenue, between Manchester Boulevard and Century Boulevard to provide bicycle lanes, modification to the "Bike Route Plan" Map is proposed to remove Prairie Avenue as a Type I Designated Bike Route.

Safety Element

The Safety Element[30] would be amended to include descriptions of the proposed Project components including the guideway, stations, the MSF and TPSSs. Specifically, the proposed Project would be added as

29 City of Inglewood, *General Plan*, "Circulation Element" (1992), accessed March 2019, https://www.cityofinglewood.org/DocumentCenter/View/128/Circulation-Element-1992-PDF.

30 City of Inglewood, *General Plan*, "Circulation Element" (1992), accessed March 2019, https://www.cityofinglewood.org/DocumentCenter/View/128/Circulation-Element-1992-PDF.

a Critical Facility. The description of transportation routes would be updated to incorporate the presence of proposed Project components.

Overlay Zone

An amendment to Chapter 12, Planning and Zoning, of the IMC is proposed to add a Transportation Corridor Overlay Zone (TC Overlay Zone) that would apply to the proposed Project. The intent of the TC Overlay Zone is to define specific uses and development standards applicable to the proposed Project as the standards in the underlying zones are not applicable to an elevated guideway, stations, or various other components of the proposed Project infrastructure. The TC Overlay Zone standards would supersede the standards of the zones underlying the TC Overlay Zone footprint, but only with respect to the proposed Project elements; the standards of the underlying zones would continue to govern existing and future development of non-Project elements.

The TC Overlay Zone defines the uses permitted in this overlay zone area along with supplemental development standards and design guidelines. The boundaries of the proposed TC Overlay Zone are shown in **Figure 4.9-4: Transportation Corridor Overlay Zone**. The TC Overlay Zone area includes the guideway, stations, and all related support facilities.

The uses permitted by the TC Overlay Zone are similar to, and expand upon, the City's existing Transportation Corridor (T-C) Zone (Section 12-38.50)31 of the IMC, which provides the zoning framework for the Metro Crenshaw/LAX Line within the City. The proposed TC Overlay Zone would allow the following as permitted uses (TC Overlay Zone Uses):

1. The construction, operation and maintenance of any at-grade or elevated fixed guideway transportation system, including, without limitation, light rail (which may consist of an automated people mover system, automated guideway transit, monorail, and/or any other comparable system that may be steel-wheel/steel rail, rubber tired or magnetically levitated, supported on rail(s) from below, straddling, or suspended from overhead beam(s) from above), trolley, busway (including rapid transit), and/or comparable transit or transportation system, including public and private rights-of-way, easements, underground utilities, tracks, spurs, guideways, footings, support columns, support beams, and any appurtenant facilities, improvements, and equipment, including stations (which may be at-grade or elevated and comprise of one or multiple levels), maintenance facilities, storage facilities, operations control centers, related administrative and office facilities, restrooms, vertical and horizontal circulation elements (such as stairs, escalators, elevators, and pedestrian bridges and

31 City of Inglewood. Inglewood Municipal Code. Section 12-38.50. T-C Zone. Permitted Uses. https://qcode.us/codes/inglewood/view.php?topic=12-17_2-12_38_50&frames=on.

walkways), plazas or similar open space areas, platforms, signals, utility and storage areas, power distribution elements, electrical or traction power substations, rolling stock, and the like, that are necessary and related to the operation, maintenance and security of the transportation system.

2. Parking facilities (surface, subsurface, or structured) for transportation facilities (including such facilities' employees and users) or for use by adjacent businesses or public facilities.
3. Mobility hubs (which may be co-located with parking facilities) and multimodal pick-up and drop-off facilities.
4. In conjunction with the uses permitted in subsections (1) - (3) of this section, property in the TC Overlay Zone may be landscaped and otherwise improved with ornamental fencing, ornamental lighting, directional and informational signage, public information and communications signage systems and all related facilities, fiberoptics, emergency lighting, security systems, rest areas and seating, café or food service carts, service kiosks or structures, retail, and other similar streetscape improvements, public amenities or other uses typically found in public transit stations.
5. Station sites and maintenance or storage facility sites in the TC Overlay Zone may be jointly developed with station facilities and commercial, residential, public facility, or mixed uses.
6. As interim uses only during periods of construction, construction staging and laydown (including storage of all equipment and materials), fencing, construction-related office and employee space (which may include restrooms and a canteen and/or food vendor area), interim parking, and ancillary temporary structures and any other temporary use approved by the Director of Public Works as reasonably related to any of the foregoing temporary or permanent uses or otherwise in the public interest.

Development of the TC Overlay Zone Uses within the TC Overlay Zone will be subject to the Inglewood Transit Connector Design Guidelines (ITC Design Guidelines). The ITC Design Guidelines provide design guidance for each component of the Project (e.g., guideway, stations, parking lots) and define the City's review and permitting process for the development of the TC Overlay Zone Uses in the TC Overlay Zone area. With respect to such uses only, the ITC Design Guidelines will supersede the standards in Inglewood Municipal Code, the Downtown Inglewood and Fairview Heights Transit Oriented Development Plan, and the Hollywood Park Specific Plan, as well as any other design, plan review, or permit process described in any of the foregoing documents (including the Site Plan Review process in Article 18.1 in Chapter 12). However, to the extent feasible, TC Overlay Zone uses will be designed to be compatible with the urban design features and development standards outlined in the aforementioned regulatory documents guiding design in adjacent areas. Compliance with the review process as specified in the ITC Design Guidelines will be required prior to the issuance of building permit(s) for development of the TC Overlay Zone Uses.

The ITC Design Guidelines will include standards for design, features and design elements for buildings, structures, transit system elements, streetscapes, landscaping, lighting, parking, and sustainability.

The TC Overlay Zone also sets forth the following specific development standards for the TC Overlay Zone Uses:

- A height limit of 104 feet for station sites, 85 feet for the MSF site, and 75 feet for all other improvements, structures, and elements of the propose Project, which include the guideway. These are height limits calculated above finished grade.
- No minimum setbacks (0' setback).
- No minimum street frontage requirements.
- Parking and public art requirements as specified in ITC Design Guidelines.

The TC Overlay Zone specifies that where the zone overlays a property or portions of a property, any affected area will continue to be treated as a legal setback area and shall continue to be counted within density calculations under the underlying zone, regardless of whether such area is developed with the TC Overlay Zone Uses or dedicated as a public right-of-way. The TC Overlay Zone does not impact allowable Floor Area Ratios (FAR) of developments within the overlay zone area.

Design Guidelines

The ITC Design Guidelines identify the objectives for the various project components and provides design guidance to help achieve the objectives. The ITC Design Guidelines include instructions on the project component dimensions, characteristics, and construction methods to better integrate the proposed Project with existing resources and nearby communities.

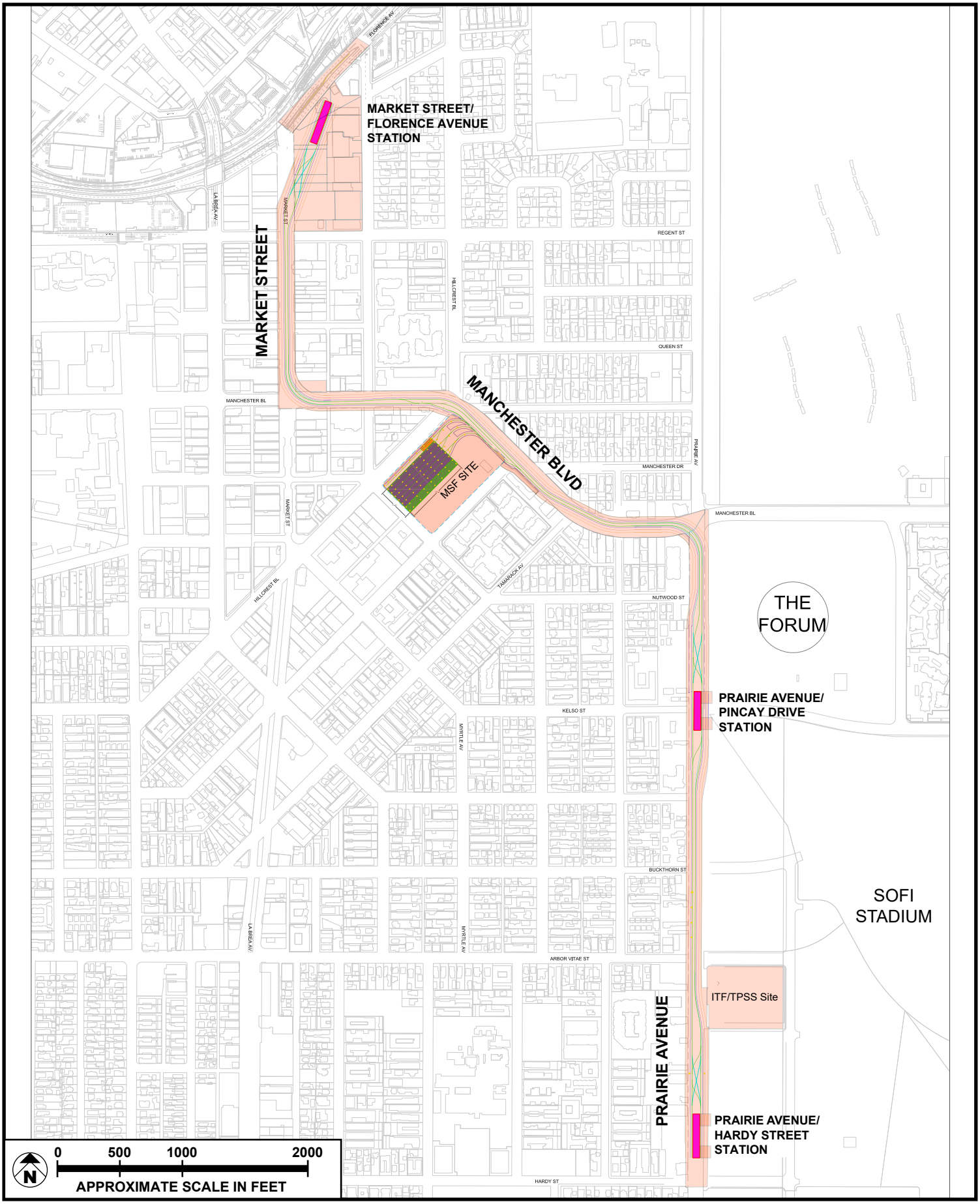
Guideline Objectives

APM Guideway

The guideway would have a significant presence on the streets of it is located on, connecting the major entertainment centers with each station. The guideway would be simple, clean, respectful of the surrounding environment and complimentary to the station design.

Stations

The stations would be the dominant feature of the proposed Project. The designs of the stations would be sleek, simple and are encouraged to enhance the user experience and the identity of the proposed Project. Stations would be designed to reflect the unique character of downtown Inglewood and the new surrounding development along Prairie Avenue. By designing the platform enclosures to visually frame views towards points of interest, users would have a sense of place, arrival, and intuitive wayfinding.



SOURCE: Meridian Consultants LLC - 2020

FIGURE **4.9-4**

Transportation Corridor Overlay Zone

208-001-18

Maintenance and Storage Facility

The Maintenance and Storage Facility (MSF) will be easily accessible by employees who serve and maintain APM trains. It will be as unobtrusive as possible to its adjacent neighbors.

Streetscape

Roadway and street related designs would establish a framework and overall vision for the streetscape. Building upon proposed development within the Inglewood downtown and areas adjacent to the APM, the streetscape improvements associated with the proposed Project would add additional pedestrian facilities, active transportation, and aesthetics.

The public right-of-way includes the roadway, the bicycle network, and the sidewalk area. The goals for the roadways, streetscape, and pedestrian connections are to create an attractive and functional environment for the users, and seeks to create well defined edges between the pedestrian and the vehicle realm, to use a hierarchy of spaces that help define the use of the pedestrian space, and to improve the passenger experience ease through clarity of circulation and wayfinding.

Pedestrian Network and Streetscape

The pedestrian network would connect buildings, streets, parking areas, and the Project stations to create an environment that supports all modes of transportation. Sidewalks are the most important component of the area's pedestrian circulation network. Sidewalks provide pedestrian access to virtually every activity and provide critical connections between other modes of travel (automobile, public transit, bicycles, etc.) to land uses in the area. The pedestrian zone would be of adequate width to accommodate pedestrians, including those with disabilities while providing pedestrian connections to the APM stations.

Under the ITC Design Guidelines, streetscape in Downtown Inglewood would be consistent with the street furniture items which currently exists on Market Street and the historic core and in accordance with the Downtown TOD Plan.[32] Existing furniture on Market Street include waste baskets, light posts, sidewalk posts, and street chairs spread across the downtown area on sidewalk areas. Street furniture and street would be consistent with the ITC Design Guidelines, which include consideration of the street trees recommended on Market Street and surrounding areas under the Downtown TOD Plan.

32 City of Inglewood. *New Downtown And Fairview Heights Transit Oriented Development Plan and Design Guidelines.* http://inglewood.arroyogroup.com/wp-content/uploads/2017/01/The-New-Downtown-Fairview-Heights-TOD-Plan-Design-Guidelines-lo-res.pdf. November 1, 2016.

For the streetscape adjacent to HPSP on Prairie Avenue, the ITC Guidelines provide that streetscape design in the area include consideration the streetscape design guidelines for the HPSP project and that elements of this streetscape vision may be incorporated as feasibly consistent with the ITC Design Guidelines' overall Project vision. The HPSPS streetscape plan is designed to achieve a diverse urban forest, to integrate Hollywood Park with the adjoining urban fabric and to assist in developing districts of distinctive and appropriate character. Street trees selected for Prairie Avenue are based on recommendations from local arborists to create a palette of horticulturally successful, low maintenance and climate-appropriate tree species.[33] Tree selections on Prairie Avenue under the design guidelines of the HPSP are Afghan Pine, Camphor Tree, Southern Magnolia, and Canary Island Pine trees. Prairie Avenue adjacent to HPSP would also accommodate residential and retail gateways to the development and HPSP identifying elements with the goal of accommodating and providing architectural features, landscaping, graphic elements, special pedestrian or automobile paving, special night lighting effects or other similar features that complement the HPSP development.

Overall, the streetscape design would build upon proposed development within the Inglewood Downtown and APM adjacent areas and existing land use plans. The goals for the roadways, streetscape, and pedestrian connections is to create a cohesive, attractive and functional environment for the users and seeks to create well defined edges between the pedestrian and the vehicle realm. Hierarchy of spaces would be used to define the pedestrian space and improve passenger circulation and wayfinding experience.[34]

Parking

The proposed Project includes parking lots at three locations: The Market Street/Florence Avenue Station, 150 S. Market Street, and 500 E. Manchester Boulevard (MSF). The Market Street/Florence Avenue Station site would include pick up and drop off areas on Locust Avenue and Regent Street and a surface parking lots containing approximately 650 public parking spaces. The surface parking lot at 150 S. Market Street would contain approximately 50 public parking spaces, and the surface parking lot on the MSF site would contain approximately 450 public parking spaces. Planting zones will be provided to separate parking stalls from sidewalks with trees will be planted at a minimum ratio of one tree per 10 parking spaces, not including the trees along the street edge of the parking lot.

---

33 Hollywood Park Lan Company, LLC. *Hollywood Park Specific Plan.* https://www.cityofinglewood.org/DocumentCenter/View/1347/Hollywood-Park-Specific-Plan. Adopted July 8, 2009, Amended September 23, 2014, Amended February 24, 2015.

34 ITC Design Guidelines.

Construction Commitment Program

The Construction Commitment Program identifies construction practices that would be implemented during construction of the proposed Project to address potential impacts associated with construction activities. These include measures to avoid or reduce adverse impacts of the proposed Project to environmental resources and the surrounding communities. Construction measures included in this Program address:

- Construction staging and traffic control requirements
- Maintaining access to parking, businesses, and pedestrian facilities
- Noise and vibration
- Air quality
- Tree removal and replacement
- Visual screening[35]

Impact LU-1: Would the project physically divide an established community?

Construction

Implementation of the Clean Construction Program would ensure access to project adjacent sites would be available to the public with minor inconveniences. The Worksite Traffic Control Plans required by the CCP would prioritize maintaining a minimum of one travel lane in each direction on streets affected by construction activities. In the event that a complete road closure would be required, a detour route would be reviewed and approved by the City and public notice will be provided regarding the closure and the detour route. The detour route will allow for continued access to areas affected by project construction.

To minimize impacts on surrounding communities, construction staging would largely take place on parcels outside the existing right of way, limiting impacts on circulation. Staging would also comply with any City issued permits and be reviewed by the City prior to its implementation.

Although construction activities during Phase 3 would occasionally pose physical barriers to connections on Market Street or Manchester Boulevard, the physical barriers would be temporary and measures within the Construction Commitment Program would be provided to minimize transportation impacts that may

35 ITC Construction Commitment Program.

arise from temporary street closures. Relevant Construction Commitment Program measures to reduce local transportation impacts are outlined below:

Construction Staging and Traffic Control Program

1. The City of Inglewood would establish a Project Task Force for the ITC Project. This Project Task Force will provide input into worksite traffic control plans and other traffic management plans that are developed for the Project. The Project Task Force will review the traffic management plans to ensure the following topics are considered:
    - Coordination with other public infrastructure projects within the City's boundaries,
    - Detour impact analysis for pedestrian, business, bicycle, and traffic flow,
    - Coordinate closures and restricted access with all special events,
    - Notification of the public with use of signage and web-based media,
    - Work with City of Inglewood and LA County police and fire personnel regarding maintenance of emergency access and response times,
    - Monitor and coordinate deliveries,
    - Establish detour routes,
    - Work with residential and commercial neighbors regarding upcoming construction activities and,
    - Analyze traffic conditions to determine the need for additional traffic signals, signs, lane restriping, signal modifications, etc.

2. The Contractor and its consultants and sub-contractors shall develop and submit Worksite Traffic Control Plans to the City of Inglewood that address the following:
    - Worksite Traffic Control Plans shall be designed to minimize traffic impacts on residential streets.
    - Except as provided in the work hours permit issued by the City, the minimum traffic lane requirements for arterial streets impacted by Construction shall maintain at least the full number of traffic lanes in the peak direction, and if feasible one traffic lane in the off-peak direction, with additional capacity provided through appropriate detour routes.
    - The minimum traffic requirements for all other commercial and residential streets impacted by construction activities shall be one lane in each direction, unless varied by a City-approved Worksite Traffic Control Plan that protects the surrounding residential and business neighborhoods and promotes the free flow of traffic along the arterial streets.
    - Access shall be maintained to and from all alleys at one or both ends of the alley. If an alley is obstructed at one end such that a turnaround by any vehicle is not feasible, then at its sole expense the Contractor will provide flaggers to control the alley.

- Worksite Traffic Plans shall demonstrate that adequate access for public safety vehicles (such as police, fire, and emergency response), and pedestrian access within the Project area or approved detours is provided at all times.
- Worksite Traffic Plans shall provide adequate street access to City service vehicles, including but not limited to trash pickup and street sweeping service vehicles, during planned service times.
- All existing bus stops must be maintained or if necessary, relocated nearby with appropriate signage.
- Sidewalk closures in accordance with an approved Construction Staging Plan or Worksite Traffic Control Plan are permitted only when necessary to facilitate the Contractor's Contract work and when approved by the City.
- Provide reasonable vehicular access to all businesses and community facilities, including parking needs.

3. The Contractor and its consultants and sub-contractors shall take the following actions related to any road closures required during construction:
   - The City and Contractor shall provide advanced notice of the planned date of the temporary full street closure. Such community outreach will include at least one meeting with businesses and residents to discuss and receive comments for each temporary full street closure.
   - Temporary directional street closures for ground improvement activities on residential streets may be permitted with prior approval from the City, provided that the Contractor gives thirty (30) days' notice.
   - Temporary full street closures are permitted upon thirty (30) days' notice to the City.
4. If the City determines that traffic impacts have not been sufficiently mitigated, then, at any time, the City's traffic engineer may revise the Worksite Traffic Control Plans to incorporate additional mitigation measures or to modify traffic control.
5. Detour routes during temporary street closures shall be subject to review and approval by the City, provided that the Contractor gives thirty (30) days' notice. Detour routes must not use residential streets unless authorized by the City. Wayfinding signage identifying the closures and alternative routes will be provided by the Contractor.
6. Temporary directional street closures for ground improvement activities on residential streets may be permitted with prior approval from the City, provided that the Contractor gives thirty (30) days' notice.
7. Construction staging and traffic control requirements (including lane closures, street closures and hauling restrictions) shall be in accordance with the standards set forth in: this Article; all Construction Staging Plans, Traffic Management Plans, and any conditions of approval included in a City-issued permit.

8. The Contractor and its consultants and sub-contractors take the following actions related to Preliminary Haul and Overload routes:
    - Haul routes and overload/oversized vehicle routes must be reviewed and approved by the City.
    - To the extent possible, truck deliveries of bulk materials such as aggregate, bulk cement, dirt, etc. to the Project area, and hauling of material from the Project area, shall be scheduled during off-peak hours to avoid the peak commuter traffic periods on designated haul routes. For dirt, aggregate, bulk cement, and all other materials and equipment, truck deliveries would be on designated routes only (freeways and non-residential streets).
    - The City may restrict one or more of the above haul routes during special events within the City or situations when lane restrictions affect a haul route.

The CCP also includes the following business and community support programs:

1. The Contractor and its consultants and contractors shall develop and submit Business and Community Support Plans to the City of Inglewood for the purpose of assisting those businesses financially affected by the construction performed. Business Support Plans shall address the following:
    - Advertising support in a local or regional newspaper, social media
    - Notice plans of the schedule for specific planned construction activities, changes in traffic flow, and required short-term modifications to property access
    - Notice plans to property owners if utilities would be disrupted for short periods of time and scheduled major utility shut-offs during low-use periods of the day.
    - Methods by which business owners can convey their concerns about construction activities and the effectiveness of measures during the construction period so activities can be modified to reduce adverse effects.
    - Access plans that ensure that all businesses and service providers are provided with adequate access during construction. Where there is a significant LEP population, signage shall be provided in various languages (as appropriate).
    - Funding for temporary signage and advertising during construction to help businesses that are partially blocked or that have inconvenient access due to construction activity.

These measures would continue to allow access within the Project area, including access to businesses at all times, and transportation related inconveniences would be reduced to the extent feasible and provide additional support for businesses. Efforts would be made to keep all traffic lanes open for peak directional travel. If all lanes cannot remain open, one lane would be kept open for peak direction and supplemented by detour options. Advanced notice of road closures and detours would be provided to the City and the community.

Measures to minimize transportation impacts are not limited to private vehicles. Bus stop relocation and bicycle/pedestrian detours facilitates access by other modes of transportation and ensures continued operation and connectivity to nearby communities. Multimodal access to local businesses would be maintained throughout construction.

While access to some neighborhoods would be disrupted and detoured for short periods of time during construction, through implementation of the Worksite Traffic Control Plans, and other Project construction mitigation measures, access would continue to be available to neighborhoods for both residents and emergency response. The proposed Project would not physically divide the existing community during construction and this impact is less than significant.

Additional construction impact analysis including aesthetics, air quality, noise, traffic, and vibration can be found in **Sections 4.1**, **4.2**, **4.10**, and **4.12**.

Operation

The proposed Project will connect the Metro Crenshaw/LAX line with Downtown Inglewood and local entertainment centers including SoFi Stadium and the Forum, facilitating regional transit connectivity across the greater Los Angeles region. Both the guideway and the stations will be elevated and primarily located within public right-of-way for the length of the proposed Project. Existing uses adjacent to the proposed Project include commercial, single and multifamily residential, and entertainment uses.

As discussed below, the proposed Project guideway and stations would be elevated to minimize access impacts to adjacent land uses and ground transportation. The columns for the guideway and the guideway will change the physical characteristics of the streets it is located on, including affecting the views of buildings along these streets. These streets are, however, existing transportation facilities that are a feature of the community and divide the community in this regard. Stations would be designed to provide easy access for pedestrians to and from the station and adjacent streets. The proposed support facilities for the APM system, such as the MFS, would not be constructed on existing transportation facilities and would be contained within designated parcels without physically dividing the community. Therefore, operation of the proposed Project will have a less than significant impact on access and will not introduce features on these streets that will physically divide the community.

Market Street Segment

The Market Street/Florence Avenue station footprint would be entirely contained within the 9-acre site and will not contribute to physically dividing the surrounding community.

The elevated guideway will travel south from this station on Market Street until the intersection with Manchester Boulevard. Since the guideway will be elevated, located within the existing street and the columns for the guideway and other associated components of the system will not introduce physical features that will form a physical barrier. While the columns for the guideway and the guideway will change the physical characteristics of this segment of Market Street, including affecting the views of buildings along the street the Project will not introduce features that will physically divide the community.

As identified in *Section 4.9.4: Existing Conditions*, adjacent to this segment are commercial retail, office, restaurant, parking, and mixed-use residential uses, as well as vacant lots. The guideway will remain elevated with a minimum of 4 feet from adjacent structures, as outlined in the ITC Design Guidelines, and would not pose a physical barrier except for the occasional columns support for the guideway. The number of support columns will be minimized by providing the maximum allowable spacing between each column. Aside from the property to be acquired at the corner of Market Street and Manchester Boulevard (further described in the Manchester Boulevard Segment), the guideway is not expected to intrude into any existing land uses or impact the existing traffic flow below the guideway. No physical division of the community will occur.

An elevated pedestrian walkway will connect the station with the Crenshaw/LAX line through the Downtown Inglewood station across from Florence Avenue. Because the pedestrian walkway will be elevated, it will not interfere with access to existing neighborhoods and would not physically divide an existing community.

Manchester Boulevard Segment

The Manchester Boulevard segment begins at the intersection of Market Street and Manchester Boulevard and continues east until the intersection of Manchester Boulevard and Prairie Avenue. The Manchester Boulevard roadway is bordered by commercial retail, office, churches, mixed-use and residential uses on both sides of the street. As the guideway turns east on Manchester Boulevard, the guideway will extend into the property located at 150 S. Market Street. This property contains a two-story commercial building that will be acquired and demolished to allow construction of the guideway.

Similar to the Market Street segment, the guideway will be constructed primarily within the Manchester Boulevard right-of-way. The guideway will remain elevated with a minimum of 4 feet from adjacent structures, as outlined in the ITC Design Guidelines, and would not pose a physical barrier except for the occasional columns support for the guideway. The columns will be spaced out to the maximum extent possible to minimize visual and land use impacts for nearby right of way and properties.

The MSF will be constructed within the Manchester Boulevard segment, located southwest of Manchester Boulevard between Hillcrest Boulevard and Spruce Avenue, at an existing commercial center. This commercial center will be acquired and the existing buildings and site improvements demolished to accommodate the MSF. One TPSS will be co-located on the MSF site. Since the MSF site will be entirely contained within the existing commercial center site, the structure will not physically divide the existing community or impede on access to local businesses, amenities, and residential uses. Existing traffic circulation will continue to operate around the MSF site without physical obstructions.

Neither the elevated guideway nor the MSF site will physically divide the community by limiting local access or obstructing traffic. The guideway and columns will be located within the street and will not introduce physical features that will form a physical barrier. While the columns for the guideway and the guideway will change the physical characteristics of this segment of Manchester Boulevard, including affecting the views of buildings along the street, the Project will not introduce features that will physically divide the community.

Prairie Avenue Segment

The Prairie Avenue segment begins at the intersection of Manchester Boulevard and Prairie Avenue and continues south on Prairie Avenue until the termination of the guideway at the intersection of Hardy Street and Prairie Avenue. As the guideway turns south from Manchester Boulevard, the guideway will partially extend beyond the public right-of-way into the property at 401 S. Prairie Avenue. An easement or partial acquisition of this parcel may be necessary to accommodate the placement of support columns. This segment of the guideway would be bordered by commercial and multifamily residential uses on the west and a mix of uses on the east, including the Forum and entertainment, retail, and residential uses under development within the HPSP area.

The Prairie Avenue segment will be constructed primarily within the Prairie Avenue right-of-way and will be adjacent to established communities to the west and entertainment centers and developing communities to the east. A 30-foot easement will be required to reconfigure Prairie Avenue and accommodate columns, sidewalk, and existing number of travel lanes. Similar to other segments, the guideway will be elevated, at least 4 feet from adjacent buildings, and spaced out to the extent practical to limit the number of columns. Existing traffic flow below the guideway structure will be maintained.

There are two stations within this segment which will be located at the intersection of Pincay Drive/Prairie Avenue and Hardy Street/Prairie Avenue. Easements to accommodate the station components at the Forum and the HPSP properties will be necessary and extend up to 30 feet (with limited station elements such as pedestrian access point landings extending up to 75 feet outside the existing right of way and onto properties the Forum and HPSP properties). The elevated stations will not obstruct existing traffic flow or

physically divide communities. A TPSS will be constructed east of Prairie Avenue at the Civic Center Site which is part of HPSP. The TPSS will not impact existing traffic circulation as it will be completely contained away from the transportation facilities. The TPSS will also be relatively small in nature, with an approximate dimension of 30 feet wide, 100 feet long, and 20 feet high.

Additionally, the residential neighborhoods located west of the Prairie Avenue commercial entertainment facilities located east of Prairie Avenue are currently separated by Prairie Avenue. As with the other streets the system is located on, the guideway and columns will be located within the street. While the columns for the guideway and the guideway will change the physical characteristics of this segment of Prairie Avenue, including affecting the views of buildings along the street, the Project will not create any additional division of this portion of the community Access to existing commercial and residential uses to the east side of the guideway would remain due to the elevated nature of the guideway and the implementation of the ITC Design Guidelines. Therefore, the Prairie Avenue Segment of the proposed Project will have a less than significant impact to local access and physical division of the community.

Mitigation Measures

Impact is less than significant. No mitigation measures required.

Level of Significance after Mitigation

Impact is less than significant. No mitigation measures required.

Impact LU-2: Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Impacts

This analysis addresses both the construction and operation of the proposed Project. The discussion evaluates whether implementation of the proposed Project would conflict with an applicable land use plan, policy, or regulation to such an extent that it would constitute a significant impact.

The criterion for determining significance with respect to land use plans considers conflicts with plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect. This criterion recognizes that an inconsistency with an individual plan, policy, or regulation does not necessarily equate to a significant physical impact on the environment.

SCAG 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy

The overarching goals of the 2020–2045 SCAG RTP/SCS address four core categories: economy, mobility, environment, and healthy/complete communities. The RTP/SCS includes goals to improve mobility and access for local communities in the region with reliable and safe transportation options. The RTP/SCS also encourages a diverse portfolio of transportation options that would increase people and goods movement within the region using new transportation technologies and data driven solutions that result in more efficient travel. Beyond transportation, the RTP/SCS also seeks to reduce greenhouse gas emissions and improve air quality within the region while supporting a more healthy and equitable communities.

The proposed Project would further the objectives of the plan by increasing local and regional transportation options while minimizing greenhouse gas emissions locally and in the region. The proposed Project would be a reliable transportation system that would improve the security and resilience of the regional transportation system by increasing local transportation service capacity and options for transportation in the region. The increase in transportation service capacity would promote regional economic prosperity and competitiveness while serving major regional activity centers including Downtown Inglewood, SoFi Stadium, the Forum and the Inglewood Basketball and Entertainment Center (IBEC).

The proposed Project would decrease local VMT and improve local air quality (See **Section 4.2**) in the City of Inglewood. As the proposed Project is located within and adjacent to disadvantaged and underserved communities, the health benefits and reliable, low-cost transit service would create a more equitable community with increased access and reliable transportation options. Lastly, the proposed Project would increase transportation options for diverse housing types in the area, including single and multifamily residential uses in the City of Inglewood.

Table 4.9-2: SCAG 2020–2045 RTP/SCS Analysis provides a consistency analysis of the proposed Project as compared to applicable goals and policies contained in various chapters of the SCAG 2020-2045 RTP/SCS. The analysis contained in **Table 4.9-2** demonstrates the proposed Project would generally be consistent with the advisory and voluntary RTP/SCS Goals and Policies. Therefore, implementation of the proposed Project would not result in significant land use impacts due to inconsistency with the RTP/SCS. Accordingly, impacts would be less than significant.

Table 4.9.6-2
SCAG 2020–2045 RTP/SCS Analysis

2020 RTP/SCS Goals, Policies, and Strategies	Project Consistency
Goal 1: Encourage regional economic prosperity and global competitiveness.	**Consistent**. Implementation of the proposed Project would have local and regional economic benefits by improving access to the City's major activity centers including Downtown Inglewood, SoFi Stadium, Forum and IBEC, increasing regional connectivity, and incentivize economic activity across the region along the transit route.
Goal 2: Improve mobility, accessibility, reliability, and travel safety for people and goods.	**Consistent**. The proposed Project would develop a fully elevated guideway connecting the Metro Crenshaw/LAX Line, Downtown Inglewood, and the City's major activity centers. The proposed Project would maximize the movement of passengers and travelers on both event and non-event days at SoFi Stadium, Forum and IBEC, by integrating pedestrian, roadway, and transit improvements into an efficient transportation network. Further, the proposed Project would provide convenient, reliable, and time-certain transit service for residents and visitors. As such, the proposed Project would improve mobility, accessibility, reliability, and travel safety for the region.
Goal 3: Enhance the preservation, security, and resilience of the regional transportation system.	**Consistent**. The proposed Project would develop a fully grade separated guideway with supporting maintenance facilities integrated into the City of Inglewood's transportation system and linking with the regional light rail system. Regular maintenance would be provided to support the continuing operation of the system, enhancing the security and resilience of this new component of the regional transportation system.
Goal 4: Increase person and goods movement and travel choices within the transportation system.	**Consistent**. The proposed Project would expand the range of travel choices available in the City of Inglewood by adding a transit system that links Downtown Inglewood and activity centers in the City with the regional light rail network.
Goal 5: Reduce greenhouse gas emissions and improve air quality.	**Consistent**. The proposed Project would reduce reliance on automobiles and other light duty vehicles in the City of Inglewood by providing an alternative mode of travel within the City that links to the regional light rail network. The proposed Project also includes streetscape improvements that would facilitate pedestrian and bicycle travel by reducing vehicles and congestion on the existing roadway system and increasing transit, pedestrian, and bicycle use which would reduce greenhouse gas emissions and improve air quality.
Goal 6: Support healthy and equitable communities.	**Consistent**. The proposed Project would reduce traffic congestion and overall vehicle miles traveled, increasing

2020 RTP/SCS Goals, Policies, and Strategies	Project Consistency
	use of transit, bicycle, and pedestrian travel, which would improve local and regional air quality and public health in the City of Inglewood. The addition of the proposed Project in the City of Inglewood that links to the regional light rail network would provide a reliable, low-cost transportation option to SB 535 disadvantaged communities.
Goal 7: Adapt to a changing climate and support an integrated regional development pattern and transportation network.	**Consistent**. The proposed Project would include a range of both mandatory and feasible sustainability measures, reduce congestion, and reduce overall vehicle miles traveled (See **Section 3.0**, *Table 3.0-5*). The proposed Project would link Downtown Inglewood and activity centers in the City to the Crenshaw/LAX light rail line, which would support an integrated development pattern and transportation network.
Goal 8: Leverage new transportation technologies and data-driven solutions that result in more efficient travel.	**Consistent**. The proposed Project would integrate a new transportation technology into the City's transportation system. By linking Downtown Inglewood and activity centers in the City to the regional light rail network, the proposed Project would result in more efficient travel.
Goal 9: Encourage development of diverse housing types in areas that are supported by multiple transportation options	**Consistent.** Implementation of the proposed Project would expand the range of transportation options available in the City of Inglewood by providing a transit system within the City that links to the regional light rail network, which would facilitate the development of a diverse range of housing in the City.

Source: SCAG. 2020-2045 RTP/SCS ConnectSoCal. May 7,2020. https://www.connectsocal.org/Documents/Adopted/fConnectSoCal-Plan.pdf. Accessed August 12, 2020.

For consistency with SCAG growth forecast for population, employment, and housing please refer to **Section 4.11**.

Los Angeles County Airport Land Use Commission, Airport Land Use Plan

Portions of the guideway, stations, and support facilities, including the MSF, the Prairie Avenue/Pincay Street Station, and the Prairie Avenue/Hardy Street Station,[36] are located within the LAX Planning Boundary/Airport Influence Area. Based on review by the Los Angeles County Airport Land Use Commission staff, review of the proposed Project by the Airport Land Use Commission is not required.

36 Los Angeles County Airport Land Use Commission, *Los Angeles County Airport Land Use Plan*, adopted 1991 and revised 2004.

LAX Airport Land Use Plans

The Los Angeles World Airports (LAWA) adopted the LAX Plan[37] and LAX Specific Plan[38] to implement the City of Los Angeles General Plan for LAX. The plans provide a land use policy framework to guide implementation of the LAWA Master Plan and include zoning and development regulations in the LAX Zone.

The LAX Plan and LAX Specific Plan include areas adjacent to the LAX airport west of La Cienega Boulevard. The proposed Project is approximately one mile east of La Cienega Boulevard and is not included in the area addressed by these plans. The proposed Project is also not located within the Runway Protection Zone (RPZ)[39] and is not subject to land use restrictions in the RPZ, including the restrictions on residential and public assembly uses. However, the proposed Project would be located within the 65 CNEL Noise Contour for LAX operations as shown in **Figure 4.9-5: ALUP Noise Contours.**

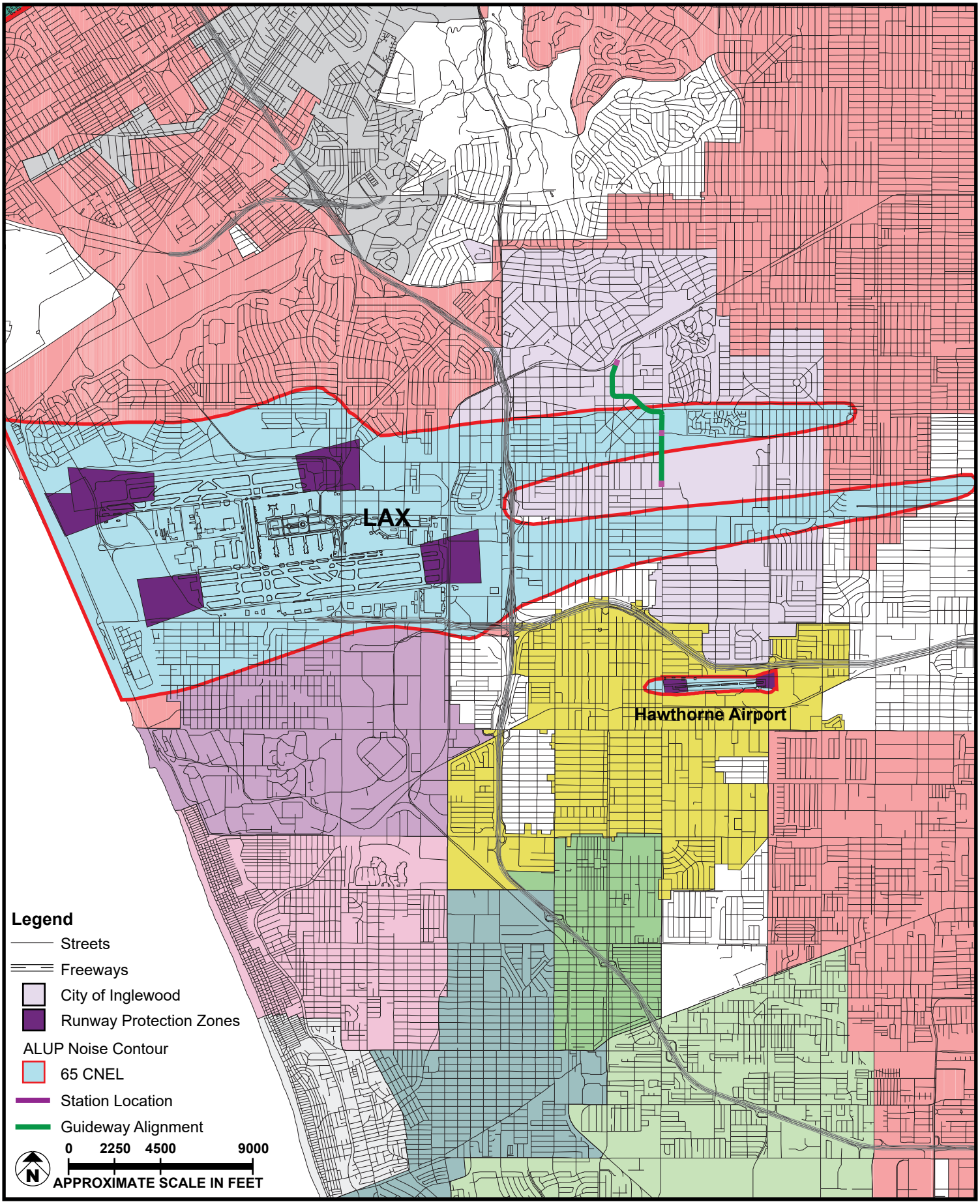
The LAX Plan includes guidelines to direct airport operations and development as far from, or oriented away from, residential neighborhoods to the fullest extent feasible. The proposed Project does not include the construction or planned development of use sensitive to noise and would not obstruct the objective of the LAX Plan to avoid impacts to sensitive land uses.

The proposed Project is outside the LAX Plan, LAX Specific Plan, and RPZ areas and, therefore, is not subject to any regulations applicable to the airport and adjacent areas. The implementation of the proposed Project would not conflict with the LAX Airport land use plans.

37 Los Angeles International Airport. *LAX Plan*. 2017. lawa.org/-/media/lawa-web/lawa-our-lax/plan-and-ordiance/2017-lax-plan.ashx. Accessed August 16, 2020.

38 Los Angeles International Airport. *LAX Specific Plan*. 2017. file:///C:/Users/clan/Downloads/17-0276-s2_ord_185164_10-28-17.pdf.file:///C:/Users/clan/Downloads/17-0276-s2_ord_185164_10-28-17.pdf. Accessed August 16, 2020.

39 Los Angeles World Airports. *Los Angeles Plan Amendment Study Report.* March 2012.



SOURCE: Google Earth - 2020; Meridian Consultants LLC - 2020

FIGURE **4.9-5**

ALUP Noise Contours

208-001-18

City of Inglewood General Plan

Land Use Element

The General Plan policies focus largely on orderly infill development, promotion of transit oriented development, facilitation of mixed uses, provision of housing for all income level households, improvement of aesthetics, provision of public services, safety from seismic effects, use of alternative energy sources, and prevention of land use consistency conflicts. In order to ensure the proposed Project is consistent with the Land Use Element of the General Plan, the following changes to the Land Use Element are proposed:

1. The new text shown as underlined is proposed to be added to the goal below in the "Circulation" subsection of the "Goals and Objectives" section:
   - Promote and support adequate public transportation within the city and the region, including through the development and operation of the Inglewood Transit Connector and its appurtenant infrastructure, stations, maintenance and storage facility, substations, and related improvements.
   - The new text shown as underlined is proposed to be added to the "Downtown Transit Oriented District" subsection of the "Goals and Objectives" section for the following policies and the text shown as strikethrough will be deleted:
   - Policy 2.3: *Preservation of Historic Fabric*. Require the preservation of buildings that have been designated as historic and encourage the reuse of other historic buildings. Maintain the sense of place in areas with historic fabric and/or meaning such as Market Street between Regent Street and Hillcrest Avenue and the Hillcrest neighborhood east of Locust Street, while also accommodating for the development of the Inglewood Transit Connector along Market Street between Regent Street and Manchester Boulevard.
   - Policy 3.5: *Local Transit Connections to Metro Rail*. Provide quality local transit connections from major destinations such as the NFL Stadium and Forum to Downtown and the Downtown Inglewood Metro station through development and operation of the Inglewood Transit Connector ~~using existing or emerging technologies~~.
   - Policy 3.6: *Parking District*. Establish a parking district with shared parking consolidated in garages or surface lots and manage pricing.
2. The new text shown as underlined is proposed to be added and the text shown as strikethrough would be deleted under the "Passenger Train Service" subsection in the "Development Factors – Transportation Network" section:

   D. Passenger Train Service

   Inglewood is currently connected to the Los Angeles Metro Rail system by Crenshaw Station on the Metro Green Line. This station is located in the 105 freeway at Crenshaw Boulevard.

The Metro Crenshaw/LAX Line, scheduled to open in 20211~~9~~, will add three new stations to the City of Inglewood: Fairview Heights (Florence/West), Downtown Inglewood (Florence/La Brea), and Westchester/Veterans (Florence/Hindry).

The Inglewood Transit Connector, anticipated to open in 2026, would further enhance connectivity by adding an extension from the Metro Crenshaw/LAX Line that would connect the transit line's Market Street Station (located at Florence/Market) to the entertainment, housing, and employment centers located at or near The Forum, the NFL Stadium, Hollywood Park and the future Inglewood Basketball and Entertainment Center.

3. The new text shown as underlined is proposed to be added and the text shown as strikethrough would be deleted in the "Downtown Transit Oriented District" subsection in "Future Land Uses":

   G. Downtown Transit Oriented District [*Intervening text intentionally omitted*]

   The Downtown Transit Oriented District consists principally of the half-mile radius around the Downtown Inglewood Metro Station located near Florence Avenue and Market Street. The Transit Oriented District should contain a variety of mutually complementary uses, including residential, office, retail, government and light industrial/creative office, all in a pedestrian-friendly environment that facilitates transit usage. Concept plans, zoning and design guidelines for this District are given by the TOD Plan for the area or, with respect to those areas impacted by the Inglewood Transit Connector, the zoning provisions and design guidelines of the Transportation Corridor Overlay Zone. It is divided into seven sub-districts: Historic Downtown, Civic Center, TechTown, Beach Avenue, Fairview West, Hillcrest and Queen Street.

The proposed amendments are consistent with the intent of these existing goals and policies for the Downtown Transit Oriented District and the City's circulation system. Specifically, the proposed Project would implement Policy 3.5 by providing a local connection to the Metro Rail system from Downtown Inglewood and activity centers in the City including SoFi Stadium, Forum, and IBEC. The additional surface parking lots providing public parking included as components of the proposed Project are consistent with the intent of Policy 3.6 for parking in the Downtown Transit Oriented District.

The proposed changes are consistent with the Land Use Element goals for promoting and providing adequate public transit to the local community. The proposed Project would add reliable public transit to Inglewood communities that do not have access to existing transit services The ITC Design Guidelines would ensure the proposed Project is integrated into the historic fabric for the segment of the guideway that would travel through the City's historic core.

The proposed TOC Overlay Zone and ITC Design Guidelines are complementary to, and consistent with the existing policies for the Downtown Transit Oriented District to create a pedestrian-friendly environment that facilitates transit usage.

Overall, the proposed Project furthers the goals of the Land Use Element by providing additional transit options and facilitating transit-oriented development within the City of Inglewood. As the proposed Project would connect passengers between Downtown Inglewood and the City's activity centers, it would result in additional transit options for both residents and visitors and create transit-oriented development areas near the transit line.

The proposed Project also supports other General Plan policies as well which are not directly related to transit. The proposed Project would support infill development and increase the use of alternative methods of circulation centered around the Metro system, pedestrian network, and bicycle facilities. The increase in visitors and pedestrian activity that would be associated with the proposed Project in Downtown and around the other stations, coupled with proposed streetscape improvements, would advance economic development through increased patronage at local businesses and help encourage mixed-use land development patterns conducive to pedestrian activity.

As shown in **Table 4.9-3: Project Consistency with General Plan Land Use Element**, the proposed Project would support and would be generally consistent with the Land Use Element. Operation of the proposed Project would not conflict with any of the applicable goals, objectives, and policies included in the City's General Plan Land Use Element and, thus, would not result in a significant impact.

Table 4.9-3
Project Consistency with General Plan Land Use Element

Goals and Policies	Project Consistency
Goals and Policies added with 2016 Amendment	
Goal 1: Downtown is a place to live, work, shop, recreate, and be entertained.	**Consistent.** The proposed Project would strengthen Downtown Inglewood for commercial and residential uses by increasing accessibility to the downtown area from local activity centers and the regional light rail network. This increased transit accessibility would promote local economic development opportunities, and enhance Downtown's retail, recreation, and entertainment offerings and range of housing and employment options. Implementation of the proposed Project would activate and complement development in the City, and enhance social cohesion, equity, and community resilience.
Policy 1.1: Mixed Use Development. Encourage a range of residential, retail, office, recreational, and institutional uses in the Historic Downtown to create a vibrant urban district and support local business.	**Consistent.** The proposed Project would increase transit accessibility in the City's Historic Downtown, which would support and encourage the development of a range of residential, retail, office, recreational, and institutional uses. By connecting Downtown with local activity centers and the regional light rail network, the proposed Project would result in an increase in visitors

Goals and Policies	Project Consistency
	and pedestrian activity in the Downtown neighborhood that would support the development of a vibrant urban district and support local businesses.
Goal 2: Downtown is a revitalized yet forward-looking gathering place for the community.	**Consistent.** The proposed Project would promote economic development opportunities in Downtown Inglewood and support the development of a revitalized Downtown that serves as a gathering place for residents and visitors by increasing transit accessibility.
Policy 2.2: Pedestrian Network. Enhance sidewalks, repurpose alleys and create mid-block passthroughs and internal courtyards to serve as pedestrian passageways and enjoyable public spaces.	**Consistent.** The proposed Project would maintain and enhance sidewalks around the stations and guideway which would enhance the pedestrian environment. Sidewalks would be enhanced and widened at necessary points adjacent to the support columns to meet Americans with Disabilities Act (ADA) pedestrian circulation requirements, including along Market Street. New enjoyable public spaces would be created at each of the proposed stations that would be designed in accordance with the ITC Design Guidelines.
Policy 2.3: Preservation of Historic Fabric. Require the preservation of buildings that have been designated as historic and encourage the reuse of other historic buildings. Maintain the sense of place in areas with historic fabric and/or meaning such as Market Street between Regent Street and Hillcrest Avenue and the Hillcrest neighborhood east of Locust Street, <u>while also accommodating for the development of the Inglewood Transit Connector along Market Street between Regent Street and Manchester Boulevard.*</u>	**Consistent.** The proposed Project would result significant impacts to historic buildings. Mitigation measures would be proposed and incorporated to the extent feasible but the impacts would be significant and unavoidable. For detailed analysis, please refer to **Section 4.4 Cultural Resources**. To properly incorporate the proposed Project into the existing historic fabric of Downtown Inglewood, the amendment to Policy 2.3 has been proposed to include the APM system. With the incorporation of the GP amendment and the mitigation measures the proposed Project would be consistent with the GP Land Use Element. Additionally, the ITC Design Guidelines address the integration of the proposed Project into the historic character of the Downtown along Market Street. The guideway would have an integrated, clean design, with round columns. The underside of the guideway would be smooth, and color of the concrete would be neutral with accents achieved through lighting. The design guidelines for the Market Street Station call for large enclosure openings facing east to integrate the station with Downtown in a manner that complements and preserves the historic fabric of Downtown.
Goal 3: Downtown provides a unique mix of accessibility options including light rail, pedestrians, bicycles, autos, buses, and advanced technology local transit.	**Consistent.** The proposed Project would expand the range of accessibility options in Downtown consistent with this goal by connecting Downtown to the regional light rail network and enhance pedestrian and bicycle transit through streetscape improvements.
Policy 3.1: Complete Streets. Accommodate all modes of transportation on streets, with particular attention to	**Consistent.** The guideway would be fully elevated above the existing street network, adding an additional mode of

Goals and Policies	Project Consistency
transit vehicles and pedestrians, but also design streets to serve as open spaces in the urban environment, places where people gather, communicators of the locality's culture, vision and values, and generators of development on adjacent parcels.	transportation without affecting the existing street network. Streetscape improvements would maintain and improve pedestrian access around the stations. The ITC Design Guidelines address the design character of the stations and the integration of the stations with the pedestrian, bicycle, and vehicular character of the street network.
Policy 3.4: Pedestrian Connections to Metro Rail. Establish high-quality at-grade and/or bridge connections from the Downtown Inglewood Metro station across Florence Avenue to the south. Make every effort to facilitate a direct pedestrian connection from the station to Beach Avenue to the north.	**Consistent.** The proposed Project would provide a pedestrian connection from the Market Street/Florence Avenue Station to the Metro Crenshaw/LAX Line by means of a pedestrian walkway spanning Florence Avenue. The walkway would extend north from the mezzanine level of the Market Street/Florence Avenue Station, cross Florence Avenue, and land on the pedestrian sidewalk on the northern side of Florence Avenue. Additionally, the Market Street/Florence Avenue Station would include pedestrian connections to the grade level to encourage pedestrian circulation in the vicinity of the proposed Project.
Policy 3.5: Local Transit Connections to Metro Rail. Provide quality local transit connections from major destinations such as the NFL Stadium and Forum to Downtown and the Downtown Inglewood Metro station using existing or emerging technologies.	**Consistent.** The primary intent of the proposed Project is to provide a public transportation connection between the Metro Crenshaw/LAX line and major activity centers in the City, including the Forum, Los Angeles Sports and Entertainment District, and future Inglewood Basketball and Entertainment Center. The APM trains would be a driverless, self-propelled electric train using existing technologies to make the transit connection.
Policy 3.6: Parking District. Establish a parking district with shared parking consolidated in garages and manage pricing.	**Consistent.** Parking facilities would be provided as part of the proposed Project to supplement existing parking in downtown and offset any existing street-side parking that may be impacted by the implementation of the proposed Project.
Goal 4: Downtown is a major economic engine providing jobs, sales tax, and other revenues.	**Consistent.** The proposed Project would increase the number of visitors to Downtown Inglewood. This increase would generate additional business patronage and economic growth in Downtown, contributing to more jobs, sales tax revenue, and other revenues in the City.
Policy 4.1: Major Sites Development. Develop major sites and create new destinations at the north and south ends of Market Street, immediately north of the Metro station, and on and around the City Yard that create jobs, generate revenues for the city through sales and bed tax and provide new opportunities for residents.	**Consistent.** The guideway would begin at the Market Street/Florence Avenue Station, located near the Market Street/Florence Avenue intersection. The placement of a station in this vicinity would serve to create a public transportation destination for visitors or residents traveling to one of the City's activity centers or to Downtown. This increase in transit accessibility and activity in Downtown would support the development of major site at the north and south ends of Market Street.

Goals and Policies	Project Consistency
Goals and Policies (as adopted January 1980)	
General	
Provide for the orderly development and redevelopment of the City while preserving a measure of diversity among its parts. Allocate land in the City to satisfy the multiple needs of residents but recognize that land is a scarce resource to be conserved rather than wasted.	**Consistent.** The proposed Project involves the development of an elevated guideway built entirely above grade and largely within the public rights-of-way, with support constructed on appropriate sites adjacent to the guideway. The MSF would consist of a multilevel building on an approximately 4- to 6-acre site with sufficient space for maintenance facilities, administration facilities, storage, shipping/receiving areas, and staff parking. The guideway, stations, and support facilities are intended to meet the transportation needs of the City while ensuring that the development of new, major activity centers can be accommodated by the local and regional transportation network in an orderly fashion. Additionally, the proposed Project would encourage complementary transit-oriented, mixed-use development near stations conducive to the anticipated increase in pedestrian activity, including within the Downtown TOD Plan area.
Help promote sound economic development and increase employment opportunities for the City's residents by responding to changing economic conditions.	**Consistent.** The proposed Project would support economic activity in Downtown Inglewood by improving connectivity to activity centers in the region and locally, thereby increasing employment opportunities for the City's residents. Additionally, the proposed Project would create jobs in the maintenance and operation of the APM trains at the MSF.
Maximize the use and conservation of existing housing stock and neighborhoods and also facilitate development of new housing to meet community needs.	**Consistent.** The proposed Project would provide an additional transportation option between Downtown Inglewood and the City's activity centers for visitors and residents. The proposed Project would enhance the use and viability of existing housing as well as encourage new mixed-use, transit-oriented development, including residential uses.
Promote Inglewood's image and identity as an independent community within the Los Angeles metropolitan area.	**Consistent.** The proposed Project would encourage and facilitate greater access to the City's activity centers, including SoFi Stadium, Forum, IBEC and Downtown Inglewood. These activity centers contribute to the City's status and identity as an entertainment destination within the Los Angeles metropolitan area.
Commercial	
Create and maintain a healthy economic condition with the present business community and assist new business to locate within the City.	**Consistent.** The proposed Project's introduction of increased visitors through increased connectivity to the region would likely have the effect of encouraging business patronage, employment, and economic growth in the City.

Goals and Policies	Project Consistency
Protect local businessmen and encourage the importance of maintaining a strong commercial district in the downtown.	**Consistent.** As mentioned previously, the proposed Project's introduction of increased visitors and pedestrian traffic in the Downtown neighborhood would likely have the effect of encouraging business patronage, employment, and economic growth in the area.
Improve the visual appearance and economic condition of the existing arterial commercial development along Inglewood's major streets.	**Consistent**. The proposed Project would enhance the appearance of major streets adjacent to the APM system facilities including sidewalks and roadway medians. The appearance of the APM structure would be modern with transparent and nude toned color scheme to create an appealing appearance. The color scheme is also chosen to help better integrate the APM structure with the adjacent environment. The APM system would facilitate movement of greater numbers of residents and visitors along major streets in the City, thereby having the potential to activate existing commercial corridors, particularly along Market Street.
Promote the development of commercial/recreational uses which would complement those which are already located in Inglewood.	**Consistent**. As mentioned previously, the proposed Project's introduction of increased visitors and pedestrian traffic in the Downtown neighborhood would likely have the effect of encouraging business patronage, employment, and recreational development in the area. Connectivity to existing recreational uses such as the Forum and SoFi stadium would complement commercial recreational uses already located in Inglewood.
Industrial	
Increase the industrial employment opportunities for the City's residents.	**Consistent**. The proposed Project would include an MSF which would provide for regular and preventive maintenance of the APM train rolling stock and operating equipment, as well as space for storage of the vehicle fleet. Additionally, the MSF would house the operations control center where automated train operations would be monitored and controlled. The proposed Project is anticipated to generate approximately 150 full time employment opportunities in the light industrial sector.
Circulation	
Ensure that proposed new uses can be accommodated by adequate and safe streets.	**Consistent.** During construction of the proposed Project, right-of-way closures or diversions may occur along the length of the guideway and near the MSF and ITF sites. However, such closures would be temporary and would adhere to a traffic construction management plan as approved by the City of Inglewood Transportation Division. Upon implementation of the proposed Project, the existing number of travel lanes in the area would be maintained and area roadways would continue to accommodate a range of transportation options.
Promote and support adequate public transportation within the City and the region.	**Consistent.** The proposed Project would increase existing capacity and provide additional access to public transportation within the City and the region by adding a

Goals and Policies	Project Consistency
	transit system to connect visitors and residents with Downtown Inglewood and activity centers in the City and to regional light rail system.
Develop modified traffic systems that would discourage through traffic from utilizing neighborhood streets.	**Consistent.** Implementation of the proposed Project would increase transit choices and reduce vehicle trips in the City.
Develop a safe and adequate pedestrian circulation system which is barrier-free for the handicapped.	**Consistent.** The proposed Project would include pedestrian access at the ground level surrounding the stations along the proposed Project. Access to the stations would be accomplished through ADA-compliant pedestrian amenities such as escalators, elevators, stairs, signage, walkways, and mezzanine areas. Streetscape improvements along the guideway would ensure that sidewalks/walkways would be ADA-compliant surrounding stations, support columns, and other facilities.
Community Facilities	
Maintain the present high level of police and fire services to the extent it is fiscally prudent.	**Consistent.** The proposed Project would divert some attendees of the City's activity centers who would otherwise travel by private vehicle, resulting in reduced traffic and congestion. The reduction in surface vehicle traffic could potentially reduce the amount of police and fire services required in the area. However, passengers of the APM system would require additional police and fire services. The City would work with the local police and fire services to ensure that a high quality of existing police and fire services would be maintained.
Expand opportunities for cultural and social growth for the City's residents.	**Consistent.** The proposed Project would encourage economic development in Downtown Inglewood and transit-oriented development in the vicinity of the proposed Project while connecting neighborhoods with the City's activity centers. These efforts would serve to expand opportunities for cultural and social growth amongst the City's residents.

Source: City of Inglewood General Plan, "Land Use Element" (2016).
**Proposed GP Amendment*

<u>Environmental Justice Element</u>

The Environmental Justice Element focuses on issues of equity when planning for future growth and development in the City, highlighting two environmental justice factors- pollution burden and population characteristics. Environmental Justice is a prominent issue in the City as residents in the City primarily

reside in SB 535 disadvantaged communities and the City of Inglewood consistently ranks among the top 25 percent in California with the highest pollution burden and socioeconomic vulnerabilities.[40]

The proposed Project would further the goals and objectives stated within the Element by providing reliable transit service and improving mobility of the local City residents while reducing the number of vehicles on the existing roadway. These reductions in vehicle miles traveled would contribute to a reduction in air quality impacts in the local neighborhoods and the region, providing an improvement to local air quality and public health (see **Section 4.2**). Noise impacts on the roadways would not increase during the operation of the proposed Project and the overall noise impact would be less than significant during operation which would ensure the quality of life of the nearby communities (see **Section 4.10**). The City has involved and would continue to involve the community during the proposed Project's planning and environmental review process and has provided and would continue to provide information to the public through public outreach efforts, notifications online and publications in newspapers and mailing notices. For outreach effort information conducted during the planning period by the proposed Project, please refer to **Section 2.0: Introduction** and associated appendices (**Appendix 2.0.1a Recirculated Notice of Preparation, Appendix 2.0.1b Original Notice of Preparation,** and **Appendix 2.0.3 Summary of Comments Received on the Revised and Original NOP and IS Memorandum**). Furthermore, over 35 public meetings have been held with community members including local businesses and property owners. The City would continue outreach efforts during the construction period to inform communities and businesses of the latest project construction updates, to coordinate mitigation measures to local businesses for parking and access, and to provide additional signage, advertisements, and support throughout the construction duration.[41] These outreach efforts increase the participation of nearby disadvantaged neighborhoods and makes project information available to the public.

As shown in **Table 4.9-4: Project Consistency with Environmental Justice Element**, the proposed Project would support and be consistent with the Environmental Justice Element. The proposed Project has provided ample notification to the community online, in newspaper publications, and in mailing notice distributions. Comment submittals were also available both online and by mail, allowing members of the public and stakeholders to submit comments if a public meeting attendance would be difficult. The proposed Project would not impede the City's ability to achieve the goals of the Environmental Justice

40 City of Inglewood. *Environmental Justice Element*. April 2020. https://www.cityofinglewood.org/DocumentCenter/View/14211/Environmental-Justice-Element. Accessed August 11, 2020.

41 ITC Construction Commitment Program.

Element and the proposed Project would not conflict with majority of the applicable goals, objectives, and policies included in the City's General Plan Environmental Justice Element.

Table 4.9-4
Project Consistency with Environmental Justice Element

Goals and Policies	
Participation and Collaboration	
Goal 1: Residents and stakeholders who are aware of, and effectively participate in, decisions that affect their environment and quality of life.	**Consistent**. The City circulated the Initial Study (Original IS) and issued a Notice of Preparation (Original NOP) on July 16, 2018. Publication of project notices were also published in Los Angeles Times (July 18, 2018), La Opinion (July 18, 2018), and Inglewood News (July 19, 2018) newspaper circulations. A public scoping meeting for the proposed Project was held on July 26, 2018. Notification of revised project scope were circulated via a Revised NOP and Revised IS on September 10, 2020. Notice was provided by publication in newspaper circulations for the Revised NOP including Los Angeles Times on September 16, 2020, Inglewood Today on September 24, 2020, and the Spanish- language newspaper La Opinion on September 15, 2020 as well. Comments were collected from both rounds of NOP/IS publications and the scoping meeting and considered in the formulation and assessment for the proposed Project. The City would continue to ensure residents and stakeholders are aware of, and can effectively participate in, decisions concerning the proposed Project and its environmental effects.
Policy EJ-1.11: Conduct broad outreach on public hearings that affect the environment in languages used by the community.	**Consistent**. The City hosted an open house style public scoping meeting for the proposed Project on July 26, 2018. Both Spanish translators and sign language interpreters were present to assist with interpretation. The Original IS and Original NOP were circulated on July 16, 2018 and three newspaper publications were published on July 18/19, 2018. Additionally, a Revised NOP and IS with updated project information were published on September 10, 2020. Publications notices were published in the newspaper circulations for the Revised NOP including Los Angeles Times on September 16, 2020, Inglewood Today on September 24, 2020, and the Spanish- language newspaper La Opinion on September 15, 2020 as well. Comments from the public, organizations, and agencies were collected and considered for Project analysis. Outreach efforts continued after and in between the scoping periods and reaching over 35 community and stakeholder outreach meetings prior to the publication of this DEIR. Outreach efforts will continue to be held after the publication of the DEIR with additional newspaper publications and public hearings being held.

Goals and Policies	
Policy EJ-1.12: Inform the public on decisions that affect their environment using multiple communication methods, including traditional and online forms of communication.	**Consistent**. Three newspaper notices publications were published on July 18/19, 2018. Circulation of Original NOP by mail was distributed on July 16, 2018. The Original IS and Original NOP were also posted on City of Inglewood's Envisioning Inglewood website and CEQAnet. Additionally, a Revised NOP and IS with updated project information were published on September 10, 2020. Publications notices were published in the newspaper circulations for the Revised NOP including Los Angeles Times on September 16, 2020, Inglewood Today on September 24, 2020, and the Spanish- language newspaper La Opinion on September 15, 2020 as well. The City would continue to use multiple communication methods, including traditional and online forms of communications, for the proposed Project during the Project review, the approval process, and during the construction duration.
Policy EJ-1.13: Provide written notices and other announcements regarding key land use and development issues in English and Spanish where feasible. For all other materials, note that verbal translation assistance is available.	**Consistent.** Newspaper notices were published in both Spanish and English in three newspapers–Los Angeles Times, La Opinion, and Inglewood Times. The City would continue to follow these notice procedures for the proposed Project.
Policy EJ-1.14: Offer interpretation services at key meetings and workshops on issues affecting the environment.	**Consistent.** Project public scoping meeting hosted on July 26, 2018 included Spanish translators and sign language interpreters for the meeting. Spanish translators and sign language interpreters will also be present at future meetings hosted for the Project.
Policy EJ-1.15: Consider offering childcare at key meetings and workshops on environmental issues affecting entire neighborhoods and the City as a whole.	**Consistent.** The scoping meeting was a focused technical meeting; childcare was considered for this meeting but determined not to be warranted. Childcare would be considered for future general meetings on the Project.
Policy EJ-1.16: Consider varying the time and date of key meetings and workshops, or holding multiple meetings and workshops, in order to ensure broad participation.	**Consistent.** Over 35 meetings with community stakeholders, including business owners and property owners, and agencies has been conducted over the span of over two years. The number of meetings and varying time, date, and places ensured broad participation by the public. The City would continue to consider varying times, dates, and places for Project meetings and workshops for all future meetings.
Policy EJ-1.17: Seek feedback on public decisions through traditional and online forms of communication, such as website, email, mobile phone apps, online forums, and podcasts.	**Consistent.** Public commenting period were held from July 16, 2018 to August 15, 2018 and from September 10, 2020 to October 12, 2020. Comments and feedback on the proposed Project were accepted both through an online form and mail. Both the Original NOP and the Revised NOP for the proposed Project was published through the Envision Inglewood website and distributed through emails and on the ground mailing. The City would continue to seek feedback on the proposed Project through traditional and online forms of communication.
Policy EJ-1.18: Partner with community-based organizations that have relationships, trust, and cultural	**Consistent.** The City has and would continue to coordinate with community-based organizations to

Goals and Policies	
competency with target communities to outreach on local initiatives and issues.	conduct outreach on the proposed Project (See **Section 2.0**).
General Environmental Health	
Goal 2: The community's exposure to pollution in the environment is minimized through sound planning and public decision making.	**Consistent.** The proposed Project would reduce overall vehicle miles traveled, reduce congestion, and improve local air quality.
Policy EJ-2.1: Incorporate compliance with State and federal environmental regulations in project approvals.	**Consistent.** The proposed Project would comply with all State and federal environmental regulations for project approval.
Policy EJ-2.2: Work with other agencies to minimize exposure to air pollution and other hazards in the environment.	**Consistent.** The proposed Project would reduce overall vehicle miles traveled, reduce congestion, and improve air quality in the local community. The City has planned the proposed Project in cooperation with local and regional agencies.
Policy EJ-2.3: Ensure compliance with rules regarding remediation of contaminated sites prior to occupancy of new development.	**Consistent.** The proposed Project would provide remediation to sites with contamination prior to construction of the proposed Project's components. This includes the removal of existing UST at the MSF site and potentially contaminated soil due to prior use. Refer to **Section 4.8: Hazards** for more information.
Policy EJ-2.4: Create land use patterns and public amenities that encourage people to walk, bicycle and use public transit.	**Consistent.** The proposed Project would add to local transportation options and promote land use patterns that encourage people to walk, bicycle, and use public transit. Pedestrian facilities near stations and along the guideway would be widened and improved to incorporate ADA components and bicycle parking would be provided at transit stations.
Policy EJ-2.8: Encourage new development to reduce vehicle miles traveled to reduce pollutant emissions.	**Consistent.** The proposed Project would provide additional public transit option to the local area and reduce overall vehicle miles traveled, reduce congestion, and improve local air quality.
Policy EJ-2.12: Place adequate conditions on large construction projects to ensure they do not create noise, dust or other impacts on the community to the extent feasible.	**Consistent.** The proposed Project would include a Construction Commitment Program and implement mitigation measures to minimize the impacts of construction on the community to the extent feasible. Refer to **Sections 4.2** and **4.10** for more information.
Access and Connectivity	
Goal 3: A community that promotes physical activity and opportunities for active living.	**Consistent.** The proposed Project would promote active living by reducing vehicle volumes and congestion on the City's street system and enhancing the pedestrian and bicycle infrastructure in the City.
Policy EJ-3.4: Require the provision of on-site bicycle facilities in new large-scale development projects.	**Consistent.** The proposed Project would construct on-site bicycle facilities at stations to facilitate an active lifestyle around the City.
Policy EJ-3.5: Partner with transit agencies to ensure that parks and recreational facilities are accessible to low-income and minority populations.	**Consistent.** The proposed Project would provide an additional transit option for residents to access park and recreation facilities in the City.
Policy EJ-3.7: Encourage new specific plans and development projects be designed to promote	**Consistent.** Pedestrian facilities including sidewalks, pedestrian bridges, and access around stations would be

Goals and Policies	
pedestrian movement through direct, safe, and pleasant routes that connect destinations inside and outside the plan or project area.	improved to accommodate for ADA requirements and widened to accommodate for support column widths. A pedestrian bridge would connect the Market Street/Florence Avenue Station with the Metro Crenshaw/LAX station to facilitate direct and safe pedestrian travel.
Affordable and Nutritious Food	
Goal 4: Healthy, affordable and culturally appropriate food is readily available to all members of the community.	**Consistent.** Currently all Inglewood residents are within 1-mile of a grocery store, and approximately ninety-two percent (92.1%) of all residents are within 1/8-mile of a grocery store. The removal of the Vons supermarket at 500 East Manchester Boulevard (76,402 SF) would reduce the City of Inglewood's grocery store inventory square footage to 494,888 SF, including several major supermarkets and numerous smaller community markets All Inglewood residents will remain within 1-mile of a grocery store, and approximately eighty-seven percent (87.7%) of all residents will remain within 1/8-mile of a grocery store.
Policy EJ-4.4: Maximize multimodal access to fresh food by encouraging grocery stores, healthy corner stores, and outdoor markets at key transit nodes and within new transit-oriented development projects.	**Consistent.** The proposed Project would provide additional transportation modes for local assess to grocery stores and fresh food through the APM system. Roadway adjacent facilities such as pedestrian walkways would also be improved to encourage local multimodal access. The proposed Project would remove one grocery store to accommodate for the APM system support facilities (MSF).
Public Facilities	
Goal 6: Adequate and equitably distributed public facilities are available in the community.	**Consistent.** The proposed Project would provide transit service linking the southern area of the City with Downtown and the regional light rail network. The proposed Project would increase local transit options, providing additional reliable and low-cost transportation facilities connecting communities across the City and to regional activity centers on the Metro Crenshaw/LAX line.
Policy EJ-6.1: Ensure the City provides equitable public improvements and community amenities to all areas of the City.	**Consistent.** The proposed Project would provide a reliable and low-cost transit option for the southern area of the City from the Metro Crenshaw/LAX line, thereby increasing local transit options. Pedestrian facilities along the guideway and stations would be widened and improved to accommodate for ADA compliance and column widths. In addition, bike racks would be provided for community use and promote active transportation.
Policy EJ-6.2: Prioritize the City's capital improvement program to address the needs of disadvantaged communities.	**Consistent.** The proposed Project is entirely within or adjacent to SB 535 disadvantaged communities, located in the center of Downtown Inglewood and provides transit service to the southern area of the City. The proposed Project would increase local transit options, providing additional reliable and low-cost transportation facilities connecting underserved communities across the

Goals and Policies	
	City and to regional activity centers on the Metro Crenshaw/LAX line.
Policy EJ-6.3: Plan for the future public improvement and service needs of underserved communities.	**Consistent.** As discussed in **Section 4.11**, both employment and population in Inglewood are anticipated to increase overtime. In addition, over 90 percent of the City's residents work outside of the City in the greater Los Angeles region. The proposed Project would reduce congestion and increase transportation capacity, while providing a reliable and low-cost transportation option to disadvantaged communities. As previously discussed, the proposed Project would be located entirely within an SB 535 disadvantaged communities.
Policy EJ-6.6: Provide ongoing infrastructure maintenance in existing residential neighborhoods through the capital improvement program.	**Consistent.** The proposed Project would construct the MSF to allow for the continued maintenance of the APM trains. Long term maintenance and operation of the system is anticipated for the proposed Project.
Policy EJ-6.8: Ensure that new public facilities are well designed, energy efficient and compatible with adjacent land uses.	**Consistent.** The proposed Project includes a range of both mandatory and additional feasible sustainability measures including energy efficiency measures, and measures to reduce congestion and overall vehicle miles traveled (See **Section 3.0***, Table 3.0-5*). As discussed in **Section 4.1**, the proposed Project would include designs that would complement adjacent land uses and fit into the larger fabric of the community.
Policy EJ-6.10: Coordinate with the Inglewood Unified School District, transit agencies and other public agencies to provide adequate public facilities, improvements and programs to the City of Inglewood.	**Consistent.** The NOP and Revised NOP were distributed to the Inglewood Unified School District and various public agencies including Metro and Caltrans. The proposed Project has taken the School District's concerns into account regarding Kelso Elementary School and would continue to work with the School District to minimize any potential project impacts to the school.

Source: City of Inglewood General Plan, "Environmental Justice Element" (2020).

City of Inglewood Planning and Zoning Code

The City of Inglewood Planning and Zoning Code implements the goals and policies of the comprehensive General Plan. To be consistent with the established zoning code, a proposed Project needs to be consistent with applicable standards.

The proposed Project includes the proposed adoption of a TC Overlay Zone to define appropriate standards for the development and operation of the proposed Project. A description of the TC Overlay Zone is analyzed below for its consistency to the General Plan and its effect on the proposed Project.

TC Overlay Zone Consistency with General Plan

The TC Overlay Zone implements the goals and policies of the General Plan related to the addition of the proposed Project to the City's circulation system. Development of the proposed Project within the TC Overlay Zone would provide the Downtown with a unique mix of accessibility options including light rail, pedestrians, buses, and advanced technology local transit. The TC Overlay Zone would also allow transit and pedestrian connection to the Metro Rail. Aerial development of transit conserves limited land within the urban environment which furthers additional goals for conservative use of land within the City.

The TC Overlay Zone allows for pedestrian walkway improvements and ADA compliance upgrades which the proposed Project would implement. Upgraded pedestrian facilities would add to the existing pedestrian network and provide additional public spaces. Lastly the transit connections provided by the TC Overlay Zone would promote local entertainment and commercial centers, boosting local economy and local businesses.

The TC Overlay Zone would implement goals and policies of the existing General Plan and is consistent with the General Plan for this reason.

New Downtown and Fairview Heights Transit Oriented Development Plan and Design Guidelines

The New Downtown and Fairview Heights TOD Plan and Design Guidelines applies to new construction or rehabilitation within the areas of Fairview Heights and Downtown Inglewood. The New Downtown and Fairview Heights TOD Plan and Design Guidelines address the Downtown TOD area and Fairview Heights TOD areas separately. The Downtown TOD area consists of approximately 585 acres located in the center of Inglewood along the new Crenshaw/LAX line just east of the Florence Avenue/La Brea Avenue intersection. This planning and zoning area extends approximately ½ miles in all directions from the Crenshaw/LAX Downtown Inglewood Station.

The New Downtown and Fairview Heights TOD Plan details its vision for the downtown area of the City as a place to live, work, shop and be entertained with a unique mix of accessibility options. The Plan also promotes sustainable development. The proposed Project supports this vision through the implementation of the transit system and the upgrading of pedestrian facilities, while connecting downtown to major commercial entertainment centers including the Forum and HPSP. The TC Overlay Zone, which is designed to implement the proposed Project, would also complement anticipated mixed-use development adjacent to the proposed Project to help revitalize Downtown Inglewood. Transit development is considered a sustainable development through its reduction in VMT and air pollutants while offering reliable transit service to the public. In general, the proposed Project supports the visions of the New Downtown and Fairview Heights TOD Plan.

An analysis of the New Downtown and Fairview Heights TOD Plan vision and design concept elements is provided in **Table 4.9-5: Project Consistency with New Downtown and Fairview Heights TOD Plan and Design Guidelines**. The analysis within this section and the table shows that the proposed Project would support and be generally consistent with the New Downtown and Fairview Heights TOD Plan and Design Guidelines. Thus, the proposed Project would result in a less than significant impact related to potential conflicts with the New Downtown and Fairview Heights TOD Plan and Design Guidelines.

Table 4.9-5

Project Consistency with New Downtown and Fairview Heights TOD Plan and Design Guidelines

Vision and Design Concept Elements	
Vision	
Downtown is a place to live, work, shop and be entertained.	**Consistent.** The proposed Project would strengthen Downtown Inglewood neighborhoods by providing a direct connection between Downtown Inglewood and major activity centers, promoting local economic development opportunities, and enhancing future transit-oriented development opportunities. These efforts would have the effect of enhancing Downtown's retail, recreation, and entertainment offerings and range of housing and employment options. Implementation of the proposed Project would activate and complement development in the City, and enhance social cohesion, equity, and community resilience.
Downtown is a revitalized yet forward-looking gathering place for the community.	**Consistent.** The proposed Project would help promote economic development in Downtown Inglewood and enhance future transit-oriented land use patterns. These opportunities would be a culmination of local planning efforts to achieve a denser built environment connected by modern modes of public transportation. Connections to Downtown from regional activity centers would encourage visitors and residents to gather in Downtown gathering spaces. Combined, these efforts would serve to promote Downtown Inglewood as a destination location within the neighborhood and broader community.
Downtown provides a unique mix of accessibility options including light rail, pedestrians, bicycles, autos, buses and advanced technology local transit.	**Consistent.** Implementation of the proposed Project would provide a convenient, reliable, and efficient public transportation option and help diversify the transit options in the Downtown Inglewood neighborhood. The proposed Project would serve to increase accessibility to and through the area and help to complete the first/last mile connection from the regional Metro rail system to the City's major activity centers. Pedestrian access and sidewalks in and around the guideway would be enhanced and widened to support columns and meet ADA pedestrian circulation requirements. The updated pedestrian sidewalks would increase accessibility options around Downtown.
Downtown is a major economic engine providing jobs, sales tax and other revenues.	**Consistent.** As discussed previously, the proposed Project would increase the number of visitors to and through Downtown Inglewood. This increase in activity would

Vision and Design Concept Elements	
	generating additional business patronage and economic growth in the Downtown neighborhood, contributing to more jobs, sales tax revenue, and other revenues in the City.
Downtown is a model for sustainable development.	**Consistent**. The proposed Project would reduce roadway congestion. The proposed Project's associated streetscape improvements would improve pedestrian access in the proposed Project. The removal of vehicles and congestion on the existing roadway and the increase of transit and pedestrian roadway use would improve air quality in the region and reduce greenhouse gas emissions
Downtown expresses the unique culture of Inglewood.	**Consistent.** The proposed Project design would reflect the unique character of downtown Inglewood through wholistic and integrated design components that integrates the stations within the local setting. For more information please refer to **Section 4.1**.
Design Concept Elements	
Area 1: Creation of a new North Market Place destination which includes Inglewood Plaza- the City's new gathering place, closure of Market Street north of Regent Street as part of the Plaza, provision of pedestrian oriented retail around the plaza, new residential developments, several public parking structures and a bridge/escalator connection across Florence Boulevard.	**Consistent.** Pedestrian facilities along the guideway and surrounding stations would be improved to incorporate ADA components and widened to accommodate for support columns. In addition, a pedestrian bridge would be incorporated to connect the Market Street/Florence Avenue Station with the Metro Crenshaw/LAX line across Florence Boulevard, with pedestrian entrance/exit on both sides of Florence Boulevard.
Area 3: Restoration of the Fox Theater in conjunction with revitalization of the Fox Theater block.	**Consistent.** The proposed Project would connect the local community with the greater Los Angeles region and bring in visitors to Downtown and the Fox Theater block. The number of columns near the Fox Theater in Downtown would be minimized by providing the maximum allowable spacing between each column to promote compatibility of the proposed Project with the historic context of the Fox Theater. The inflow of visitors would economically benefit local businesses, helping revitalize the Downtown region. An increase in transportation option and transportation capacity would connect the Downtown region to the south part of the City as well, likely increasing traffic flow to and from Downtown Inglewood and south Inglewood.
Area 12: Linkage between the Metro Station, Downtown, the Forum, Hollywood Park and the NFL Stadium via a combination of existing and advanced technology local transit systems/people movers.	**Consistent.** The proposed Project would connect the Metro Crenshaw/LAX line with Downtown Inglewood, the Forum, Hollywood Park, and the NFL Stadium using existing technology. The System would provide a reliable and low-cost method of connecting riders from the region to the City.

Source: City of Inglewood. The New Downtown Fairview Heights TOD Plan Design Guidelines*. November 2016. http://inglewood.arroyogroup.com/wp-content/uploads/2017/01/The-New-Downtown-Fairview-Heights-TOD-Plan-Design-Guidelines-lo-res.pdf.*

For additional discussion regarding the Fox Theater please see **Section 4.4**. Additional discussion regarding the integration of the proposed Project into the Downtown culture can be found in **Section 4.1**.

Hollywood Park Specific Plan

The HPSP is located in the City of Inglewood, east of the 405 Freeway and north of the 105 Freeway, within the Centinela Valley and South Bay region. The proposed Project is located northeast of Prairie Avenue and Century Boulevard with Pincay Drive to the north. The purpose of the HPSP is to define the land use framework for the redevelopment of the 298-acre Hollywood Park site with a mix of parks, retail, housing, entertainment, gaming, hotel, and civic uses. The HPSP:

- Determines the appropriate location and intensity of development, mix of land uses and building heights to be constructed in the Specific Plan area;
- Guides the character of the land planning to ensure that high-quality, place making improvements are made to create a safe and inviting, pedestrian oriented, regional retail destination not currently available in the area;
- Establishes public and private sector implementation measures and responsibilities that adequately address both local and regional impacts; and
- Defines the future locations and dimensions of streets, rights-of-ways, or other access ways.

The proposed Project would be implemented through the TC Overlay Zone while supporting the HPSP development through the enhancement of local multimodal transportation including the upgrade of pedestrian facilities and providing transit. The proposed Project would connect the development with the region, connecting residents and visitors to the regional retail, entertainment, and sports venues within the HPSP area. In terms of development, the TC Overlay Zone would complement development allowed by the underlying zone classification with any facilities associated with the APM system including the guideway, stations, MSF, TPSS, vertical circulation elements, walkways, bridges.

A consistency analysis is presented in **Table 4.9-6: Project Consistency with Hollywood Park Specific Plan,** which shows the proposed Project would support and be generally consistent with the Hollywood Park Specific Plan (HPSP).[42] As such, operation and construction of the proposed Project would not conflict with any of the applicable principles and goals included in the HPSP. The analysis in this section and within Table 4.9-6 shows the proposed Project would result in a less than significant impact with the HPSP.

42 City of Inglewood. *Hollywood Park Specific Plan* (2009, amended 2014, amended 2015). https://www.cityofinglewood.org/DocumentCenter/View/1347/Hollywood-Park-Specific-Plan. Accessed August 17, 2020.

The Hollywood Park Specific Plan includes the following policies and measures applicable to the proposed Project:

Table 4.9-6
Project Consistency with Hollywood Park Specific Plan

Principles and Goals	Project Consistency
Transportation	
Provide pedestrian connections from Hollywood Park to major transit corridors on Century Boulevard and Prairie Avenue.	**Consistent**. The proposed Project would provide pedestrian facilities and connections, such as pedestrian bridges and ADA compliant sidewalks for visitors and residents to major transit corridors on Prairie Avenue and in the greater Los Angeles region.
Reduce reliance on the private automobile by enhancing opportunities for transit ridership, walking and biking.	**Consistent.** The proposed Project would reduce congestion on the existing roadway by reducing overall vehicle miles traveled and providing an increase in local transit options. Pedestrian connections to stations, Metro Crenshaw/LAX line, and along the guideway would also be widened and improved to incorporate ADA compliance components. The proposed Project would enhance opportunities for alternative transportation and reduce reliance on the private automobile.
Reduce traffic compared to other developments by providing a mix of commercial, entertainment, restaurant, residential and park uses in proximity to each other and to existing transit routes.	**Consistent.** The proposed Project would provide an additional transit option near commercial, entertainment, restaurants, residential and park uses. The transit connection to these local destinations would reduce traffic on the road and reduce overall vehicle miles traveled.
Design Guideline Checklist	
– Pedestrian and vehicular circulation routes shall comply with all requirements of the Americans with Disabilities Act (ADA), and include one or more of the following design elements along all or a portion of all streets or pedestrian pathways: (1) pedestrian pathway includes a pattern, color, or paving material that is differentiated from surrounding landscaping or paved areas; (2) way-finding signage; (3) the streets and pathways are oriented such that they include verifiable lines of sight that would allow both pedestrians and vehicles to see any one or more of the following: (a) Stadium, (b) performance venue, casino, retail or residential gateway, or (c) Champion Plaza, Lake Park, Arroyo Park, or Bluff Park.	**Consistent.** Pedestrian facilities along the guideway, and adjacent to stations adjacent to the HPSP area would be widened and improved to comply with all ADA requirements. The pedestrian walkway would be made of a different paving material than those of the surrounding paved areas and way finding signage would be installed where appropriate. Pedestrian walkways to the east of the guideway and stations will provide lines of sight to the HPSP area and, depending on location, could include the Stadium, the performance venue and/or the retail or residential gateway.
The exterior entryways of buildings shall include one or more of the following: (1) a trim or border of a different color or material than other portions of the façade; (2) an integral porch; (3) an awning; (4) an articulated	**Consistent.** Stations would incorporate an entry way with distinguishing features.

Principles and Goals	Project Consistency
entryway offset from the immediately adjacent façade by not less than one foot; or (5) an arched opening.	
When using more than one material on a façade (except as a trim or offset portion of the façade or as an entry or window treatment), the variation in materials shall continue to all side and rear elevations that are visible from the front or corner lot line.	**Consistent.** Materials used on the station would continue through the entirety of the station including side and rear elevations that are visible.
Each building shall include one or more of the following: – Entry or window trim/surrounds – Horizontal banding – Corner quoins – Balconies (supported, cantilevered or Juliet) – False, shuttered windows – Awnings – Change in material or color	**Consistent.** Stations would include compatible elements, such as horizontal banding and articulated materials.
Railings shall be constructed of wood, wrought iron, or other material, such as stucco, that is used to construct the façade or entry or window trim on the same building.	**Consistent.** The materials chosen for station railings would be consistent with the other station materials.
Exposed gutters and downspouts shall be colored or painted, and shall not be constructed of unpainted aluminum, copper or zinc.	**Consistent.** Exposed gutters along Prairie Avenue would be painted or colored.
Stairs shall be constructed of the same material as the deck and landing.	**Consistent.** Station stairs would be constructed of the same material as the deck and landing as feasible.
Columns and posts shall be constructed of stone, stucco, or wood (or other material painted or molded to look like one of the allowed materials) and shall be not less than four inches in diameter if round, or four inches on each side if rectangular.	**Consistent.** Columns and posts would be constructed of materials used elsewhere in the station. The columns would be larger than four inches in diameter or four inches on each side if rectangular.
Sustainability	
Goal 1: Create a more sustainable community	**Consistent.** The proposed Project would reduce vehicle miles traveled and reduce congestion. In turn, local air quality is expected to improve. Additionally, the ITC Design Guidelines outlines sustainability measures including energy efficiency, addressing heat island effect, use of recycled water and rain water, and recycling of demolished materials.
Goal 2: Respect the site.	**Consistent.** Landscape designs and use of drought-resistant plants would be consistent with the landscape areas and plants provided by the HPSP. Soil would be protected during construction per building code requirements.
Goal 3: Save water and reduce local water impacts**.**	**Consistent.** Water conservation measures are provided for within the ITC Design Guidelines. Measures include using rain and recycled water for operations at the stations, system maintenance, and irrigation. Using low

Principles and Goals	Project Consistency
	flow faucets, shower heads, and water facilities to increase water efficiency.
Goal 4: Reduce, reuse, recycle.	**Consistent.** Measures to reduce material waste is provided for within the ITC Design Guidelines. Measures including recycling of demolished materials, diversion of debris from landfills, and use of a variety of recycled materials.
Goal 5: Make concrete with sustainable materials.	**Consistent.** The ITC Design Guidelines requires the proposed Project to use concrete made with recycled content such as fly ash, slag, or recycled aggregate.
Goal 6: Design to save wood and labor.	**Consistent.** The proposed Project would use an integrated design approach that brings together all, applicable, major design disciplines including architecture, planning, structural, landscape, mechanical, electrical and plumbing engineers and other specialists to collaborate on the most effective way to meet programmatic goals with lowest lifecycle environmental impacts.
Goal 7: Support sustainable forests.	**Consistent.** The proposed Project would use an integrated design approach that brings together all, applicable, major design disciplines including architecture, planning, structural, landscape, mechanical, electrical and plumbing engineers and other specialists to collaborate on the most effective way to meet programmatic goals with lowest lifecycle environmental impacts. The proposed project will use rapidly renewable materials from plants harvested within a ten-year cycle.
Goal 8: Make a sustainable roof.	**Consistent.** Stations and MSF of the proposed Project would be constructed to be solar ready, if solar is not immediately available. The station and MSF roofs would also serve to reduce heat island effect by using roofing materials with a minimum 3-year aged solar reflectance and thermal emittance or install a roof with a thermal mass over the roof membrane, including areas of vegetated (green) roofs.
Goal 9: Save energy through passive design.	**Consistent**. Designs with passive reductions to energy use would be preferred. Design components including traction elevators with a regenerative drive system that feeds electrical power back into the building grid when the elevator is in motion, automatic turn offs for car lights and fans, and submetering using an integrated energy management system would be incorporated into the proposed Project.
Goal 10: Save water and energy in plumbing systems.	**Consistent.** The proposed Project would utilize rainwater or gray-water for toilet flushing as feasible. Low flow fixtures including low flow faucets would be used to reduce water and energy consumption within the plumbing system.

Principles and Goals	Project Consistency
Goal 11: Save energy in lighting.	**Consistent.** Outdoor lighting power would be no greater than 90 percent of the Title 24, Part 6 calculated value of allowed outdoor lighting power. For buildings requiring indoor lighting and mechanical systems the Energy Budget would be no greater than 85 percent of the Title 24, Part 6 Energy Budget for the proposed MSF, and, where feasible, the stations Automatic light off for elevator car lights would also be included.
Goal 12: Save energy in equipment use.	**Consistent.** Sustainability measures to reduce energy use of equipment would be incorporated into the proposed Project. Measures include using Tier 4 construction equipment (See **Section 4.5: Energy**) and regenerative energy reclaiming systems for elevators (See **Section 3.0,** *Table 3.0-5: Proposed Sustainability Guidelines*).
Goal 13: Create healthy indoor environments	**Consistent.** The ITC Design Guidelines include measures to provide maximum natural daylighting and access to views of the outdoors. Passenger comfort will also be considered in design of thermal and lighting systems by maximizing individual control. Indoor spaces will use high efficiency air filtration (MERV 13). Walk off mats, isolation of chemicals and other means of reducing contamination of indoor spaces will be implemented. Acoustic insulation will be used to create a comfortable indoor acoustical environment. Where options exist, materials with no added formaldehyde will be used. Low or zero VOC paints, coatings, and sealants will be used. Flooring materials must meet the CalGreen Tier2 emissions criteria (See ITC Design Guideline).
Goal 14: Replace fossil fuel use with alternatives**.**	**Consistent.** Where feasible, the proposed Project would utilize as much renewable energy as possible while reducing its energy footprint through energy efficient installations.
Goal 15: Support market for recycled materials.	**Consistent.** The ITC Design Guidelines include measures to support markets for recycled materials including the use of materials with recycling components, where feasible, and recycling
Goal 16: Use creativity and innovation to build sustainable environments.	**Consistent.** The proposed Project uses existing technology to provide transit service and remove vehicles off of existing roadway. The guideway would be elevated to allow existing roadway capacity to remain while improvements to sidewalks would promote alternative transportation and an active lifestyle in the local community.

Source: City of Inglewood. Hollywood Park Specific Plan*. (July 2009, amended 2014, amended 2015). https://www.cityofinglewood.org/DocumentCenter/View/1347/Hollywood-Park-Specific-Plan. Accessed August 17, 2020.*

Summary of Impacts

A project is considered to be consistent with a general plan and related planning documents if, considering all its aspects, it will further the objectives and policies of the plan or not obstruct their attainment. As discussed above, the proposed Project would be consistent with applicable plans, policies, and regulations, and would further the goals and objectives of the existing plans and policies and would not obstruct the attainment of the existing policies, plans, and programs. As demonstrated in this section, the proposed Project (including the proposed General Plan Amendment, TC Overlay Zone, property acquisitions and easements) would further the objectives and policies of applicable regional and local plans or will not obstruct the attainment of the goals of these plans, and therefore, the proposed Project's impacts would be less than significant.

Mitigation Measures

Impact is less than significant. No mitigation measures required.

Level of Significance after Mitigation

Impact is less than significant. No mitigation measures required.

4.9.7 CUMULATIVE IMPACTS

A cumulative impact analysis for land use evaluates whether impacts of a project and related projects, when taken as a whole, would have significant environmental impacts under the two land use thresholds. The geographic scope of this cumulative impact analysis is the community, City, and the region. If the cumulative projects listed in **Section 4.0***, 4.0.6: Cumulative Assumptions* in combination with the proposed Project would result in a cumulatively significant impact, then the significance of the proposed Project's incremental contribution to that cumulatively significant impact must be determined.

As analyzed above within this section, the proposed Project would have a less than significant impact on physically dividing the community. Potential future projects would not create physical divisions in the community, in the City, or in the region. Therefore, the proposed Project, in combination with related projects, would not cause a significant cumulative impact related to the physical division of an established community.

The related projects would be required to be consistent with all applicable planning documents. The proposed Project, with the proposed amendments to the General Plan and IMC, would also be consistent with existing policies, plans, and programs. Therefore, the proposed Project, in combination with related project, would not cause a cumulatively significant impact related to inconsistencies with existing policies, plans, and programs.

4.9.8 CONSISTENCY WITH CITY OF INGLEWOOD GENERAL PLAN

As discussed in the analysis provided above, the proposed Project is consistent with the City of Inglewood General Plan with the proposed regulatory changes included in the Project For General Plan consistency analysis regarding specific topic areas please refer to the chapters addressing those topic areas. No additional analysis is required.

4.10 NOISE AND VIBRATION

4.10.1INTRODUCTION

This section of the Draft Environmental Impact Report (Draft EIR) addresses construction and operational noise and vibration impacts associated with the proposed Project. This includes temporary impacts associated with operation of construction equipment and associated activities, as well as long-term impacts from transit operations and roadway traffic.

Prior to the preparation of this EIR, a Revised Initial Study (included as **Appendix 2.0.2** of this EIR) was prepared using the California Environmental Quality Act (CEQA) Environmental Checklist Form to assess potential environmental impacts associated with noise and vibration. The Initial Study found that the proposed Project would result in "No Impact" on the following issue and does not require any additional analysis in this EIR:

- For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

Impacts found to be less than significant are further discussed in **Section 6.0: Other Environmental Considerations**.

The following data was used in completing the analyses:

- Ambient Noise Measurements - **Appendix 4.10.1**:
  - *Long-Term (24-hour) Ambient Noise Measurements – **Appendix 4.10.1-1***
  - *Short-Term (1-hour) Ambient Noise Measurements (Daytime) – **Appendix 4.10.1-2***
  - *Short-Term (15-minute) Ambient Noise Measurements (Nighttime) – **Appendix 4.10.1-3***
- Roadway Noise Levels – **Appendix 4.10.2**:
  - *Traffic Turning Movement Counts Conversions – **Appendix 4.10.2-1***
  - *Adjusted Baseline Conditions During Typical Non-Event Weekdays Without ITC Project Count Conversions – **Appendix 4.10.2-2***
  - *Adjusted Baseline Conditions During Typical Non-Event Weekdays With ITC Project Count Conversions – **Appendix 4.10.2-3***
  - *Opening Year (2026) Conditions With NFL Event Without ITC Project Count Conversions – **Appendix 4.10.2-4***
  - *Opening Year (2026) Conditions With NFL Event With ITC Project Count Conversions – **Appendix 4.10.2-5***

  - *Future Horizon Year (2045) Conditions With NFL Event Without ITC Project Count Conversions* – ***Appendix 4.10.2-6***
  - *Future Horizon Year (2045) Conditions With NFL Event With ITC Project Count Conversions* – ***Appendix 4.10.2-7***
  - *Roadway Noise Level Tables* – ***Appendix 4.10.2-8***
- Vibration Monitoring Data Sheets – **Appendix 4.10.3**
- Construction Noise Worksheets- **Appendix 4.10.4:**
  - *Construction Sound Power Level Worksheets* – ***Appendix 4.10.4-1***
  - *Construction Noise (Phase 1) Worksheets* – ***Appendix 4.10.4-2***
  - *Construction Noise (Phase 2) Worksheets* – ***Appendix 4.10.4-3***
  - *Construction Noise (Phase 3) Worksheets* – ***Appendix 4.10.4-4***
  - *Construction Noise (Phase 4) Worksheets* – ***Appendix 4.10.4-5***
- Construction Vibration Worksheets – **Appendix 4.10.5**
- Operational Noise Worksheets – **Appendix 4.10.6:**
  - *Maintenance and Storage Facility (MSF) Stationary Source Worksheets* – ***Appendix 4.10.6-1***
  - *Guideway Worksheets* – ***Appendix 4.10.6-2***

Please see **Section 8.0** for a glossary of terms, definitions, and acronyms used in this Draft EIR.

4.10.2 OVERVIEW OF NOISE AND VIBRATION

4.10.2.1 Noise Descriptors

Noise levels are measured using a variety of scientific metrics. As a result of extensive research into the characteristics of noise and human response, standard noise descriptors have been developed for noise exposure analyses. All noise levels provided in this analysis are for outdoor conditions, unless otherwise stated specifically to be interior noise levels.

A-Weighted Sound Pressure Level (dBA): The decibel (dB) is a unit used to describe sound pressure level. When expressed in dBA, the sound has been filtered to reduce the effect of very low and very high frequency sounds, much as the human ear filters sound frequencies. Without this filtering, calculated and measured sound levels would include events that the human ear cannot hear (e.g., dog whistles and low-frequency sounds, such as the groaning sounds emanating from large buildings with changes in temperature and wind). With A-weighting, calculations and sound-monitoring equipment approximate the sensitivity of the human ear to sounds of different frequencies.

Maximum Noise Level (Lmax): Lmax is the maximum or peak sound level during a noise event. The metric accounts only for the instantaneous peak intensity of the sound, and not for the duration of the event. As a vehicle passes by an observer, the sound level increases to a maximum level and then decreases. Some sound level meters measure and record the maximum or Lmax level.

Sound Exposure Level (SEL): SEL, expressed in dBA, is a time-integrated measure, expressed in decibels, of the sound energy of a single noise event at a reference duration of 1 second. The sound level is integrated over the period that the level exceeds a threshold. Therefore, SEL accounts for both the maximum sound level and the duration of the sound. The standardization of discrete noise events into a 1-second duration allows calculation of the cumulative noise exposure of a series of noise events that occur over a period of time.

Equivalent Continuous Noise Level (Leq): Leq is the sound level, expressed in dBA, of a steady sound that has the same A-weighted sound energy as the time-varying sound over the averaging period. Unlike SEL, Leq is the average sound level for a specified time period (e.g., 24 hours, 8 hours, 1 hour). Leq is calculated by integrating the sound energy from all noise events over a given time period and applying a factor for the number of events. Leq can be expressed for any time interval; for example, the Leq representing an averaged level over an 8-hour period would be expressed as Leq(8).

Community Noise Equivalent Level (CNEL): CNEL, expressed in dBA, is the standard metric used in California to represent cumulative noise exposure. The metric provides a single-number description of the sound energy to which a person or community is exposed over a period of 24 hours similar to DNL. CNEL includes penalties applied to noise events occurring after 7:00 PM and before 7:00 AM, when noise is considered more intrusive. The penalized time period is further subdivided an evening period (7:00 PM through 10:00 PM) with an addition of 5 dBA to measured noise levels and a nighttime period (10:00 PM to 7:00 AM) with an addition of 10 dB to measured noise levels. The evening weighting is the only difference between CNEL and DNL.

4.10.2.2 Groundborne Noise

Groundborne noise refers to noise generated by groundborne vibration. More specifically, groundborne noise is the low-frequency rumbling noise emanating from the motion of building room surfaces due to the vibration of floors and walls; it is perceptible only inside buildings.[1] The relationship between groundborne vibration (discussed in section 4.10.2.3, directly below) and groundborne noise depends on the frequency content of the vibration and the acoustical absorption characteristics of the receiving room.

1 Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, p. 112, September 2018, accessed October 2020, https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf

For typical buildings, groundborne vibration that causes low frequency noise (i.e., the vibration spectrum peak is less than 30 Hz) results in a groundborne noise levels that is approximately 50 decibels lower than the velocity level. For groundborne vibration that causes mid-frequency noise (i.e., the vibration spectrum peak is between 30 and 60 Hz), the groundborne noise level will be approximately 35 dB lower than the velocity level. For groundborne vibration that causes high-frequency noise (i.e., the vibration spectrum peak is greater than 60 Hz), the groundborne noise level will be approximately 20 dB lower than the velocity level.[2] Therefore, for typical buildings, the groundborne noise decibel level is lower than the groundborne vibration velocity level at low frequencies.

4.10.2.3 Groundborne Vibration

Ground-borne vibration is the perceptible movement of building floors, rattling windows, and doors, shaking of items on shelves or walls, and rumbling sounds. The root mean square (RMS) amplitude of a motion over a 1-second period is commonly used to predict human response to vibration. The motion due to ground-borne vibration is described in vibration velocity levels, measured in decibels referenced to 1 microinch per second and expressed as vibration decibels (VdB). Ground-borne vibration is not a common environmental problem unlike roadway noise or transit noise. The vibration source levels for various types of construction equipment would be based on data provided in Table 7-4 of the FTA *Transit Noise and Vibration Impact Assessment Manual*.

Construction activity can result in varying degrees of ground vibration, depending on the equipment and methods employed. Operation of construction equipment causes ground vibrations that spread through the ground and diminish in strength with distance. While ground vibrations from construction activities do not often reach the levels that can damage structures, fragile buildings must receive special consideration.

4.10.2.4 Effects of Noise on Humans

Human response to sound is highly individualized. Annoyance is the most common issue associated with community noise levels. Many factors influence the response to noise including the character of the noise, the variability of the sound level, the presence of tones or impulses, and the time of day of the occurrence. Additionally, non-acoustical factors, such as individual opinion of the noise source, the ability to adapt to the noise, the attitude towards the source and those associated with it, and the predictability of the noise, all influence the response to noise. These factors result in the reaction to noise being highly subjective, with the perceived effect of a particular noise varying widely among individuals in a community. The effects of noise can be grouped into three general categories:

3 City of Inglewood, IMC, Chapter 5 Offenses, Miscellaneous, "Article 2. Noise Regulations," Section 5-26. Noise Level Measurement Criteria.

- Subjective effects of annoyance, nuisance, dissatisfaction;
- Interference with activities such as speech, sleep, and learning; and
- Physiological effects such as starting hearing loss.

Noise-induced hearing loss usually takes years to develop. Hearing loss is one of the most obvious and easily quantifiable effects of excessive exposure to noise. While the loss may be temporary at first, it can become permanent after continued exposure. When combined with hearing loss associated with aging, the amount of hearing loss directly due to the environment is difficult to quantify. Although the major cause of noise induced hearing loss is occupational, nonoccupational sources may also be a factor.

Noise can mask important sounds and disrupt communication between individuals in a variety of settings. This process can cause anything from a slight irritation to a serious safety hazard, depending on the circumstance. Noise can disrupt face-to-face communication and telephone communication, and the enjoyment of music and television in the home. Interference with communication has proved to be one of the most important components of noise-related annoyance.

Noise-induced sleep interference is one of the critical components of community annoyance. Sound level, frequency distribution, duration, repetition, and variability can make it difficult to fall asleep and may cause momentary shifts in the natural sleep pattern or level of sleep. It can produce short-term effects, with the possibility of more serious effects on health if it continues over long periods.

Annoyance can be defined as the expression of negative feelings resulting from interference with activities, as well as the disruption of one's peace of mind and the enjoyment of one's environment. The consequences of noise-induced annoyance are privately held dissatisfaction, publicly expressed complaints to authorities, and potential adverse health effects, as discussed above.

Some common sounds on the dBA scale, relative to ordinary conversation, are provided in **Table 4.10-1: Common Sounds on the A-Weighted Decibel Scale**. As shown, the relative perceived loudness of sound doubles for each increase of 10 dBA, although a 10 dBA change corresponds to a factor of 10 in relative sound energy. Generally, sounds with differences of 3 dBA or less are not perceived to be noticeably different by most listeners.

Table 4.10-1
Common Sounds on the A-Weighted Decibel Scale

Sound	Sound Level (dBA)	Subjective Evaluations
Near Jet Engine	140	Deafening
Threshold of Pain	130	
Rock music, with amplifier	120	
Thunder, snowmobile (operator)	110	Very Loud
Boiler shop, power mower	100	
Orchestral crescendo at 25 feet, noisy kitchen	90	
Busy street	80	Loud
Interior of department store	70	
Ordinary conversation, 3 feet away	60	Moderate
Quiet automobiles at low speed	50	
Average office	40	Faint
City residence	30	
Quiet country residence	20	Very Faint
Rustle of leaves	10	
Threshold of hearing	0	

Source: U.S. Department of Housing and Urban Development, Aircraft Noise Impact – Planning Guidelines for Local Agencies, 1972
Note:
[1] Continuous exposure above 85 dB is likely to degrade the hearing of most people (hearing protection recommended).
[2] Range of Speech: 50 – 70 dB

4.10.3 METHODOLOGY

4.10.3.1 Noise Measurements

Noise measurements were collected pursuant to Section 5-26 of the Inglewood Municipal Code (IMC),[3] which states that sound level meters (SLMs) shall meet the American National Standard Institute's (ANSI) standard S1.4-1971[4] for Type 1 sound level meters, or by using an instrument with associated recording and analyzing equipment that would provide equivalent data. The SLMs were field calibrated before the measurements and have annual calibration records traceable to the National Institute of Standards and Technology.[5]

3 City of Inglewood, IMC, Chapter 5 Offenses, Miscellaneous, "Article 2. Noise Regulations," Section 5-26. Noise Level Measurement Criteria.

4 American Institute of Physics for the Acoustical Society of America, American National Standard Specification for Sound Level Meters (1992).

5 NIST Handbook, State Weights and Measures Laboratories Program Handbook, March 2003, accessed August 2020, https://www.nist.gov/system/files/documents/2017/04/28/hb143-03-final.pdf

A Type 1 (precision) Larson Davis Model 831 SLM[6] was used to conduct the noise monitoring survey. This meter meets all requirements of ANSI S1.4-1983 and ANSI 1.43-1997 Type 1 standards,[7] as well as International Electrotechnical Commission (IEC)[8] and IEC 60804 Type 1, Group X standards.[9] The SLM was located approximately 5 feet aboveground and covered with a Larson Davis windscreen. The SLM was field calibrated with an external calibrator prior to operation.

Noise measurements were taken to establish ambient noise conditions for three time periods. Locations and data measurements are discussed in section 4.10.5.2 and shown in **Figure 4.10-5**. 24-hour ambient noise measurements were collected between November 14, 2018 to November 16, 2018, (refer to **Appendix 4.10-1.1**). Short-term (1-hour) ambient noise measurements were collected between November 26, 2018, to January 23, 2019, during the morning peak hours (7:00 AM to 10:00 AM) and evening peak hours (4:00 PM – 7:00 PM) (refer to **Appendix 4.10-1.2**). Short-term (15-minute) ambient noise measurements were collected between August 3, 2020 to August 5, 2020 during the nighttime period after 8:00 PM (refer to **Appendix 4.10-1.3**). It is important to note, short-term ambient noise measurements were collected during the "Safer at Home" order that took into effect in March 2020 due to the COVID-19 pandemic. For quality assurance, gathered nighttime noise measurements were compared to the results of the existing average daily traffic volumes that occurred prior to "Safer at Home". As shown in data sets provided later in this section, nighttime noise measurements taken along the study intersections were similar to the conditions calculated from the existing average daily traffic volumes that were calculated before the COVID-19 pandemic.

4.10.3.2 Construction Noise and Vibration

This section addresses the methodology to assess potential noise and vibration impacts associated with operating equipment and construction-related traffic during the various phases of construction. The construction traffic and equipment assumptions are provided in the **Appendix 3.0.4: ITC Construction Scenarios for the EIR, June 2020**. The construction footprint for each phase is described in *Section 4.10.7* of this topical section.

Federal methodologies for assessing noise and vibration impact assessment methodology are defined in the FTA's Transit Noise and Vibration Impact Assessment Manual. As updated in 2018, the FTA Assessment

6 Larson Davis Model 831 SLM, http://www.larsondavis.com/support/slmsupport/model831.
7 American Institute of Physics for the Acoustical Society of America, American National Standard Specification for Sound Level Meters (1992).
8 International Electrotechnical Commission (IEC), IEC 61672-1 Ed. 1.0, IEC 60651. Ed 1.2.
9 Larson Davis, 831 Advanced Sound Level Meter for Architectural, Environmental, & Product Noise Analysis, http://www.larsondavis.com/contentstore/mktg/LD_Downloads/831_Lowres.pdf.

Manual provides procedures and impact criteria for noise and vibration from transit sources and the criteria apply to transit projects that seek federal funds.

These criteria include procedures for evaluating transit projects, including guidelines for evaluating the impact of operational noise on sensitive land uses as shown in **Table 4.10-2: FTA Land Use Categories and Metrics for Transit Noise Impact Criteria.**

The FTA Assessment Manual also provides guidance on how to evaluate the impact of noise levels from transit projects, as shown in **Table 4.10-3: FTA Levels of Impact**.

Table 4.10-2
Land Use Categories and Metrics for Transit Noise Impact Criteria

Land Use Category	Land Use Type	Noise Metric, dBA	Description of Land Use Category
1	High Sensitivity	Outdoor Leq (1hr)[1]	Land where quiet is an essential element of its intended purpose. Example land uses include preserved land for serenity and quiet, outdoor amphitheaters and concert pavilions, and national historic landmarks with considerable outdoor use. Recording studios and concert halls are also included in this category.
2	Residential	Outdoor DNL	This category is applicable all residential land use and buildings where people normally sleep, such as hotels and hospitals.
3	Institutional	Outdoor Leq (1hr)[1]	This category is applicable to institutional land uses with primarily daytime and evening use. Example land uses include schools, libraries, theaters, and churches where it is important to avoid interference with such activities as speech, meditation, and concentration on reading material. Places for meditation or study associated with cemeteries, monuments, museums, campgrounds, and recreational facilities are also included in this category.

Source: Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, September 2018
Note:
[1] Leq(1hr) for the loudest hour of project-related activity during hours of noise sensitivity.

The FTA Assessment Manual identifies noise significance thresholds which are a function of existing ambient noise levels and the land use category of sensitive receptors. As illustrated in **Figure 4.10-1: FTA Noise Impact Criteria for Transit Projects**, the thresholds at which a moderate or severe impact occur vary as the existing noise environment changes. The Assessment Manual also provides guidance on evaluating cumulative noise impacts.

No standardized criteria have been developed for assessing construction noise impact. Consequently, criteria must be developed on a project-specific basis unless local ordinances apply. Local noise ordinances

are typically not very useful in evaluating construction noise. They usually relate to nuisance and hours of allowed activity, and sometimes specify limits in terms of maximum levels, but are generally not practical for assessing impacts during construction. According to the FTA Assessment Manual, project construction noise criteria should account for the existing noise environment, the absolute noise levels during construction activities, the duration of construction, and the adjacent land use. As such, the FTA Assessment Manual provides the following reasonable criteria for assessment for residential, commercial, and industrial land uses:

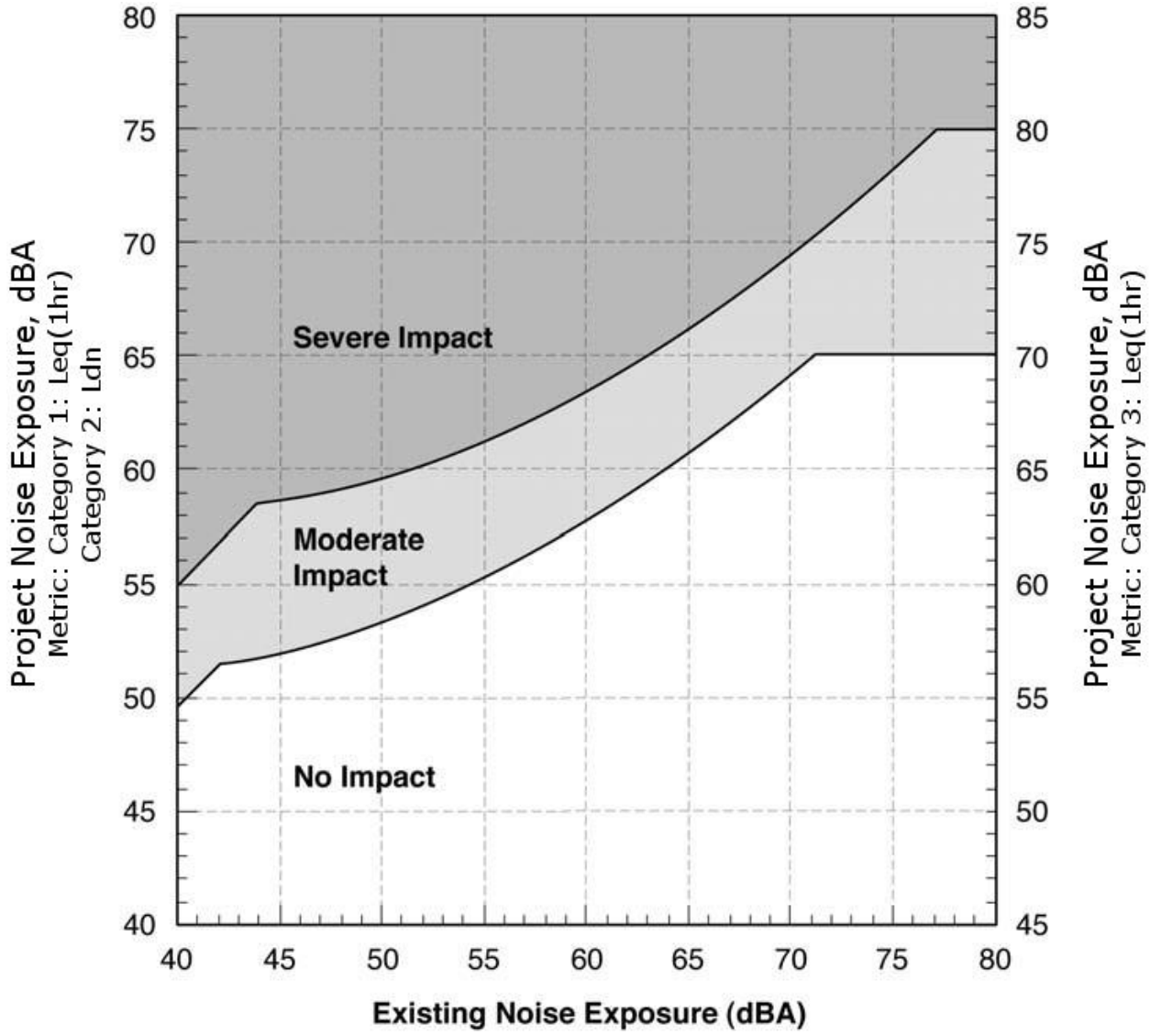
- Residential: 80 dBA Leq (8-hour) during the daytime; 70 dBA Leq (8-hour) during the nighttime
- Commercial: 85 dBA Leq (8-hour) during the daytime; 85 dBA Leq (8-hour) during the nighttime
- Industrial: 90 dBA Leq (8-hour) during the daytime; 95 dBA Leq (8-hour) during the nighttime

The FTA Assessment Manual also provides guidelines for evaluating the vibration impacts of constructing and operating transit projects.

Table 4.10-3
FTA Levels of Impact

Level of Impact	Description
No Impact	Project-generated noise is not likely to cause community annoyance. Noise projections in this range are considered acceptable by FTA and mitigation is not required.
Moderate Impact	Project-generated noise in this range is considered to cause impact at the threshold of measurable annoyance. Moderate impacts serve as an alert to project planners for potential adverse impacts and complaints from the community. Mitigation should be considered at this level of impact based on project specifics and details concerning the affected properties.
Severe Impact	Project-generated noise in this range is likely to cause a high level of community annoyance. The project sponsor should first evaluate alternative locations/alignments to determine whether it is feasible to avoid severe impacts altogether. In densely populated urban areas, evaluation of alternative locations may reveal a trade-off of affected groups, particularly for surface rail alignments. Projects that are characterized as point sources rather than line sources often present greater opportunity for selecting alternative sites. This guidance manual and FTA's environmental impact regulations both encourage project sites which are compatible with surrounding development when possible. If it is not practical to avoid severe impacts by changing the location of the project, mitigation measures must be considered.

_____
Source: Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, September 2018.



SOURCE: TRANSIT NOISE AND VIBRATION IMPACT ASSESSMENT MANUAL, FEDERAL TRANSIT ADMINISTRATION

FIGURE **4.10-1**

FTA Noise Impact Criteria for Transit Project

Construction Equipment Noise

Construction activities typically generate noise from the operation of equipment required for demolition, site preparation, grading, construction, paving, and application of architectural coatings. Noise impacts from construction and staging of construction equipment were evaluated by determining cumulative noise levels generated by construction activity, calculating the construction-related noise level at nearby noise-sensitive receptor locations, and comparing these construction-related noise levels to existing ambient noise levels (i.e., noise levels without Project-related construction noise). The actual noise level would vary, depending upon the equipment type, model, the type of work activity being performed, and the condition of the equipment. Over the course of construction, activities would occur over a 16 hour/day schedule with two shifts, either a morning shift from approximately 7:00 AM to 3:00 PM and an evening shift from approximately 3:00 PM to 11:00 PM, or a morning shift from approximately 7:00 AM to 3:00 PM and a night shift from approximately 11:00 PM to 7:00 AM. The night shift would be used for material deliveries, export of soil and debris and other light construction activities. Construction during the nighttime period would require a permit from the Permits and Licenses Committee of the City.

The Construction Scenario (see **Appendix 3.0.4** of the EIR) identifies the anticipated construction equipment for on- and off-site construction activities and is shown in **Table 4.10-4: Proposed Project Anticipated Construction Equipment by Phase**.

Off-Road On-Site Equipment: Off-road construction equipment includes dozers, loaders, sweepers, and other heavy-duty construction equipment that is not licensed for travel on public highways.

On-Road On-Site Equipment: On-road on-site equipment on-site water trucks, dump trucks, haul trucks and other on-road vehicles licensed to travel on public roadways.

On-Road Off-Site Equipment: On-road on-site equipment includes shuttle vans transporting construction employees to and from the site(s), on-site pick-up trucks, and crew vans.

Table 4.10-4
Proposed Project Anticipated Construction Equipment by Phase

Equipment	Quantity[a]				Usage Factor (%)	Lmax at 50 feet
	Phase 1	Phase 2	Phase 3	Phase 4		
Off-Road On-Site Equipment						
Impact Pile Driver	1	1	1	0	20	101
Crane	1	2	2	1	16	85
Backhoe	5	5	5	0	40	80
Loader	5	3	2	0	40	80
Auger Drill Rig	1	1	1	0	20	85
Compressor (air)	6	6	6	3	40	80
Excavator	3	2	2	0	40	85
Bobcat	3	3	4	1	40	85
Impact Hammer	6	3	3	2	20	90
Jackhammer	7	4	4	2	20	89
Pneumatic Tools	15	20	20	8	50	85
Generator	3	3	3	1	50	82
Warning Horn	2	2	2	1	5	85
Drum Mixer	0	3	3	0	50	80
Drill Rig Truck	1	1	1	0	20	84
Concrete Saw	4	2	2	1	20	90
Compactor (ground)	3	3	4	0	20	83
Portable Light Towers	4	4	6	3	N/A	55
MKN Lifts	9	9	10	5	20	75
On-Road On-Site Equipment						
Demo Dump Trucks (Total)	1,343	0	0	0	40	76
Asphalt Removal Trucks (Total)	172	0	0	0	40	76
Asphalt Placement Trucks (Total)	209	0	0	0	40	76
Soil Spoils Dump Trucks (Total)	1,607	1,503	2,395	10	40	76
Utility Trucks	28	39	35	39	N/A	75
Welder/Torch	5	5	6	4	40	73
Water Truck	2	2	2	0	N/A	74
Street Sweeper	1	2	2	1	N/A	74
Flat Bed Trucks	48	61	65	10	40	74
Pneumatic Tools	10	20	20	8	50	85
Concrete Trucks (Total)	10,284	9,477	3,516	50	40	85
Concrete Pump Trucks	2	2	2	2	20	84
On-Road Off-Site Equipment						
Pickup Trucks	60	73	80	52	40	75
Delivery Trucks	52	65	65	35	N/A	80

Source: Federal Highway Administration (FHWA) Roadway Construction Noise Model (RCNM) Version 1.1
*a - **Appendix 3.0.4**, Construction Scenarios for the EIR.*
Note:
Usage Factor (%): An acoustical usage factor to assume for modeling purposes.
Exposure Limit: The time that the equipment is predicted to produce noise.
Lmax at 50 feet: Noise emission level at 50 feet from the piece of equipment.

Construction of the proposed Project would occur in four phases over an approximate five-year period between 2022 and 2026,with preconstruction activities occurring in 2021 and demolition beginning in 2022. A summary description of construction phasing is provided below:

- **Phase 1** would include, but not limited to, demolition of buildings and site improvements on properties acquired for construction of the Project and the beginning of construction of the MSF. The properties where existing buildings and site improvements will be demolished include at the existing retail commercial center at Market Street and Regent Street (CVS plaza), the commercial buildings located at 500 and 501 E. Manchester Avenue (retail commercial site and gas station buildings), and the commercial building at 150 S. Market Street on the northeast corner of Manchester and Market Street. Phase 1 would include utility relocations, if required, construction of cast-in-place (CIP) columns and slabs, foundations for the initial construction of the MSF facility. After demolition, the remaining asphalt flatwork areas at 500 E. Manchester (retail commercial site), the commercial plaza at Market Street and Regent Street (CVS Plaza) and the commercial building at 150 S. Market Street will provide suitable space for construction staging, including but not limited to, space for equipment storage, material staging and storage, contractor jobsite trailers, and on-site parking for construction staff throughout the entire project duration. The first phase of construction would occur in 2022 and 2023.
- **Phase 2** would include activities to enable the construction sequence of the guideway along Prairie Avenue from the Hardy Street intersection to Manchester Boulevard including the demolition of sidewalks, roadways and landscaping as needed, utility relocations, if necessary, foundations, CIP columns, straddle bents and the precast trapezoidal troughs and girders, and the construction of the MSF. The second phase of construction would occur in 2023 through 2025.
- **Phase 3** would include construction of an above-ground passenger access walkway from the Market Street/Florence Avenue Station to the Metro Crenshaw/LAX Line Downtown Inglewood Station, property acquisitions, building demolition, utility relocation (if necessary), foundations, CIP columns, straddle bents and the precast trapezoidal troughs and girders. This phase includes site work completion of the MSF. The third phase of construction would occur in 2024 through 2026.
- **Phase 4** would include completion of the aerial guideway construction elements including the installation of the operation and control systems, track work, station platform equipment and systems, completion of the TPSSs, testing and commissioning of the APM trains, completion of all surface construction activities including electrical, mechanical and utilities energizations, and all surface parking lots. Phase 4 will also include final roadway improvements and modifications, and re-striping of streets as required. The fourth phase of construction would occur in 2022 through 2026.

The following were used to calculate construction noise levels:

- Ambient noise levels at surrounding noise-sensitive receptor locations were modeled based on existing noise in proximity to the nearby noise-sensitive receptors.

- Typical noise levels for each type of construction equipment were obtained from the Federal Highway Administration's (FHWA) Roadway Construction Noise Model (RCNM). A sample of typical construction equipment noise levels is shown in **Table 4.10-4**.

An inventory of possible construction equipment, including number and types of equipment, was identified for each phase/component of construction and all equipment was assumed to operate simultaneously. Although it is unlikely that all pieces of construction equipment identified in **Table 4.10-4** above would be operating simultaneously at a single location during each phase, this is considered a conservative approach to calculate the maximum noise levels that would be generated. The calculated average sound power levels (refer to **Appendix 4.10-4.1**) were inputted as area sources into the SoundPLAN model[10] each for the four construction phases:

a) Phase 1: Sound power level of 88.6 dBA per square meter (dB/m, m^2) with an Lmax of 90.0 dBA
b) Phase 2: Sound power level of 88.2 dBA per square meter (dB/m, m^2) with an Lmax of 89.8 dBA
c) Phase 3: Sound power level of 88.6 dBA per square meter (dB/m, m^2) with an Lmax of 89.8 dBA
d) Phase 4: Sound power level of 83.3 dBA per square meter (dB/m, m^2) with an Lmax of 85.0 dBA

Distances between construction activities for each of the phases and staging area locations (noise source), and surrounding noise-sensitive receptors were measured using concept plans for the proposed Project and aerial imagery.

Construction traffic and equipment noise levels were calculated for noise-sensitive receptor locations (see **Section 4.0: Environmental Impact Analysis**, *4.0.7 Sensitive Receptors*) based on the conventional standard point source noise-distance attenuation factor of 4.5 to 6.0 dBA for each doubling of distance. Construction noise levels were quantified at predetermined distances from the site using the L_{eq} metric.

Calculated noise levels associated with the proposed Project's construction at noise-sensitive receptor locations were then compared to estimated existing noise levels and the construction noise significance thresholds.

Table 4.10-5: Estimate of Hourly Construction Activity Levels presents the construction activity shifts that would occur during the 24-hour period. Construction activity would primarily occur over a 16 hour daily schedule with two shifts, either a Morning/Evening shift from approximately 7:00 AM to 3:00 PM and an evening shift from approximately 3:00 PM to 11:00 PM, or a Morning/Night shift from approximately 7:00 AM to 3:00 PM during the day and a night shift from approximately 11:00 PM to 7:00 AM.[11] There will be

10 SoundPLAN model is in compliance with ISO 9613-2 standards for assessing attenuation of sound propagating outdoors and general calculation method.

11 **Appendix 3.0.4: Construction Scenarios** for this Draft EIR, June 2020.

periods when construction activities are scheduled to occur from approximately 11:00 PM to 7:00 AM to accommodate work activities that cannot be accomplished during the daytime shifts (i.e., during large-scale pours of concrete when it would be necessary to maintain a continuous stream of concrete deliveries through multiple shifts). Construction work is assumed to occur seven days a week.

Table 4.10-5
Estimate of Hourly Construction Activity Levels

		Equipment Use Activity Factor	
	Hour	**Morning/Evening Shift (7:00 AM – 3:00 PM, 3:00 PM – 11:00 PM)**	**Morning/Night Shift (7:00 AM – 3:00 PM, 11:00 PM – 7:00 AM)**
Nighttime	12:00 AM – 1:00 AM	25%	50%
	1:00 AM – 2:00 AM	25%	50%
	2:00 AM – 3:00 AM	25%	50%
	3:00 AM – 4:00 AM	25%	50%
	4:00 AM – 5:00 AM	25%	50%
	5:00 AM – 6:00 AM	25%	50%
	6:00 AM – 6:59 AM	25%	50%
Daytime	7:00 AM – 8:00 AM	100%	100%
	8:00 AM – 9:00 AM	100%	100%
	9:00 AM – 10:00 AM	100%	100%
	10:00 AM – 11:00 AM	100%	100%
	11:00 AM – 12:00 PM	100%	100%
	12:00 PM – 1:00 PM	100%	100%
	1:00 PM – 2:00 PM	100%	100%
	2:00 PM – 3:00 PM	100%	100%
	3:00 PM – 4:00 PM	100%	50%
	4:00 PM – 5:00 PM	100%	50%
	5:00 PM – 6:00 PM	100%	50%
	6:00 PM – 6:59 PM	100%	50%
Evening	7:00 PM – 8:00 PM	75%	38%
	8:00 PM – 9:00 PM	75%	38%
	9:00 PM – 9:59 PM	75%	38%
Nighttime	10:00 PM – 11:00 PM	50%	25%
	11:00 PM – 12:00 AM	25%	50%

Source: ***Appendix 3.0.4: Construction Scenarios for the EIR****, June 2020.*

For purposes of this analysis, a hybrid construction shift was derived from **Table 4.10-5** to calculate maximum construction noise levels. Conservatively, the construction noise analysis assumed the equipment use activity factor for morning/night shift during the nighttime period (10:00 PM – 6:59 AM), morning/evening shift during the daytime period (7:00 AM – 6:59 PM), and the morning/evening shift during the evening period (7:00 PM – 9:59 PM). 24-hour CNEL, daytime (7:00 AM to 8:00 PM) and nighttime (8:00 PM to 7:00 AM) construction noise levels are provided in **Appendix 4.10.4-2** through **4.10.4-5** for each construction phase. Maximum hourly construction noise levels are provided in the tables below.

Due to site constraints, primarily along Prairie Avenue and Manchester Boulevard, just-in-time deliveries of construction materials would be required during off-peak hours and/or night hours. Additionally, construction of the guideway, columns and station components that could impact Prairie Avenue and Manchester Boulevard would be primarily constructed during the off-peak hours and night hours in order to minimize impacts to daily commuter traffic and potential event traffic. Delivery of construction materials would occur during the night shift, as would most lane closures. Construction activities during the day shift would primarily consist of work that could proceed without requiring lane closures or significant disruption to daily commuter traffic and potential event traffic along Prairie Avenue and Manchester Boulevard. Additionally, it can be anticipated that some minor activity would occur during periods in between construction shifts for logistics, moving equipment, etc. An adjusted workload intensity is assumed for these periods of minor activity.

Construction equipment noise was evaluated by determining the noise levels generated by typical outdoor construction activity and calculating the potential for exposure to noise-sensitive uses. Construction equipment noise impacts were assessed by identifying the closest noise-sensitive receptors to each construction area.

Construction Traffic Noise

The analysis of construction traffic noise impacts focuses on off-site Project construction activity by:

- Identifying major roadways that may be used for construction worker commute routes or truck haul routes;
- Identifying the nature and location of noise-sensitive receptors along those routes; and
- Evaluating the traffic characteristics along those routes, specifically as related to existing traffic volumes.

The primary haul and delivery routes include Florence Avenue, Manchester Boulevard, Prairie Avenue and Century Boulevard which have been designated by the City as Truck Routes.[12] To minimize traffic impacts to streets in and around the proposed Project area, excavated dirt materials/spoils will be hauled during off-peak and night hours.

Construction traffic volume data was provided for multiple segments along each roadway. According to FHWA, traffic noise levels increase by 3 dBA where traffic volumes double (100 percent increase). Therefore, where Project construction traffic along a haul route results in the doubling of ADT, a significant impact would occur.

12 City Municipal Code, Section 3-85. Truck Routes Established.

Construction Equipment Vibration

For quantitative construction vibration assessments related to building damage and human annoyance, vibration source levels for construction equipment were taken from the Federal Transit Administration (FTA) *Transit Noise and Vibration Impact Assessment Manual.*[13] Building damage would be assessed for each piece of equipment individually and assessed in terms of peak particle velocity. Ground-borne vibration related to human annoyance is assessed in terms of rms velocity levels.

Ground-borne vibration measurements (refer to **Appendix 4.10-3**) were collected in accordance with FTA guidance[14] at each of the five noise monitoring locations that were measured over a 24-hour period. Outdoor field measurements were taken using remote monitoring systems and an accelerometer on November 16, 2018. Accelerometers were placed on smooth surfaces on the ground to ensure that vertical vibration was accurately captured. The vibration intervals were set to 1 second at each location.

Existing vibration monitoring was conducted to provide data on ambient ground-borne vibration generated by traffic and operation of activities. The locations of the vibration monitoring selected were either adjacent to sensitive land uses (residences and hotels) or buildings that were close to where the components of the proposed Project would be constructed. Vibration data was acquired with a flat frequency response range from 6 Hertz (Hz) to 400 Hz.

4.10.3.3 Operational Noise and Vibration

This section addresses the methodology to assess potential noise impacts associated with changes in roadway traffic attributable to the operation of the proposed Project. Additionally, this section addresses noise and vibration impacts associated with operation of trains and stationary uses (MSF and TPSSs).

Traffic Noise

The analysis evaluates the extent to which ambient exterior noise levels at noise-sensitive uses located along major roadways within the Project vicinity may change due to traffic associated with the operation of the proposed Project, and noise generated from the APM trains and stationary sources such as the MSF.

The noise evaluation addressed the following scenarios:

- Adjusted Baseline Conditions during typical non-event Weekday without the ITC Project
- Adjusted Baseline Conditions during typical non-event Weekday with the ITC Project
- Opening Year (2026) Conditions with NFL event Weekday without the ITC Project

13 FTA, Transit Noise and Vibration Impact Assessment Manual, September 2018, accessed August 2020, https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf

14 USDOT, FTA, Transit Noise and Vibration Impact Assessment.

- Opening Year (2026) Conditions with NFL event Weekday with the ITC Project
- Future Horizon Year (2045) Conditions with NFL event Weekday without the ITC Project
- Future Horizon Year (2045) Conditions with NFL event Weekday with the ITC Project

Traffic Data Conversions

The traffic study (see **Appendix 4.12.1**) evaluated an extensive network of roadway intersections to be assessed for increases in traffic volumes within the area surrounding the proposed Project. Existing ADTs were estimated using the validated Inglewood Travel Demand Forecasting Model (ITDF). The ITDF Model was utilized along with existing transportation networks for each of the four time periods (AM, Mid-Day, PM, Nighttime) and the associated socio-economic database consistent with the SCAG RTP/SCS Regional Model. The results for all four time periods were aggregated to reflect the average daily conditions. The resulting ADT volumes reflect typical weekday operations under the existing (2020) conditions.

This area is generally bound by Florence Avenue to the north, Century Boulevard and 104th Street to the south, Crenshaw Boulevard to the east and La Brea Avenue to the west. A total of 26 intersections were studied that may be subjected to an increase or decrease in ambient roadway traffic noise as a result of the proposed Project (see **Appendix 4.12.1**). These intersections are identified on **Table 4.10-6: Proposed Project Study Intersections** and shown on **Figure 4.10-2: Traffic Study Areas and Intersections**. At each intersection, turning movements were recorded during the morning and afternoon peak traffic hours. The collected turning movement data was converted into estimated road traffic noise levels using the FHWA TNM methodology.[15]

Traffic Volume Data

The process of assessing potential road traffic noise impacts that would be generated by implementation of the Project requires that estimates of current road traffic noise levels be prepared to establish existing conditions as a baseline for noise impact analyses. The traffic turning movement counts collected as part of the Traffic Study (see **Appendix 4.12.1**) were used to calculate estimates of daytime (7:00 AM to 10:00 PM) and nighttime (10:00 PM to 7:00 AM) average daily traffic (ADT) volumes on the roadway segments between traffic study intersections (refer to **Appendix 4.10-2.1**). These ADT values were inputted into the FHWA traffic noise model.

Traffic Noise Modeling

Traffic volume and road parameter data were inputted via the SoundPLAN[16] noise model to the FHWA TNM 2.5 model,[17] which is the road traffic noise model preferred by the California Department of

15 Federal Highway Administration, Traffic Noise Model Version 2.5, https://www.fhwa.dot.gov/environment/noise/traffic_noise_model/tnm_v25/.
16 SoundPLAN https://www.soundplan.eu/en/
17 Federal Highway Administration, Traffic Noise Model Version 2.5, https://www.fhwa.dot.gov/environment/noise/traffic_noise_model/tnm_v25/.

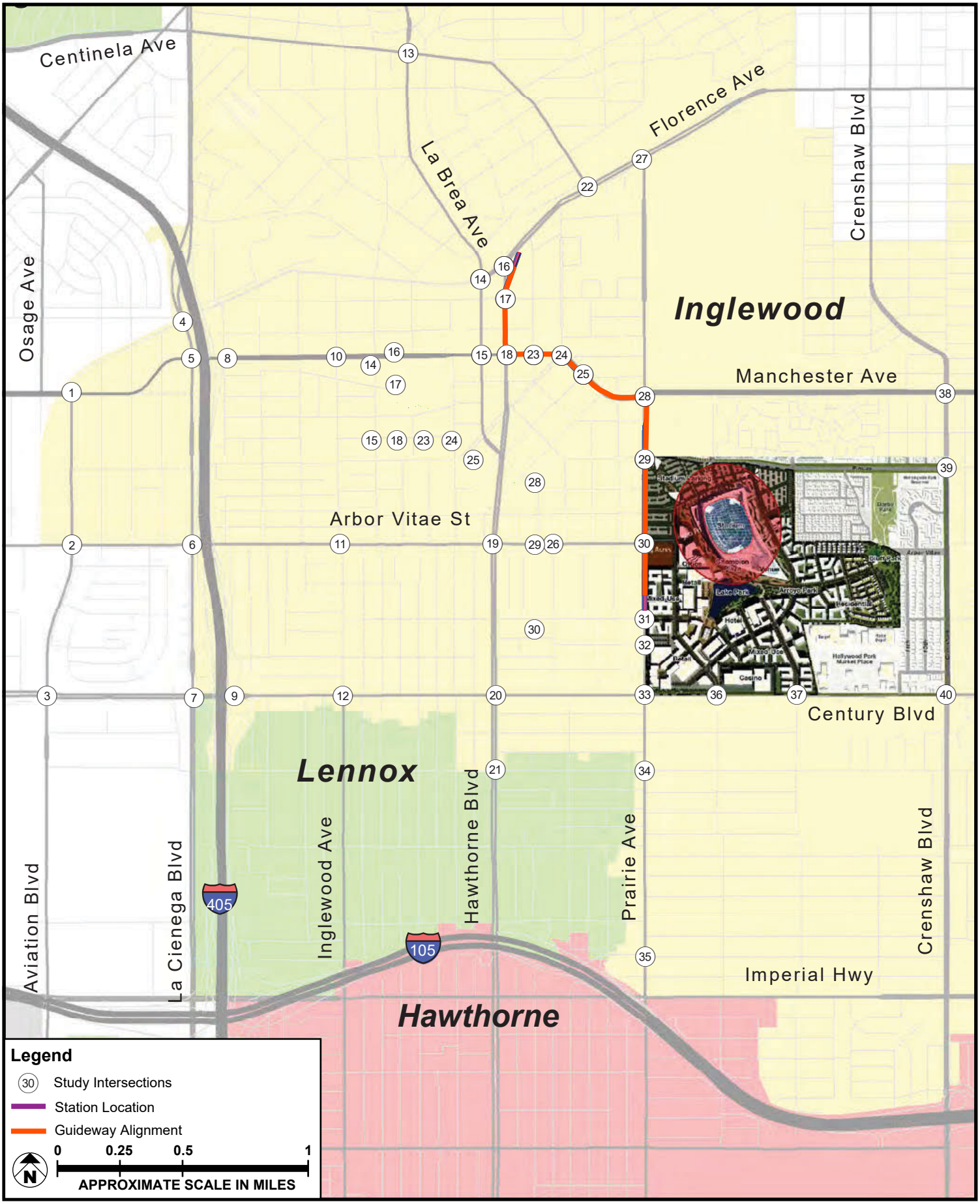
Transportation (Caltrans). The TNM model calculates the average noise levels at the specific locations based on nearby roadway traffic volumes, average vehicle speeds, roadway geometry, and physical site conditions. The modeled noise levels for each of the scenarios described above is the average CNEL[18] calculated for the daytime and nighttime periods by the model for sensitive receptors assumed to be located adjacent to the street. These values represent the maximum potential noise levels to which sensitive receptors could be exposed to from road traffic noise.

Table 4.10-6
Proposed Project Study Intersections

Map ID	Intersection
1	La Brea Avenue & Florence Avenue
2	La Brea Avenue & Manchester Boulevard
3	Market Street & Florence Avenue
4	Market Street & Regent Street
5	Market Street & Manchester Avenue
6	La Brea Avenue & Arbor Vitae Street
7	La Brea Avenue & Century Boulevard
8	Hawthorne Boulevard & 104th Street
9	Centinela Avenue & Florence Avenue
10	Locust Street & Manchester Avenue
11	Hillcrest Boulevard & Manchester Boulevard
12	Spruce Avenue & Manchester Boulevard
13	Myrtle Avenue & Arbor Vitae Street
14	Prairie Avenue & Florence Avenue
15	Prairie Avenue & Manchester Boulevard
16	Prairie Avenue & Kelso Street/Pincay Drive
17	Prairie Avenue & Arbor Vitae Street
18	Prairie Avenue & Hardy Street
19	Prairie Avenue & 97th Street
20	Prairie Avenue & Century Boulevard
21	Prairie Avenue & 104th Street
22	Doty Avenue & Century Boulevard
23	Yukon Avenue & Century Boulevard
24	Crenshaw Boulevard & Manchester Boulevard
25	Crenshaw Boulevard & Pincay Drive/90th Street
26	Crenshaw Boulevard & Century Boulevard

Source: Raju Associates, Traffic Study 2020, ***Appendix 4.12.1.***

18 Community Noise Equivalent Level (CNEL) is a weighted average of noise level over time. It is used to compare the noisiness of neighborhoods. CNEL is frequently used in regulations of airport noise impact on the surrounding community. A CNEL exceeding 65db is generally considered unacceptable for a residential neighborhood.



SOURCE: Google Earth - 2020; Meridian Consultants LLC - 2020

FIGURE **4.10-2**

Traffic Study Areas and Intersections

251-003-20

FTA Vibration Guidelines

The FTA has published a technical manual, *Transit Noise and Vibration Impacts Assessment*, that provides ground-borne vibration impact criteria with respect to building damage during construction activities.[19] Building vibration damage is measured in PPV. According to the FTA guidelines, a vibration criterion of 0.20 PPV should be considered as the significant impact level for nonengineered timber and masonry buildings. Structures or buildings constructed of reinforced concrete, steel, or timber have a vibration damage criterion of 0.50 PPV based on the FTA guidelines.

The human reaction to various levels of vibration is highly subjective and varies from person to person. **Table 4.10-7: Ground-borne Vibration Criteria—Human Annoyance** shows the FTA's vibration criteria to evaluate vibration-related annoyance due to resonances of the structural components of a building. These criteria are based on extensive research that suggests humans are sensitive to vibration velocities in the range of 8 to 80 Hz.[20]

Structures amplify ground-borne vibration, and wood-frame buildings, such as typical residential structures, are more affected by ground vibration than are heavier buildings. The level at which ground-borne vibration is strong enough to cause architectural damage has not been determined conclusively. The most conservative estimates are reflected in the FTA standards, shown in **Table 4.10-8: Ground-borne Vibration Criteria—Architectural Damage**.[21]

Table 4.10-7
Ground-borne Vibration Criteria—Human Annoyance

Land Use Category	Max Lv (VdB)	Description
Workshop	90	Distinctly felt vibration; appropriate to workshops and nonsensitive areas
Office	84	Felt vibration; appropriate to offices and nonsensitive areas
Residential: Daytime	78	Barely felt vibration; adequate for computer equipment
Residential: Nighttime	72	Vibration not felt, but ground-borne noise may be audible inside quiet rooms

Source: United States Department of Transportation, Federal Transportation Authority, Transit Noise and Vibration Impact Assessment *(May 2006).*
Note: For Max Lv (VdB), Lv is the velocity level in decibels as measured in 1/3 octave bands of frequency over the frequency ranges of 8 to 80 Hz

19 US Department of Transportation, Federal Transit Administration (USDOT, FTA), Transit Noise and Vibration Impact Assessment, FTA report no. 0123 (September 2018), accessed December 2018, https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf.
20 USDOT, FTA, Transit Noise and Vibration Impact Assessment.
21 USDOT, FTA, Transit Noise and Vibration Impact Assessment.

Table 4.10-8
Ground-borne Vibration Criteria—Architectural Damage

Building Category	PPV (ips)	Lv (VdB)
I. Reinforced concrete, steel, or timber (no plaster)	0.5	102
II. Engineered concrete and masonry (no plaster)	0.3	98
III. Nonengineered timber and masonry buildings	0.2	94
IV. Buildings extremely susceptible to vibration damage	0.12	90

Source: United States Department of Transportation, Federal Transportation Authority, Transit Noise and Vibration Impact Assessment *(May 2006).*
Note: For Max Lv (VdB), Lv = the velocity level in decibels as measured in 1/3 octave bands of frequency over the frequency ranges of 8 to 80 Hz; VdB = vibration decibels; Hz = hertz; ips = inches per second.

Transit Noise and Vibration

The proposed Project will be a "pinched loop" system, whereby trains operate back and forth from the Market Street/Florence Avenue Station to the Prairie Avenue/Hardy Street Station, stopping at each station along the way and reversing at "turnbacks" at each end of the system.[22] Trains will crossover to the adjacent guideway prior to entering the Market Street/Florence Avenue Station and reverse direction when leaving the station. At the Prairie Avenue/Hardy Street Station end of the line, trains will also crossover prior to entering the station and reverse direction when leaving the station.

The proposed Project is planned to operate from 6:00 AM to 12:00 AM for normal weekday/weekend service, with the possibility to add trains and extend hours, as needed, to serve special events. Generally, additional service will be provided before the start of an event to bring passengers to the venue, and again at the end of the event to bring passengers back to the Metro Crenshaw/LAX Line.

As part of the proposed Project, the Operating Systems Report[23] technical requirements identified large, automated monorail, and rubber-tire APM trains as the technology to be maintained for consideration. The review confirmed that rubber-tire APM train and large automated monorail technologies are applicable and appropriate for the proposed Project. The requirements for rubber-tire APM train and large monorail technologies were used in the design and in this analysis.[24]

The APM trains would be either a rubber-tire, steel-wheel system, or a monorail system. The technical requirements for large, automated monorail, rubber-tire APM train, and automated steel-wheel/steel-rail, also known as automated light rail transit (ALRT) were reviewed against the public rights of-way and

22 Lea+Elliott, Inc. Inglewood Transit Connector EIR Operating Systems Conceptual Planning EIR Project Definition DRAFT - December 2020. Section 5, System Operations.
23 Lea+Elliott, Inc. Inglewood Transit Connector EIR Operating Systems Conceptual Planning EIR Project Definition DRAFT - December 2020. Section 3, Technology Assessment.
24 Lea+Elliott, Inc. Inglewood Transit Connector EIR Operating Systems Conceptual Planning EIR Project Definition DRAFT - December 2020. Section 3, Technology Assessment.

property availability to determine the technologies best applicable for the proposed Project. While rubber tired APM trains, including monorail systems, can meet the defined physical requirements for the Project, steel wheel/steel rail technologies may also be viable provided this technology can comply with the defined requirements for the Project, including the ability to fit within the defined physical space available for the Project and maximum limits on noise. A steel wheel/steel rail may be applied to the project provided it can be demonstrated that the noise that would be generated by this system would be within the maximum limits defined for rubber tired APM Systems in the ASCE APM Standards Section 2.2.1, Exterior Airborne Noise, ASCE 21-05.[25] Accordingly if steel wheel/steel rail technologies are applied the Project the noise levels generated would not be greater than the noise levels from a rubber tire system and no additional analysis for noise that would be generated by a steel wheel/steel rail system is required.

The estimated fleet size considers the operating fleet, which is the number of vehicles required to provide the necessary line capacity to meet the projected demand, as well as the spare fleet, comprised of the hot standby and maintenance trains to ensure that the number of trains required for operations is always available.[26] Rubber-tire APM train are typically used at airports around the world as well as urban areas. Typical characteristics of such APM trains include speeds of up to 50 miles per hour and vehicle dimensions of approximately 40 to 42 feet long and approximately 9 feet wide.[27] Monorail technologies are typically used in urban environments. Typical characteristics of both APM trains and monorails include train speeds of up to 50 miles per hour and vehicle dimensions of approximately 55 to 65 feet long by approximately 9.5 feet to 10.3 feet wide.[28]

Exterior APM Train Noise

Noise from APM trains is generated primarily from electric control systems and traction (electric) motors, gear systems, wind shear, and contact between wheels and the rails. While train horns and crossing notification systems can also be typical noise sources for APM trains, the guideway would be completely grade-separated, with no vehicle or passenger walkway along the routes.

The Automated People Mover Standards Committee of the Standards Council of the Transportation and Development Institute of ASCE[29] has developed the Automated People Mover Standards,

25 American Society of Civil Engineers, Automated People Mover Standards – Part 2 Section 2.2.1, Exterior Airborne Noise, ASCE 21-05.

26 Lea+Elliott, Inc. Inglewood Transit Connector EIR Operating Systems Conceptual Planning EIR Project Definition DRAFT - December 2020. Section 5.4, Fleet Size and Line Capacity Analysis.

27 Lea+Elliott, Inc. Inglewood Transit Connector EIR Operating Systems Conceptual Planning EIR Project Definition DRAFT - December 2020.

28 Lea+Elliott, Inc. Inglewood Transit Connector EIR Operating Systems Conceptual Planning EIR Project Definition DRAFT - December 2020.

29 Automated People Mover Standards Committee of the Standards Council of the Transportation and Development Institute of ASCE, https://www.asce.org/templates/membership-communities-committee-detail.aspx?committeeid=000000885461.

ANSI/ASCE/T&DI 21-13,30 which establishes the minimum requirements necessary to achieve an acceptable level of safety and performance for an APM train. An APM train is defined as a guided light-rail transit train mode that is fully automated, featuring vehicles that operate on guideways with exclusive right-of-way. The ASCE Standard covers design, construction, operation, and maintenance of APM trains. Top APM train speed of 50 mph is achievable, but the actual operational speed will be limited to a maximum of 45 mph for passenger comfort and will be further governed by the speed restrictions imposed by the City as a condition of operation. Conservatively, this analysis assumes a maximum top speed of 50 miles per hour and travel speeds of 45 miles per hour for the rubber tire APM trains and monorails.

The exterior noise level generated by the APM train, with all contributing noise sources in operation, would not exceed the levels specified in Section 2.2.1, Exterior Airborne Noise, ASCE 21-05.[31] The design of any barrier-type noise reducing devices along the guideway would be subject to the limits noted in **Table 4.10-9: Exterior APM Train Noise Limits**.

Table 4.10-9
Exterior APM Train Noise Limits

Condition	Maximum dBA Level	Measurement Location
Maximum length train entering and leaving station	76 (slow response)	In the station, 5 feet from the platform edge and 5 feet above the station floor.
Maximum length train stopped in station	74 (slow response)	In the station, 5 feet from the platform edge and 5 feet above the station floor, with vehicle doors and platform doors fully open.
Maximum length train traveling along the entire guideway under any normal velocity, acceleration, and deceleration operating condition	76 (fast response)	At any point* on a cylindrical envelope co-axial with, and 50 feet from, the centerline of each guideway lane (track), whichever is closer.
Maximum length train traveling at 10 mph	74 (fast response)	At any point* on a cylindrical envelope co-axial with, and 50 feet from, the centerline of each guideway lane (track).

Source: American Society of Civil Engineers, Automated People Mover Standards - Part 2 Section 2.2.1, Exterior Airborne Noise, ASCE 21-05

Potential operational transit noise levels for operation of APM trains are calculated with the computer noise model SoundPLAN, which generates computer simulations of noise propagation from sources such as rail noise. SoundPLAN creates noise contour maps and forecast noise levels at specific receptors using

30 Automated People Mover Standards Committee of the Standards Council of the Transportation and Development Institute of ASCE, Automated People Mover Standards, ANSI/ASCE/T&DI 21-13. https://ascelibrary.org/doi/book/10.1061/asce21#:~:text=Automated%20People%20Mover%20Standards%2C%20Part%201%20(ASCE%2021%2D96)&text=Automated%20People%20Mover%20Standards%20establishes%20the%20minimum%20set%20of%20requirements,people%20mover%20(APM)%20system.

31 American Society of Civil Engineers, Automated People Mover Standards - Part 2 Section 2.2.1, Exterior Airborne Noise, ASCE 21-05.

sound power data and three-dimensional topographical data. Rail noise is modeled according to the industry standard rail noise prediction methodologies adopted by the Federal Railroad Administration (FRA).[32] The FRA noise prediction model calculates an A-weighted noise level at a receiver location through direct propagation or by taking into account shielding provided by barriers.

Operational Vibration

Ground-borne vibration measurements were collected in accordance with guidance provide in the FTA *Transit Noise and Vibration* Impact *Assessment Manual*.[33] Under the FTA *Transit Noise and Vibration Impact Assessment Manual*, land use types in determining noise impact criteria are designated into three land use categories:

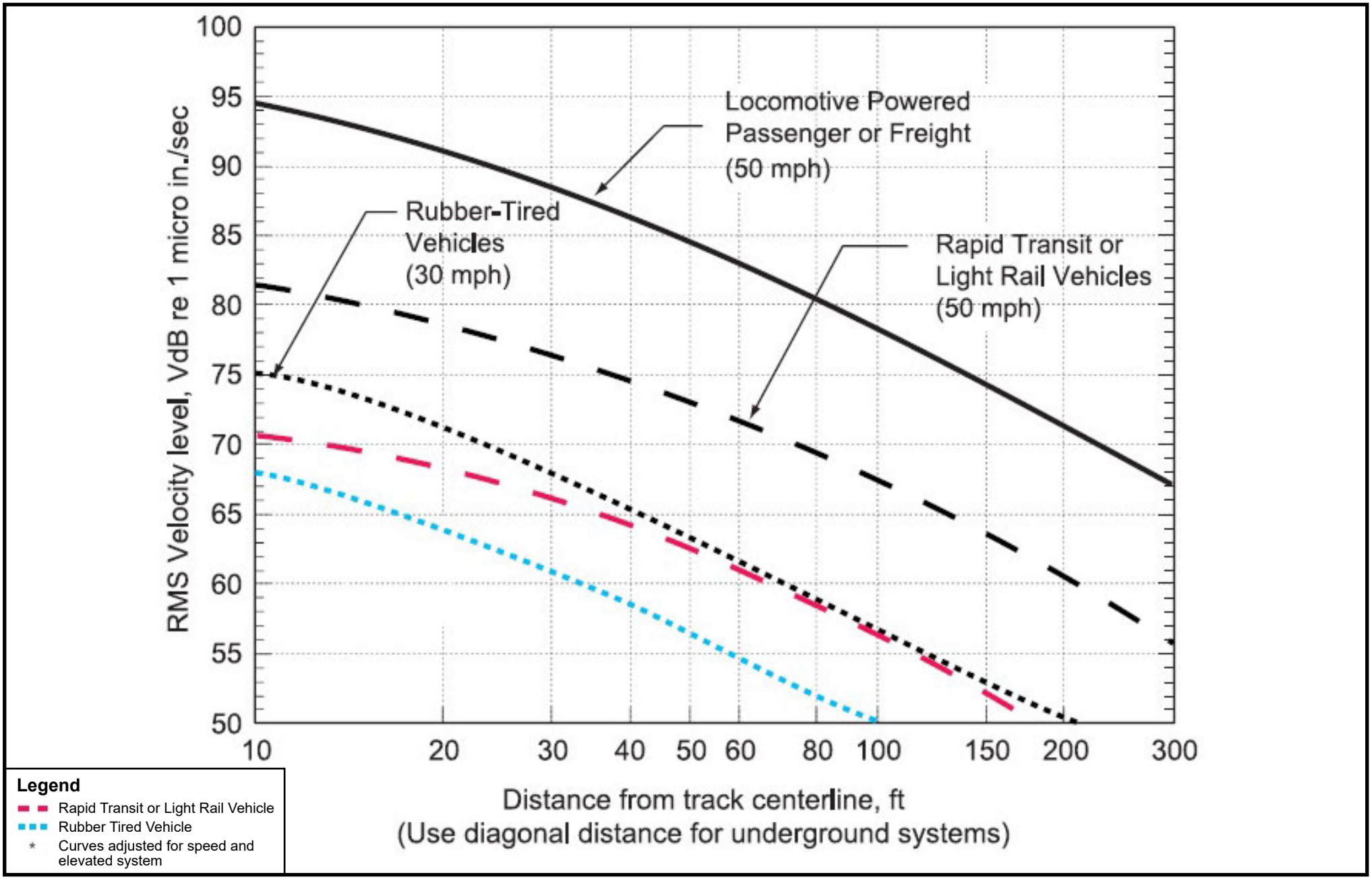
- **Category 1 (high vibration sensitivity)** includes uses where quiet is an essential element in their intended purpose, such as indoor concert halls or outdoor concert pavilions, or National Historic Landmarks where outdoor interpretation routinely takes place.
- **Category 2 (residential)** includes residences and buildings where people sleep, and
- **Category 3 (institutional)** includes institutional land uses with primarily daytime and evening uses, such as school, places of worship, and libraries.

These categories are developed to determine the level of vibration (VdB) that would disturb people during various activities and at various locations. The basic approach for a General Vibration Assessment is to define a curve, or set of curves, that predicts the overall ground-surface vibration as a function of distance from the source, apply adjustment to those vibration curves to account for site- or system-specific factors such as speed and system design, and estimate the vibration levels for uses located along the transit corridor.

Figure 4.10-3: Generalized Ground-Surface Vibration Curves presents the generalized ground-surface vibration curves at representative North American transit systems. These curves assume typical ground-borne vibration levels, equipment in good condition, and speeds of 50 miles per hour (mph) for the rail systems and 30 mph for buses. The top curve applies to trains that are powered by diesel or electric locomotives, which includes intercity passenger trains and commuter rail trains. The curve for rapid transit rail cars covers both heavy- and light-rail vehicles on at-grade and subway tracks. The curve for rubber-tired vehicles is for vehicles that rarely create ground-borne vibration problems unless there is a discontinuity or bump in the road that causes the vibration. Adjustment factors related to speed and distance determine the base curve for assessment of the guideway.

32 Federal Railroad Administration, High-Speed Ground Transportation Noise and Vibration Impact Assessment, September 2012.

33 Federal Transit Administration (FTA), Transit Noise and Vibration Impact Assessment Manual, FTA Report No. 0123, September 2018.



SOURCE: Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual - September 2018

FIGURE **4.10-3**

Generalized Ground-Surface Vibration

251-003-20

As shown in **Figure 4.10-3**, based on adjustment factors presented in the FTA *Transit Noise and Vibration Impact Assessment* manual[34] each base curve was reduced by 10 dB to account for the design of the proposed Project to operate on an elevated structure. Speed adjustments were also made, with 0.9 dB being subtracted to the vibration curve (red dotted line) for rapid transit or light rail vehicles to reduce the default speed of 50 mph to 45 mph, and 3.5 dB was added to rubber-tired APM trains vibration curve (blue dotted line) to increase the default speed of 30 mph to 45 mph.

4.10.4 REGULATORY FRAMEWORK

Federal, State, and local agencies regulate different aspects of environmental noise. Federal and State agencies generally set noise standards for mobile sources such as aircraft and motor vehicles, while regulation of stationary sources is left to local agencies.

Local regulation of noise involves implementation of general plan policies and noise ordinance standards. Local general plans identify general principles intended to guide and influence development plans; local noise ordinances establish standards and procedures for addressing specific noise sources and activities.

4.10.4.1 Federal Regulations and Directives

There are no federal noise standards that directly regulate environmental noise related to the construction or operation of the proposed Project.

Noise Control Act

In 1972, the Noise Control Act[35] was passed by congress to promote limited noise environments in support of public health and welfare. It also established the USEPA Office of Noise Abatement and Control to coordinate federal noise control activities.

USEPA established guidelines for noise levels that would be considered safe for community exposure without the risk of adverse health or welfare effects.

In a 1974 study,[36] USEPA found that to prevent hearing loss over the lifetime of exposure, the yearly average Leq should not exceed 70 dBA. To prevent interference and annoyance, the USEPA found that the DNL should not exceed 55 dBA outdoors or 45 dBA indoors. In 1982, noise control was largely passed to State and local governments.

34 Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, September 2018.
35 Noise Control Act (42 United States Code section 4901 et seq.)
36 US Environmental Protection Agency, 1974. Information on Levels of Environmental Noise Requisite to Protect Public Health and Welfare with an Adequate Margin of Safety. March 1974. p. 34.

Office of Safety and Health Administration

With regard to noise exposure and workers, the Office of Safety and Health Administration (OSHA) regulations safeguard the hearing of workers exposed to occupational noise. OSHA is responsible for the protection against the effects of noise exposure when sound levels exceed those, listed in **Table 4.10-10: Permissible Noise Exposures for Workers**, when measured on the A scale of a standard sound level meter at slow response.[37]

Table 4.10-10
Permissible Noise Exposures for Workers

Work Duration per Day (hours)	Sound level (dBA)
8	90
6	92
4	95
3	97
2	100
1.5	102
1	105
0.5	110
0.25 or less	115

Source: Occupational Safety and Health Administration, "Occupational Noise Exposure,"https://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=STANDARDS&p_id=10625.

Federal Vehicle Noise Regulations

Federal regulations establish noise limits for medium and heavy trucks (more than 4.8 tons, gross vehicle weight rating) under 40 Code of Federal Regulations (CFR), Part 205, Subpart B.[38] The federal truck pass-by noise standard is 80 dBA at 50 feet (approximately 15 meters) from the vehicle pathway centerline under specified test procedures. These requirements are implemented through regulatory controls on truck manufacturers. There are no comparable federal standards for vibration, which tend to be specific to the roadway surface, the vehicle load, and other factors.

37 OSHA, "Occupational Noise Exposure," https://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=STANDARDS&p_id=10625.

38 Code of Federal Regulations (CFR), Title 40. Protection of Environment, Environmental Protection Agency, Subchapter G. Noise Abatement Programs, Part 205. Transportation Equipment Noise Emission Controls.

4.10.4.2 State Regulations and Directives

State Noise Standards

The State of California has adopted noise compatibility guidelines for general land use planning as shown in **Figure 4.10-4: State Criteria for Noise Compatible Land Use**. The types of land uses addressed by the State and the acceptable noise categories for each land use are included in the *State of California General Plan Guidelines* guidance document, which is published and updated by the Governor's Office of Planning Research.[39] The level of acceptability of the noise environment is dependent on the activity associated with the particular land use. In addition, Section 65302(f) of the California Government Code requires each county and city in the State to prepare and adopt a comprehensive long-range general plan for its physical development, with Section 65302(g) requiring a noise element to be included in the general plan. The noise element must (1) identify and appraise noise problems in the community, (2) recognize Office of Noise Control guidelines, and (3) analyze and quantify current and projected noise levels.

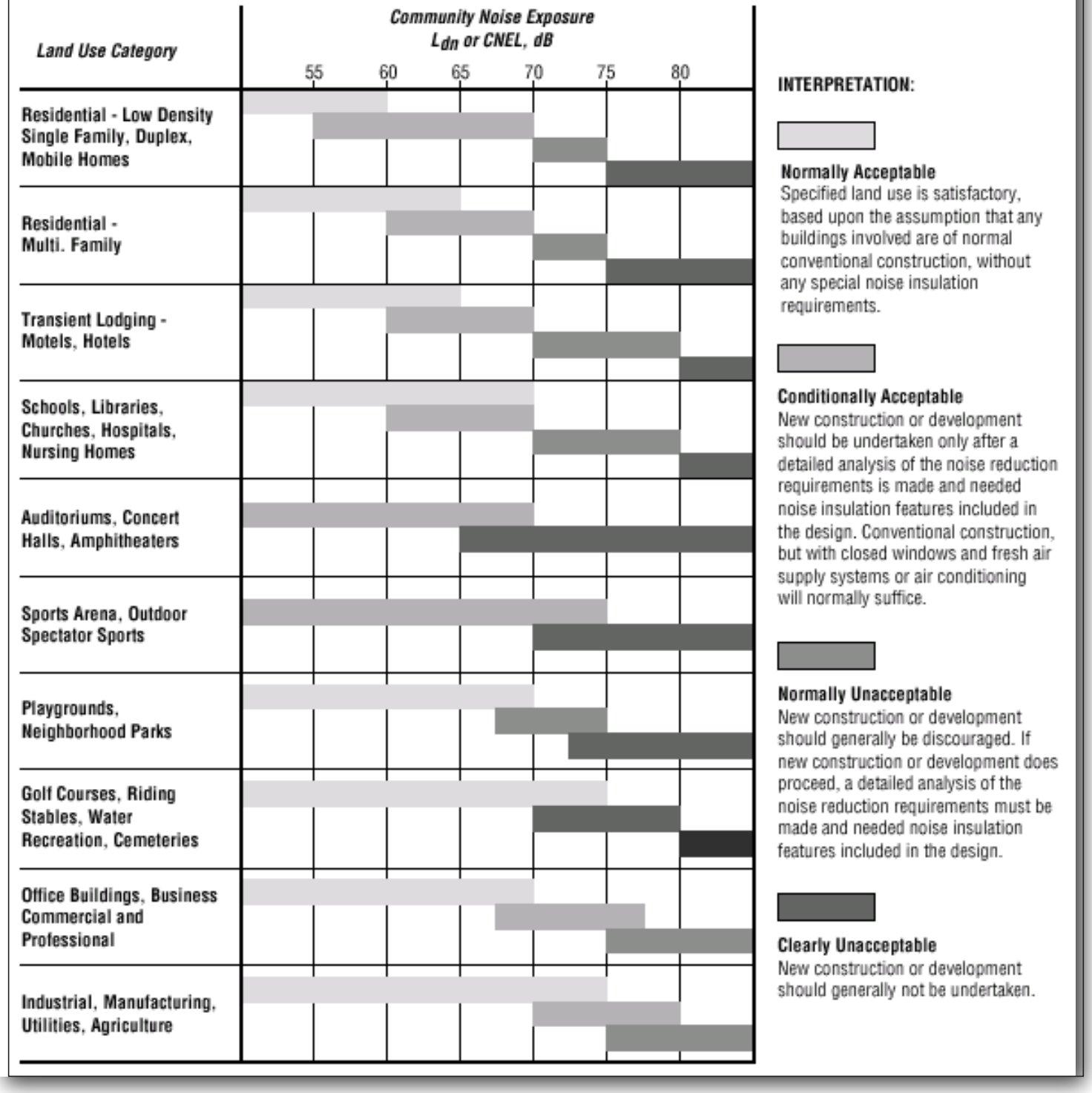
DHS's Office of Noise Control has established guidelines to provide communities with noise environments that it deems to be generally acceptable based on land-use categories. These guidelines serve as a primary tool for a city to use to assess the compatibility between land uses and outdoor noise. Noise exposure for single-family uses is normally acceptable when the noise level at exterior residential locations is equal to or below 60 dBA (CNEL or Ldn), conditionally acceptable when noise levels are between 55 to 70 dBA (CNEL or Ldn), and normally unacceptable when noise levels exceed 70 dBA (CNEL or Ldn). Some overlap exists between there categories as shown in **Figure 4.10-4: State Criteria for Noise Compatible Land Use**. These guidelines apply to noise sources such as vehicular traffic, aircraft, and rail movements.

The Department of Housing and Community Development has required that new residential units should not be exposed to outdoor ambient noise levels in excess of 65 dBA (CNEL or Ldn), and, if necessary, sufficient noise insulation must be provided to reduce interior ambient levels to 45 dBA. Within a 65 dBA exterior noise environment, interior noise levels are typically reduced to acceptable levels (to at least 45 dBA CNEL) through conventional construction, but with closed windows and fresh air apply systems or air conditioning.

Because typical noise attenuation within residential structures with closed windows is at least 20 dB, an exterior noise exposure of 65 dB CNEL is generally the noise land-use compatibility guideline for new residential dwellings in California. Because commercial and industrial uses are not occupied on a 24-hour basis, the exterior noise exposure standard for less-sensitive land uses generally is somewhat less stringent.

39 Governor's Office of Planning and Research, State of California General Plan Guidelines (2017), http://www.opr.ca.gov/docs/OPR_COMPLETE_7.31.17.pdf.

FIGURE 2



SOURCE: TRANSIT NOISE AND VIBRATION IMPACT ASSESSMENT MANUAL, FEDERAL TRANSIT ADMINISTRATION

FIGURE **4.10-4**

State Criteria for Noise Compatible Land Use

Vehicle Noise Standards

The State of California establishes noise limits for vehicles licensed to operate on public roads.[40] For heavy trucks, the State pass-by standard is consistent with the federal limit of 80 dBA. The State pass-by standard for light trucks and passenger cars (less than 4.8 tons, gross vehicle rating) is also 80 dBA at 50 feet (approximately 15 meters) from the centerline. These standards are implemented through controls on vehicle manufacturers and by legal sanction of vehicle operators by State and local law enforcement officials.

4.10.4.3 Regional Regulations and Directives

Los Angeles County Airport Land Use Plan

Pursuant to the California Public Utilities Code,[41] each county in California in which there is an airport served by a scheduled airline and each county with an airport operated for the benefit of the general public, with certain exceptions, is required to establish an airport land use commission (ALUC). Each ALUC must develop a plan for promoting and ensuring compatibility between each airport in the county and surrounding land uses.

In Los Angeles County, the Los Angeles County Regional Planning Commission also acts as the ALUC. ALUC's purpose is to coordinate planning for the area around public airports to protect the public health, safety and welfare from land uses that do not minimize the public's exposure to excessive noise and safety hazards. This is achieved through review of proposed development surrounding airports and through policy and guidance provided in the Los Angeles County Airport Land Use Plan (ALUP).[42]

In formulating the Los Angeles County ALUP, the ALUC establishes provisions to ensure safe airport operations, through the delineation of Runway Protections Zones (RPZs) and height restriction boundaries, and to reduce excessive noise exposure to sensitive uses through noise insulation or land reuse. The extent of the planning boundary designated for the airports in the Los Angeles County ALUP is determined by CNEL noise contours. The Los Angeles County ALUP employs a land use compatibility table to identify the level of compatibility for particular land uses within the planning area boundaries/ AIAs for the County's airports based on community noise exposure level

Per the CFR Part 150 Land Use Compatibility Guidelines,[43] residential uses are identified as noncompatible land uses for parcels exposed to 65 dBA CNEL or higher. Commercial land uses are identified as compatible

40 2009 California Vehicle Code - Section 27200-27207: Article 2.5. Noise Limits

41 California Public Utilities Code, Division 9, Part 1, Chapter 4, Article 3.5, Sections 21670– 21679.5.

42 Los Angeles County Airport Land Use Commission, Los Angeles County Airport Land Use Plan, adopted December 1991, http://planning.lacounty.gov/view/alup/

43 Federal Aviation Administration, Land Use Compatibility and Airports. p.V-10.

with 65 and 70 dBA CNEL noise levels. The CFR Part 150 Land Use Compatibility Guidelines categorizes hotel uses as a transient lodging form of residential.

4.10.4.4 Local Regulations and Directives

Inglewood General Plan Noise Element

The General Plan includes a Noise Element[44] which identifies a program for noise control in the planning process and a tool for achieving and maintaining environmental noise levels compatible for land use. The Element includes goals and policies to help control noise through land use planning decisions and by developing measures to control nontransportation noise impacts.

The City's noise standards correlate with land-use zoning classifications to maintain identified ambient noise levels and to limit, mitigate, or eliminate intrusive noise that exceed the ambient noise levels within a specified zone. The City has adopted local guidelines based in part on the community noise compatibility guidelines established by the California Department of Health Services for use in assessing the compatibility of various land-use types with a range of noise levels.[45] These guidelines are set forth in the City's Noise Element in terms of the CNEL. These include:

- Residential uses normally incompatible in areas where the ambient noise levels exceed 70 dB CNEL; and residential uses are clearly and normally compatible in areas where the ambient noise levels range between 55–70 dB CNEL.
- Commercial/professional office buildings and land uses are normally incompatible in areas where the ambient noise levels exceed 75 dB CNEL and are normally compatible within areas where the ambient noise levels range from 65 dB CNEL to 75 dB CNEL (for commercial/professional offices only).
- Industrial uses are normally incompatible in areas where the ambient noise levels exceed 75 dB CNEL; and are normally compatible in areas where the ambient noise level ranges between 65-75 dB CNEL.
- Institutional land uses are normally incompatible in areas where the ambient noise levels exceed 65 dB CNEL and are normally compatible within areas where the ambient noise levels range from 60 to 65 dB CNEL.
- Schools, libraries, hospitals, and nursing homes are treated as noise-sensitive land uses, requiring acoustical studies within areas exceeding 60 dB CNEL.

The following goals from the City General Plan Noise Element are applicable to the proposed Project:

Goal 1: Provide for the reduction of noise where the noise environment represents a threat to public health and welfare. In those areas where the environment represents a threat to

44 City, General Plan, "Noise Element" (September 1, 1987).

45 California Department of Health Care Services, Systems of Care Division, Child Health and Disability Prevention Program, Health Assessment Guidelines (July 2016).

the public health and welfare, it is the objective of the City to reduce environmental hazards to levels consistent with the protection of the public health and welfare.

Goal 3: Protect and maintain those areas having acceptable noise environments. In those areas where a quality environment now exists, it is the objective of the City to prevent degradation of that environment.

Goal 4: Provide sufficient information concerning the community noise levels so that noise can be objectively considered in land use planning decisions. Noise and land use compatibilities can be avoided for new developments when noise is properly considered in the planning and design of the project. It is the objective of the City to prevent future land use and noise conflicts through the planning process.

Inglewood Municipal Code (IMC)

City Municipal Code Chapter 5 (Offenses, Miscellaneous), Article 2 (Noise Regulations) establishes "criteria and standards for the regulation of noise levels within the community." Rather than being adopted to assist the City in guiding land use decisions, like the Noise Element of the General Plan, the City's Noise Regulations are intended to protect "the comfort, repose, health, or peace of residents in the area," and define noise levels that are considered public nuisances and are subject to abatement through the City's exercise of its enforcement authority. Section 5-27 establishes base ambient noise levels within respective times and zones. Where actual noise measurements exceed base ambient noise levels as designated by Section 5-27, the measured noise level shall be employed as the base ambient noise level.

- **Section 5-27: Base Ambient Noise Level:** establishes base ambient noise levels within respective times and zones. Where actual noise measurements exceed base ambient noise levels as designated by Section 5-27, the measured noise level shall be employed as the base ambient noise level.
- **Sections 5-29: Excessive Noise. Unlawful** and **5-30: Maximum Residential Noise Levels:** establish the City's authority to regulate noise that "disturbs the peace or quiet of any neighborhood or which causes discomfort or annoyance to any reasonable person residing in the area," and identifies maximum lawful noise levels and maximum duration periods that may be generated on residential and nonresidential properties.
- **Section 5-31: Maximum Nonresidential Noise Levels:** Measured on the exterior of nonresidential properties, no noise level is permitted to exceed the respective base ambient noise levels for commercial and industrial land uses for a maximum cumulative duration of 30 minutes in any hour.
- **Section 5-39: Machinery, Equipment, Fans and Air-Conditioning, Noise Regulated:** states that it is unlawful for any person to operate, cause to operate or permit the operation of any machinery, equipment, device, pump, fan, compressor, air-conditioning apparatus, or similar mechanical device in any manner so as to create any noise which would cause the noise level at the property line of any property to exceed the ambient noise base level by 5 dBA.

- **Section 5-41: Construction of Building and Projects, Noise Regulated:** states that is unlawful for any person within a residential zone, or within a radius of 500 hundred feet therefrom, to operate equipment or perform any outside construction or repair work on buildings, structures, or projects or to operate any pile driver, pneumatic hammer, derrick, excavation or earth moving equipment, or other construction equipment between the hours of 8:00 PM and 7:00 AM of the next day in such a manner that a reasonable person residing in the area is caused discomfort or annoyance unless a permit has been obtained from the Permits and Licenses Committee of the City.
- **Section 5-43: Motor Driven Vehicles. Noise Regulated:** prohibits the operation of any motor driven vehicle due to the nature of the operation of the vehicle, condition of the vehicle, or modification made to the vehicle, that would generate noise so that a reasonable person is caused discomfort or annoyance.
- **Section 5-45: Excessive Train Horn Noise Prohibited:** states that it is unlawful for any person to operate or sound, or cause to be operated or sounded, between the hours of 10:00 PM and 7:00 AM of the next day, a train horn or train whistle which creates a noise in excess of 90 dBA at any place or point 300 hundred feet or more distant from the source of such sound.

4.10.5 EXISTING CONDITIONS

4.10.5.1 Adjusted Baseline

The noise analysis assumes the Adjusted Baseline Environmental Setting as described in **Section 4.0: Environmental Analysis**; refer to **Table 4.0-1** for the details of the Adjusted Baseline. Related to noise, the changes associated with the Hollywood Park Specific Plan (HPSP) Adjusted Baseline projects, currently under development and anticipated to be operational prior to construction of the proposed Project, include vehicle trips associated with new uses in the HPSP area.

Vehicle trips associated with activities at the HPSP would take place during 2020 and would have an impact on the existing environment. Accordingly, the roadway noise associated with this development within the HPSP area are considered as part of the Adjusted Baseline. No other changes to the existing environmental setting related to noise would occur under the Adjusted Baseline.

4.10.5.2 Summary of Surrounding Land Uses

The proposed Project is located in the central portion of the City, within the Downtown TOD Plan,[46] and extends south along Market Street to Manchester, and then south along Prairie Avenue to Hardy Street.

46 City, New Downtown and Fairview Heights Transit Oriented Development Plan and Design Guidelines, (adopted November 1, 2016), accessed March 2019, http://inglewood.arroyogroup.com/wp-content/uploads/2017/01/The-New-Downtown-Fairview-Heights-TOD-Plan-Design-Guidelines-lo-res.pdf.

The southern portion of the proposed Project is adjacent to the Hollywood Park Specific Plan (HPSP)[47] development site.

The Downtown TOD Plan areas contain a variety of building types and designs and architectural styles. Open spaces within the Downtown TOD Plan area consist of man-made parks, plazas, the Inglewood Cemetery, and landscaped areas that also have an urban and developed character.

Land uses are well balanced in downtown Inglewood with the concentration of commercial retail uses in the historic core. Land uses within Downtown TOD consists of residential uses; retail commercial, and office; and the remainder consists of public services/facilities, industrial, and vacant parcels. The residential neighborhoods in Downtown Inglewood contain a mix of single-family homes, duplexes, or triplexes, along with apartments or townhomes.

The Downtown District is a pedestrian-scaled area with historic commercial buildings that provide retail and office uses. This district contains many buildings of architectural, historic, and cultural significance that help define its visual character. These buildings include, but are not limited to: Fox West Coast Theater, Bank of Inglewood, Lepper Building, S.H. Kress Store, and the Inglewood Veterans Memorial Building. The area centered on Hillcrest Boulevard between Regent Street and Grace Avenue, which consists entirely of single-family dwellings. Industrial uses are generally located west of La Brea Boulevard, with additional industrial uses north of Florence Avenue east of La Brea.

Located immediately to the south of The Forum, the former Hollywood Park Racetrack on Prairie Avenue between Arbor Vitae Street and Century Boulevard is being redeveloped as part of the HPSP with major new development. The HPSP, which was adopted in 2009, which is a large mixed-use development, including high density residential, retail space, office development, a relocated casino, hotel, four acres of civic uses, and 25 acres of new public parks, including a large lake.

As the result of the current construction of SoFi stadium, development plans for the Hollywood Park site were expanded to add the area between Pincay Drive and Arbor Vitae Street, and to reorganize the northern part of the site, enabling room for the stadium and its parking lots, along with increasing retail and office capacity to 890,000 SF and 780,000 SF, respectively.

The HPSP is located in a developed area which is supported by existing urban infrastructure. The surrounding area is comprised of a mix of low- to medium-density residential, commercial, and office uses.

47 City of Inglewood, Hollywood Park Specific Plan, adopted July 8, 2009, amended September 23, 2014, and further amended February 24, 2015.

The properties immediately to the west of the HPSP (across Prairie Avenue) are several single-story retail/commercial and multifamily residential uses.

4.10.5.3 Sensitive Receptors

Some land uses are considered more sensitive to intrusive noise than others based on the types of activities typically involved at the receptor location. Land uses considered to be noise sensitive, as identified in the City's General Plan Noise Element[48], includes residences, schools, hospitals, libraries, and parks. Residential land uses are considered especially noise sensitive because (1) considerable time is spent by individuals at home, (2) significant activities occur outdoors, and (3) sleep disturbance is most likely to occur in a residential area. The Federal Highway Administration (FHWA) considers uses where people normally sleep, such as residences, hotels, and motels, noise-sensitive land uses.[49] Commercial and industrial uses are not considered noise-sensitive by either the City or FHWA. However, for purposes of this analysis, adjacent commercial and industrial uses that are considered vibration-sensitive are listed below.

Land uses adjacent to and within a quarter mile radius of the proposed Project, including the guideway and stations and the MSF, include noise sensitive receptors, including single and multifamily residences (identified as Category 2 uses), schools, places of worship, medical offices (identified as Category 3 uses), and hotels (see **Section 4.0**, *4.0.7*). For the purpose of presenting the results of the potential noise impact analyses in this EIR, the noise sensitive receptors nearest to the proposed Project have been organized into groups by geographic proximity as shown **Figure 4.10-5: Noise Sensitive Receptor Groups**. These receptor groups are used in this EIR to provide a representation of the potential noise impacts on noise-sensitive receptors around the proposed Project and represent the areas where baseline noise monitoring was conducted. Although the receptor groups shown do not include all the receiver points evaluated in the noise modeling analyses, these identified groups include all noise-sensitive receptors nearest to the proposed Project and represent the greatest potential for noise impacts. Adjacent commercial and industrial uses that are not noise-sensitive (specifically, receptor groups Site A – Commercial uses along E. Queen Street, Site D – Commercial uses along Prairie Avenue; lodging uses along W. Century Boulevard, Site E – Commercial and lodging uses along the southern portion of W. Century Boulevard, Site J – Commercial uses along E. Manchester Boulevard, and Site K – Commercial uses along E. Regent Street) but considered vibration-sensitive (as discussed in more detail below), are also listed in the prior locations for informational purposes. As such, the areas where noise and vibration monitoring was conducted along

48 City of Inglewood, Inglewood General Plan: Noise Element, September 1987, https://www.cityofinglewood.org/DocumentCenter/View/130/Noise-Element-1987-PDF. Accessed December 2018.

49 Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, p. 23, September 2018, accessed October 2020, https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf

the proposed alignment and stations are comprised of the following uses:

Market Street Segment

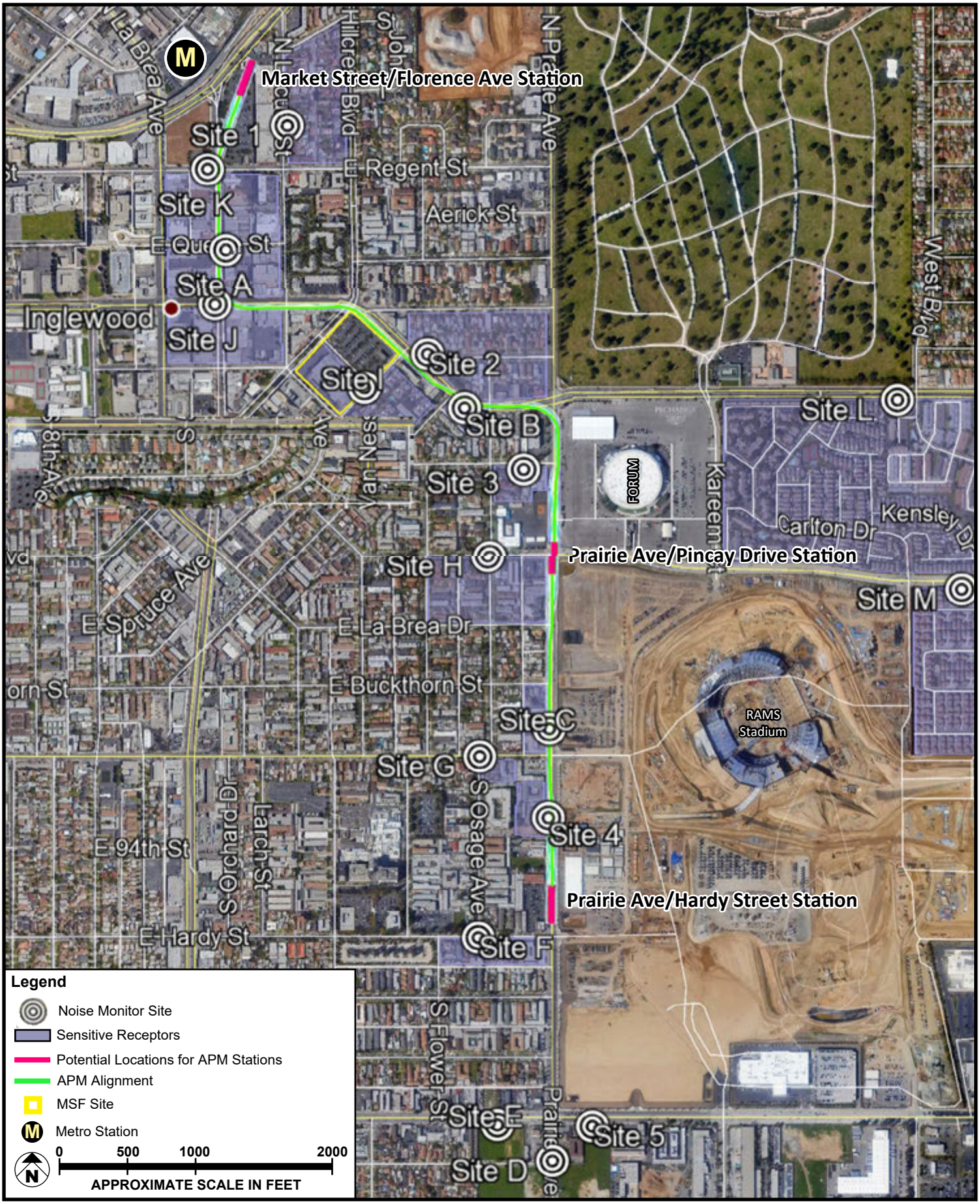
- **Site 1:** Residential uses to the west of N. Locust Street including the Holy Faith Episcopal Church, commercial uses to the east of N. Locust Street;
- **Site A:** Commercial uses along E. Queen Street; and
- **Site K**: Commercial uses along E. Regent Street.

Manchester Boulevard Segment

- **Site 2:** Residential uses along E. Manchester Boulevard, Manchester Drive and S. Osage Avenue;
- **Site B:** Residential uses on the northern portion of E. Manchester Boulevard, commercial uses on the southern portion of E. Manchester Boulevard;
- **Site I:** Residential uses on the eastern portion of E. Spruce Avenue, commercial uses on the western portion of E. Spruce Avenue;
- **Site J:** Commercial uses along E. Manchester Boulevard; and
- **Site L:** Residential uses along W. Manchester Boulevard.

Prairie Avenue Segment

- **Site 3:** Residential uses along E. Nutwood Street, educational facilities along Prairie Avenue;
- **Site 4:** Mixed-use residential along west side of Prairie Avenue;
- **Site H:** Residential uses on the northern and southern portion of E. Kelso Street; educational uses on the corner of Prairie Avenue and Kelso Street;
- **Site G:** Residential uses along E. Arbor Vitae Street;
- **Site M:** Residential uses along Pincay Drive;
- **Site F:** Multifamily residential uses along E. Hardy Street;
- **Site C:** SoFi Stadium to the west of Prairie Avenue, commercial and lodging uses to the east of Prairie Avenue;
- **Site 5:** Lodging uses on the southern portion of W. Century Boulevard;
- **Site D:** Commercial uses along Prairie Avenue; lodging uses along W. Century Boulevard; and
- **Site E:** Commercial and lodging uses along the southern portion of W. Century Boulevard.



SOURCE: Google Earth - 2020; Meridian Consultants LLC - 2020

FIGURE **4.10-5**

Noise Sensitive Receptor Groups

251-003-20

4.10.5.4 Noise

Ambient Noise

The immediate area surrounding the proposed Project is highly urbanized with multiple noise sources including, but not limited to, traffic on local and arterial streets, aircraft arrivals to and departures from LAX, and commercial and industrial activity (e.g., truck loading/unloading).

To establish baseline noise conditions, long-term 24-hour noise levels (refer to **Appendix 4.10-1.1**) were monitored at five representative receptor locations (identified as Sites 1 to 5) in the vicinity of the proposed guideway and stations, and at the proposed MSF site. Thirteen (13) additional locations (Site A through M) were monitored on two nonsuccessive days, measured as one-hour measurements (refer to **Appendix 4.10-2.2**). The daytime (AM peak) ambient noise levels were measured between 7:00 AM and 10:00 AM, and the evening (PM peak) ambient noise levels were measured between 4:00 PM and 7:00 PM.

Table 4.10-11: Long-term (24-hour) Ambient Noise Measurements provides a summary of the ambient noise measurements conducted at the five selected noise receptor locations for a 24-hour period. Based on field observations, the ambient noise at the measurement locations is dominated by local vehicular traffic and, to a lesser extent, airplane flyovers and other typical urban noises. As shown, the existing 24-hour ambient noise levels (CNEL) at the off-site noise receptor locations ranged from a low of 63.7 dBA CNEL at residential use at Site 1 (Residential uses to the west of N. Locust Street including the Holy Faith Episcopal Church, commercial uses to the east of N. Locust Street) to a high of 80.6 dBA CNEL at the residential uses at Site 4 (Mixed-use residential along west side of Prairie Avenue). In terms of the City's land use noise compatibility categories, locations range from clearly compatible to clearly incompatible. Specifically, the noise exposure compatibility categories are summarized as follows:

- Clearly Compatible: Locations where residential uses are dominant along Locust Avenue (Site 1) and Manchester Boulevard (Site 2) with nighttime averages falling within this category.
- Normally Compatible: Locations where residential uses are dominant along Locust Avenue (Site 1) and Manchester Boulevard (Site 2) with daytime averages and 24-hour CNEL falling within this category. Additionally, nighttime averages of the residential uses along Nutwood Street (Site 3) and lodging uses along Century Boulevard (Site 5) fall within this category.
- Normally Incompatible: Locations where residential uses are dominant along Nutwood Street (Site 3) and lodging uses along Century Boulevard (Site 5) with daytime averages and 24-hour CNEL falling within this category. Additionally, locations where commercial uses are dominant along Prairie Avenue (Site 4) with daytime and nighttime averages falling with this category.
- Clearly Incompatible: Locations where commercial uses are dominant along Prairie Avenue (Site 4) with 24-hour CNEL averages falling within this category.

Table 4.10-12: Short-term (1-hour) Ambient Noise Measurements (Daytime) provides the one-hour measurements during the AM and PM peak hours at the 13 selected noise receptor locations (refer to **Appendix 4.10-1.2**). As shown, the existing 1-hour ambient noise levels (dBA Leq) at the off-site noise receptor locations ranged from a low of 62.7 dBA Leq at the residential uses at Site F (Multifamily residential uses along E. Hardy Street) during the AM period to a high of 76.6 dBA Leq at the residential uses at Site M (Residential uses along Pincay Drive) during the PM period. In terms of the City's land use noise compatibility categories, locations range from clearly compatible to clearly incompatible. Specifically, the noise exposure compatibility categories are summarized as follows:

- Clearly Compatible: Locations where public uses are dominant along Market Street (Site K).
- Normally Compatible: Locations where residential uses are dominant along Queen Street (Site K), Manchester Boulevard (Site I), Arbor Vitae Street (Site G), Kelso Street (Site H) and Hardy Street (Site F).
- Normally Incompatible: Land uses where commercial uses are dominant along Market Street (Site J), where residential uses are dominant along Manchester Boulevard (Site L), where lodging uses are dominant along Prairie Avenue (Site D) and Century Boulevard (Site E), and where education uses are dominant along Manchester Boulevard (Site B) and Kelso Street (Site H).
- Clearly Incompatible: Land uses where places of worship are dominant on Prairie Avenue (Site C).

Table 4.10-13: Short-term (15-minute) Ambient Noise Measurements (Nighttime) provides the 15-minute measurements during the nighttime period after 8:00 PM at the 13 selected noise receptor locations (refer to **Appendix 4.10-1.3**). As shown, the existing short-term 15-minute noise levels during the nighttime ranged from a low of 56.6 dBA Leq at Site H (Residential uses on the northern and southern portion of E. Kelso Street; educational uses on the corner of Prairie Avenue and Kelso Street) to a high of 72.8 dBA Leq at Site L (Residential uses along W. Manchester Boulevard). In terms of the City's land use noise compatibility categories, locations range from clearly compatible to clearly incompatible. Specifically, the noise exposure compatibility categories are summarized as follows:

- Clearly Compatible: Land uses where residential uses are dominant along Queen Street (Site A), Manchester Boulevard (Site I), Kelso Street (Site H), and Hardy Street (Site F). Additionally, where commercial uses are dominant along Market Street (Site J and K).
- Normally Compatible: Land uses where residential uses are dominant along Arbor Vitae Street (Site G), Chapman Lane (Site M). Additionally, where lodging uses are dominant along Prairie Avenue (Site D) and Century Boulevard (Site E).
- Normally Incompatible: Land uses where residential uses are dominant along Manchester Boulevard (Site L). Additionally, where educational uses are dominant along Manchester Boulevard (Site B) and where place of worship uses are dominant along Prairie Avenue (Site C).
- Clearly Incompatible: None.

Table 4.10-11
Long-term (24-hour) Ambient Noise Measurements

Site	Address	Existing Land Use	Monitored Date	CNEL (dBA)	Daytime Average (dBA Leq)[1]	Nighttime Average (dBA Leq)[2]	Noise Exposure Compatibility Category
Market Street Segment							
1	220 Locust Avenue	Residential	November 14, 2018	63.7	61.9	54.6	Clearly/Normally Compatible
			November 15, 2018	65.7	65.6	55.1	Clearly/Normally Compatible
Manchester Boulevard Segment							
2	607 Manchester Boulevard	Residential	November 14, 2018	67.7	65.0	59.4	Clearly/Normally Compatible
			November 15, 2018	67.5	64.1	59.6	Clearly/Normally Compatible
Prairie Avenue Segment							
3	818 Nutwood Street	Residential	November 14, 2018	74.1	71.2	66.0	Normally Compatible/Normally Incompatible
			November 15, 2018	75.2	71.5	67.5	
4	923 Prairie Avenue	Commercial	November 14, 2018	80.1	78.0	71.6	Normally Incompatible/Clearly Incompatible
			November 15, 2018	80.6	77.2	72.8	
5	3940 Century Boulevard	Lodging	November 14, 2018	77.6	73.3	70.2	Normally Compatible/Normally Incompatible
			November 15, 2018	77.6	73.7	70.0	

*Source: Refer to **Appendix 4.10-1: Long-Term (24-hour) Ambient Noise Measurement Sheets** for monitoring data sheets.*
Note:
[1] Daytime period (Lday) includes 7:00 AM to 10:00 PM.
[2] Nighttime period (Lnight) includes 10:00 PM to 7:00 AM.

Table 4.10-12
Short-term (1-hour) Ambient Noise Measurements (Daytime)

Site	Approximate Address	Existing Land Use	Monitored Date	1-hour Leq (dBA)		Average	Noise Exposure Compatibility Category
				AM Peak Hour	PM Peak Hour		
Market Street Segment							
J	201 Market Street	Commercial/Mixed Use	December 17, 2018 December 19, 2018	73.3 73.8	73.2 73.9	73.6	Normally Incompatible
K	205 Market Street	Public	November 26, 2018 November 28, 2019	67.1 69.1	68.0 64.6	67.5	Clearly/Normally Compatible
A	300 Queen Street	Residential	November 26, 2018 November 28, 2018	64.2 63.5	64.1 64.6	64.1	Normally Compatible
Manchester Boulevard Segment							
L	3500 Manchester Boulevard	Residential	December 17, 2018 December 19, 2018	73.9 74.5	74.2 73.4	74.0	Normally Incompatible
I	500 Manchester Boulevard	Residential	December 11, 2018 December 13, 2018	69.5 67.6	66.6 67.8	68.0	Normally Compatible
B	712 Manchester Boulevard	Educational	December 11, 2018 December 13, 2018	72.1 76.1	71.2 72.9	73.5	Normally Incompatible
Prairie Avenue Segment							
G	629 Arbor Vitae Street	Residential	December 11, 2018 December 13, 2018	64.3 68.0	67.0 68.8	67.3	Normally Compatible
H	728 Kelso Street	Educational/Residential	December 17, 2018 December 19, 2018	68.1 65.4	69.1	67.6	Normally Compatible/Normally Incompatible
M	3681 Chapman Lane	Residential	December 17, 2018 December 19, 2018	72.8 73.2	75.9 76.6	74.9	Normally Incompatible
F	636 Hardy Street	Residential	January 21, 2019 January 23,2019	62.7 71.5	63.8 70.9	68.8	Normally Compatible

Site	Approximate Address	Existing Land Use	Monitored Date	1-hour Leq (dBA)		Average	Noise Exposure Compatibility Category
				AM Peak Hour	PM Peak Hour		
C	823 Prairie Avenue	Place of Worship/Lodging	December 11, 2018	77.3	76.1	76.7	Normally/Clearly Incompatible
			December 13, 2018	77.1	76.2		
D	10023 Prairie Avenue	Lodging	November 27, 2018	75.1	78.5	76.2	Normally Incompatible
			December 4, 2018	74.4	75.4		
E	4020 Century Boulevard	Lodging	November 27, 2018	72.8	71.7	72.6	Normally Incompatible
			December 4, 2018	73.1	72.7		

*Source: Refer to **Appendix 4.10-2: Short-term (1-hour) Ambient Noise Measurement (Daytime)** for monitoring data sheets.*

Note: Two sets of measurements were taken on nonsuccessive days for each site. AM Peak hour measurements taking place between 7:00 AM to 10:00 AM. PM peak hour measurements took place between 4:00 PM to 7:00 PM.

Table 4.10-13
Short-term (15 minute) Ambient Noise Measurements (Nighttime)

Site	Approximate Address	Existing Land Use	Monitored Date	15-minute dBA	Noise Exposure Compatibility Category
Market Street Segment					
J	201 Market Street	Commercial/Mixed Use	August 3, 2020	69.1	Cleary Compatible
K	205 Market Street	Public	August 3, 2020	63.4	Cleary Compatible
A	300 Queen Street	Residential	August 3, 2020	57.8	Cleary Compatible
Manchester Boulevard Segment					
L	3500 Manchester Boulevard	Residential	August 4, 2020	72.8	Normally Incompatible
I	500 Manchester Boulevard	Residential	August 3, 2020	58.5	Cleary Compatible
B	712 Manchester Boulevard	Educational	August 4, 2020	70.5	Normally Incompatible
Prairie Avenue Segment					
G	629 Arbor Vitae Street	Residential	August 5, 2020	61.5	Normally Compatible
H	728 Kelso Street	Educational/Residential	August 4, 2020	56.6	Cleary Compatible
M	3681 Chapman Lane	Residential	August 4, 2020	67.9	Normally Compatible
F	636 Hardy Street	Residential	August 5, 2020	59.9	Cleary Compatible
C	823 Prairie Avenue	Place of Worship/Lodging	August 5, 2020	70.6	Normally Incompatible
D	10023 Prairie Avenue	Lodging	August 5, 2020	67.0	Normally Compatible
E	4020 Century Boulevard	Lodging	August 5, 2020	66.2	Normally Compatible

*Source: Refer to **Appendix 4.10-3: Short-term (15-minute) Ambient Noise Measurements (Nighttime)** for monitoring data sheets.*
Note: Nighttime measurements took place between 8:00 PM to 9:45 PM.

Roadway Noise

Adjusted baseline conditions include socio-economic and demographic components, and transportation network components that are currently under construction or have building permits issued by the City in the immediate vicinity of the ITC Project alignment. Accordingly, as explained in Traffic Study (refer to **Appendix 4.12.1**) the travel demand forecasting model used in the process was updated as required to reflect these assumptions.

The adjusted baseline traffic noise on local roadways in the surrounding areas was calculated to quantify the daytime and nighttime noise levels using information provided by the Traffic Study (see **Appendix 4.12.1**). As previously noted, a total of 26 intersections and corresponding roadway segments were selected for the existing off-site traffic noise analysis, based on proximity to noise sensitive uses along the roadway segments and potential increases in traffic volume from the proposed Project.

Trip generation associated with the buildout and operation of the Adjusted Baseline (see **Section 4.0**, *4.0.5: Adjusted Baseline*) has been estimated and traffic volumes in the area surrounding the proposed Project have been projected to establish the Adjusted Baseline traffic environment along the roadway segments selected for analysis. Additionally, trip generation associated with events at the SoFi Stadium, The Forum, and concurrent events at both venues has been estimated and traffic volumes projected to establish the combined traffic environment during which one or more events are being held.

Appendix 4.10.2-6 provides the roadway noise levels for the adjusted baseline traffic levels in details. As shown, adjusted baseline roadway noise levels during the daytime ranged from a low of 55.8 dBA along Market Street from Florence Avenue to Regent Street to a high of 72.5 dBA along Century Boulevard between Grevillea Avenue and La Brea Avenue/Hawthorne Boulevard. Additionally, nighttime roadway noise levels ranged from a low of 48.2 along Market Street from Florence Avenue to Regent Street to a high of 64.3 dBA along Century Boulevard from Club Drive to Crenshaw Boulevard.

Aircraft Noise

The nearest public use airports to the proposed Project include LAX and Jack Northrop Field/Hawthorne Municipal Airport (HHR). There are no private airstrips located in the vicinity of the proposed Project.

The Planning Boundary for LAX represents the combined areas around the airport subject to potential noise impacts and safety hazards associated with airport operations. The ALUP[50] provides noise and safety policies governing development of compatible future land uses in areas around LAX. Portions of the alignment between south Market Street, along Manchester Boulevard and south Prairie Avenue are

50 Los Angeles County Airport Land Use Plan, 1991, Contour Map, http://planning.lacounty.gov/view/alup/

located within the Planning Boundary/Airport Influence Area established for LAX in the Los Angeles County ALUP[51] Map for LAX as shown in **Figure 4.10-6: ALUP Noise Contours**. Portions of the proposed Project between south Market Street, along Manchester Boulevard and south prairie Street are located within the CNEL 65 dBA contour established for LAX in the ALUP (see **Figure 4.10-4**).[52]

Groundborne Noise

Groundborne noise levels in residential areas similar to the Project area would generally be 20 to 50 decibels lower than the velocity level depending on the frequency level of the source.[53] With a background groundborne vibration level is residential areas of 50 VdB or lower, groundborne noise levels would be approximately 0 to 30 dBA. A bus traveling at a distance of 50 feet would generate groundborne noise levels of approximately 23 to 38 dBA. Typical vibration from construction equipment would fall under the low frequency range with vibratory equipment such as pile drivers falling in the mid frequency range.[54] With a vibration velocity of 108 VdB at five feet from the source, a large bulldozer would generate groundborne noise level of approximately 58 dBA. The approximate level of human perception of groundborne noise is 25 dBA for low frequency vibration (near 30 Hz) and 40 dBA for mid-frequency vibration (near 60 Hz).[55]

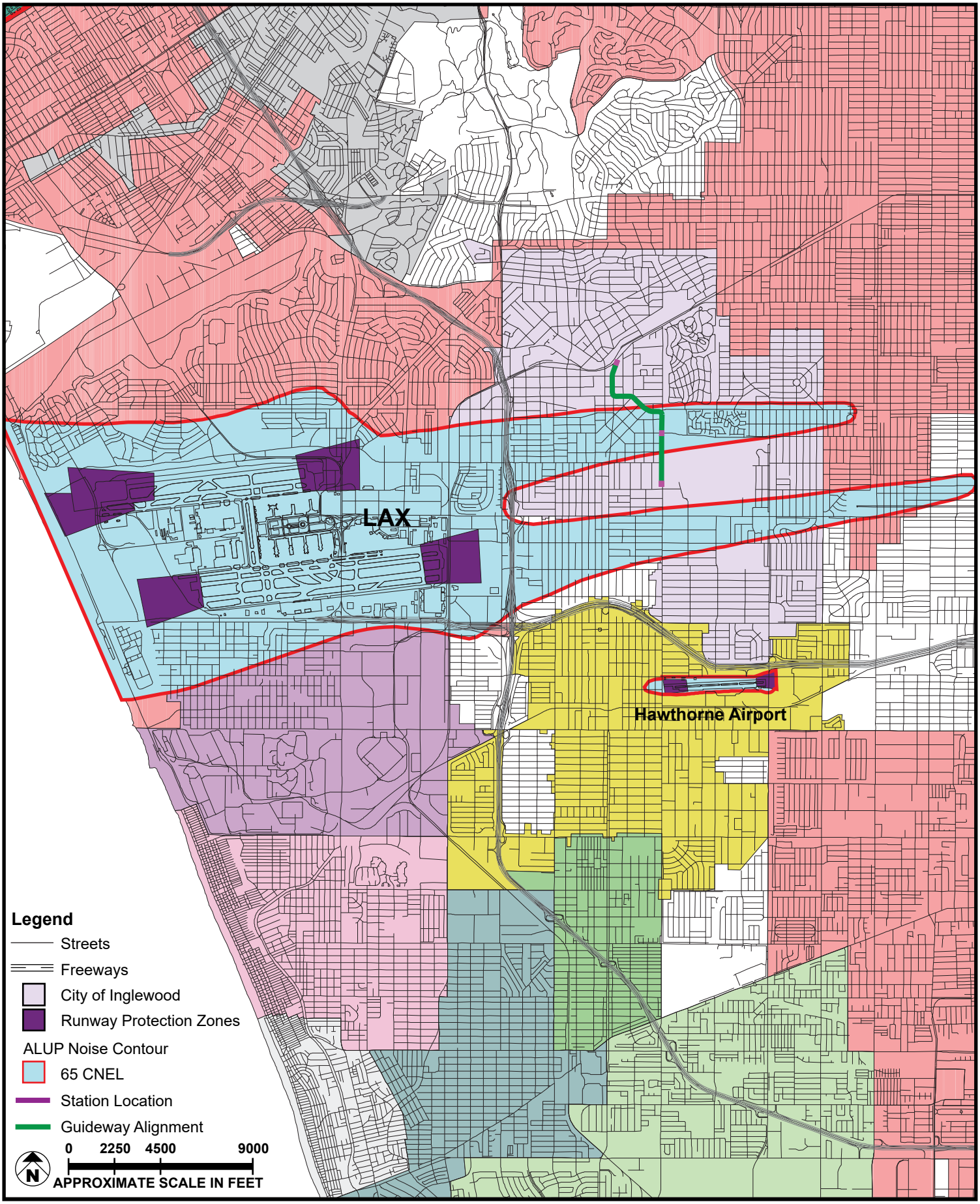
51 Los Angeles County Airport Land Use Plan, 1991, Los Angeles Internal Airport Contour Map, http://planning.lacounty.gov/view/alup/

52 Los Angeles County Airport Land Use Plan, 1991, Los Angeles Internal Airport Contour Map, http://planning.lacounty.gov/view/alup/

53 Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, p. 146, September 2018, accessed October 2020, https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf

54 Roberts, Cedric, Construction Noise and Vibration Impact on Sensitive Premises, p. 6, November 23 – 25, 2009, accessed October 2020, https://www.acoustics.asn.au/conference_proceedings/AAS2009/papers/p11.pdf

55 Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, p. 120, September 2018, accessed October 2020, https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf



SOURCE: Google Earth - 2020; Meridian Consultants LLC - 2020

FIGURE **4.10-6**

ALUP Noise Contours

251-003-20

4.10.5.2 Vibration

Groundborne Vibration

The groundborne vibration level in residential areas is usually 50 VdB or lower, well below the threshold of perception for humans, which is around 65 VdB.[56] Most perceptible indoor vibration is caused by sources within buildings such as operation of mechanical equipment, movement of people or slamming of doors. Typical outdoor sources of perceptible groundborne vibration are construction equipment, steel-wheeled trains, and traffic on rough roads. If the roadway is smooth, the vibration from traffic is rarely perceptible. Although not sources of groundborne vibration, noise-induced building responses such as rattling of windows and walls from aircraft flyovers contribute to the existing vibration setting. The primary sources of existing groundborne vibration in the area surrounding the Project area would be from adjacent industrial activities, including truck travel, heavy-duty vehicular travel (bus, refuse trucks, delivery trucks, etc.) on local roadways, and aircraft flyovers. A bus traveling at a distance of 50 feet typically generates groundborne vibration velocity of 63 VdB (approximately 0.006 in/sec PPV).[57] Aircraft flyovers could generate vibration levels that would cause human annoyance; however, they would not generate building vibration levels that would cause building damage.[58]

Ambient Vibration

An ambient vibration monitoring survey was undertaken to establish existing ground-borne vibration levels at various locations near the proposed Project. Existing vibration monitoring was conducted to provide data on ambient ground-borne vibration generated by traffic and operation of activities. The locations of the vibration monitoring selected were either adjacent to sensitive land uses (residences and hotels) or buildings that were close to where the components of the proposed Project would be constructed. Five ground vibration monitoring locations were established, as shown on **Figure 4.10-5**.

Table 4.10-14: 24-hour Vibration Measurements in Project Vicinity shows vibration velocities attributed to road traffic and normal operations of establishments in the area. The vibration velocity is expressed in vibration decibels (VdB) and is the maximum RMS value measured on the frequency range between 8 and 80 Hz. As shown, the average vibration velocities ranged from a low of 52 VdB at Site 1 at 220 Locust Avenue to a high of 67 VdB at Site 5 at 3940 Century Boulevard. It is important to note, Site 5 is located outside of the guideway of the proposed Project. Maximum vibration velocities within the proposed

56 Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, p. 113, September 2018, accessed October 2020, https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf

57 Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, p. 113, September 2018, accessed October 2020, https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf

58 National Aeronautics and Space Administration, Building Vibrations Induced by Noise from Rotorcraft and Propeller Aircraft Flyovers, p. 10, June 1992.

Project is 62 VdB at Site 4 at 923 Prairie Avenue. These vibration velocities are considered to be below the approximate threshold of perception for many humans of 72 VdB as established by the FTA. [59]

Table 4.10-14
24-hour Vibration Measurements in Project Vicinity

Site	Address	Existing Land Use	24-HR VdB
Market Street Segment			
1	220 Locust Avenue	Residential Development	52
Manchester Boulevard Segment			
2	607 Manchester Boulevard	Residential Development	60
Prairie Avenue Segment			
3	818 Nutwood Street	Educational/Residential Development	60
4	923 Prairie Avenue	Residential Development	62
5	3940 Century Boulevard	Lodging	67

*Source: Refer to **Appendix 4.10-5** for Vibration monitoring data sheets.*
Note: Vibration measurements were conducted on November 16, 2018.

4.10.6 THRESHOLDS OF SIGNIFICANCE

The project would have a significant impact in relation to noise and vibration if it were to result in:

Threshold NOI-1 **Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?**

Threshold NOI-2 **Generation of excessive groundborne vibration or groundborne noise levels?**

4.10.6.1 Construction Noise

The City has not adopted thresholds of significance for analysis of impacts from noise. Section 5-41 of the City's Municipal Code[60] regulates construction noise and specifies restrictions for work occurring within a residential zone or within a radius of 500 feet between the hours of 8:00 PM and 7:00 AM. Pursuant to Section 5-41, it is unlawful for any person within a residential zone, or within a radius of 500 hundred feet therefrom, to operate equipment or perform any outside construction or repair work on buildings, structures, or projects or to operate any pile driver, pneumatic hammer, derrick, excavation or earth

59 US Department of Transportation, Federal Transit Administration (USDOT, FTA), Transit Noise and Vibration Impact Assessment, FTA report no. 0123 (September 2018), accessed December 2018, https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf.

60 City of Inglewood, Municipal Code, Article 2, Noise Regulations. Section 5-41, Construction of Building and Projects, Noise Regulated 41http://www.qcode.us/codes/inglewood/?view=desktop&topic=5-2

moving equipment, or other construction equipment between the hours of 8:00 PM and 7:00 AM of the next day in such a manner that a reasonable person residing in the area is caused discomfort or annoyance unless a permit has been obtained from the Permits and Licenses Committee of the City. The prohibition of nighttime construction in or near residential zones, without first obtaining a permit authorizing such nighttime construction (8:00 PM to 7:00 AM), reflects that the City does not regulate construction noise during daytime hours (7:00 AM to 8:00 PM).

Because the proposed Project would include construction between the hours of 8:00 PM and 7:00 AM throughout the project construction period (all phases), for this EIR the City has elected to identify a threshold of significance to apply to the proposed nighttime construction work for identified time period mentioned in Section 5-41. Further, because of the unique size, scale, planned construction schedule, and proximity of the proposed Project to noise sensitive uses, for this EIR the City has elected to apply a threshold of significance for daytime construction noise, which could occur on a fluctuating and intermittent basis throughout the construction period. For the reasons described above, the City has decided that in this EIR it will define "a substantial temporary or permanent increase in ambient noise levels" during construction as an exceedance in existing ambient exterior noise levels by 5 dBA Leq 1-hour or more at a noise sensitive use during the daytime (7:00 AM to 10:00 PM) and nighttime (10:00 PM to 7:00 AM) period.

As stated previously, the use of these thresholds in this Draft EIR responds to the unique circumstances of the proposed Project and its alignment along the fixed guideway corridor. By utilizing these quantitative thresholds in this Draft EIR, the City is not making a decision whether to use these thresholds in CEQA documents on other proposed projects in the future. The City would, however, retain its authority as CEQA lead agency to utilize these or other thresholds, including relying exclusively on the provisions of Municipal Code section 5-41,[61] for the consideration of construction noise, as appropriate to the circumstances of other projects in the future.

4.10.6.2 Operational Noise

For operational impacts, the City recognizes that such impacts occur on the long-term, and, as a result, the City has determined that in this case the significance threshold should be more conservative, specifically in areas where sensitive receptors are already exposed to above acceptable levels. As such, an increase in noise level of 3 dBA Leq to or within the "normally unacceptable" or "clearly unacceptable" land use compatibility categories is considered significant. For residential – low density single-family, duplex, mobile home and multifamily uses and schools, libraries, churches, hospitals, and nursing homes

61 City, Municipal Code, Article 2, Noise Regulations. Section 5-41, Construction of Building and Projects, Noise Regulated 41http://www.qcode.us/codes/inglewood/?view=desktop&topic=5-2

– the upper limit for Conditionally Acceptable noise exposures is 70 dBA DNL or CNEL. For office buildings, business commercial and profession uses the upper limit for Conditionally Acceptable noise exposures is 77.5 dBA DNL or CNEL.

As described above, the City has adopted Noise Regulations[62] that prohibit noise in excess of specified levels, depending on base ambient noise levels, the nature of the use where noise levels are measured, and the duration period of such noise. The Noise Regulations may prohibit any increase in ambient noise levels under specified circumstances. The City has not previously relied on the Noise Regulations to serve as significance thresholds for operational noise. The City has determined that the Noise Regulations should not serve as operational noise thresholds for the proposed Project. The reason for this determination is that an increase in ambient noise would be imperceptible, or at most barely perceptible, where that increase is less than 3 dBA. Such an increase in ambient noise levels would not have a significant effect on the physical environment. The City has instead determined that the threshold should be set at a level that is actually perceivable. Additionally, the more a new source of noise exceeds the ambient noise level, the less acceptable the new noise will be judged by those hearing it. With regard to increases in A-weighted noise levels, a 10 dBA change is subjectively heard as approximately doubling in loudness, and can cause adverse response.[63] As such, in the event the resulting noise levels remain within acceptable noise limits, an increase of 10 dBA or more is considered significant.

In the cumulative context, the proposed Project's noise and vibration impacts are considered in conjunction with other reasonably foreseeable development, using the same thresholds set forth above.

4.10.6.3 Groundborne Noise

According to the FTA, airborne noise levels would be higher than groundborne noise levels.[64] Unless indoor receptors have substantial sound insulation (e.g., recording studio) and would be exposed to vibration velocities great enough to cause substantial levels of groundborne noise, groundborne noise does not need to be assessed. There are no substantially insulated indoor receptors located within the area surrounding the proposed guideway vicinity. Therefore, the effects of airborne noise would continue to be higher than groundborne noise levels. In addition, groundborne noise generated by a large bulldozer within five feet of a receptor building would reach an approximate level of 58 dBA, which is not greater

62 City, Municipal Code, Article 2, Noise Regulations. http://www.qcode.us/codes/inglewood/?view=desktop&topic=5-2.

63 California Department of Transportation, *Technical Nosie Supplement,* September 2013, accessed December 2020, https://dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/env/tens-sep2013-a11y.pdf

64 Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, p. 112, September 2018, accessed October 2020, https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf

than the airborne noise levels generated by construction equipment discussed below. As such, impacts related to groundborne noise are not discussed further.

4.10.6.4 Groundborne Vibration

Construction activity can result in varying degrees of ground vibration, depending on the equipment and methods employed. Operation of construction equipment causes ground vibrations that spread through the ground and diminish in strength with distance. Buildings founded on the soil near the construction site respond to these vibrations with varying results, ranging from no perceptible effects at the lowest levels, low rumbling sounds and perceptible vibrations at moderate levels, and slight damage at the highest levels.

There are no adopted City standards or thresholds of significance for vibration. The evaluation of potential building damage impacts related to construction vibration levels is based on the published data in the FTA guidelines.[65] While ground vibrations from construction activities do not often reach the levels that can damage structures, fragile buildings must receive special consideration. As such, the vibration damage criteria adopted by the FTA and applied in this analysis are listed below:

- Reinforced-concrete, steel, or timber (no plaster) would exceed 0.5 peak particle velocity (PPV) (inches per second);66
- Engineered concrete and masonry (no plaster) would exceed 0.3 PPV;
- Nonengineered timber and masonry buildings would exceed 0.2 PPV;
- Buildings extremely susceptible to vibration damage would exceed 0.12 PPV.

The PPV is defined as the maximum instantaneous positive or negative peak of the vibration and is often used in monitoring of vibration because it is related to the stresses experienced by structures. The FTA has also adopted standards associated with human annoyance for groundborne vibration impacts for the following three-land use categories: (1) Category 1, High Sensitivity; (2) Category 2, Residential; and (3) Category 3, Institutional.

- **Category 1** refers to buildings where vibration would interfere with operations within the building, including vibration-sensitive research and manufacturing facilities, hospitals with vibration-sensitive equipment, and university research operations. Vibration-sensitive equipment includes, but is not

65 US Department of Transportation, Federal Transit Administration (USDOT, FTA), Transit Noise and Vibration Impact Assessment, FTA report no. 0123 (September 2018), accessed December 2018, https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf.

66 When assessing vibration source levels from construction equipment, vibration is generally assessed in terms of peak particle value (PPV). PPV is defined as the peak signal value of an oscillating vibration velocity waveform, expressed in inches per second.

limited to, electron microscopes, high-resolution lithographic equipment, and normal optical microscopes.

- **Category 2** refers to all residential land uses and any buildings where people sleep, such as hotels and hospitals.
- **Category 3** refers to institutional land uses such as schools, churches, other institutions, and quiet offices that do not have vibration-sensitive equipment, but still have the potential for activity interference.

For purposes of this analysis, the human annoyance threshold is 72 VdB for residences and buildings where people normally sleep and 75 VdB for commercial uses, industrial uses, and churches with primarily daytime use.

It is important to note, it is extremely rare for vibration from train operations to cause substantial or even minor cosmetic building damage. However, damage to fragile historic buildings located near the right of way may be of concern. Even in these cases, damage is unlikely except when the track is located very close to the structure.

4.10.7 IMPACT ANALYSIS

Impact NOI-1: **Would the project result in a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?**

Construction

Proposed Project Construction Activities

As previously discussed, construction activity would primarily occur over a 16-hour per day schedule with two shifts, either a Morning/Evening shift from approximately 7:00 AM to 3:00 PM and an evening shift from approx. 3:00 PM to 11:00 PM, or a Morning/Night shift from approximately 7:00 AM to 3:00 PM and a night shift from approximately 11:00 PM to 7:00 AM.[67] There will also be periods when construction activities are scheduled to occur from approximately 11:00 PM to 7:00 AM to accommodate work activities that cannot be accomplished during the daytime shifts (i.e., during large-scale pours of concrete when it would be necessary to maintain a continuous stream of concrete deliveries through multiple shifts). Construction work is assumed to occur seven days a week.

67 **Appendix 3.0.4: ITC Construction Scenarios** in this Draft EIR, June 2020.

Construction noise impacts due to construction activities were determined by comparing the calculated construction-related noise levels of the proposed Project to the measured existing ambient noise levels (i.e., noise levels without construction noise from the proposed Project). Construction noise levels were calculated for each phase of construction (Phases 1 through 4) at the adjacent sensitive receptors.

Phase 1

As described above, Phase 1 includes demolition of commercial property for Market Street/Florence Avenue Station, for retail commercial property on Manchester Boulevard, and the commercial building on the southeast corner of Manchester Boulevard and Market Street. Phase 1 will also include the start of construction for the MSF Structure.

Table 4.10-15: Phase 1 Proposed Project Construction Noise Levels presents the forecasted demolition and construction noise levels generated by construction equipment during Phase 1 of the nearby adjacent sensitive receptors.

As shown, construction noise level increases over the significance threshold during the daytime period would range from a low of 1.2 dBA Leq1-hour at the residential uses at Site 2 located approximately 225 feet from the proposed MSF (Residential uses along E. Manchester Boulevard, Manchester Drive and S. Osage Avenue) to a high of 14.5 dBA Leq1-hour at the residential use at Site 1 located approximately 100 feet from the demolition of the commercial property for the Market Street/Florence Avenue Station (Residential uses to the west of N. Locust Street including the Holy Faith Episcopal Church, commercial uses to the east of N. Locust Street). Additionally, construction noise level increases over the significance threshold during the nighttime period would range from a low of 0.3 dBA Leq1-hour at the residential uses at Site A to a high of 18.8 dBA Leq1-hour at the residential uses at Site 1.

As demonstrated by the evaluation of impacts to noise-sensitive receptors, daytime (7:00 AM to 10:00 PM) and nighttime (10:00 PM to 7:00 AM) construction noise levels from peak construction activity would exceed the 5 dBA threshold of significance over ambient noise levels (Leq) to noise-sensitive receptors.

The proposed Project's construction noise impacts during Phase 1 would be potentially significant.

Table 4.10-15
Phase 1 Proposed Project Construction Noise Levels

Receptor	Existing Land Use	Time Period	Ambient Noise Levels	Construction Noise (Max Leq, 1hr)	Ambient plus Construction Noise[1]	Significance Threshold	Increase Over Significance Threshold	Significant Impact?
			dBA					
Market Street Segment								
Site 1	Residential	Daytime	61.9	81.4	81.4	66.9	+14.5	**Yes**
		Nighttime	54.6	78.4	78.4	59.6	+18.8	**Yes**
Site 2	Residential	Daytime	67.5	72.5	73.7	72.5	+1.2	**Yes**
		Nighttime	64.1	69.5	70.6	69.1	+1.5	**Yes**
Site A	Commercial	Daytime	64.1	64.6	67.4	69.1	--	No
		Nighttime	57.8	61.6	63.1	62.8	+0.3	**Yes**
Manchester Boulevard Segment								
Site 2	Residential	Daytime	67.5	72.5	73.7	72.5	+1.2	**Yes**
		Nighttime	64.1	69.5	70.6	69.1	+1.5	**Yes**
Site B	Residential	Daytime	73.5	64.5	74.0	78.5	--	No
		Nighttime	70.5	61.5	71.0	75.5	--	No
Site I	Residential	Daytime	68.0	81.4	81.6	73.0	+8.6	**Yes**
		Nighttime	58.5	78.4	78.4	63.5	+14.9	**Yes**
Site J	Commercial/Mixed Use	Daytime	73.6	71.5	75.7	78.6	--	No
		Nighttime	69.1	68.5	71.8	74.1	--	No
Prairie Avenue Segment								
Site K	Public	Daytime	67.5	76.9	77.4	72.5	+4.9	**Yes**
		Nighttime	63.4	73.9	74.3	68.4	+5.9	**Yes**

*Source: SoundPLAN (version 8.2). Refer to **Appendix 4.10-4.2** for construction noise (Phase 1) worksheets.*
Note: [1] Logarithmic increase = Ambient Noise + Modeled Construction Level.

Phase 2

As mentioned previously, Phase 2 would continue enabling the construction sequence of the proposed Project along Prairie Avenue from the Hardy Street intersection to Manchester Boulevard. **Table 4.10-16: Phase 2 Proposed Project Construction Noise Levels** presents the forecasted construction noise levels generated by construction equipment during Phase 2 at the nearby adjacent sensitive receptors. As shown, construction noise level increases over the significance threshold during the daytime period would range from a low of 0.5 dBA Leq1-hour at the education/residential uses at Site 3 approximately 145 feet from the construction sequence of the guideway along Prairie Avenue (Residential uses along E. Nutwood Street, educational facilities along Prairie Avenue) to a high of 8.1 dBA Leq1-hour at the residential uses at Site I approximately 95 feet from construction of the MSF (Residential uses on the eastern portion of E. Spruce Avenue, commercial uses on the western portion of E. Spruce Avenue). Additionally, construction noise level increases over the significance threshold during the nighttime would range from a low of 1.5 dBA Leq1-hour at the residential uses at Site 2 located approximately 225 feet from the proposed MSF (Residential uses along E. Manchester Boulevard, Manchester Drive and S. Osage Avenue) to a high of 14.4 dBA Leq1-hour at the residential uses at Site I.

As demonstrated by the evaluation of impacts to noise-sensitive receptors, daytime (7:00 AM to 10:00 PM) and nighttime (10:00 PM to 7:00 AM) construction noise levels from worst-case construction activity would exceed the 5 dBA threshold of significance over ambient noise levels (Leq) to noise-sensitive receptors.

The proposed Project's construction noise impacts during Phase 2 would be potentially significant.

Table 4.10-16
Phase 2 Proposed Project Construction Noise Levels

Receptor	Existing Land Use	Time Period	Ambient Noise Levels	Construction Noise (Max Leq, 1hr)	Ambient plus Construction Noise[1]	Significance Threshold, dBA	Increase Over Significance Threshold	Significant Impacts?
			dBA					
Manchester Boulevard Segment								
Site 2	Residential	Daytime	67.5	72.5	73.7	72.5	+1.2	**Yes**
		Nighttime	64.1	69.5	70.6	69.1	+1.5	**Yes**
Site B	Educational	Daytime	73.5	66.1	74.2	78.5	--	No
		Nighttime	70.5	63.1	71.2	75.5	--	No
Site I	Residential	Daytime	68.0	80.9	81.1	73.0	+8.1	**Yes**
		Nighttime	58.5	77.9	77.9	63.5	+14.4	**Yes**
Site L	Residential	Daytime	74.0	58.3	74.1	79.0	--	No
		Nighttime	72.8	55.3	72.9	77.8	--	No
Prairie Avenue Segment								
Site 3	Education/Residential	Daytime	71.2	75.2	76.7	76.2	+0.5	**Yes**
		Nighttime	66.0	72.2	73.1	71.0	+2.1	**Yes**
Site 4	Residential	Daytime	77.2	71.0	78.1	81.2	--	No
		Nighttime	71.6	68.0	73.1	76.6	--	No
Site C	Place of worship/Lodging	Daytime	76.7	86.5	86.9	81.7	+5.2	**Yes**
		Nighttime	70.6	83.5	83.7	75.6	+8.1	**Yes**
Site G	Residential	Daytime	67.3	66.9	70.1	72.3	--	No
		Nighttime	61.5	63.9	65.6	66.5	--	No
Site H	Education/Residential	Daytime	67.6	70.4	72.2	72.6	--	No
		Nighttime	56.6	67.3	67.7	61.6	+6.1	**Yes**
Site M	Residential	Daytime	74.9	58.8	75.0	79.9	--	No
		Nighttime	67.9	55.8	68.1	72.9	--	No

*Source: SoundPLAN (version 8.2). Refer to **Appendix 4.10-6.2** for construction noise (Phase 2) worksheets.*
Note: [1] Logarithmic increase = Ambient Noise + Modeled Construction Level.

Phase 3

Phase 3 would continue enabling the construction sequence of the proposed Project along Manchester Boulevard from Prairie Avenue to Market Street, and Market Street from Manchester Boulevard to Florence Avenue. **Table 4.10-17: Phase 3 Proposed Project Construction Noise Levels** presents the forecasted construction noise levels generated by construction equipment during Phase 3 of the nearby adjacent sensitive receptors. As shown, construction noise level increases over the significance threshold during the daytime would range from a low of 1.5 dBA Leq1-hour at the commercial/mixed-use developments at Site J located approximately 60 feet from the construction sequence of the guideway (Commercial uses along E. Manchester Boulevard and Market Street) to a high of 20.5 dBA Leq1-hour at the residential uses at Site A located approximately 25 feet from the construction sequence of the guideway (Commercial uses along E. Queen Street and Market Street). Additionally, construction noise level increases over the significance threshold during the nighttime would range from a low of 2.7 dBA Leq-1hour at the commercial/mixed-use developments at Site J to a high of 23.8 dBA Leq-1hour at the residential uses at Site A.

As demonstrated by the evaluation of impacts to noise-sensitive receptors, daytime (7:00 AM to 10:00 PM) and nighttime (10:00 PM to 7:00 AM) construction noise levels from worst-case construction activity would exceed the 5 dBA threshold of significance over ambient noise levels (Leq) to noise-sensitive receptors.

The proposed Project's construction noise impacts during Phase 3 would be potentially significant.

Table 4.10-17
Phase 3 Proposed Project Construction Noise Levels

Receptor	Existing Land Use	Time Period	Ambient Noise Levels	Construction Noise (Max Leq, 1hr)	Ambient plus Construction Noise[1]	Significance Threshold	Increase Over Significance Threshold	Significant Impacts?
			dBA					
Market Avenue Segment								
Site 1	Residential	Daytime	61.9	72.6	73.0	66.9	+6.1	**Yes**
		Nighttime	54.6	69.6	69.7	59.6	+10.1	**Yes**
Site A	Commercial	Daytime	64.1	89.6	89.6	69.1	+20.5	**Yes**
		Nighttime	57.8	86.6	86.6	62.8	+23.8	**Yes**
Site K	Public	Daytime	74.9	77.0	77.3	79.9	--	**No**
		Nighttime	63.4	74.0	74.4	68.4	+6.0	**Yes**
Manchester Boulevard Segment								
Site 2	Residential	Daytime	67.5	79.4	79.7	72.5	+7.2	**Yes**
		Nighttime	64.1	76.3	76.6	69.1	+7.5	**Yes**
Prairie Avenue Segment								
Site 3	Education/Residential	Daytime	71.2	70.9	74.0	76.2	--	No
		Nighttime	66.0	67.9	69.8	71.0	--	No
Site B	Educational	Daytime	73.5	83.5	83.9	78.5	+5.4	**Yes**
		Nighttime	70.5	80.5	80.9	75.5	+5.4	**Yes**
Site I	Residential	Daytime	68.0	81.2	81.4	73.0	+8.4	**Yes**
		Nighttime	58.5	78.2	78.2	63.5	+14.7	**Yes**
Site J	Commercial/Mixed-Use	Daytime	73.6	79.0	80.1	78.6	+1.5	**Yes**
		Nighttime	69.1	76.0	76.8	74.1	+2.7	**Yes**

*Source: SoundPLAN (version 8.2). Refer to **Appendix 4.10-6.3** for construction noise (Phase 3) worksheets.*
Note: [1] Logarithmic increase = Ambient Noise + Modeled Construction Noise Level.

Phase 4

Phase 4 would continue enabling the completion of the aerial construction elements of the proposed Project. **Table 4.10-18: Phase 4 Proposed Project Construction Noise Levels**, presents the forecasted construction noise levels generated by construction equipment during Phase 4 of the nearby adjacent sensitive receptors. As shown, construction noise level increases over the significance threshold during the daytime would range from a low of 1.0 dBA Leq-1hour at the residential uses at Site 2 located approximately 225 feet from the proposed MSF (Residential uses along E. Manchester Boulevard, Manchester Drive and S. Osage Avenue) to a high of 8.3 dBA Leq-1hour at the residential uses at Site A located approximately 25 feet from the construction sequence of the guideway and stations (Commercial uses along E. Queen Street and Market Street). Additionally, construction noise level increases over the significance threshold during the nighttime would range from a low of 0.4 dBA Leq-1hour at the place of worship/lodging uses at Site C located approximately 25 feet from the construction sequence of the guideway and stations (Places of worship and commercial uses along Prairie Avenue) to a high of 11.1 dBA Leq-1hour at the residential uses at Site A.

As demonstrated by the evaluation of impacts to noise-sensitive receptors, daytime (7:00 AM to 10:00 PM) and nighttime (10:00 PM to 7:00 AM) construction noise levels from worst-case construction activity would exceed the 5 dBA threshold of significance over ambient noise levels (Leq) to noise-sensitive receptors.

Construction noise impacts during Phase 4 of the proposed Project would be potentially significant.

Table 4.10-18
Phase 4 Proposed Project Construction Noise Levels

Receptor	Existing Land Use	Time Period	Ambient Noise Levels	Construction Noise Level, (Max Leq, 1hr)	Ambient plus Construction Noise[1]	Significance Threshold	Increase Over Significance Threshold	Significant Impacts?
			dBA					
Market Street Segment								
Site 1	Residential	Daytime	61.9	67.7	68.7	66.9	+1.8	**Yes**
		Nighttime	54.6	64.6	65.0	59.6	+5.4	**Yes**
Site A	Commercial	Daytime	64.1	77.2	77.4	69.1	+8.3	**Yes**
		Nighttime	57.8	74.2	74.3	62.8	+11.5	**Yes**
Site K	Public	Daytime	67.5	73.5	74.5	72.5	+2.0	**Yes**
		Nighttime	63.4	70.5	71.3	68.4	+2.9	**Yes**
Manchester Boulevard Segment								
Site 2	Residential	Daytime	67.5	72.2	73.5	72.5	+1.0	**Yes**
		Nighttime	64.1	69.2	70.4	69.1	+1.3	**Yes**
Site B	Educational	Daytime	73.5	73.1	76.3	78.3	--	No
		Nighttime	70.5	70.1	73.1	75.5	--	No
Site I	Residential	Daytime	68.0	65.9	70.0	73.0	--	No
		Nighttime	58.5	62.9	64.2	63.5	+0.7	**Yes**
Site J	Commercial/Mixed Use	Daytime	73.6	69.9	75.1	78.6	--	No
		Nighttime	69.1	66.9	71.0	74.1	--	No
Site L	Residential	Daytime	74.0	56.9	74.1	79.0	--	No
		Nighttime	72.8	53.9	72.9	77.8	--	No
Prairie Avenue Segment								
Site 3	Education/Residential	Daytime	71.2	71.2	74.2	76.2	--	No
		Nighttime	66.0	68.2	70.0	71.0	--	No

Receptor	Existing Land Use	Time Period	Ambient Noise Levels	Construction Noise Level, (Max Leq, 1hr)	Ambient plus Construction Noise[1]	Significance Threshold	Increase Over Significance Threshold	Significant Impacts?
			dBA					
Site 4	Residential	Daytime	77.2	83.2	84.0	81.2	+3.8	**Yes**
		Nighttime	71.6	80.2	80.4	76.6	+3.8	**Yes**
Site C	Place of worship/Lodging	Daytime	76.7	83.4	84.2	81.7	+2.5	**Yes**
		Nighttime	70.6	80.4	80.5	75.6	+4.9	**Yes**
Site E	Lodging	Daytime	72.6	56.3	72.7	77.8	--	No
		Nighttime	66.2	53.3	66.4	71.2	--	No
Site F	Residential	Daytime	68.8	62.7	69.7	67.7	--	No
		Nighttime	59.9	59.7	62.6	64.9	--	No
Site G	Residential	Daytime	67.3	67.4	70.4	69.2	--	No
		Nighttime	61.5	64.4	65.9	66.5	--	No
Site H	Education/Residential	Daytime	67.6	68.4	71.0	72.6	--	No
		Nighttime	56.6	65.3	65.5	61.6	+3.9	**Yes**
Site M	Residential	Daytime	74.9	57.0	75.0	79.9	--	No
		Nighttime	67.9	54.0	68.1	72.9	--	No
Site 5	Lodging	Daytime	73.3	56.6	73.4	78.3	--	No
		Nighttime	70.0	53.6	70.1	75.0	--	No
Site D	Lodging	Daytime	76.2	56.6	76.2	81.2	--	No
		Nighttime	67.0	53.6	67.2	72.0	--	No

*Source: SoundPLAN (version 8.2). Refer to **Appendix 4.10-6.4** for construction noise (Phase 4) worksheets.*
Note: [1] Logarithmic increase = Ambient Noise + Modeled Construction Noise Level.

Potential Health Effects of Proposed Project Construction Noise

As detailed in **Table 4.10-15** through **4.10-18**, construction noise levels would exceed ambient exterior levels by 5 dBA Leq 1-hour or more during the daytime and nighttime period. More specifically, ambient plus construction noise levels during the daytime would range from a low of 67.4 dBA Leq-1hour during Phase 1 at Site A located approximately 25 feet from the construction sequence of the guideway and stations (Commercial uses along E. Queen Street and Market Street) (Phase 1) to a high of 89.6 dBA Leq1-hour during Phase 3 at Site A. Additionally, ambient plus construction noise levels during the nighttime would range from 62.6 dBA Leq 1-hour during Phase 4 at Site F (Residential uses along E. Hardy Street) to a high of 86.2 dBA Leq-1hour at Site A during Phase 3. However, although noise levels would exceed applicable thresholds, construction levels would not reach the point at which pain or hearing damage would occur. As shown in **Table 4.10-1** above, when measured on the A scale of a standard sound level meter, short-term noise levels constituting the threshold of pain and hearing damage are between 130 dBA and 140 dBA.

With respect to potential nighttime awakenings due to construction noise, the area surrounding the proposed Project where there is the potential for sleep disturbance during nighttime construction has been identified. Construction activities will occur adjacent to residential uses, especially adjacent to the MSF site and other areas along the proposed Project.

According to the Acoustical Society of America, receivers that would experience an indoor SEL of 50 dBA or lower would have an awakening probability of zero.[68] Based on the assumption that standard building construction in a warm climate area such as southern California offers an exterior-to-interior attenuation rate of 12 dB, it is assumed that indoor SEL would be 12 dB lower than exterior construction noise levels.[69] The area surrounding the proposed Project that would experience an indoor SEL of greater than 50 dBA (exterior construction noise level of greater than 62 dBA Leq) during a worst-case or loudest maximum nighttime construction noise level event was identified. This does not take into account the existing indoor SEL currently experienced due to aircraft flyovers from LAX and/or other existing noise sources in the area such as traffic and industrial operations. Based on the preceding impact analyses provided in **Table 4.10-15** through **Table 4.10-18**, exterior noise increases above ambient would range from a low of 0.3 dBA to a high of 23.8 dBA throughout various stages during the four phases of construction. Exterior noise levels at all analyzed locations would be above 62 dBA Leq prior to the addition of construction noise.

Due to the high variability of each individual's sensitivity to nighttime noise, uncertain factors related to nighttime construction activity such as number of peak noise level occurrences, and lack of an established or adopted threshold designating acceptable occurrences of awakenings, the estimated area for

68 Acoustical Society of America, 2018. Rationale for Withdrawing ANSI/ASA S12.9-2008/Part 6. Annex 3. July 22, 2018.
69 United States Environmental Protection Agency, Protective Noise Levels, 1978, p.11

awakenings presented in this analysis represents the City's best effort to disclose the potential sleep disturbance effects of nighttime construction, but do not represent predictions of sleep awakenings for any specific location or population.

There are no established thresholds with regard to an acceptable level of short-term sleep disturbance. While exposure to high levels of noise during sleep can result in physiological responses, it is not possible to predict such effects in any particular population. As such, due to the lack of established thresholds and noise levels do not exceed the threshold of pain and hearing damage, construction activities from the proposed Project would not result in adverse health effects related to pain and hearing loss.

Off-Site Construction Traffic

Construction traffic would generate noise along access routes to and from the proposed Project's construction areas. Construction activities would require the movement of heavy equipment throughout the Project area during respective construction phases and for each specialized construction activity (e.g., demolition, grading). Construction staging, parking and equipment storage areas will be on-site within the proposed fenced in yards or within each phasing area.

Delivery of construction materials would occur during the night shift, as would most lane closures. Construction activities during the day shift would primarily consist of work that could proceed without requiring lane closures or significant disruption to daily commuter traffic and potential event traffic along Prairie Avenue and Manchester Boulevard. Additionally, it can be anticipated that some minor activity would occur during periods in between construction shifts for logistics, moving equipment, etc.

Construction employee parking would be provided within the construction areas and may also serve as temporary parking for construction personnel. Parking could occur at staging locations along Manchester Boulevard, Market Street, and designated areas as noted in the Construction Scenario (**Appendix 3.0.4** to this Draft EIR).

Designated delivery and haul routes would be established for the proposed Project consistent with the City's General Plan roadway designations and the haul routes currently used for local projects. As shown in **Figure 3.0-37: Construction Haul Routes**, the primary delivery and haul routes proposed during construction of the proposed Project would utilize Florence Avenue, Manchester Boulevard, Prairie Avenue, and Century Boulevard, which have been designated by the City as appropriate for heavy truck use.[70] These routes would convey materials to and from regional routes, including the I-405 (Glen Anderson Freeway) and I-405 (San Diego Freeway).

70 City of Inglewood, Municipal Code, Section 3-95, Truck Routes Established. https://www.qcode.us/codes/inglewood/view.php?topic=3-3-3_85&frames=on

The construction contractor would be required to utilize the haul route closest to the respective areas of the proposed Project. Excavated dirt materials will be hauled at night, where possible, due to the congested freeways and surface streets around or near the excavation site during daytime hours. The construction contractor would develop an excavation plan that defines haul routes, dust control, sweeping, and the location(s) for final disposal.

As shown in the Construction Scenario, a variety of heavy trucks will travel to and from the proposed Project during various phases of construction. The total trucks per phase is shown in **Table 4.10-4** above. The proposed Project is expected to generate a maximum of approximately 145 trips per day and 19 trips per hour which includes both on-road on- and off-site equipment.

Although it is unlikely that all Project construction related heavy-duty construction trucks would travel along the same haul route, due to the uncertainty of the route trucks would take it has been conservatively assumed that the maximum anticipated number of heavy-duty construction trucks could potentially travel along the same route.

Traffic volume data was provided for multiple segments along each roadway, resulting in multiple different daily volumes. The lowest adjusted baseline average daily trip (ADTs) volumes along West Century Boulevard, Manchester Boulevard, and South Prairie Avenue are 33,218 trips, 20,326 trips, and 22,141 trips, respectively, (refer to **Appendix 4.10-2.2**) and the highest adjusted baselines volumes along West Century Boulevard, Manchester Boulevard, and South Prairie Avenue are 50,753 trips, 36,827 trips, and 39,187 trips, respectively.[71]

The sound power from one heavy-duty truck is greater than the sound power from one passenger vehicle (i.e., car). According to Caltrans, the noise levels from one heavy-duty truck at a speed of 35 miles per hour is equivalent to 19 passenger vehicles traveling at a speed of 35 miles per hour. Applying this multiplier to a maximum of approximately 145 trips per day, construction would generate a potential maximum sound power equivalency of up to 2,755 passenger vehicle trips per day. Additionally, the maximum workforce estimate range between 210 – 238 persons during Phase 3, as such resulting in 2,993 passenger trips per day.

According to FHWA, assuming all other factors remain the same, it takes a doubling of traffic volumes (100 percent increase) in order to increase traffic noise levels by 3 dBA.[72] As compared to adjusted baseline average daily traffic volumes along the roadways mentioned above, the sound power generated by the maximum anticipated number of construction trucks would not be equivalent or greater to a doubling of

71 Traffic data provided in the Traffic report available in **Appendix 4.12.1**.

72 Federal Highway Administration, FHWA Highway Traffic Noise Prediction Model, December 1978, https://ia801807.us.archive.org/3/items/fhwahighwaytraff00barr/fhwahighwaytraff00barr.pdf.

both the minimum and maximum ADT along West Century Boulevard, Manchester Boulevard or South Prairie Avenue and therefore would not result in a 5 dBA Leq (1-hour) increase along those roadways.

Therefore, noise impacts from off-site construction traffic from trucks would be less than significant.

Mitigation Measures

The following mitigation measures have been identified to reduce potentially significant noise impacts related to construction:

MM 4.10-1: **Construction Noise Control Plan**. Prior to the issuance of any demolition or construction permit for each phase of project development, the Construction Manager shall develop a Construction Noise Control Plan demonstrating how to ensure increases in ambient noise levels are less than 5 dBA Leq (1-hour) over existing conditions. The Construction Noise Control Plan shall be developed in coordination with a certified acoustical/vibration consultant and the Construction Manager, and shall be approved by the City's Director of Public Works prior to construction. The Plan shall include the following elements:

- Measurements of existing one-hour Leq noise levels at sensitive receptors prior to construction activities.
- Construction noise measures necessary to ensure increase in noise are less than 5 dBA Leq over existing conditions. This plan could include, but would not be limited to, the following strategies:
  - Install temporary noise barriers that block line-of-sight to sensitive receptors including when work occurs on the elevated guideways and stations.
  - Reduce the simultaneous use of heavy-duty construction equipment.
  - Operate equipment at the lowest possible power levels.
  - Use solar, battery powered, or hybrid equipment whenever practical.
  - Locate staging areas as far away from sensitive receptors as feasible.
- Enclose stationary noise sources with acoustical barriers where possible.
  - Stationary noise sources (e.g., generators) shall be muffled and enclosed within sheds, incorporate insulation barriers, or other measures to ensure increases in ambient noise levels are less than 5 dBA Leq (1-hour). Pole power shall be utilized at the earliest feasible point in time, and to the maximum extent feasible in lieu of generators. If stationary equipment such as diesel- or gasoline-powered generators are not enclosed within a shed or barrier, such equipment must be located at least 100 feet from sensitive land uses (e.g., residences, schools, childcare centers, hospitals, parks, or similar uses), whenever possible.

- Impact tools (i.e., jack hammers, pavement breakers, and rock drills) used for project construction shall be hydraulically or electrically powered wherever possible to avoid noise associated with compressed air exhaust from pneumatically powered tools. Where use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust and external jackets shall be used to ensure increases in ambient noise levels are less than 5 dBA Leq (1-hour). Quieter procedures shall be used, such as drills rather than impact equipment, whenever feasible. Limiting the use impact pile drivers and impact hammers operating simultaneously can reduce Lmax noise levels by approximately 7 dBA. Additionally, use of "quiet" pile driving technology (such as auger displacement installation), where feasible in consideration of geotechnical and structural requirements and conditions shall be considered.

MM 4.10-2: **Designate Community Affairs Liaison. Designate a Community Affairs Liaison Officer**. The City shall designate a Community Affairs Liaison Officer. This person's contact information shall be posted around the Project area, in adjacent public spaces, and in construction notifications. The Community Affairs Liaison shall be responsible for responding within 24 hours to any local complaints about construction activities. This Community Affairs Liaison shall receive all public complaints about construction noise and vibration disturbances and be responsible for determining the cause of the complaint and implementation of feasible measures to be taken to alleviate the problem. Additionally, the Community Affairs Liaison Officer shall coordinate with the Kelso Elementary School administrators to avoid disruptive activities during school hours.

The Community Affairs Liaison shall have the authority to coordinate with a designated construction contractor representative for the purpose of investigating the noise disturbance and undertaking all feasible measures to protect public health and safety and shall ensure that steps be taken to reduce construction vibration levels as deemed appropriate and safe by the designated construction contractor representative. Such steps could include the application of noise and vibration absorbing barriers, substitution of lower noise and vibration generating equipment or activity, rescheduling of noise and vibration-generating construction activity, or other potential adjustments to the construction program to reduce noise and vibration impacts at the adjacent noise and vibration-sensitive receptors.

Level of Significance after Mitigation

As shown in **Table 4.10-15** through **Table 4.10-18**, the maximum construction noise level increase over the significance threshold before mitigation would be approximately 23.8 dBA during Phase 3 of construction.

Implementation of **Mitigation Measure MM 4.10-1** would require development of a Construction Noise Control Plan to demonstrate how to ensure increases in ambient noise levels are less than 5 dBA Leq (1-hour) over existing conditions. One-hour Leq noise measurements at sensitive receptors would occur prior to construction activities to establish baseline conditions. Also, implementation of **Mitigation Measure MM 4.10-2** would designate a Community Affairs Liaison to be responsible for responding within 24 hours to any local complaints about construction activities related to noise and vibration.

With implementation of **MM 4.10-1** that would require continuous noise measurements to occur during construction to ensure noise levels are less than 5 dBA Leq (1-hour) and designation of a Community Affairs Liaison as discussed in **MM 4.10-2**, noise impacts resulting from construction would be less than significant.

Operation

Road Traffic Noise

As the City transforms into a major regional activity center, the ITC Project is designed to meet the City's goals and objectives related to the reducing the City's traffic congestion and alleviate growing demand on the existing roadway network by encouraging and providing the use of intermodal transportation systems. Thus, the Project is intended to reduce vehicle trips and roadway noise levels due to the ITC Project, resulting in negligible increases in the roadway network as discussed below.

Adjusted Baseline Conditions During Typical Non-Event Weekdays With ITC Project

Appendix 4.10.2-6 illustrates the change in daytime (7:00 AM to 10:00 PM) and nighttime (10:00 PM to 7:00 AM) noise levels for the Adjusted Baseline Conditions during typical Non-Event Weekday with ITC Project traffic noise levels in detail. The difference in traffic noise between Adjusted Baseline Without ITC Project and Adjusted Baseline With ITC Project represents the increase (or decrease) in noise attributable to Project-related traffic area. As shown, the maximum noise level increase along analyzed roadways during the daytime period (7:00 AM to 10:00 PM) would be 0.2 dBA Leq (Lday)along Hillcrest Boulevard from Nutwood Street/Locust Street to Manchester Boulevard. Additionally, roadway noise levels during the nighttime period (10:00 PM – 7:00 AM) would be 0.3 dBA Leq (Lnight) along Hillcrest Boulevard from Nutwood Street/Locust Street to Manchester Boulevard. Because the proposed Project would remove trips, there would be some intersections that would see a decrease in noise. Therefore, the roadway noise level during the daytime or nighttime periods would not exceed the threshold of significance of an increase

in noise level of 3 dBA Leq to or within the "normally unacceptable" or "clearly unacceptable" land use compatibility categories or result in an increase of 10 dBA when noise levels remain within acceptable limits.

Impacts of the proposed Project related to traffic generated noise for the Adjusted Baseline Conditions during typical non-event weekdays with ITC Project would be less than significant.

Opening Year (2026) Conditions With NFL Event Without ITC Project

Appendix 4.10.2-6 illustrates the change in daytime (7:00 AM to 10:00 PM) and nighttime (10:00 PM to 7:00 AM) provides the roadway noise levels for the Opening Year (2026) Conditions With NFL Event Without ITC Project traffic noise levels in detail. As shown, roadway noise levels during the daytime ranged from a low of 57.2 dBA Leq (Lday) along Market Street from Florence Avenue to Regent Street to a high of 73.8 dBA Leq (Lday) along Century Boulevard between Grevillea Avenue and La Brea Avenue/Hawthorne Boulevard. Additionally, nighttime roadway noise levels ranged from a low of 49.7 dBA Leq (Lnight) along Market Street from Florence Avenue to Regent Street to a high of 65.5 dBA Leq (Lnight) along Century Boulevard between Doty Avenue and HP Casino Way and between HP Casino Way to Yukon Avenue.

Opening Year (2026) Conditions With NFL Event With ITC Project

Appendix 4.10.2-6 compares the daytime and nighttime noise levels from Opening Year (2026) Conditions With NFL Event Without ITC Project to the Opening Year (2026) Conditions With NFL Event With ITC Project. As shown, roadway noise levels during both the daytime (7:00 AM to 10:00 PM) and nighttime (10:00 PM to 7:00 AM) periods would not exceed the threshold of significance of an increase in noise level of 3 dBA Leq to or within the "normally unacceptable" or "clearly unacceptable" land use compatibility categories or result in an increase of 10 dBA or greater when noise levels remain within acceptable limits.

Impacts of the proposed Project related to traffic generated noise for the Opening Year (2026) Conditions with NFL Event With ITC Project would be less than significant.

Future Horizon Year (2045) With NFL Event Without ITC Project

Appendix 4.10.2-6 illustrates the daytime and nighttime noise levels from traffic generated for the Future Horizon Year (2045) With NFL Event Without ITC Project. As shown, roadway noise levels during the daytime ranged from a low of 58.1 dBA Leq (Lday) along Market Street from Florence Avenue to Regent Street to a high of 74.6 dBA Leq (Lday) along Century Boulevard between Grevillea Avenue and La Brea Avenue/Hawthorne Boulevard. Additionally, nighttime roadway noise levels ranged from a low of 50.6 dBA Leq (Lnight) along Market Street from Florence Avenue to Regent Street to a high of 66.1 dBA Leq (Lnight) along Century Boulevard between Doty Avenue and HP Casino Way and between HP Casino Way to Yukon Avenue.

Future Horizon Year (2045) With NFL Event With ITC Project

Appendix 4.10.2-6 compares the daytime and nighttime noise levels from traffic generated by the Future Horizon Year (2045) With NFL Event Without ITC Project to the Future Horizon Year (2045) With NFL Event With Project conditions. As shown, roadway noise levels during both the daytime (7:00 AM to 10:00 PM) and nighttime (10:00 PM to 7:00 AM) periods would not exceed the threshold of significance of an increase in noise level of 3 dBA Leq to or within the "normally unacceptable" or "clearly unacceptable" land use compatibility categories or result in an increase of 10 dBA or greater when noise levels remain within acceptable limits.

Therefore, impacts of the proposed Project related to traffic generated noise for the Future Horizon Year (2045) With NFL Event without and with the ITC Project would be less than significant.

APM Train Transit Noise

As mentioned previously, for analysis purposes it is assumed that the proposed Project would either utilize large, automated monorail technologies or rubber-tire vehicles operating along a fixed guideway. **Table 4.10-19: APM Trains Exterior Noise Levels** below provides the predicted noise levels of both the rubber-tired APM train and monorail.

Rubber-tired APM Train Noise

As shown in **Table 4.10-19**, when compared to ambient conditions, daytime noise level increases from the rubber-tired APM trains would range from 0.1 dBA Leq (Lday) at various sites to a high of 0.2 dBA Leq (Lday) at Site 1 (Residential uses to the west of N. Locust Street including the Holy Faith Episcopal Church, commercial uses to the east of N. Locust Street). Additionally, nighttime noise levels increase would range from a low of 0.1 dBA Leq (Lnight) at Site A (Commercial uses along E. Queen Street) to a high of 0.8 dBA Leq (Lnight) at Site 1. It is important to note that the majority of the noise monitoring locations identified are not predicted to experience any increase resulting from operation of the rubber-tired APM trains. As such, operational noise levels would not result in increases of 3 dBA to or within the "normally unacceptable" or "clearly unacceptable" compatibility category for land uses or result in an increase of 10 dBA or greater when noise levels remain within acceptable limits.

The results of the modeling process for operations of the proposed Project using rubber-tired APM trains is shown graphically in **Figure 4.10-7: Proposed Project with Rubber-Tired APM Train Noise Contour Map (Daytime)** and **Figure 4.10-8: Proposed Project with Rubber-Tired APM Train Noise Contour Map (Nighttime)**.

Monorail Noise

As shown in **Table 4.10-19**, when compared to ambient conditions, daytime noise level increases from the monorail technology would range from a low of 0.1 dBA Leq (Lday) at various sites to a high of 0.7 dBA Leq (Lday) at Site 2. Additionally, nighttime noise levels increase would range from a low of 0.1 dBA Leq (Lnight) at Sites 4, A, B and K to a high of 1.9 dBA Leq (Lnight) at Site 1. However, similar to the rubber-tired APM trains, the majority of locations monitored are not predicted to experience any increases resulting from operation of the monorail technology trains. As such, operational noise levels from the monorail technology would not result in increases of 3 dBA Leq to or within the "normally unacceptable" or "clearly unacceptable" compatibility category for land uses or result in an increase of 10 dBA or greater when noise levels remain within acceptable limits.

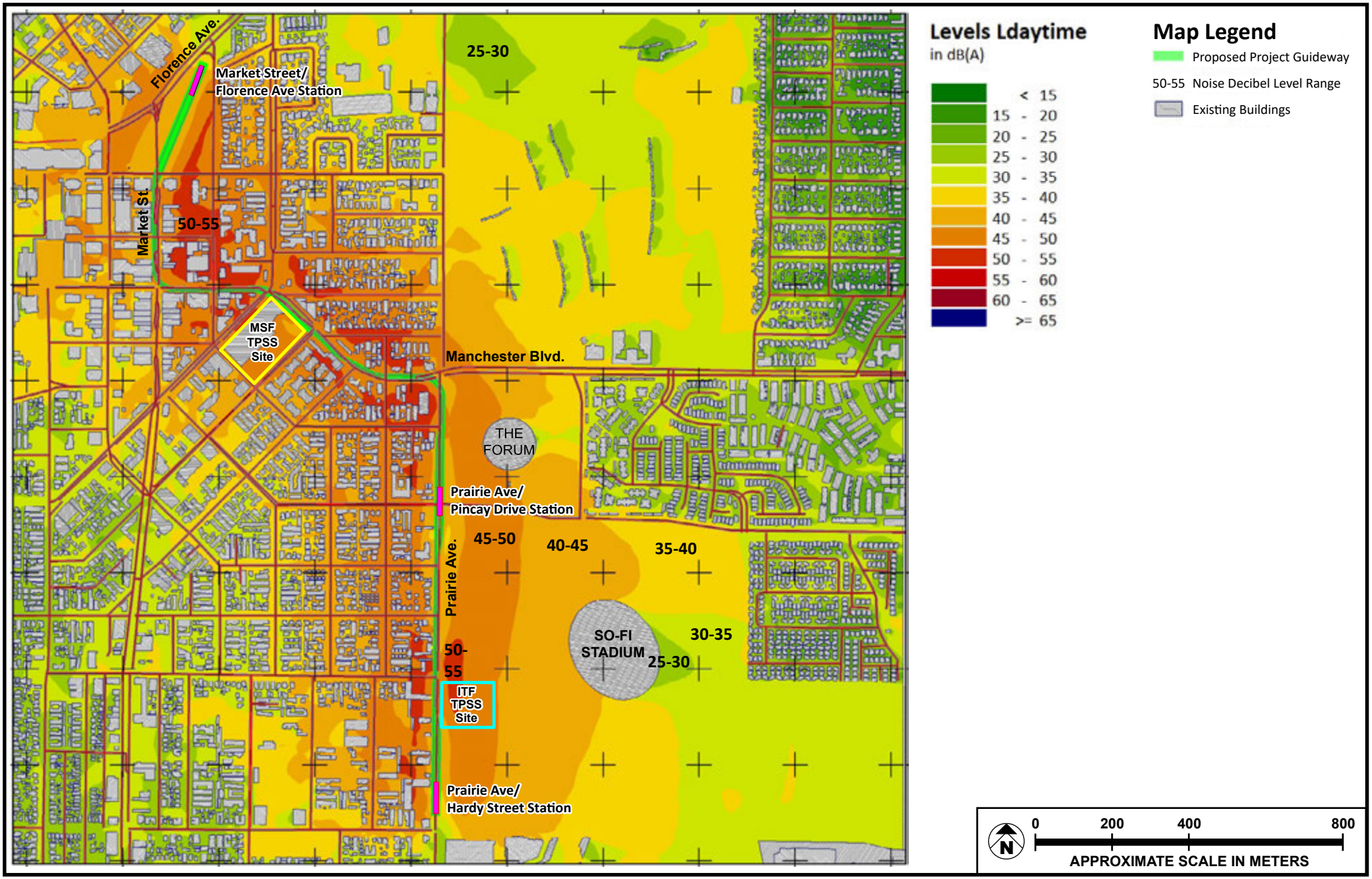
The results of the modeling process for operations of the monorail technology is shown graphically in **Figure 4.10-9: Monorail Noise Contour Map (Daytime)** and **Figure 4.10-10: Monorail Noise Contour Map (Nighttime)**.

Table 4.10-19
APM Trains Exterior Noise Levels

Site ID	Land Use	Existing Ambient		Train Type	Modeled Guideway Noise Levels		Future Ambient Plus Proposed APM Trains		Increase in Noise		Significant Impact?
		Daytime	Nighttime		Daytime	Nighttime	Daytime	Nighttime	Daytime	Nighttime	
		dBA			dBA						
Market Street Segment											
Site 1	Residential	61.9	54.6	Rubber Tired	48.4	47.6	62.1	55.4	+0.2	+0.8	**No**
				Monorail	52.8	52.0	62.4	56.5	+0.5	+1.9	**No**
Site A	Residential	64.1	57.8	Rubber Tired	41.9	41.0	64.1	57.9	0.0	+0.1	**No**
				Monorail	51.7	50.8	64.3	58.6	+0.2	+0.8	**No**
Site K	Public	67.5	63.4	Rubber Tired	39.2	38.4	67.5	63.4	0.0	0.0	**No**
				Monorail	49.0	48.2	67.6	63.5	+0.1	+0.1	**No**
Manchester Boulevard Segment											
Site 2	Residential	64.1	59.4	Rubber Tired	49.5	48.6	64.2	59.7	+0.1	+0.3	**No**
				Monorail	56.7	55.9	64.8	61.0	+0.7	+1.6	**No**
Site B	Educational	73.5	70.5	Rubber Tired	47.5	46.6	73.5	70.5	0.0	0.0	**No**
				Monorail	55.0	54.1	73.6	70.6	+0.1	+0.1	**No**
Site I	Residential	68.0	58.5	Rubber Tired	46.3	45.5	68.0	58.7	0.0	+0.2	**No**
				Monorail	51.1	50.2	68.1	59.1	+0.1	+0.6	**No**
Site J	Commercial/Mixed Use	73.6	69.1	Rubber Tired	41.2	40.3	73.6	69.1	0.0	0.0	**No**
				Monorail	50.2	49.4	73.6	69.1	0.0	0.0	**No**
Site L	Residential	74.0	72.8	Rubber Tired	30.4	29.5	74.0	72.8	0.0	0.0	**No**
				Monorail	37.9	37.0	74.0	72.8	0.0	0.0	**No**

Prairie Avenue Segment											
Site 3	Educational/Residential	71.2	66.0	Rubber Tired	50.3	49.4	71.2	66.0	0.0	0.0	**No**
				Monorail	55.6	54.7	71.3	66.3	+0.1	+0.3	**No**
Site 4	Residential	77.2	71.6	Rubber Tired	41.3	40.4	77.2	71.6	0.0	0.0	**No**
				Monorail	53.4	52.5	77.2	71.7	0.0	+0.1	**No**
Site C	Place of Worship/Lodging	76.7	70.6	Rubber Tired	41.9	41.1	76.7	70.6	0.0	0.0	**No**
				Monorail	53.2	52.4	76.7	70.7	0.0	+0.1	**No**
Site E	Lodging	72.6	66.2	Rubber Tired	25.3	24.4	72.6	66.2	0.0	0.0	**No**
				Monorail	38.3	37.4	72.6	66.2	0.0	0.0	**No**
Site F	Residential	68.8	59.9	Rubber Tired	40.7	39.8	68.8	59.9	0.0	0.0	**No**
				Monorail	46.8	46.0	68.8	60.0	0.0	+0.1	**No**
Site G	Residential	67.3	61.5	Rubber Tired	46.2	45.3	67.3	61.6	0.0	+0.1	**No**
				Monorail	53.1	52.2	67.5	62.0	+0.2	+0.5	**No**
Site H	Educational/Residential	67.6	56.6	Rubber Tired	46.2	45.4	67.6	56.9	0.0	+0.3	**No**
				Monorail	52.4	51.6	67.7	57.8	0.0	+1.2	**No**
Site M	Residential	74.9	67.9	Rubber Tired	27.7	26.8	74.9	67.9	0.0	0.0	**No**
				Monorail	34.8	33.9	74.9	67.9	0.0	0.0	**No**
Site 5	Lodging	73.3	70.0	Rubber Tired	27.3	26.4	73.3	70.0	0.0	0.0	**No**
				Monorail	39.9	39.0	73.3	70.0	0.0	0.0	**No**
Site D	Lodging	76.2	67.0	Rubber Tired	24.6	23.7	76.2	67.0	0.0	0.0	**No**
				Monorail	37.2	36.3	76.2	67.0	0.0	0.0	**No**

*Source: Refer to **Appendix 4.10-7** for Operational Noise for Modeled Guideway System Worksheets.*



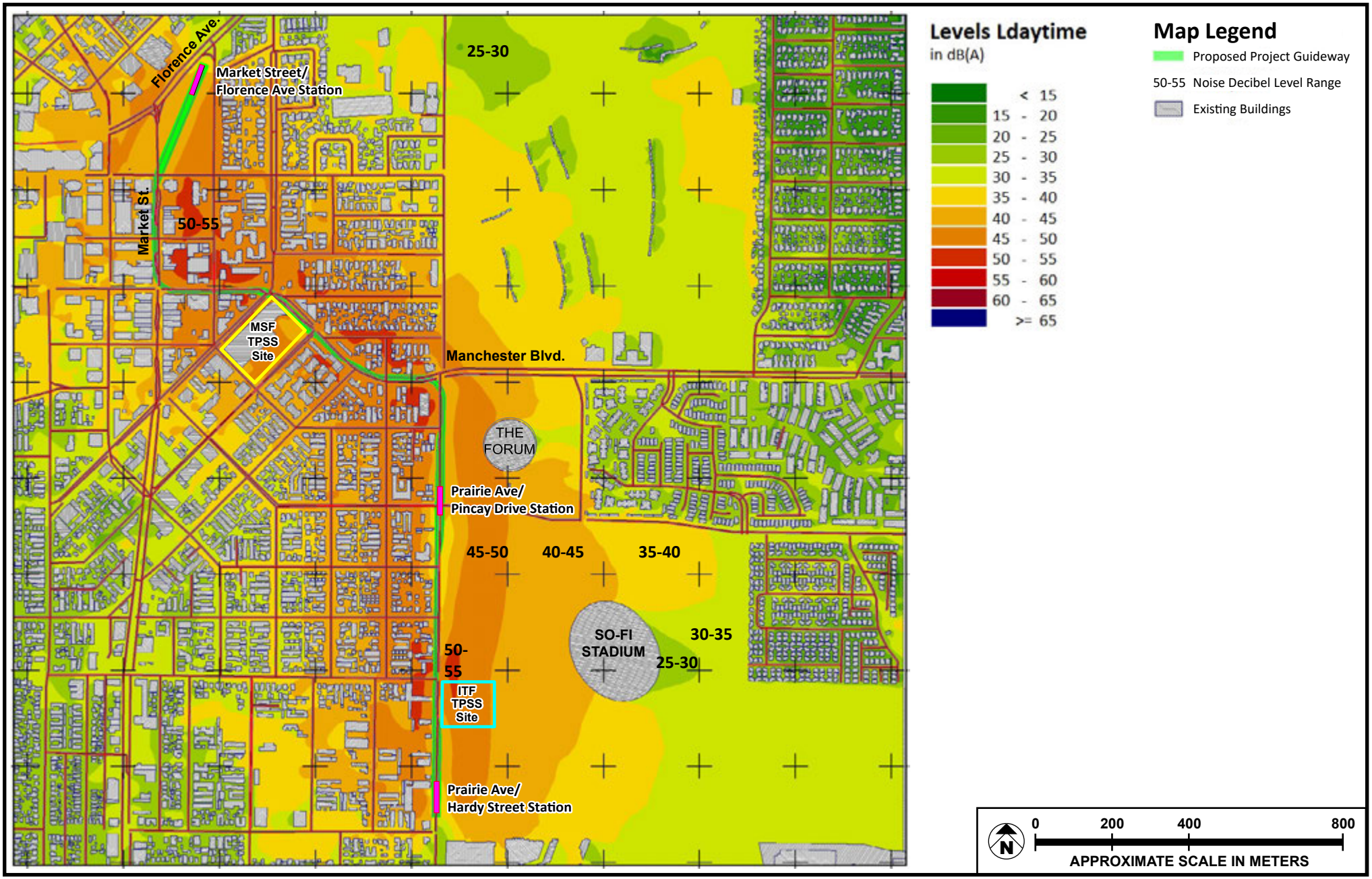
SOURCE: Google Earth - 2020

FIGURE **4.10-7**

Meridian Consultants

Proposed Project with Rubber-tire APM Train - Noise Contour Map (Daytime)

251-003-20



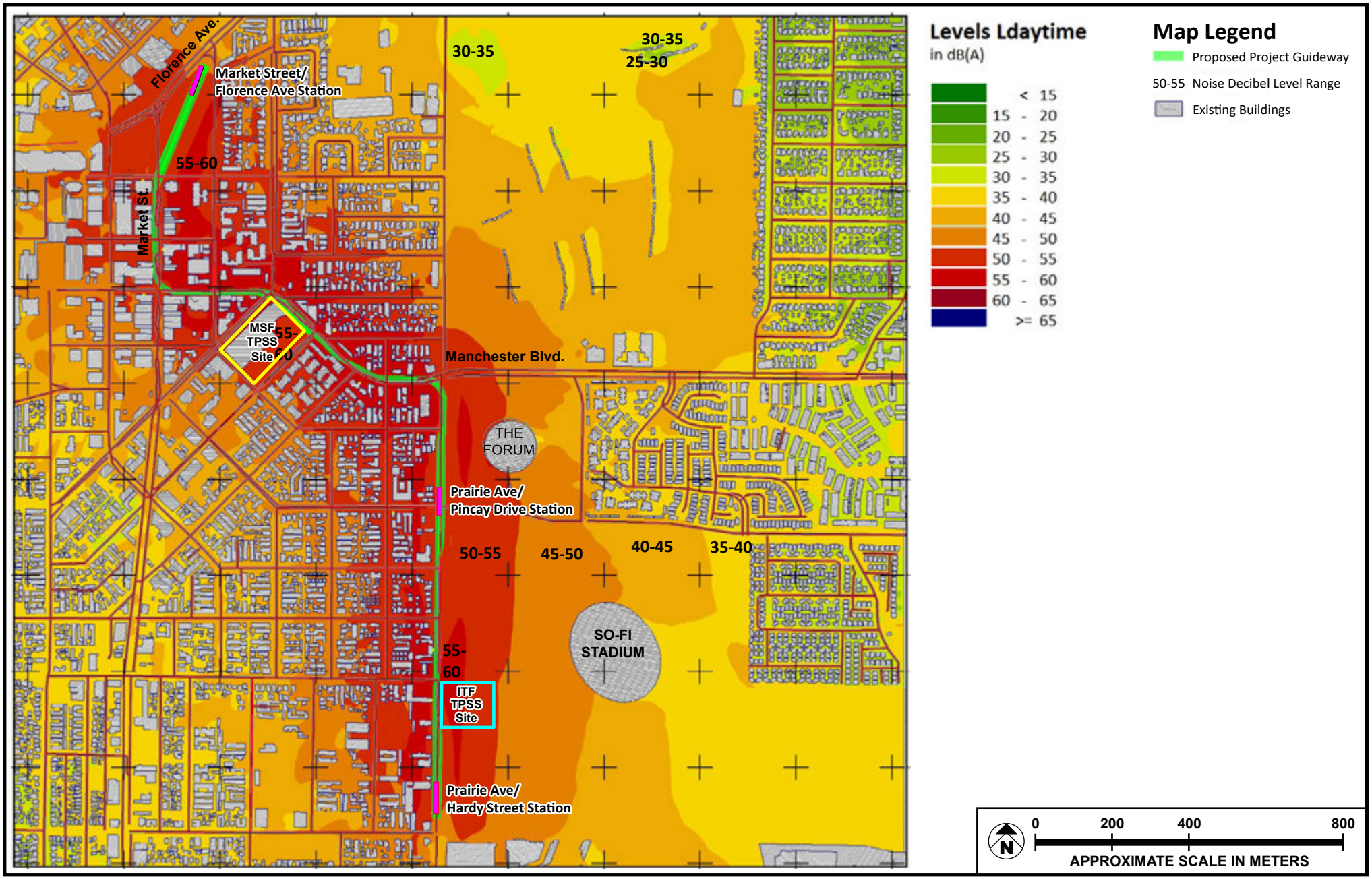
SOURCE: Google Earth - 2020

FIGURE **4.10-8**

Meridian Consultants

Proposed Project with Rubber-tire APM Train - Noise Contour Map (Nighttime)

251-003-20



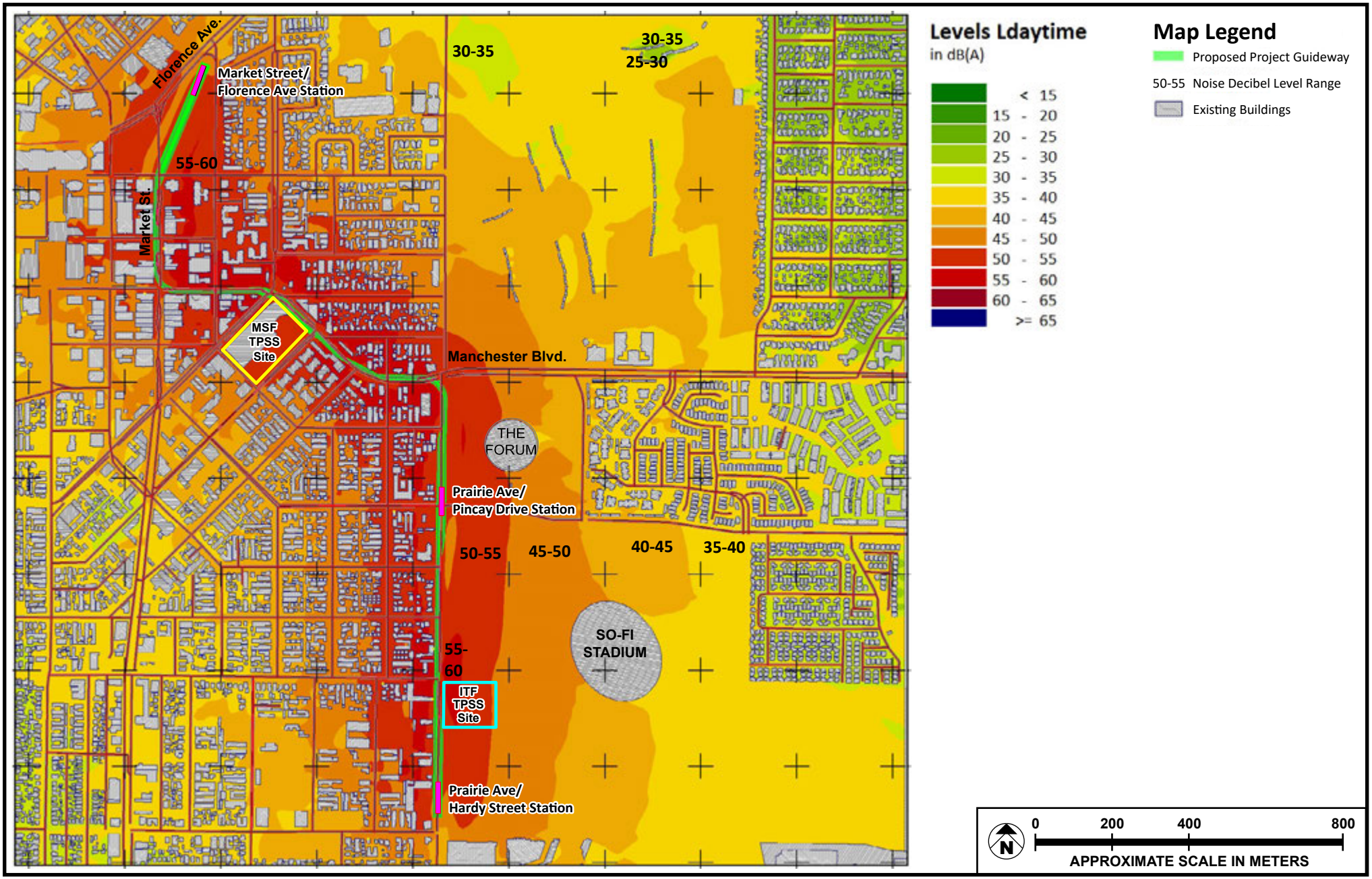
SOURCE: Google Earth - 2020

FIGURE **4.10-9**

Meridian Consultants

Monorail APM System Noise Contour Map (Daytime)

251-003-20



SOURCE: Google Earth - 2020

FIGURE **4.10-10**

Meridian Consultants

Monorail APM System Noise Contour Map (Nighttime)

251-003-20

Stationary Source Noise

MSF Site Operations

The proposed Project would include a Maintenance and Storage Facility (MSF) that would be used to maintain and store trains. A description of the MSF is provided in **Section 3.0: Project Description**, *3.5.2: Maintenance Storage Facility (MSF).*

The MSF is a large facility (approximately 97,400 SF), spread out over considerable area with various noise levels. The MSF would cover approximately 1.8 acres and would be sized to accommodate the APM train rolling stock and operating equipment. The MSF building would be elevated and consist of three levels. General dimensions of the MSF building would amount to approximately 195 feet in width (northwest–southeast) and 400 feet in length (northeast–southwest). The minimum clearance for the structure would be 16 feet 6 inches above grade, with a maximum height from the ground of approximately 75 feet.

The MSF would be an elevated multistory structure with a largely unenclosed ground floor. The maintenance level for APM train vehicles would be located on the second floor to match the height of the elevated guideway. Three entrance/exit tracks would be individually supported by dual-column spans, while the tracks just prior to switching into six rail docks would be supported by rounded, dual-column spans. As shown in **Figure 3.0-7**, the MSF would include the following three levels:

- Ground Level: The ground floor of the MSF would consist of a generally unenclosed space for employee parking, loading dock and large truck circulation, access driveways, traction power substation (30 feet by 100 feet), facility support rooms (mechanical, electrical, and plumbing support services), and freight elevator and other vertical circulation cores to higher levels of the structure.
- Maintenance Level: The maintenance level of the MSF would be located on the second floor, approximately 37.5 feet above grade. The northwestern side of the MSF would house one dock to be used for APM trains exterior/interior washing, including a collection system for wastewater and fluids from the train washing system. Towards the center area, the MSF would consist of two docks for light maintenance of the trains. Finally, near the southeastern side, the MSF would include two more docks to be used for heavy vehicle maintenance. The heavy maintenance docks would be located on top of a solid platform structure to capture and contain any mechanical fluids or components during maintenance activities.
- Rail access would be provided to the MSF maintenance level via a tertiary track adjacent to the Manchester Boulevard portion of the guideway that would match the height of the guideway.
- Mezzanine Level: The mezzanine level of the MSF would be located above the inventory and storage area, along the southeastern side of the facility. This area would house the operations control center where automated train operations are monitored and controlled.

Vehicle and passenger access to the MSF would be provided via controlled gates, as well as paved interior circulation for employees, service vehicles, and delivery vehicles.

The MSF site is bordered on three sides by residential and commercial uses across E. Hillcrest Boulevard, E. Spruce Avenue and E. Nutwood Street. In addition, there are commercial and residential uses to the east/northeast across Manchester Boulevard.

Using the general assessment of FTA's *Noise and Vibration Impacts Assessment,* the salient features of each fixed facility are considered in the noise analysis. **Table 4.10-20: Source Reference Levels at 50 feet from the Border of the MSF Site, Stationary Sources**, shows the source reference levels at 50 feet based on measurements for the peak hour of operation of a typical stationary source of the type and size noted.

Table 4.10-20
Source Reference Levels at 50 feet from Border of the MSF Site, Stationary Sources

Source	Reference SEL dBA	Reference Conditions
Yards and shops	118	20 train movements in peak activity hour
Crossovers	100	One Train
Signals	109	3600 second duration

Source: US Department of Transportation, Federal Transit Administration (USDOT, FTA), Transit Noise and Vibration Impact Assessment, FTA report no. 0123 (September 2018).

The items shown in **Table 4.10-20** are the highest of the activities in a typical maintenance and operations facility. The MSF is a large facility, spread out over considerable area with various noise levels depending on the layout of the facility. Specifying the reference SEL at a distance of 50 feet from the property line would be misleading in this case. Consequently, the reference distance is described as the "the equivalent distance of 50 feet," which is determined by estimating the noise levels at a greater distance and projecting back to 50 feet, assuming the noise sources are concentrated at the MSF on the northern side of the site.

The SoundPLAN noise propagation model was used to calculate area noise sources with the MSF. The model accounts for multiple receiver points, resulting in varying impacts due to distance of each point and the location of any intervening existing structures that serve as shields or noise barriers. As shown in **Table 4.10-21: Modeled Operational Noise Levels**, operational noise level increases during the daytime would range from no change at the majority of the identified receptors listed below to a high of 2.4 dBA Leq (Lday) at Site I (residential uses along Spruce Ave across from the MSF). Taking into account the ambient environment exterior noise levels during the daytime period at Site I would be 70.2 dBA. Increases in daytime noise levels would not exceed the 3 dBA Leq to or within the "normally unacceptable" or "clearly unacceptable" land use compatibility categories or result in an increase of 10 dBA or greater when noise levels remain within acceptable limits. Additionally, nighttime noise level increases would range from no

change at the majority of the identified receptors listed below to a high of 4.4 dBA Leq (Lnight) at Site I. Taking into account the ambient environment, exterior noise levels during the nighttime period at Site I would be 62.9 dBA. Although nighttime noise levels would increase by more than 3 dBA Leq, nighttime noise levels would not result in an exterior environment that exceeds the "normally unacceptable" or "clearly unacceptable" land use compatibility categories or result in an increase of 10 dBA or greater when noise levels remain within acceptable limits. Additionally, equipment noise generating mechanical equipment in the MSF would include sound enclosures that would further reduce noise levels.

Impacts related to stationary noise sources from the MSF would be less than significant.

TPSS Site Operations

The proposed Project will include two TPSS sites. The identified TPSS locations are the proposed MSF site (AIN 4021-024-015) and the City's Civic Center site on Prairie Avenue (AINs 4025-011-901 and 4025-011-902). Each TPSS includes equipment to transform the medium- to high-voltage power feed provided from the power companies to the required 750-volt direct current (VDC) needed to power the vehicles and other ancillary equipment. A description of the TPSSs is provided in **Section 3.0**, *3.5.3: Traction Power Substations*.

Noise from transformers and similar equipment at substations is usually a low-frequency (60 Hz) humming sound. Noise from fans and ventilation equipment at substation sites can also contribute to this source. Transformer noise will "transmit" and attenuate at different rates depending on the transformer size, voltage rating, and design.[73] The substation line would be the source of noise from what is termed corona discharge. Noise from corona discharge and similar electrical phenomena associated with high voltage transmission lines is heard as a cracking or hissing sound, which commonly varies with the humidity. While distinctive at a short distance, this noise is typically only about 40 to 50 dBA or less and would not be loud enough to exceed any noise compatibility standards.[74] As mentioned previously, residential uses are normally compatible in areas where the ambient noise levels range between 55 – 70 dBA. When taking into account the noise from the transmission line ranging from 40 to 50 dBA, this results in a maximum increase of 0.1 dBA Leq, which is technically considered not perceivable. With the concurrent operation of noise generated from the MSF, the noise levels generated by the transformers would be negligible. Additionally, equipment noise generating mechanical equipment in the off-site TPSS would include sound enclosures that would further reduce noise levels.

Thus, the off-site TPSS would result in a less-than-significant noise impact.

73 Southern California Edison, Tehachapi Renewable Transmission Project, accessed August 2020, https://www1.sce.com/nrc/trtp/PEA/4.12_Noise.htm

74 Southern California Edison, Tehachapi Renewable Transmission Project, accessed August 2020, https://www1.sce.com/nrc/trtp/PEA/4.12_Noise.htm

Table 4.10-21
Modeled Operational Noise Levels

Receptor	Land Use	Time Period	Ambient Noise	MSF Operational Noise, Leq	MSF Operational Noise plus Ambient, leq	Increase Over Ambient, Leq	Significant Impact?
			dBA				
Market Street Segment							
Site 1	Residential	Daytime	61.9	37.5	61.9	0.0	**No**
		Nighttime	54.6	31.8	54.6	0.0	**No**
Site A	Residential	Daytime	64.1	38.1	64.1	0.0	**No**
		Nighttime	57.8	32.4	57.8	0.0	**No**
Site K	Public	Daytime	67.5	36.1	67.5	0.0	**No**
		Nighttime	63.4	30.4	63.4	0.0	**No**
Manchester Boulevard Segment							
Site 2	Residential	Daytime	67.5	57.5	67.9	+0.4	**No**
		Nighttime	64.1	51.9	64.4	+0.3	**No**
Site B	Educational	Daytime	73.5	45.9	73.5	0.0	**No**
		Nighttime	70.5	40.2	70.5	0.0	**No**
Site I	Residential	Daytime	68.0	66.6	70.4	+2.4	**No**
		Nighttime	58.5	61.0	62.9	+4.4	**No**
Site J	Commercial/Mixed Use	Daytime	73.6	37.6	73.6	0.0	**No**
		Nighttime	69.1	32.0	69.1	0.0	**No**
Site L	Residential	Daytime	74.0	41.1	74.0	0.0	**No**
		Nighttime	72.8	35.5	72.8	0.0	**No**
Prairie Avenue Segment							
Site 3	Educational/Residential	Daytime	71.2	48.3	71.2	0.0	**No**
		Nighttime	66.0	42.6	66.0	0.0	**No**
Site 4	Residential	Daytime	77.2	34.0	77.2	0.0	**No**

Receptor	Land Use	Time Period	Ambient Noise	MSF Operational Noise, Leq	MSF Operational Noise plus Ambient, leq	Increase Over Ambient, Leq	Significant Impact?
			dBA				
		Nighttime	71.6	28.3	71.6	0.0	**No**
Site C	Place of Worship/Lodging	Daytime	76.7	36.0	76.7	0.0	**No**
		Nighttime	70.6	30.3	70.6	0.0	**No**
Site E	Lodging	Daytime	72.6	29.3	72.6	0.0	**No**
		Nighttime	66.2	23.7	66.2	0.0	**No**
Site F	Residential	Daytime	68.8	39.1	68.8	0.0	**No**
		Nighttime	59.9	33.4	59.9	0.0	**No**
Site G	Residential	Daytime	67.3	42.3	67.3	0.0	**No**
		Nighttime	61.5	36.7	61.5	0.0	**No**
Site H	Educational/Residential	Daytime	67.6	46.9	67.6	0.0	**No**
		Nighttime	56.6	41.3	56.7	+0.1	**No**
Site M	Residential	Daytime	74.9	37.4	74.9	0.0	**No**
		Nighttime	67.9	31.7	67.9	0.0	**No**
Site D	Lodging	Daytime	76.2	38.1	76.2	0.0	**No**
		Nighttime	67.0	32.5	67.0	0.0	**No**
Site 5	Lodging	Daytime	73.3	38.4	73.3	0.0	**No**
		Nighttime	70.0	32.8	70.0	0.0	**No**

*Source: Refer to **Appendix 4.10-5.1** for MSF Stationary Source Worksheets.*

Backup Generators

To assure the ability to allow APM trains to reach the nearest stations to offload riders in the event of loss of electrical supply, each TPSS will be equipped with backup power generators. The proposed Project would include up to two stationary standby generators, one at each of the two TPSS sites, with an estimated total capacity rated at approximately 4,000 kilowatts (kW) to provide emergency power primarily for APM train operation, lighting, and other emergency systems.

Community response to noise and vibration correlates with the frequency of events and, intuitively, more frequent events of low noise and vibration levels may evoke the same responses as fewer high vibration level events. This effect is accounted for in the ground-borne noise and vibration impact criteria by characterizing projects by frequency of events. According to the FTA Transit Noise and Vibration Impact Assessment Manual, frequent events are defined as more than 70 events per day and infrequent events are defined as fewer than 30 events per day. Each standby generator would operate for 2 hours per day during 24 days per year (twice a month) for a total of not more than 50 hours per year. Each standby generator would be tested during different days; if needed for emergency operation, both generators would operate for up to 2 hours each and operation could occur simultaneously.

Reference noise levels for emergency generators from the SoundPLAN source library range from 60 dB to 75 dB at 10 meters (32.8 feet) from the source. Assuming the maximum emergency generator noise level of 75 dB, sensitive receptors within this distance without the use of barriers would exceed the upper limit for the Normally Acceptable noise exposure to residential residences of 70 dBA. As mentioned previously, based on conventional standard point source noise-distance attenuation factors, noise levels would be reduced by a factor of 4.5 to 6.0 dBA for each doubling distance. Assuming the lowest end of the attenuation factor of 4.5 dBA per doubling distance, emergency generator noise levels within 100 feet would be reduced to 67.6 dBA, below the normally acceptable noise exposure for residential residences. Additionally, stationary noise sources would be muffled and enclosed and would incorporate insulation barriers or other measures to the extent feasible to further reduce noise levels from the emergency generator. As such, due to the infrequent use of the generator and the use of barriers for stationary noise sources, a less-than-significant noise impact is anticipated for the use of emergency generators.

Station Operation Noise

The proposed Project includes three station at Market Street/Florence Avenue, Prairie Avenue/Pincay Street and Prairie Avenue/Hardy Street. Both the Prairie Avenue/Pincay Street and Prairie Avenue/Hardy Street station will be located within the public rights-of-way while the Market Street/Florence Avenue will be located outside the right-of way on the current CVS commercial plaza site at the northeast corner of Market Street and Regent Street. All platforms would be elevated at least 16 feet above ground level and

would include three levels (street level, mezzanine level, and platform level); a typical station design is shown in **Figure 3.0-8**. Additional details of the stations are discussed in **Section 3.0**, *3.5.1: Proposed Project Description.* The Market Street/Florence Avenue Station will also include a passenger walkway across Florence Avenue to connect with the Metro Crenshaw/LAX Line station.

The station and aerial passenger walkway designs would reduce LRT vehicle noise at nearby sensitive land uses by moving the noise source further from these land uses. Additional noise may be generated as reflection from the elevated structure. Moderate noise impacts from APM train or monorail passbys have been analyzed along each of the guideway segments (Market Street, Manchester Boulevard and Prairie Avenue) including noise from the trains/monorails entering and exiting stations.

The exterior noise level generated by the APM trains, with all contributing noise sources in operation, would conform to the levels specified in Section 2.2.1, Exterior Airborne Noise, ASCE 21-05 and not exceed the exterior noise standards set forth therein.[75] The guideway would be designed to have noise limiting barriers to limit train noise as noted in **Table 4.10-5** above. As shown, the FTA noise limits for trains entering or leaving stations is 76 dBA.[76]

Furthermore, as shown in **Table 4.10-19** above, operation of the proposed Project would result in noise level increases from a low of 0.1 dBA Leq to a high of 1.9 dBA Leq for the monorail technology, which results in a higher increase when compared to the rubber-tired APM trains. Additionally, exterior noise levels from the APM trains at the Market Street Station would range from 39.2 dBA Leq (Lday) at Site K (commercial uses along E. Regent Street and N. Market Street) to a high of 52.8 dBA Leq (Lday) at Site 1 (Residential uses along N. Locust Street). Additionally, nighttime noise levels from the APM trains at the Market Street Station would range from a low of 38.4 dBA Leq (Lnight) at Site K to a high of 52.0 dBA Leq (Lnight) at Site 1.

As shown in **Table 4.10-19** above, exterior noise levels from the APM trains at the Prairie Avenue/Pincay Street Station during the daytime would range from a low of 46.2 dBA Leq (Lday) at Site H (Residential uses along E. Kelso Street and Osage Avenue) to a high of 55.6 dBA Leq (Lday) at Site 3 (Residential and commercial uses along E. Nutwood Street and Prairie Avenue). Additionally, APM train noise levels during the nighttime period would range from a low of 45.4 dBA Leq (Lnight) at Site H to a high of 54.7 dBA Leq (Lnight) at Site 3.

75 American Society of Civil Engineers, Automated People Mover Standards - Part 2 Section 2.2.1, Exterior Airborne Noise, ASCE 21-05.

76 American Society of Civil Engineers, Automated People Mover Standards - Part 2 Section 2.2.1, Exterior Airborne Noise, ASCE 21-05.

As shown in **Table 4.10-23** above, exterior noise levels from the APM trains at the Prairie Avenue/Hardy Street station during the daytime would range from a low of 40.7 dBA Leq (Lday) at Site F (Residential uses along Hardy Street) to a high of 53.4 dBA Leq (Lday) at Site 4 (Residential uses along Prairie Avenue). Additionally, exterior noise levels from the APM trains during the nighttime would range from a low of 39.8 dBA Leq (Lnight) at Site F to a high of 52.5 dBA Leq (Lnight) at Site 4.

Noise from passengers that would use the passenger walkways from the Market Street/Florence Avenue Station to the Metro Crenshaw/LAX Line station would not be considered a substantial noise source in that the crossover would be elevated above Florence Avenue and removed from any adjacent buildings. In addition, the noise would be muffled by existing background noise from vehicle traffic on Florence Avenue and surrounding streets.

The anticipated noise increase from operation of the stations would not result in an increase in noise level of 3 dBA to or within the "normally unacceptable" or "clearly unacceptable" land use compatibility categories or result in an increase of 10 dBA or greater when noise levels remain within acceptable limits.

Composite Traffic and Proposed Project Noise

As discussed above, implementation of the proposed Project would result in changes to existing road traffic noise, generation of construction-related noise and transit noise.

Operation

As discussed, and shown in **Appendix 4.10.2-6**, operation of the proposed Project would not result in significant impacts related to noise from roadway traffic levels, resulting in maximum increases of 0.1 dBA; in some areas, noise would actually decrease. Additionally, as shown in **Table 4.10-19**, operation of the proposed Project would result in noise levels increases from a low of 0.1 dBA Leq to a high of 1.9 dBA Leq for the monorail technologies, which results in a higher increase when compared to the rubber-tired APM trains.

As shown in **Table 4.10-21**, anticipated noise levels from stationary sources from the proposed MSF would range from no increase to a high of 4.4 dBA Leq. Taking into account the ambient environment, exterior noise levels during the nighttime period at Site I would be 62.9 dBA Leq (Lnight). Although nighttime noise levels would increase by more than 3 dBA Leq, nighttime noise levels would not result in an exterior environment that exceeds the "normally unacceptable" or "clearly unacceptable" land use compatibility categories or result in an increase of 10 dBA or greater when noise levels remain within acceptable limits.

Table 4.10-22: Composite Noise (Roadway, APM Trains, and Stationary Sources) presents the composite operational noise levels at each of the sensitive receptors. The impacts are indicative of the impacts that

would be experienced taking into account the change in roadway noise levels, operation of the APM trains and stationary noise from the proposed MSF. As a result, impacts within each receptor group may vary depending on the distance of each receiver point within the specific receptor group and the location of any shielding or barriers.

As shown in **Table 4.10-22**, maximum composite noise level increases during the daytime period range from a low of 0.1 dBA Leq (Lday) to a high of 4.8 dBA Leq (Lday). Additionally, maximum composite noise level increases during the nighttime period from a low of 0.3 dBA Leq (Lnight) to a high of 6.4 dBA Leq (Lnight). Although exterior noise levels would increase by more than 3 dBA Leq during both the daytime and nighttime period, increases would not cause noise levels to be within the "normally unacceptable" or "clearly unacceptable" land use compatibility ranges for residential uses or result in an increase of 10 dBA or greater when noise levels remain within acceptable limits.

Composite noise levels impacts would be less than significant.

Table 4.10-22
Composite Operational Noise (Roadway, APM Trains, and Stationary Sources)

Sensitive Receptor ID	Land Use	Time Period	Future Long-Term (2045) With Project Roadway Noise Levels[1]	Maximum Noise Levels at Guideway [2]	Maximum Stationary Noise Levels[3]	Future Roadway plus Maximum Noise at Guideway [3]	Increase in Composite Noise	Significant Impact?
			dBA					
Market Street Segment								
Site 1	Residential	Daytime	58.7	52.8	37.5	59.7	+1.0	**No**
		Nighttime	51.2	52.0	31.8	54.7	+3.5	**No**
Site A	Residential	Daytime	60.9	51.7	38.1	61.4	+0.5	**No**
		Nighttime	53.3	50.8	32.4	55.3	+2.0	**No**
Site K	Public	Daytime	67.3	49.0	36.1	67.4	+0.1	**No**
		Nighttime	59.8	48.2	30.4	60.1	+0.3	**No**
Manchester Boulevard Segment								
Site 2	Residential	Daytime	70.2	56.7	57.5	70.6	+0.4	**No**
		Nighttime	62.7	55.9	51.9	63.8	+1.1	**No**
Site B	Educational	Daytime	70.2	55.0	45.9	70.3	+0.1	**No**
		Nighttime	62.7	54.1	40.2	63.3	+0.6	**No**
Site I	Residential	Daytime	63.6	51.1	66.6	68.4	+4.8	**No**
		Nighttime	56.1	50.2	61.0	62.5	+6.4	**No**
Site J	Commercial/Mixed Use	Daytime	68.9	50.2	37.6	69.0	+0.1	**No**
		Nighttime	61.4	49.4	32.0	61.7	+0.3	**No**
Site L	Residential	Daytime	73.0	37.9	41.1	73.0	0.0	**No**
		Nighttime	65.5	37.0	35.5	65.5	0.0	**No**
Prairie Avenue Segment								
Site 3	Educational/Residential	Daytime	71.9	55.6	48.3	72.0	+0.1	**No**

Sensitive Receptor ID	Land Use	Time Period	Future Long-Term (2045) With Project Roadway Noise Levels[1]	Maximum Noise Levels at Guideway [2]	Maximum Stationary Noise Levels[3]	Future Roadway plus Maximum Noise at Guideway [3]	Increase in Composite Noise	Significant Impact?
			dBA					
		Nighttime	64.3	54.7	42.6	64.8	+0.5	**No**
Site 4	Residential	Daytime	71.8	53.4	34.0	71.9	+0.1	**No**
		Nighttime	64.3	52.5	28.3	64.6	+0.3	**No**
Site C	Place of Worship/Lodging	Daytime	72.1	53.2	36.0	72.2	+0.1	**No**
		Nighttime	64.6	52.4	30.3	64.9	+0.3	**No**
Site E	Lodging	Daytime	73.0	38.3	29.3	73.0	0.0	**No**
		Nighttime	65.5	37.4	23.7	65.5	0.0	**No**
Site F	Residential	Daytime	59.7	46.8	37.1	59.9	+0.2	**No**
		Nighttime	52.2	46.0	33.4	53.2	+1.0	**No**
Site G	Residential	Daytime	65.3	53.1	42.3	65.6	+0.3	**No**
		Nighttime	57.8	52.2	36.7	58.9	+1.1	**No**
Site H	Educational/Residential	Daytime	64.8	52.4	46.9	65.1	+0.3	**No**
		Nighttime	57.3	51.6	41.3	58.4	+1.1	**No**
Site M	Residential	Daytime	71.8	34.8	37.4	71.8	0.0	**No**
		Nighttime	64.3	33.9	31.7	64.3	0.0	**No**
Site D	Lodging	Daytime	73.6	37.2	38.1	73.6	0.0	**No**
		Nighttime	66.1	36.3	32.5	66.1	0.0	**No**
Site 5	Lodging	Daytime	73.6	39.9	38.4	73.6	0.0	**No**
		Nighttime	66.1	39.0	32.8	66.1	0.0	**No**

*Notes: [1] Refer to **Table 4.10-20** for Roadway Noise Levels*
*[2] Refer to **Table 4.10-23** for Monorail Guideway System operational noise levels.*
*[3] Refer to **Table 4.10-25** for MSF Operational Noise Levels*
[4] Logarithmic increase = Roadway Noise + Guideway Noise + Stationary MSF Noise

Mitigation Measures

Impacts associated with noise from operation of the proposed Project are less than significant do not require any mitigation.

Impact NOI-2: Would the project result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Construction

Construction activities can generate varying degrees of ground vibration, depending on the construction phase (e.g., site preparation, grading, etc.) and the type of construction equipment used. The operation of construction equipment generates vibrations that spread through the ground and diminish in amplitude with distance from the source. The effect on buildings located near the construction site often varies depending on soil type, ground strata, and construction characteristics of the receptor buildings. The results from vibration can range from no perceptible effects at the lowest vibration levels to low rumbling sounds and perceptible vibration at moderate levels.

Ground-borne vibration impacts due to proposed Project construction activities were evaluated by identifying potential vibration sources (i.e., construction equipment), estimating the vibration levels at potentially affected receptors, and comparing the proposed Project's vibration levels to the applicable vibration significance thresholds.

Vibration levels were calculated based on the FTA published standard[77] vibration velocities for various construction equipment operations. Vibration levels with regard to potential building damage are evaluated at the nearest off-site buildings to the Project area, whereas the potential for human annoyance associated with construction-related vibration are evaluated at the identified receptor locations. In addition, vibration impacts, in accordance with FTA and Caltrans guidance, are evaluated based on the maximum peak vibration levels generated by each type of construction equipment. This differs from the analysis of noise impacts which is based on the average/equivalent (Leq) levels, which are dependent on the total number of construction equipment operating during the analysis period (i.e., 1 hour).

Construction Related Vibration Impacts from On Site Activities

77 Federal Transit Administration (FTA), Transit Noise and Vibration Impact Assessment Manual, FTA Report No. 0123, September 2018.

The proposed Project will involve the use of heavy equipment as discussed in the Construction Scenario (see **Appendix 3.0.4** of the EIR), the anticipated construction equipment for on and off site construction activities and is shown in **Table 4.10-4.**

Off-Road On-Site Equipment: Off-road construction equipment includes dozers, loaders, sweepers, and other heavy-duty construction equipment that is not licensed for travel on public highways.

On-Road On-Site Equipment: On-road on-site equipment includes shuttle vans transporting construction employees to and from the site(s), on-site pick-up trucks, crew vans, water trucks, dump trucks, haul trucks and other on road-road vehicles licensed to travel on public roadways.

Phases 1, 2 and 3 will involve extensive use of construction equipment that has the ability to create groundborne vibration. Phase 4 will include a significantly reduced amount of construction equipment that is not anticipated to include vibration intensive activities.

Table 4.10-23: Construction Related Vibration Impacts – Building Damage presents the construction vibration impacts associated with construction in terms of building damage. As indicated in **Table 4.10-23**, the forecasted vibration levels due to construction activities would exceed the building damage significance threshold of 0.2 PPV inches per second (ips) at:

Market Street and Market Street/Florence Avenue Station

- **Site 1** (Residential uses to the west of N. Locust Street including the Holy Faith Episcopal Church, commercial uses to the east of N. Locust Street**)** with an estimated vibration velocity levels at the nearest off-site structures of 0.267 PPV ips;
- **Site A** (Commercial uses along E. Queen Street) with an estimated vibration velocity levels at the nearest off-site structures of 0.318 PPV ips; and
- **Site K** (Commercial uses along E. Regent Street) with an estimated vibration velocity levels at the nearest off-site structures of 0.228 PPV ips.

Manchester Boulevard and MSF Site

- **Site B** (Residential uses on the northern portion of E. Manchester Boulevard, commercial uses on the southern portion of E. Manchester Boulevard) with an estimated vibration velocity levels at the nearest off-site structures of 0.318 PPV ips; and
- **Site I** (Residential uses on the eastern portion of E. Spruce Avenue, commercial uses on the western portion of E. Spruce Avenue) with an estimated vibration velocity levels at the nearest off-site structures of 0.228 PPV ips; and

Prairie Avenue and Prairie Avenue/Pincay Drive and Prairie Avenue/Hardy Street Stations

- **Site 4** (Mixed-use residential along west side of Prairie Avenue) with an estimated vibration velocity levels at the nearest off-site structures of 0.490 PPV ips;
- **Site C** (SoFi Stadium to the west of Prairie Avenue, commercial and lodging uses to the east of Prairie Avenue) with an estimated vibration velocity levels at the nearest off-site structures of 0.318 PPV ips

These impacts are primarily caused by impact pile drivers located within 55 feet of the nearest receptor.

As such, construction vibration impacts would be potentially significant.

As shown in **Table 4.10-24: Proposed Project Construction Related Vibration Impacts—Human Annoyance**, the forecasted vibration levels from construction activities would exceed human annoyance significance threshold of 72 PPV ips for various types of equipment at:

Market Street and Market Street/Florence Avenue Station

- **Site 1** (Residential uses to the west of N. Locust Street including the Holy Faith Episcopal Church, commercial uses to the east of N. Locust Street**)** with an estimated maximum vibration velocity levels at the nearest off-site structures of 96 VdB.
- **Site A** (Commercial uses along E. Queen Street) with an estimated maximum vibration velocity levels at the nearest off-site structures of 98 VdB.
- **Site K** (Commercial uses along E. Regent Street) with an estimated maximum vibration velocity levels at the nearest off-site structures of 95 VdB.

Manchester Boulevard and MSF Site

- **Site 2** (Residential uses along E. Manchester Boulevard, Manchester Drive and S. Orange Avenue) with an estimated maximum vibration velocity levels at the nearest off-site structures of 91 VdB.
- **Site B** (Residential uses on the northern portion of E. Manchester Boulevard, commercial uses on the southern portion of E. Manchester Boulevard) with an estimated maximum vibration velocity levels at the nearest off-site structures of 98 VdB.
- **Site I** (Residential uses on the eastern portion of E. Spruce Avenue, commercial uses on the western portion of E. Spruce Avenue) with an estimated maximum vibration velocity levels at the nearest off-site structures of 95 VdB.
- **Site J** (Commercial uses along E. Manchester Boulevard) with an estimated maximum vibration velocity levels at the nearest off-site structures of 93 VdB.

Table 4.10-23

Proposed Project Construction Related Vibration Impacts – Building Damage

Nearest Off-Site Building Structures	Estimated Vibration Velocity Levels at the Nearest Off-Site Structures from Proposed Project Construction Equipment							Significance Threshold (PPV ips)	Significant Impacts?
	Pile Driver (impact)	Vibratory Roller	Large Bulldozer	Caisson Drilling	Loaded Trucks	Jack-hammer	Small bulldozer		
Market Street Segment									
Site 1	***0.267***	0.087	0.037	0.037	0.031	0.058	0.001	0.2	**Yes**
Site A	***0.318***	0.104	0.044	0.044	0.038	0.069	0.001	0.2	**Yes**
Site K	***0.228***	0.074	0.031	0.031	0.027	0.049	0.001	0.2	**Yes**
Manchester Boulevard Segment									
Site 2	0.137	0.045	0.019	0.019	0.016	0.030	0.001	0.2	No
Site B	***0.318***	0.104	0.044	0.044	0.038	0.069	0.001	0.2	**Yes**
Site I	***0.228***	0.074	0.031	0.031	0.027	0.049	0.001	0.2	**Yes**
Site J	0.173	0.056	0.024	0.024	0.020	0.038	0.001	0.2	No
Site L	0.002	0.001	0.000	0.000	0.000	0.000	0.000	0.2	No
Prairie Avenue Segment									
Site 3	0.051	0.017	0.007	0.007	0.006	0.011	0.000	0.2	No
Site 4	***0.490***	0.160	0.068	0.068	0.058	0.107	0.002	0.2	**Yes**
Site 5	0.124	0.040	0.017	0.017	0.015	0.027	0.001	0.2	No
Site C	***0.318***	0.104	0.044	0.044	0.038	0.069	0.001	0.2	**Yes**
Site D	0.012	0.004	0.002	0.002	0.001	0.003	0.000	0.2	No
Site E	0.011	0.004	0.002	0.002	0.001	0.002	0.000	0.2	No
Site F	0.051	0.017	0.007	0.007	0.006	0.011	0.000	0.2	No
Site G	0.028	0.009	0.004	0.004	0.003	0.006	0.000	0.2	No
Site H	0.008	0.003	0.001	0.001	0.001	0.002	0.000	0.2	No
Site M	0.001	0.000	0.000	0.000	0.000	0.000	0.000	0.2	No

Source: US Department of Transportation, Federal Transportation Authority, Transit Noise and Vibration Impact Assessment
*Refer to **Appendix 4.10-5** for Construction Vibration Worksheets*
*Note: **Boldface type** indicates noise level in exceedance of the significance threshold.*

Table 4.10-24

Proposed Project Construction Related Vibration Impacts – Human Annoyance

Nearest Off-Site Building Structures	Estimated Vibration Velocity Levels at the Nearest Off-Site Structures from Proposed Project Construction Equipment							Significance Threshold (VdB)	Significant Impacts?
	Pile Driver (impact)	Vibratory Roller	Large Bulldozer	Caisson Drilling	Loaded Trucks	Jack-hammer	Small bulldozer		
Market Street Segment									
Site 1	***96***	***87***	***79***	***79***	***78***	***83***	50	72	**Yes**
Site A	***98***	***88***	***81***	***81***	***79***	***85***	51	72	**Yes**
Site K	***95***	***85***	***78***	***78***	***77***	***82***	48	72	**Yes**
Manchester Boulevard Segment									
Site 2	***91***	***81***	74	74	72	***77***	44	72	**Yes**
Site B	***98***	***88***	***81***	***81***	***79***	***85***	51	72	**Yes**
Site I	***95***	***85***	***78***	***78***	***77***	***82***	48	72	**Yes**
Site J	***93***	***83***	***76***	***76***	74	***79***	46	72	**Yes**
Site L	53	44	36	36	35	40	7	72	No
Prairie Avenue Segment									
Site 3	***82***	72	65	65	64	69	36	72	**Yes**
Site 4	***102***	***92***	***85***	***85***	***83***	***89***	55	72	**Yes**
Site 5	***90***	***80***	***73***	***73***	71	***77***	43	72	**Yes**
Site C	***98***	***88***	***81***	***81***	***79***	***85***	51	72	**Yes**
Site D	*70*	60	52	52	51	56	23	72	No
Site E	*69*	59	51	51	50	55	22	72	No
Site F	***82***	72	65	65	64	69	36	72	**Yes**
Site G	***77***	67	60	60	58	64	30	72	**Yes**
Site H	66	56	49	49	47	53	19	72	No
Site M	44	34	26	26	25	30	-3	72	No

Source: US Department of Transportation, Federal Transportation Authority, Transit Noise and Vibration Impact Assessment
Refer to ***Appendix 4.10-5*** *for Construction Vibration Worksheets*
Note: ***Boldface type*** *indicates noise level in exceedance of the significance threshold.*

Prairie Avenue and Prairie Avenue/Pincay Drive and Prairie Avenue/Hardy Street Stations

- **Site 3** (Residential uses along E. Nutwood Street, education facilities along Prairie Avenue) with an estimated maximum vibration velocity levels at the nearest off-site structures of 82 VdB.
- **Site 4** (Mixed-use residential along west side of Prairie Avenue) with an estimated maximum vibration velocity levels at the nearest off-site structures of 102 VdB.
- **Site 5** (Lodging uses on the southern portion of W. Century Boulevard) with an estimated maximum vibration velocity levels at the nearest off-site structures of 90 VdB.
- **Site C** (SoFi Stadium to the west of Prairie Avenue, commercial and lodging uses to the east of Prairie Avenue) with an estimated maximum vibration velocity levels at the nearest off-site structures of 98 VdB.
- **Site F** (Multifamily residential uses along E. Hardy Street) with an estimated maximum vibration velocity levels at the nearest off-site structures of 82 VdB.
- **Site G** (Residential uses along E. Arbor Vitae Street) with an estimated maximum vibration velocity levels at the nearest off-site structures of 77 VdB.

The sites that exceed the human annoyance significance threshold of 72 PPV ips for forecasted vibration levels due to construction activities from heavy equipment would range from 73 PPV ips for large dozers and drilling equipment at Site 5 (Lodging uses on the southern portion of W. Century Boulevard) to 102 PPV ips for piles drivers at Site 4 (Mixed-use residential along west side of Prairie Avenue).

Thus, proposed Project construction would result in a significant vibration impact with regard to human annoyance.

Construction Haul Route Related Vibration Impacts

In addition to on-site construction activities, construction delivery/haul trucks would generate ground-borne vibration as they travel along the proposed Project's anticipated off-site truck travel routes. Based on FTA data,[78] the vibration generated by a typical heavy-duty truck would be approximately 63 VdB (0.00566 PPV) at a distance of 50 feet from the truck.

Existing buildings along the proposed Project's anticipated off-site truck travel routes (Florence Avenue, Manchester Boulevard, Prairie Avenue, and Century Boulevard) that are situated approximately 35 feet from the truck travel pathway would be exposed to ground-borne vibration levels of approximately 0.01 PPV. This forecasted vibration level would be below the most stringent building damage criteria of 0.12

78 Federal Transit Administration (FTA), Transit Noise and Vibration Impact Assessment Manual, FTA Report No. 0123, September 2018.

PPV. [79] Therefore, vibration impacts with respect to building damage from off-site construction truck travel on public roadways would be less than significant.

In addition, vibration sensitive uses (e.g., residential, hotel uses) are located along Florence Avenue, Manchester Boulevard, Prairie Avenue, and Century Boulevard. Ground-borne vibration levels generated by proposed Project off-site construction truck travel would be below the FTA 72 VdB significance threshold,[80] as these uses are located more than 25 feet from the truck travel pathway. Therefore, vibration impacts with respect to human annoyance from off-site construction truck travel would be less than significant for the vibration sensitive land uses located along these roadways.

Operation

The condition of the rails, type of guideway construction, other proposed Project components, and the mass and stiffness of the guideway structure would have an influence on the level of ground-borne vibration. Jointed rail, worn rail, and wheel impacts at special track work can all cause substantial increases in ground-borne vibration. It is rare for ground-borne vibration to be a problem with elevated railways except when guideway supports are located within 50 feet of buildings.[81] For rubber-tired APM trains, the smoothness of the roadway/guideway is the critical factor; if the surface is smooth, vibration problems are unlikely.

The vibration sensitive land uses nearest to the guideway include commercial and residential uses along Market Street, Manchester Boulevard and Prairie Avenue which would be approximately 30 feet from the guideway centerline. Based on the adjusted vibration level curve, the estimated ground-borne vibration levels would be approximately 67 VdB for monorail trains (rapid transit or light rail vehicles) and 64 VdB for rubber-tired APM trains. Consequently, the maximum vibration level of the uses along the guideway would be below the FTA recommended maximum acceptable level threshold of 72 VdB.[82]

As such, transit-related ground-borne vibration for rubber-tired APM train vehicles would be less than significant.

79 Federal Transit Administration (FTA), Transit Noise and Vibration Impact Assessment Manual, FTA Report No. 0123, September 2018.

80 Federal Transit Administration (FTA), Transit Noise and Vibration Impact Assessment Manual, FTA Report No. 0123, September 2018.

81 U.S. Department of Transportation, Office of Planning and Environment, Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, September 2018, accessed July 2020, https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf

82 Federal Transit Administration (FTA), Transit Noise and Vibration Impact Assessment Manual, FTA Report No. 0123, September 2018

Mitigation Measures

The following mitigation measures have been identified to reduce potentially significant vibration impacts related to construction.

Construction

MM 4.10-3: **Construction Vibration Reduction Plan**. Prior to the issuance of any demolition or construction permit for each phase of project development, a Construction Vibration Reduction Plan shall be prepared to minimize construction vibration at nearby sensitive receptors from vibration created by construction activities. The Plan shall be developed in coordination with a certified acoustical/vibration consultant and the Construction Manager and shall be approved by the City's Director of Public Works. The Plan shall include but not be limited to the following elements to ensure impacts from groundborne vibration are less than significant:

A. A Pre-Demolition and Construction Plan that includes but not limited to:

   i. Photos of current conditions of buildings and structures that could be damaged from construction activities. This crack survey shall include photos of existing cracks and other material conditions present on or at the surveyed buildings. Images of interior conditions shall be included if possible. Photos in the report shall be labelled in detail and dated.

   ii. Identify representative cracks in the walls of existing buildings, if any, and install crack gauges on such walls of the buildings to measure changes in existing cracks during project activities.

   Crack gauges shall be installed on multiple representative cracks, particularly on sides of the building facing the project.

   iii. Determine the number and placement of vibration sensors at the affected buildings in consultation with a qualified architect. The number of units and their locations shall take into account proposed demolition and construction activities so that adequate measurements can be taken illustrating vibration levels during the course of the project, and if/when levels exceed the established threshold.

   iv. A line and grade pre-construction survey at the affected buildings shall be conducted.

B. A Vibration Plan During Demolition and Construction:

   i. The Construction Manager shall regularly inspect and photograph crack gauges, maintaining records of these inspections to be included in postconstruction reporting. Gauges shall be inspected every two weeks, or

more frequently during periods of active project actions in close proximity to crack monitors.

ii. The vibration monitoring system shall measure and continuously store the peak particle velocity (PPV) in inches/second. Vibration data shall be stored on a one-second interval. The system shall also be programmed for two preset velocity levels: a regulatory level that represents when PPV levels would exceed the FTA's threshold of significance for a building given its conditions, and a warning level that is 0.05 inch/second (PPV) less than the regulatory level. The system shall also provide real-time alert when the vibration levels exceed either of the two preset levels.

iii. In the event the warning level (PPV) is triggered, the contractor shall identify the source of vibration impacts and establish steps to reduce the vibration levels, including but not limited to halting or staggering concurrent activities and using lower vibratory techniques.

iv. In the event the regulatory level (PPV) is triggered, the Construction Manager shall halt the construction activities in the vicinity of the Project area and visually inspect the building for any damage. Results of the inspection must be logged. The Construction Manager shall identify the source of vibration generation and provide steps to reduce the vibration level. Vibration measurement shall be made with the new construction method to verify that the vibration level is below the warning level (PPV). Construction activities may then restart.

v. In the event damage occurs to historic finish materials due to construction vibration, such materials shall be repaired in consultation with a qualified preservation consultant.

vi. The Construction Manager shall collect vibration data from receptors and report vibration levels to the City Chief Building Official on a daily basis.

The reports shall include annotations regarding project activities as necessary to explain changes in vibration levels.

C. Post-Construction:

i. The Construction Manager shall provide a report to the City Chief Building Official regarding crack and vibration monitoring conducted during demolition and construction. In addition to a narrative summary of the monitoring activities and their findings, this report shall include photographs illustrating the post-

construction state of cracks and material conditions that were presented in the pre-construction assessment report, along with images of other relevant conditions showing the impact, or lack of impact, of project activities. The photographs shall sufficiently illustrate damage, if any, caused by the project and/or show how the project did not cause physical damage to the buildings. The report shall include analysis of vibration data related to project activities, as well as summarize efforts undertaken to avoid vibration impacts. Finally, a postconstruction line and grade survey shall also be included in this report.

ii. The Construction Manager shall be responsible for repairs and damage to buildings if damage is caused by vibration or movement during the demolition and/or construction activities. Repairs may be necessary to address, for example, cracks that expanded as a result of the project, physical damage visible in post-construction assessment, or holes or connection points that were needed for shoring or stabilization. Repairs shall be directly related to project impacts and will not apply to general rehabilitation or restoration activities of the buildings.

MM 4.10-4: **Construction Equipment Locations (Building Damage)**. To address potential structural and building damage, the following measures are proposed to reduce vibration impacts:

- Limit the location of pile driving and vibratory roller activity to not be within 55 feet and 30 feet of the nearest off-site sensitive receptor, respectively.
- Limit the number of jackhammers operating simultaneously to one (1) piece operating within 45 feet of off-site sensitive receptors.
- In the event impact pile driving is required, equipment shall only be used from the hours of 7:00 AM to 7:00 PM. If feasible, pile driving should use alternative technology such as vibration or hydraulic insertion.

MM 4.10-5: **Construction Equipment Locations (Human Annoyance)**. To reduce construction vibration impacts related to human annoyance, the following measures are proposed:

- Limit the location of pile driving to 310 feet of off-site vibration sensitive receptors.
- Limit the location of vibratory roller to 150 feet of off-site vibration sensitive receptors.
- Limit the location of large bulldozer to 85 feet of off-site vibration sensitive receptors.
- Limit the location of caisson drilling to 85 feet of off-site vibration sensitive receptors.
- Limit the location of loaded trucks to 75 feet of off-site vibration sensitive receptors.
- Limit the location of jackhammers to 45 feet of off-site vibration sensitive receptors.
- Limit the location of small bulldozer to 25 feet of off-site vibration sensitive receptors.

Operation

Impacts associated with groundborne vibration and noise from operation of the proposed Project are less than significant do not require any mitigation.

Level of Significance after Mitigation

Construction

As shown in **Table 4.10-23** and **4.10-24**, impacts related to construction vibration to both building damage and human annoyance would be significant.

As mentioned previously, implementation of **Mitigation Measure MM 4.10-2** would designate a Community Affairs Liaison to be responsible for responding within 24 hours to any local complaints about construction activities related to noise and vibration. **MM 4.10-2** would provide a community affairs liaison to investigate noise disturbance and undertake all feasible measures are implemented to reduce construction vibration levels as deemed appropriate. Additionally, implementation of **Mitigation Measure MM 4.10-3** would require a preparation of a Construction Vibration Reduction Plan to ensure minimization of construction vibration at nearby sensitive receptors from vibration created by construction activities. The Construction Vibration Reduction Plan would require continuous monitoring and collection of vibration data to verify vibration levels are below the warning level PPV. In the event regulatory levels of PPV is triggered, construction activities would halt to visually inspect sensitive buildings for damage. Additionally, **Mitigation Measure MM 4.10-4** and **MM 4.10-5** would require vibration-generating equipment to be located at specified distances from adjacent noise receptors.

Table 4.10-25: Mitigated Proposed Project Construction Related Vibration Impacts – Human Annoyance implements **Mitigation Measure MM 4.10-5** and provides the adjusted distances required to reduce vibration to below the perceptible levels of 72 VdB. As shown, impacts related to construction vibration impacts to human annoyance with adjusted distance of construction equipment would be less than significant with mitigation.

Table 4.10-25
Mitigated Proposed Project Construction Related Vibration Impacts – Human Annoyance

Equipment	Unmitigated		Mitigated		Exceed Significance Threshold of 72 VdB?
	Distance (feet)	Estimated Vibration Velocity Levels (PPV ips)	Distance (feet)	Estimated Vibration Velocity Levels (PPV ips)	
Pile Driver (impact)	25	104	310	71	**No**
Vibratory Roller	25	94	150	71	**No**
Large Bulldozer	25	87	85	71	**No**
Caisson Drilling	25	87	85	71	**No**
Loaded Trucks	25	86	75	71	**No**
Jackhammer	25	79	45	71	**No**
Small bulldozer	25	58	25	58	**No**

_____
Source: US Department of Transportation, Federal Transportation Authority, Transit Noise and Vibration Impact Assessment

Operation

Impacts associated with groundborne vibration from operation of the proposed Project are less than significant and do not require any mitigation.

4.10.8 CUMULATIVE IMPACTS

The analysis of changes to the community noise environment based on cumulative conditions considers development of the proposed Project in combination with ambient growth and other development projects located near the Project area. The potential for cumulative noise impacts is primarily related to the distance between each related project's stationary noise sources, as well as both the presence of existing structures in the Project area and the cumulative traffic that the cumulative development would add to the surrounding roadway network. As discussed in **Section 4.0**, *4.0.6: Cumulative Scenario*, there are 74 cumulative projects within the City.

4.10.8.1 Noise

Construction

Equipment Noise

Noise from the construction of development projects is typically localized and has the potential to affect noise-sensitive uses within 500 feet of the construction site. Thus, noise from construction activities for two projects within 1,000 feet of each other can contribute to a cumulative noise impact for receptors

located midway between the two construction sites. The cumulative project lists locating within 1,000 to the Project area are Project No. 7, 8, 20, 30, 35, 44, 37, 48, 60, and 73.

As shown in **Table 4.10-15** through **4.10-18**, construction noise impacts would be potentially significant without implementation of mitigation. The timing of the construction activities for cumulative projects cannot be defined, and any quantitative analysis of those projects to assume concurrent construction would be entirely speculative. Should construction activities (day or night) during any phase of construction occur concurrently with construction of the cumulative projects, adjacent receptors could be exposed to construction noise that results in temporary noise increases in excess of 5 dBA Leq 1-hour above ambient exterior noise level significance threshold. Given that the proposed Project's construction contributes to the noise levels generated by the cumulative projects within 1,000 feet, cumulative impacts would be significant during those periods of time when the proposed Project development and the cumulative projects construction are occurring concurrently. While it could reasonably be assumed that cumulative projects would implement mitigation measures to lessen to the extent feasible potential noise impacts from construction, potential cumulative impacts as a result of the cumulative projects and the proposed Project could occur.

Therefore, the cumulative construction equipment noise impact would be cumulatively considerable and significant.

Off-Site Construction Noise

In terms of off-site construction-related noise, the location of the cumulative projects suggests that off-site construction truck travel associated with the related projects would occur along portions of the same travel routes as those anticipated to be used by the proposed Project's off-site construction trucks.

As mentioned previously, the primary delivery and haul routes proposed during construction of the proposed Project would utilize Florence Avenue, Manchester Boulevard, Prairie Avenue, and Century Boulevard, which have been designated by the City as appropriate for heavy truck use. Should use of the same designated haul routes by any of the cumulative projects overlap with use of those haul routes during the same period, traffic volumes could potentially increase such that the resulting cumulative noise increase due to construction traffic along the haul routes would exceed 3 dBA over ambient noise levels at noise-sensitive receptors along those routes. However, similar to the proposed Project, related projects would likely designate construction routes to freeway and major arterials, avoiding minor arterials.

As mentioned previously, it takes a doubling of traffic volumes (100 percent increase) in order to increase traffic noise levels by 3 dBA. As compared to adjusted baseline average daily traffic volumes along the roadways mentioned above, the sound power generated by the maximum anticipated number of

construction trucks would not be equivalent or greater to a doubling of the maximum ADT along West Century Boulevard, Manchester Boulevard or South Prairie Avenue. In combination with the cumulative projects within 1,000 feet, construction-related traffic would not result in a double or tripling of existing daily traffic volumes on streets around the proposed Project. As such, the cumulative exceedances of related project construction truck traffic would not be considered cumulative considerable. Therefore, cumulative impacts associated with off-site construction noise would not be cumulatively considerable and would be less than significant.

Operation

Roadway Noise

Noise and vibration for the six operational scenarios was based on VMTs with and without the proposed Project. The Opening Year (2026) and Future Horizon Year (2045) scenarios include the development of the related projects identified in **Section 4.0**, *4.0.6*. In addition, the traffic study (see **Appendix 4.12.1**) the SCAG 2020 RTP/SCS[83] Socio-economic data (SED) for base year (2016) and Future baseline (2045) constrained conditions were utilized as the basis for developing the socio-economic data for use with the Inglewood Travel Demand Forecast (TDF) model. Updates to the socioeconomic data include those associated with known related projects from various cities and adjacent jurisdictions. Opening year (2026) SED database was used for the Inglewood TDF developed using interpolation of the 2016 and 2045 databases from SCAG 2020 RTP/SCS data updated for related projects. Therefore, the Opening Year (2026) and Future Horizon Year (2045) scenarios account for the growth associated with related project and future growth as provided by SCAG.

As detailed in **Appendix 4.10.2-6**, roadway noise levels from Opening Year (2026) Conditions With NFL Event Without ITC Project during the daytime ranged from a low of 57.2 dBA Leq (Lday) along Market Street from Florence Avenue to Regent Street to a high of 73.8 dBA Leq (Lday) along Century Boulevard between Grevillea Avenue and La Brea Avenue/Hawthorne Boulevard. Additionally, nighttime roadway noise levels ranged from a low of 49.7 dBA Leq (Lnight) along Market Street from Florence Avenue to Regent Street to a high of 65.5 dBA Leq (Lnight) along Century Boulevard between Doty Avenue and HP Casino Way and between HP Casino Way to Yukon Avenue.

As detailed in **Appendix 4.10.2-6,** roadway noise levels from Opening Year (2026) Conditions With NFL Event With ITC Project during both the daytime (7:00 AM to 10:00 PM) and nighttime (10:00 PM to 7:00 AM) periods would not exceed the 3 dBA Leq increase significance thresholds or result in an increase of 10 dBA when noise levels remain within acceptable limits during both daytime and nighttime periods.

83 Southern California Association of Governments (SCAG), Connect SoCal: 2020-2045 Regional Transportation Plan/Sustainable Communities Strategies Draft, "Chapter 1," https://www.connectsocal.org/Pages/Connect-SoCal-Draft-Plan.aspx, Accessed on July 10, 2020.

Impacts of the proposed Project related to traffic generated noise for the Future Opening Year (2026) with NFL Event With ITC Project would be less than significant.

As detailed in **Appendix 4.10.2-6,** roadway noise levels from Future Horizon Year (2045) With NFL Event Without ITC Project during the daytime ranged from a low of 58.1 dBA Leq (Lday) along Market Street from Florence Avenue to Regent Street to a high of 74.6 dBA Leq (Lday) along Century Boulevard between Grevillea Avenue and La Brea Avenue/Hawthorne Boulevard. Additionally, nighttime roadway noise levels ranged from a low of 50.6 dBA Leq (Lnight) along Market Street from Florence Avenue to Regent Street to a high of 66.1 dBA Leq (Lnight) along Century Boulevard between Doty Avenue and HP Casino Way and between HP Casino Way to Yukon Avenue.

As detailed in **Appendix 4.10.2-6**, roadway noise levels from Future Horizon Year (2045) With NFL Event With ITC Project during both the daytime (7:00 AM to 10:00 PM) and nighttime (10:00 PM to 7:00 AM) periods would not exceed the 3 dBA Leq increase significance thresholds or result in an increase of 10 dBA when noise levels remain within acceptable limits during both daytime and nighttime periods. Therefore, impacts of the proposed Project related to traffic generated noise for the Future Horizon Year (2045) With NFL Event With ITC Project would be less than significant.

Therefore, noise impacts resulting from the proposed Project related to traffic generated noise for both the Opening Year (2026) and Future Horizon Year (2045) with NFL Event With ITC Project are less than significant and would not be cumulatively considerable.

4.10.8.2 Vibration

Construction

Cumulative development in the Project vicinity may result in the exposure of people to or the generation of excessive ground-borne vibration. The nearest cumulative project is located at 101, 125, 139, 140, and 150 Market Street (Project No. 30) located approximately 100 feet from the proposed guideway. As shown in **Table 4.10-23** above, construction vibration impacts to building damage would occur with impact pile drivers located within 55 feet of the nearest receptor. Should construction of Project No. 30 overlap with the proposed Project, impacts to vibration sensitive receptors would be potentially significant.

As previously discussed for vibration, the forecasted vibration levels due to construction vibration velocities would exceed the structural damage threshold of 0.2 in/sec PPV at certain sensitive receptors during various construction phases.

Table 4.10-23 shows the forecasted vibration levels due to construction activities would exceed the building damage significance threshold at certain locations along the proposed Project. Additionally, **Table**

4.10-24 shows the forecasted vibration levels due to construction activities would exceed human annoyance significance thresholds. Implementation of **Mitigation Measure MM 4.10-2** would provide a community affairs liaison to investigate noise disturbance and undertake all feasible measures are implemented to reduce construction vibration levels as deemed appropriate. Implementation of **Mitigation Measure MM 4.10-3** would require a preparation of a Construction Vibration Reduction Plan to ensure minimization of construction vibration at nearby sensitive receptors from vibration created by construction activities. **Mitigation Measure MM 4.10-4** and **MM 4.10-5** would require vibration-generating equipment to be located at specified distances from adjacent noise receptors.

Table 4.10-25 provides the adjusted distances required to reduce vibration to below the perceptible levels of 72 VdB. Additionally, there are no vibration-sensitive receptors that would be adjacent to both the proposed Project and Project No. 30, as the area mostly consists of commercial uses. Therefore, Proposed Project impacts would not be affected by cumulative project construction activity. Cumulative impacts related to construction vibration would be less than significant.

Operation

Cumulative noise impacts attributable to stationary sources that operate on a daily basis occur when these sources are located in relative proximity to one another. The cumulative projects located in the proximity to the Project area mentioned above generally consist of residential, retail, or other types of commercial uses. These types of uses are not typically associated with excessive exterior stationary source noise. Noise levels from stationary sources within each cumulative project development site would also be reduced to less than significant levels at the property line due to IMC requirements limiting noise from stationary sources, such as Section 5-39.

Additionally, the vibration sensitive land uses nearest to the guideway include commercial and residential uses along Market Street, Manchester Boulevard and Prairie Avenue which would be approximately 30 feet from the guideway centerline. Based on the adjusted vibration level curve, the estimated ground-borne vibration levels would be approximately 67 VdB for monorail trains (rapid transit or light rail vehicles) and 64 VdB for rubber-tired APM trains. Consequently, the maximum vibration level of the uses along the guideway would be below the FTA recommended maximum acceptable level threshold of 72 VdB.[84] As such, transit-related ground-borne vibration for rubber-tired APM train vehicles would be less than significant.

84 Federal Transit Administration (FTA), Transit Noise and Vibration Impact Assessment Manual, FTA Report No. 0123, September 2018

The proposed Project would not increase vibration in the area; as such impacts are considered less than significant. When combined with other related project within the immediate area (see **Section 4.0**, *4.0.6*) the effects of vibration would not be cumulatively considerable.

4.10.9 GENERAL PLAN CONSISTENCY

General Plan Noise Element

The proposed Project is consistent with goals listed in the General Plan Noise Element as discussed below:

Goal 1: *Provide for the reduction of noise where the noise environment represents a threat to public health and welfare. In those areas where the environment represents a threat to the public health and welfare, it is the objective of the City to reduce environmental hazards to levels consistent with the protection of the public health and welfare.*

Consistent. As discussed in **Table 4.10-15** through **4.10-18**, construction noise levels would exceed ambient noise levels. However, this increase would be temporary in nature and would not result in the type of long term exposure that is known to result in hearing loss. Additionally, the proposed Project includes various mitigation measures (**MM 4.10-1** through **4.10-2**) for construction, which integrates several features to reduce noise levels to less than significant levels. The identified mitigation measures are meant to protect and maintain acceptable limits and prevent degradation of the environment. For these reasons, construction noise would be consistent with Goal 1.

Goal 3: *Protect and maintain those areas having acceptable noise environments. In those areas where a quality environment now exists, it is the objective of the City to prevent degradation of that environment.*

Consistent. As discussed in **Table 4.10-15** through **4.10-18**, construction noise levels would exceed ambient noise levels. However, this increase would be temporary in nature and would not result in the type of long term exposure that is known to result in hearing loss. Additionally, the proposed Project includes various mitigation measures (**MM 4.10-1** through **4.10-2**) for construction, which integrates several features to reduce noise levels to less than significant levels. The identified mitigation measures are meant to protect and maintain acceptable limits and prevent degradation of the environment. For these reasons, construction noise would be consistent with Goal 3.

Goal 4: *Provide sufficient information concerning the community noise levels so that noise can be objectively considered in land use planning decisions. Noise and land use compatibilities can be avoided for new developments when noise is properly considered in the planning and design of the project. It is the objective of the City to prevent future land use and noise conflicts through the planning process.*

Consistent. As shown in **Table 4.10-19**, operational noise levels from either the Rubber-tired APM Train or monorail would not result in increase of 3 dBA to or within the

"normally unacceptable" or "clearly unacceptable" compatibility category for land uses. Consistent with Goal 4, the proposed Project would not result in noise conflicts concerning community noise levels.

General Plan Environmental Justice Element

The proposed Project is consistent with goals listed in the General Plan Environmental Justice Element as discussed below:

Policy EJ-2.11: *Continue to enforce the City's Noise Ordinance to ensure compliance with noise standards.*

Consistent. As discussed in **Table 4.10-15** through **4.10-18**, construction noise levels would exceed ambient noise levels. However, this increase would be temporary in nature and would not result in the type of long term exposure that is known to result in hearing loss. Additionally, the proposed Project includes various mitigation measures (**MM 4.10-1** through **4.10-2**) for construction, which integrates several features to reduce noise levels to less than significant levels. The identified mitigation measures are meant to protect and maintain acceptable limits and prevent degradation of the environment. For these reasons, construction noise would be consistent with Policy EJ-2.11.

4.11 POPULATION, EMPLOYMENT, AND HOUSING

4.11.1 INTRODUCTION

This section of the Draft Environmental Impact Report (Draft EIR) provides an analysis of the potential effects of the Inglewood Transit Connector Project(proposed Project) on population, housing, and employment conditions. This section identifies and describes existing and projected levels of population, employment, and housing in the City of Inglewood (City) and analyzes the effects that would be caused by development of the proposed Project. The existing and projected population, employment data, and housing stock as well as a description of the methodology and framework guide the evaluation of the proposed Project's potential population, housing, and employment impact.

Prior to the preparation of this Draft EIR, a Recirculated Initial Study (included in **Appendix 2.0.2a: Recirculated Initial Study** of this Draft EIR) was prepared using the California Environmental Quality Act (CEQA) Guidelines Environmental Checklist Form Appendix G to assess potential environmental impacts associated with Population, Housing, and Employment. It was previously determined in the Revised Initial Study that the proposed Project would have potentially significant impact on inducing populations growth in the area, either directly or indirectly and would have no impact on displacing substantial numbers of existing people or housing. Impacts related to population, employment and housing found to be less than significant are further discussed in **Section 6.3: Effects Found Not to be Significant**.

Please see **Section 8.0** for a glossary of terms, definitions, and acronyms used in this Draft EIR.

4.11.2 OVERVIEW OF POPULATION, EMPLOYMENT, AND HOUSING

The proposed Project is located within the Southern California Association of Governments (SCAG) region which includes six counties. With more than 19 million in population, 6 million in households, and 8 million jobs, the SCAG region is the nation's largest metropolitan planning organization.[1] In line with national trends, annual population growth in the SCAG region has slowed and is anticipated to continue slowing from an annual growth rate of about 0.85 percent in 2020 to 0.45 percent by 2045. The decrease in annual population growth rate is driven by a combination of several factors: 1) women are having fewer children and are doing so at a later age, leading to a decline in fertility, 2) high housing costs, 3) an aging population, and 4) a decrease in net-migration.

The employment landscape in the region has followed a "boom and bust" cycle that is in line with the employment trends in Southern California. This trend is exemplified by the growth in housing development in the 2000s and the following bust starting in 2008 in the housing construction and service

1 SCAG. *Connect SoCal, 2020-2045 RTP/SCS.* Chapter 2 SoCal Today. https://www.connectsocal.org/Documents/Adopted/fConnectSoCal-02-Plan.pdf. Accessed September 18, 2020.

sectors. Despite this, the SCAG region has shown great resilience as the number of jobs in the region continues to grow overall. In 2019, there were approximately 8.7 million jobs in the region and every county in the region has experienced a net increase in jobs between the years 2000 and 2019.[2]

Housing in the SCAG region has traditionally followed the trend of lower-density development, which has occurred farther from employment-rich areas, increasing congestion, automobile dependency, leapfrog development and air pollution, and limiting the effectiveness of public transit. This trend has been shifting with a push-and-pull between new single-family development in traditionally suburban or formerly rural areas and multi-family residential developments in higher-density communities. A continued need for housing development is clear from the region's population trend as an additional 930,000 people moved into Southern California from 2006 to 2016.

4.11.3 METHODOLOGY

The following analysis is based on information on construction and operation of the proposed Project and information on City population, employment, and housing data and characteristics. Sources of information for population-, employment-, and housing-related estimates include the City General Plan and Housing Element,[3] Southern California Association of Governments' (SCAG) 2019 Local Profiles (SCAG 2019 Local Profiles),[4] SCAG's 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (SCAG 2016-2040 RTP/SCS),[5] SCAG's 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (SCAG 2020-2045 RTP/SCS),[6] and SCAG's 6th Cycle Regional Housing Needs Allocation (6th Cycle RHNA).[7]

The information contained in this section is used as a basis for analysis of project and cumulative impacts. However, changes in population and housing, in and of themselves, are social and economic effects and under CEQA are not physical effects on the environment. CEQA provides that economic or social effects are not considered significant effects on the environment unless the social and/or economic effects are connected to physical environmental effects. A social or economic change related to a physical change may serve as a linkage between the proposed Project and a physical environmental effect or may be

2 SCAG. *Certified Final Connect SoCal PEIR.* https://www.connectsocal.org/Documents/PEIR/draft/dPEIR_ConnectSoCal_3_14_PopulationHousing.pdf. Accessed September 21, 2020.

3 City of Inglewood, *Housing Element 2013-2021,* https://www.cityofinglewood.org/DocumentCenter/View/127/2013-2021-Housing-Element-Adopted-January-28-2014-PDF. Accessed July 22, 2020.

4 SCAG. *2019 Local Profiles.* https://www.scag.ca.gov/Documents/Inglewood.pdf. Accessed July 21, 2020.

5 SCAG. *Final 2016 RTP/SCS*. http://scagrtpscs.net/Pages/FINAL2016RTPSCS.aspx. Accessed July 22, 2020.

6 SCAG. *Adopted Final Connect SoCal.* https://connectsocal.org/Pages/Connect-SoCal-Final-Plan.aspx. Accessed July 22, 2020.

7 SCAG. *Regional Housing Needs Assessment & Housing.* http://www.scag.ca.gov/programs/Pages/Housing.aspx. Accessed July 22, 2020.

considered in determining whether the physical change is significant.[8] The direction for treatment of economic and social effects is stated in CEQA Guidelines section 15131(a):

> *Economic or social effects of a project shall not be treated as significant effects on the environment. An EIR may trace a chain of cause and effect from a proposed decision on a project through anticipated economic or social changes resulting from the project to physical changes caused in turn by the economic or social changes. The intermediate economic or social changes need not be analyzed in any detail greater than necessary to trace the chain of cause and effect. The focus of the analysis shall be on physical changes.*[9]

4.11.4 REGULATORY FRAMEWORK

4.11.4.1 State Regulations and Directives

California Housing Element Requirement

California law requires cities and counties to include a housing element as one of the nine State-mandated elements of the General Plan.[10] The housing element needs to address housing conditions and housing needs in the community. Cities and counties are required to update the housing elements every 8 years following the implementation of SB 375.[11] The housing element must identify and analyze existing and projected housing needs and "make adequate provision for the existing and projected needs of all economic segments of the community," among other requirements. The City's Housing Element was updated in 2013 and adopted on January 28, 2014.[12]

California Relocation Assistance

California Government Code Section 7260-7277 establishes a uniform policy for fair and equitable treatment of people or businesses displaced as a direct result of programs or projects undertaken by a public entity.[13] The primary purpose is to ensure that these persons shall not suffer disproportionate injuries as a result of programs and projects designed for the benefit of the public and to minimize the hardship of those displaced.

8 CEQA Guidelines section 15382.
9 CEQA Guidelines section 15131(a).
10 Government Code Section 65580, et seq.
11 California Legislative Information. Senate Bill No. 375. https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=200720080SB375. Accessed May 22nd, 2020.
12 City of Inglewood. *General Plan.* https://www.cityofinglewood.org/209/General-Plan. Accessed May 18th, 2020.
13 California Government Code Section 7260-7277.

4.11.4.2 Regional Regulations and Directives

Regional Housing Needs Assessment

The Regional Housing Needs Assessment (RHNA) is mandated by State Housing Law as part of the periodic process of updating local housing elements of the General Plan. The RHNA quantifies the need for housing within each jurisdiction during specified planning periods. The current planning period, 2013 to 2021, is considered the 5th RHNA Planning Cycle. SCAG is in the process of preparing the 6th RHNA Planning Cycle Allocations for the period of 2021 to 2029. Local jurisdictions received the draft RHNA Allocations on September 4th, 2020. Local jurisdiction appeals were allowed from September 11, 2020 to October 26, 2020. Local jurisdictions and HCD had until mid-December to submit comments on the appeals filed.[14] SCAG Appeals Board Hearings are scheduled towards the end of December and early January.

Communities use the RHNA numbers in land use planning, prioritizing local allocation, and in deciding how to address identified existing and future housing needs resulting from population, employment, and housing growth. The RHNA does not encourage or promote growth, but rather is designed to enable communities to anticipate growth, so that collectively the region and sub-region can grow in ways that enhance quality of life, improve access to jobs, promotes transportation mobility, and addresses social equity and fair share housing needs.

SCAG 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy

SCAG's Regional Council adopted the 2020-2045 RTP/SCS[15] on September 3rd, 2020. The 2020-2045 RTP/SCS was adopted as part of SCAG's planning obligations. The RTP/SCS is a long-range visioning plan that serves as an important planning document for the region that balances future mobility and housing needs with economic, environmental, and public health goals. The plan charts a course for closely integrating land use and transportation so that the region can grow smartly and sustainably. The RTP/SCS includes land use policies to guide the region's development, including planning for additional housing and jobs near transit, and planning for changing demand in types of housing. Analysis for housing needs in the region as a whole and in individual cities is also completed as part of the metropolitan planning organization's obligation under the state mandate. One goal of the 2020 RTP/SCS is to encourage land use and growth patterns that facilitate transit and active transportation.

14 SCAG. *Regional Housing Needs Assessment (RHNA) & Housing.* http://www.scag.ca.gov/programs/Pages/Housing.aspx. Accessed October 28th, 2020.

15 SCAG. *Adopted Final Connect SoCal.* https://www.connectsocal.org/Pages/Connect-SoCal-Final-Plan.aspx. Accessed July 22, 2020.

4.11.4.3 Local Regulations and Directives

City General Plan

The City General Plan[16] is a comprehensive policy document that sets forth goals, objectives, and policies for the future development of the City. The General Plan also designates the location of desired future land uses within the City, including the proposed Project. A summary of the General Plan Elements is provided under **Section 4.9: Land Use and Planning**. Goals, objectives, and policies of the City's General Plan Housing and Land Use Elements are applicable to this Population, Employment, and Housing section of the Draft EIR and is outlined as follows:

Housing Element

The City General Plan Housing Element 2013–2021[17] covering the 5th cycle of RHNA was adopted on January 28, 2014. The Housing Element presents a framework upon which the City can implement a comprehensive housing program to provide its residents with decent and affordable housing.

The program established policies to create and preserve quality residential neighborhoods along with establishing policies and programs to mitigate housing shortages.

The Housing Element established the following goals for housing which are applicable to the proposed Project:

Goal 2: Maintain the existing housing stock and neighborhoods by promoting the maintenance, rehabilitation, modernization, and energy efficient upgrades of existing housing as well as the beautification and security of residential neighborhoods.

Goal 3: Encourage the Production and Preservation of Housing for All Income Categories, particularly around high-quality transit, including workers in the City that provide goods and services.

Goal 7: Encourage Energy Efficiency and Greenhouse Gas Reductions.

The Housing Element is due for an update by November 2021 to cover the new 6th cycle RHNA data for years 2021-2029.

16 City of Inglewood. *General Plan.* https://www.cityofinglewood.org/209/General-Plan. Accessed July 22, 2020.

17 City of Inglewood. *Housing Element 2013-2021.* https://www.cityofinglewood.org/DocumentCenter/View/127/2013-2021-Housing-Element-Adopted-January-28-2014-PDF. Accessed July 22, 2020.

Land Use Element

The City's Land Use Element[18] was adopted in 1980 and subsequently amended in 1986, 2009, 2016, and 2020. Applicable Land Use goals for the Population, Employment, and Housing section are as follows:

General

Goal: Help promote sound economic development and increase employment opportunities for the City's residents by responding to changing economic conditions.

Goal: Develop a land use element that facilities the efficient use of land for conservation, development and redevelopment.

Goal: Promote Inglewood's image and identify as an independent community within the Los Angeles Metropolitan area.

Commercial

Goal: Create and maintain a healthy economic condition within the present business community and assist new business to located within the City.

Goal: Protect local businessmen and encourage the importance of maintaining a strong commercial district in the downtown.

Goal: Promote the development of commercial/recreational uses which would complement those which already are located in Inglewood.

Downtown Transit Oriented District

Goal 1: Downtown is a place to live, work, shop, recreate, and be entertained.

Goal 3: Downtown provides a unique mix of accessibility options including light rail, pedestrians, bicycles, autos, buses and advanced technology local transit.

Goal 4: Downtown is a major economic engine providing jobs, sales tax and other revenues.

Goal 5: Downtown is a model for sustainable development.

18 City of Inglewood. *Land Use Element.* https://www.cityofinglewood.org/DocumentCenter/View/132/Land-Use-Element-1980-Amended-1986-2009-2016-PDF. Accessed July 22, 2020.

Environmental Justice Element

The City's Environmental Justice Element[19] was adopted on June 30, 2020. Applicable Environmental Justice goals for the Population, Employment, and Housing section are as follows:

Goal: The community's exposure to pollution in the environment is minimized through sound planning and public decision making.

Goal: Adequate and equitably distributed public facilities are available in the community.

4.11.5 EXISTING CONDITIONS

4.11.5.1 Existing Setting

Population

The City is located in Los Angeles County (County) and became an incorporated City on February 8th, 1908 with a population of 1,200.[20] The City has continued to expand and develop to reach an estimated population of 113,559 in 2018.[21] The City's population has stabilized over recent years with minor variations in City population throughout the 2000s. The fluctuations also correlate with the economic downturn which took place in 2008, creating a population decrease in the years approaching 2008 that lasted until 2010 before a rebound in population from the years of 2010 to 2018. According to SCAG's 2019 Local Profile's report the net increase in population from 2000 to 2018 was approximately 979 and the Draft SCAG 2020/2045 RTP/SCS growth forecast estimates the City's population to increase to 137,100 by 2045.

Table 4.11-1: Population Growth in the City summarizes the population trends for the City from 2000 to 2018, including growth forecast for 2040 and 2045.

The City is one of 191 cities in the SCAG region and resides within one of the six counties within the metropolitan planning organization (MPO).[22] With over 19 million people in the region as of January 2019, the SCAG region is the nation's second-largest combined statistical area[23] in the nation. The population

19 City of Inglewood. *Environmental Justice Element.* https://www.cityofinglewood.org/DocumentCenter/View/14211/Environmental-Justice-Element#:~:text=The%20Inglewood%20General%20Plan%20Environmental,City%2C%20particularly%20for%20disadvantaged%20communities. Accessed October 2, 2020.

20 City of Inglewood. *City History.* https://www.cityofinglewood.org/512/City-History. Accessed July 21, 2020.

21 SCAG. *2019 Local Profiles.* https://www.scag.ca.gov/Documents/Inglewood.pdf. Accessed July 21, 2020.

22 SCAG. http://www.scag.ca.gov/Pages/default.aspx. Accessed July 21, 2020.

23 Combined Statistical Area is a United States Office of Management and Budget (OMB) term for a combination of adjacent metropolitan and micropolitan statistical areas across the US. These areas consist of various combinations areas with economic ties measured by commuting patterns.

growth trend within the larger SCAG region has averaged approximately 0.82 percent per year from 2000 to 2016, which is about half of the 1.65 percent annual population growth rate of the region from 1970 to 2000. This decrease in population growth rate is expected to continue with 2016 to 2045 averaging 0.61 percent annual population growth rate.[24]

Table 4.11-1
Population Growth in the City

Year	2000	2006	2012	2018	2040	2045
Population Estimate	112,580	110,584	110,623	113,559	129,000*	137,100**

Source: SCAG. 2019 Local Profiles. https://www.scag.ca.gov/Documents/Inglewood.pdf. Accessed July 21, 2020.
**SCAG. 2016-2040 RTP/SCS. Demographics & Growth Forecast. http://scagrtpscs.net/Documents/2016/draft/d2016RTPSCS_DemographicsGrowthForecast.pdf. Accessed July 21, 2020.*
***SCAG. Draft 2020-2045 ConnectSoCal Demographics and Growth Forecast. https://www.connectsocal.org/Documents/Draft/dConnectSoCal_Demographics-And-Growth-Forecast.pdf. Accessed July 21, 2020.*

Housing

Similar to the population trend in the City, the number of households in the City stayed relatively stable throughout the 2000s, with a net increase of 213 units in the number of households from 2000 to 2018. The increase accounts for an approximately 0.6 percent net increase during the 2000 to 2018 time period. The same fluctuations to the Citywide population trend can also be observed in its number of household trend, with the number of households dipping to a low of 36,389 households in 2010 from 36,805 households in the year 2000. The household numbers then rebounded gradually post-recession until it reaches 37,018 households in 2018.[25]

Table 4.11-2: Number of Households in the City summarizes the number of household trend from the year 2000 and includes forecast data from 2020/2045 RTP/SCS for the number of projected households in 2045.[26]

The SCAG region that includes the proposed Project is expecting to add 1.6 million households between the years 2016 to 2045. This projection accounts for a growth rate that would continue to rise and recover

24 SCAG. *Draft 2020-2045 ConnectSoCal Demographics And Growth Forecast.* https://www.connectsocal.org/Documents/Draft/dConnectSoCal_Demographics-And-Growth-Forecast.pdf. Accessed July 21, 2020.
25 SCAG. *2019 Local Profiles.* https://www.scag.ca.gov/Documents/Inglewood.pdf. Accessed July 21, 2020.
26 SCAG. *Draft 2020-2045 ConnectSoCal Demographics And Growth Forecast.* https://www.connectsocal.org/Documents/Draft/dConnectSoCal_Demographics-And-Growth-Forecast.pdf. Accessed July 21, 2020.

from the 2008 recession. The growth rate in number of households fell from 1.3 percent in 2006 to 0.2 percent in 2010 and has only recovered to 0.6 percent in the year 2018 regionwide.

Table 4.11-2
Number of Households in the City

Year	2000	2006	2012	2018	2040	2045
Number of Households	36,805	36,460	36,993	37,018	43,300*	47,700**

Source: SCAG. 2019 Local Profiles. https://www.scag.ca.gov/Documents/Inglewood.pdf. Accessed July 21, 2020.
**SCAG. 2016-2040 RTP/SCS. Demographics & Growth Forecast. http://scagrtpscs.net/Documents/2016/draft/d2016RTPSCS_DemographicsGrowthForecast.pdf. Accessed July 21, 2020.*
***SCAG. Draft 2020-2045 ConnectSoCal Demographics and Growth Forecast. https://www.connectsocal.org/Documents/Draft/dConnectSoCal_Demographics-And-Growth-Forecast.pdf. Accessed July 21, 2020.*

RHNA is another source for predicting housing growth in a region. According to SCAG's 6th cycle RHNA numbers, the City must provide plans for a total of 7,422 units from the years 2021 to 2029. The total housing unit requirement includes 1,808 units for very-low income, 952 units for low income, 1,110 units for moderate income, and 3,552 units for above moderate income.[27]

Employment

The City has an estimated 34,962 jobs in the City in 2017.[28] This number includes wage and salary jobs and jobs held by business owners and self-employed persons and excludes unpaid volunteers, family workers, and private household workers. The trend in employment numbers reflects the same movements as the trend for population and number of households where a dip is observed in total job numbers as the City approaches 2008 and the number rebounds after 2010. Employment trend in the City can be found in **Table 4.11-3: Number of Jobs in the City**.

The number of jobs available is further divided into the following sectors: manufacturing, construction, retail trade, and professional and management. All industries exhibit a similar trend as the trend in number of jobs within the City, with a dip observed around the years of 2008 and rebounding from 2010 onwards, with the Professional and Management field recovering more gradually than others. **Table 4.11-4: 2017 Job Numbers by Sector in the City** presents the number of jobs available in each sector in the year 2017.

27 SCAG. *Regional Housing Needs Assessment & Housing. http://www.scag.ca.gov/programs/Pages/Housing.aspx*. Accessed July 22, 2020.
28 SCAG. *2019 Local Profiles.* https://www.scag.ca.gov/Documents/Inglewood.pdf. Accessed July 22, 2020.

Table 4.11-3
Number of Jobs in the City

Year	2007	2010	2013	2017	2040	2045
Number of Jobs	34,598	32,241	32,152	34,962	37,400*	45,900**

Source: SCAG. 2019 Local Profiles. https://www.scag.ca.gov/Documents/Inglewood.pdf. Accessed July 21, 2020.
**SCAG. 2016-2040 RTP/SCS. Demographics & Growth Forecast. http://scagrtpscs.net/Documents/2016/draft/d2016RTPSCS_DemographicsGrowthForecast.pdf. Accessed July 21, 2020.*
***SCAG. Draft 2020-2045 ConnectSoCal Demographics and Growth Forecast. https://www.connectsocal.org/Documents/Draft/dConnectSoCal_Demographics-And-Growth-Forecast.pdf. Accessed July 21, 2020.*

Table 4.11-4
Job Numbers by Sector in the City

Sector	Manufacturing	Construction	Retail Trade	Professional and Management
Number of Jobs	1,476	810	3,249	3,209

Source: SCAG. 2019 Local Profiles. https://www.scag.ca.gov/Documents/Inglewood.pdf. Accessed July 21, 2020.
**SCAG. 2016-2040 RTP/SCS. Demographics & Growth Forecast. http://scagrtpscs.net/Documents/2016/draft/d2016RTPSCS_DemographicsGrowthForecast.pdf. Accessed July 21, 2020.*
***SCAG. Draft 2020-2045 ConnectSoCal Demographics and Growth Forecast. https://www.connectsocal.org/Documents/Draft/dConnectSoCal_Demographics-And-Growth-Forecast.pdf. Accessed July 21, 2020.*
****Employment numbers in these sectors are estimates for analysis purposes only and does not include all jobs available within the City.*

As presented by the SCAG 2019 Local Profiles' Report, only 8 percent of the commuters in the City are also employed within the City limits.[29] The remaining 82 percent of the commuting workers travel to adjacent employment centers for work. **Table 4.11-5: Employment Centers for Inglewood Residents** provides a list of where the residents of Inglewood are employed. While construction would generate a temporary workforce, construction personnel are commonly supplied by the existing construction industry within the local area. Therefore, construction personnel for the proposed Project would likely be filled by existing construction employees within the City or the Greater Los Angeles area. According to SCAG 2020-2045 RTP/SCS,[30] there are an estimated 411,000 jobs in the region in 2016 and the number of construction jobs is expected to increase to 536,000 in the region in 2045. Over 800 construction jobs currently exist within the City limits according to SCAG 2019 Local Profiles.[31] As noted, these jobs are

29 SCAG. *2019 Local Profiles.* https://www.scag.ca.gov/Documents/Inglewood.pdf. Accessed July 21, 2020.
30 SCAG. *Draft 2020-2045 ConnectSoCal Demographics And Growth Forecast.* https://www.connectsocal.org/Documents/Draft/dConnectSoCal_Demographics-And-Growth-Forecast.pdf. Accessed July 21, 2020.
31 SCAG. *2019 Local Profiles.* https://www.scag.ca.gov/Documents/Inglewood.pdf. Accessed July 21, 2020.

typically temporary for any specific project and the various trades and professions migrate as needed between construction projects.

Table 4.11-5
Employment Centers for Inglewood Residents

Local Jurisdiction	Number of Commuters	Percent of Total Commuters
Los Angeles	17,022	42.2%
Inglewood	3,177	7.9%
Santa Monica	1,614	4.0%
Culver City	1,281	3.2%
Torrance	1,215	3.0%
El Segundo	972	2.4%
Long Beach	682	1.7%
Hawthorne	657	1.6%
Carson	602	1.5%
Beverly Hills	573	1.4%
All Other Destinations	12,533	31.1%

Source: SCAG. 2019 Local Profiles. https://www.scag.ca.gov/Documents/Inglewood.pdf. Accessed July 21, 2020.

Based on data from California Employment Development Department, the City's unemployment rate is higher than the County and the State of California. Unemployment rate at the City is 22.9 percent[32] as of July 2020, as compared to the County at 18.2 percent[33] and the State of California at 13.7 percent.[34] These unemployment rates are obtained in the midst of the COVID-19 pandemic, with widespread business closures throughout the City and the State of California. Therefore, the unemployment numbers are much higher than the unemployment numbers that would usually occur on a State and local level. For comparison purposes, the City had an unemployment rate of 5.1 percent in January 2020, before the COVID-19 pandemic. In the same period, the County and the State had an unemployment rate of 4.5 percent and 4.3 percent, respectively.[35]

32 EDD. *Labor Force and Unemployment Rate for Cities and Census Designated Places.* Cities and Census Designated Places by Individual County. https://www.labormarketinfo.edd.ca.gov/data/labor-force-and-unemployment-for-cities-and-census-areas.html. Accessed August 24, 2020.

33 EDD. *Los Angeles County Profile.* https://www.labormarketinfo.edd.ca.gov/cgi/databrowsing/localAreaProfileQSResults.asp?selectedarea=Los+Angeles+County&selectedindex=19&menuChoice=localAreaPro&state=true&geogArea=0604000037&countyName=. Accessed August 24, 2020.

34 EDD. *California Profile.* https://www.labormarketinfo.edd.ca.gov/cgi/databrowsing/localAreaProfileQSResults.asp?selectedarea=California&selectedindex=0&menuChoice=localAreaPro&state=true&geogArea=0601000000&countyName=. Accessed August 24, 2020.

35 EDD. *Unemployment Rates (Labor Force).* https://www.labormarketinfo.edd.ca.gov/cgi/dataanalysis/labForceReport.asp?menuchoice=LABFORCE. Accessed August 24, 2020.

4.11.5.2 Existing Project Area

Market Street Segment

The alignment begins with the Market Street/Florence Avenue station near the intersection of Florence Avenue and Market Street. This station is proposed on site developed with an existing retail commercial center proposed for acquisition. This existing commercial center is surrounded by businesses to the north and south and residential homes to the east. The vacant lot west of the commercial center at the northeast corner of Regent Avenue and Market Street is planned for development of a multi-family residential complex. The elevated guideway would continue south on Market Street where existing businesses line the roadway on both sides. The guideway continues south on Market Street until its intersection with Manchester Boulevard, where it turns east. (refer to **Figure 3.0-3: Project Vicinity Map**).

Manchester Boulevard Segment

As the guideway turns east onto Manchester Boulevard, the curvature of the guideway encroaches onto private property at 150 S. Market Street, which includes an existing commercial building (the Hat Store) on the northeast corner of the intersection; full acquisition and demolition of this existing building would be required. As the guideway continue east on Manchester Boulevard, the proposed MSF site would replace the existing Vons commercial plaza south of Manchester Boulevard, between Hillcrest Boulevard and Spruce Avenue (See **Figure 3.0-3**). Majority of the uses along this segment are commercial uses, with some residential and religious uses toward the eastern end of the segment near Prairie Avenue. The guideway turns south at the intersection of Manchester Boulevard and Prairie Avenue.

Prairie Avenue Segment

As the guideway turns south onto Manchester Boulevard, the curvature of the guideway would extend into the commercial parcel at the southeast corner of Manchester Boulevard and Prairie Avenue. An easement would likely be required at this site. Existing businesses, multi-family residential buildings, Kelso Elementary School, and hotels are adjacent to Prairie Avenue on the west side of the roadway. The Forum, SoFi Stadium, and HPSP developments are adjacent to Prairie Avenue on the east side of the roadway. An easement of up to 30 feet on the east side of Prairie Avenue would be required to accommodate for the installation of columns and the widening of Prairie Avenue. An easement, or acquisition of up p to 75 feet would be required for installation of pedestrian landing of stations. The alignment terminates at the intersection of Prairie Avenue and Hardy Street.

Potential Acquisitions and Existing Employments

The proposed Project currently includes approximately 7.7 acres of land consisting of a total of 19 parcels that are currently out of the public right-of-way that would be converted to Project-related uses. The

existing uses on these properties include a variety of retail and general commercial uses along with a gas station.

These existing parcel areas would be converted to Project related uses:

- The proposed location of the Market Street/Florence Avenue Station (approximately 126,912 SF of commercial/retail space at the northeast corner of Regent Street and Market Street [the CVS plaza]);
- The proposed guideway encroachment at 150 S. Market Street (the Hat Store–approximately 16,575 SF of commercial/retail space); and
- The proposed MSF site (approximately 76,402 SF of commercial/retail space at the VONS plaza at 500 and 510 Manchester Boulevard).

Regent Street and Market Street Commercial/Retail Plaza (CVS Plaza)

The proposed Market Street/Florence Avenue Station would replace an existing retail commercial center at the intersection of Market Street and Florence Avenue. This center includes approximately 126,912 SF of space and existing uses include restaurants, an auto parts store, cosmetics store, convenience store, and a drug store. These uses currently generate approximately 284 jobs.[36]

150 S. Market Street Commercial/Retail Use (Hat Store)

The commercial/retail use at 150 S. Market Street (the Hat Store) is located at the northeastern corner of Market Street and Florence Avenue. The building would be demolished to accommodate for the turning radius of the elevated guideway. The demolition is required due to space constraint at the intersection. It has been determined that the proposed placement of the elevated guideway at this location would produce the least amount of impact to the surrounding people and structures. The existing building currently occupies approximately 16,575 SF in space and generates approximately 37 jobs.[37]

500 and 510 Manchester Boulevard Commercial/Retail Plaza (VONS Plaza)

The MSF would replace the commercial plaza on Manchester Avenue, between Hillcrest Boulevard and Spruce Avenue. The commercial plaza is located south of Manchester Avenue is located adjacent to the

36 Number of employees estimated based on square feet of space multiplied by 2.2371 employees per 1,000 SF. Inglewood Unified School District's Commercial Fee Justification Study 2018.: https://www.lbschools.net/Asset/Files/Business_Services/Developer_Fees/2018/2018-Commercial-Fee-Justification-Study.pdf. Accessed July 22, 2020. It is important to note that land areas and number of employees are rounded numbers used for estimates for analysis purposes only.

37 Number of employees generated by each commercial plaza area are calculated using the square footage of the facilities multiplied by a set factor. The factor used is 2.2371 employees per 1,000 SF, which is found in Inglewood Unified School District's Commercial Fee Justification Study 2018. The report can be located at: https://www.lbschools.net/Asset/Files/Business_Services/Developer_Fees/2018/2018-Commercial-Fee-Justification-Study.pdf. Accessed July 22, 2020. It is important to note that land areas and number of employees are rounded numbers used for estimates for analysis purposes only.

future guideway. Existing services at the plaza includes a coffee house, grocery store, bank, gym, and fuel station. The plaza includes 76,604 SF of service space and generates approximately 172 employees.

These existing uses are currently operating and have existing employees. A list of the existing facilities and the number of employees currently being employed is provided in **Table 4.11-6: Estimated Existing Employment**.

4.11.5.3 Adjusted Baseline Conditions

This section assumes the Adjusted Baseline Environmental Setting as described in **Section 4.0: Environmental Impact Analysis**, *4.0-5: Adjusted Baseline*. The residential, office, retail, and entertainment uses associated with the Hollywood Park Specific Plan (HPSP) Adjusted Baseline projects would result in changes to the City's population, employment, and housing stock. **Table 4.11-7: Adjusted Baseline Projects Employment Characteristics**, details the land uses and associated residential and employment generation for the HPSP Adjusted Baseline projects.

Table 4.11-6
Estimated Existing Employment

Parcel No.	Property Address	Type of Employments	Est. SF in Area	Est. Number of Employees
4015-027-030	310 E. Florence Avenue	Restaurant	1,200 SF	3
4015-027-031	300 E. Florence Avenue	Restaurant	4,762 SF	11
4015-027-032	254 N. Market Street	Restaurant	4,608 SF	10
4015-027-033	250 N. Market Street	Auto Service	44,000 SF	98
4015-027-038	240 N. Market Street	Shopping Center	12,300 SF	28
4015-027-040	230 N. Market Street	Store	22,194 SF	50
4015-027-041	224 N. Market Street	Store	5,000 SF	11
4015-027-049	222 N. Market Street	Shopping Center	25,500 SF	57
4015-027-050	210 N. Market Street	Shopping Center	7,348 SF	16
4021-010-015	150 S. Market Street	Store	16,575 SF	37
4021-024-015	500 E. Manchester Boulevard	Supermarket	76,402 SF	171
4021-024-015	510 E. Manchester Boulevard	Gas Station	202 SF	1
Total Estimated Number of Employees				**493**

Calculation Factor for 2.2371 employees per 1,000 SF are found in: Inglewood Unified School District, 2018. https://www.lbschools.net/Asset/Files/Business_Services/Developer_Fees/2018/2018-Commercial-Fee-Justification-Study.pdf. Accessed July 22, 2020.
*Land areas and number of employees are rounded and estimates for analysis only.

Overall, the HPSP Adjusted Baseline projects would generate an increase of approximately 9,470 jobs and 314 residential units. By using the City's average household size of 2.94 persons per household,[38] the addition of 314 residential units would generate an estimated 923 people. Overall, as shown, under Adjusted Baseline conditions, the City has a residential population of 121,723[39] persons, employment of 44,270 jobs,[40] and a housing stock of 35,114 units.[41]

Table 4.11-7
Adjusted Baseline Projects Employment Characteristics

Land Use	Size	Generation Rate	Employee Population	Residential Population
Stadium[a]	70,000 seats	-	6,000[d]	-
Performance[b] venue	6,000 seats	2.24 emp/SF	683	-
Retail[c]	518,977 SF	2.24 emp/SF	1,161	-
Office[c]	466,000 SF	3.49 emp/1,000 SF	1,626	-
Housing Units	314 units	2.94 person/unit	-	923
Total			**9,470**	**923**

Notes:

a "Stadiums" are not common land uses, and the City and surrounding jurisdictions do not have an existing employment generation rates for this use. Therefore, the employment total for the stadium was based on that provided in the San Francisco 49ers Stadium, which had a similar seat count (68,500 seats). See City of Santa Clara, 2009. The 49ers Stadium Project EIR. p. 176.

b "Performance Venues" are not common land uses, and the City and surrounding jurisdictions do not have an existing employment generation rates for these uses. Consistent with the City's Hollywood Park Redevelopment Draft Environmental Impact Report, and to be conservative, the "Performance" land use is assumed to use the "Retail Use" for the City generation rates. The square footage for this Performance Venue was based off of the proposed Project, which has approximately triple the seat count of the HPSP performance venue (18,000 seats or 915,000 sf). Thus, this analysis assumes square footage for Performance Venue is that of the proposed Project divided in by three, to become 305,000 sf.

c Based on employment generation factors from Inglewood Unified School District, 2018 Developer Fee Justification Study. Table 4. Assumes employee generation rate of 2.24 employee per square foot for Retail and Service uses, and 3.49 employee per square foot for Office uses.

d Anticipated Peak Stadium employment under HPSP is provided by Appendix K, Transportation Data. It is assumed that the vast majority of these jobs are event-related employment and were estimated for the purposes of transportation analysis. Although details are not available to the City, an assessment of full-time-equivalent employment at the Stadium would be materially less than the total of 6,000.

Sources:

City of Santa Clara, 2009. 49ers Santa Clara Stadium Project EIR. Available: http://santaclaraca.gov/home/showdocument?id=12770.; City of Inglewood, 2008, Hollywood Park Redevelopment Draft Environmental Impact Report; and Inglewood Unified School District, 2018. Commercial/Industrial Development School Fee Justification Study Employment Impacts Per Sf. P. ES-1.

38 U.S. Census, QuickFacts, Inglewood City, California, https://www.census.gov/quickfacts/fact/table/inglewoodcitycalifornia/RHI125219. Accessed September 24, 2020.

39 SCAG. Draft 2020-2045 ConnectSoCal Demographics And Growth Forecast. https://scag.ca.gov/sites/main/files/file-attachments/2016_2040rtpscs_finalgrowthforecastbyjurisdiction.pdf?1605576071. Adding 923 from an increase in population from HPSP to the 2020 population numbers.

40 SCAG. Draft 2020-2045 ConnectSoCal Demographics And Growth Forecast. https://scag.ca.gov/sites/main/files/file-attachments/2016_2040rtpscs_finalgrowthforecastbyjurisdiction.pdf?1605576071. Adding 9470 from an increase in population from HPSP to the 2020 jobs numbers.

41 SCAG. Draft 2020-2045 ConnectSoCal Demographics And Growth Forecast. https://scag.ca.gov/sites/main/files/file-attachments/2016_2040rtpscs_finalgrowthforecastbyjurisdiction.pdf?1605576071. Adding 314 from an increase in population from HPSP to the 2020 housing numbers.

4.11.6 THRESHOLDS OF SIGNIFICANCE

Criteria outlined in the CEQA Guidelines were used to determine the level of significance of population and housing resource impacts. Appendix G of the State CEQA Guidelines indicates that a project would have a significant impact in relation to population and housing if it were to:

Threshold POP-1 **Induce substantial unplanned population or employment growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure).**

4.11.7 IMPACT ANALYSIS FOR THE PROPOSED PROJECT

The environmental impact analysis presented below is based on determinations made in the Initial Study for impacts considered to be potentially significant.

Impact POP-1: **Induce substantial unplanned population or employment growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?**

Construction

Population and Housing

According to SCAG 2020/2045 RTP/SCS,[42] the City currently projects a population of 137,100 and 47,700 households in the year 2045. As the proposed Project does not include any residential uses or housing developments, the construction phase of the proposed Project would not contribute directly to population or housing growth. In addition, the proposed Project does not include any existing residential uses that would be replaced or removed. Since no residential or housing stocks would be constructed or demolished, construction the proposed Project would have no direct impact on inducing growth of population or housing stock.

Employment

According to SCAG 2020/2045 RTP/SCS, the City would have 45,900 jobs in the City by 2045.[43] The proposed Project would generate a temporary workforce during the construction period between 2022 and 2026. Construction would take place over four phases, employing varying numbers of construction

42 SCAG. *Draft 2020-2045 ConnectSoCal Demographics And Growth Forecast.* https://www.connectsocal.org/Documents/Draft/dConnectSoCal_Demographics-And-Growth-Forecast.pdf. Accessed July 21, 2020.

43 SCAG. *Draft 2020-2045 ConnectSoCal Demographics And Growth Forecast.* https://www.connectsocal.org/Documents/Draft/dConnectSoCal_Demographics-And-Growth-Forecast.pdf. Accessed July 21, 2020.

personnel as appropriate for the phase. Construction phases would begin with demolition in Phase 1 in the year 2022 and end with Phase 4 in 2026. Descriptions of the construction phases are set forth in **Section 3.0: Project Description**; aspects of construction relevant to employment are briefly summarized below:

- **Phase 1** of construction includes demolition of the commercial properties necessary to accommodate the proposed Project. From 2022 to 2023, demolition would take place at Market Street/Florence Avenue Station (310 E. Florence Avenue), commercial properties and gas station at the MSF (500 E. Manchester Boulevard), and the commercial property northeast of Market Street and Manchester Boulevard (150 S. Market Street).
- **Phase 2** would begin with construction of the elevated portion of the proposed Project (guideway and stations) along Prairie Avenue from Hardy Street to Manchester Boulevard from 2023 to 2025.
- **Phase 3** includes construction of the alignment and elevated portion of the proposed Project (guideway and stations) along Manchester Boulevard and Market Street, including the Market Street/Florence Avenue Station, and would begin in 2024 and finish in 2026.
- **Phase 4** would occur from 2025 to 2026. Phase 4 primarily includes installation of the APM's system operation components and provides testing and commissioning for the system. Some Phase 4 construction activities could start as early as 2022 or when there is enough aerial structure available for the installation of certain equipment. However, majority of the construction activities for phase 4 would happen between 2025 to 2026.

The estimated construction workforce during each phase is provided in the **Table 4.11-8: Construction Workforce by Phase**.

Table 4.11-8
Construction Workforce by Phase

Phase	Time Period	Duration	Estimated Number of Employees
1	2022 – 2023	19 months	105 - 140
2	2023 – 2025	23 months	165 - 189
3	2024 – 2026	24 months	210 - 238
4	2025 – 2026*	8 months	88 - 123
Total Number of Employees During Construction			**568 - 690**

Source: Appendix 3.0.4: ITC Construction Scenarios for the EIR, June 2020.

** Note: Some Phase 4 activities could start as early as 2022 or when there is enough aerial structure available for the installation of equipment. However, majority of the construction activities for phase 4 would happen between 2025 to 2026. For analysis purposes, 2025-2026 for construction duration is used.*

While construction would generate a temporary workforce, construction personnel are commonly supplied by existing construction industry within the local area. Therefore, construction personnel for the proposed Project would likely be filled by existing construction employees within the City or the Greater Los Angeles area. According to SCAG 2019 Local Profiles,[44] over 800 construction jobs currently exist in the City. As noted, these jobs are typically temporary for any specific project and the various trades and professions migrate as needed between construction sites.

The existing construction workforce estimates in the City exceeds the number of construction personnel required for the proposed Project. Approximately 411,000 construction jobs exist in the SCAG region in 2016 and the number of construction jobs is expected to increase to 536,000 construction jobs in 2045.[45]

The proposed Project would only require approximately 0.2 percent of the existing regional workforce for the entire duration of the construction period.

Since the construction industry does not generally have a regular place of business and construction workers are highly specialized, most construction workers would most likely commute to the job site from locations within the City and throughout the surrounding region. As such, construction personnel do not normally relocate to the location of the construction project.

Based on the existing construction workforce that resides in the City and the surrounding region, the impact on workforce to meet the needs of the proposed Project would not induce substantial population growth in the City or the region.

Impacts would be less than significant.

Operation

Population and Housing

As previously discussed, the proposed Project would not include any residential uses or housing development, and therefore, would have no direct impact on population growth as a result. However, indirect impacts on population and housing can still occur through employment, discussed under a separate heading below, or through critical infrastructure improvements that encourage development around the improvements.

44 SCAG. *2019 Local Profiles*. https://www.scag.ca.gov/Documents/Inglewood.pdf. Accessed July 21, 2020.

45 SCAG. *Draft 2020-2045 ConnectSoCal Demographics And Growth Forecast.* https://www.connectsocal.org/Documents/Draft/dConnectSoCal_Demographics-And-Growth-Forecast.pdf. Accessed July 21, 2020.

The proposed Project expands existing transportation options in the neighborhood and provides a reliable and low-cost transportation method for existing local communities. As the City is projected to gain approximately 31% in population from 2019 to 2040 and approximately 47% in population for the same period within the ½ mile buffer of the proposed Project,[46] the proposed Project would be crucial in reducing local roadway congestion and ensuring there is sufficient transportation capacity to accommodate for future population growth. As the entire APM guideway and related facilities would be located in or adjacent to SB 535 and disadvantaged communities, the proposed Project would provide a reliable and low-cost option for traveling within the local area and to the greater Los Angeles region, connecting job centers such as downtown Los Angeles, The Forum, and the SoFi Stadium to existing disadvantaged communities and providing economic support for these communities.

The proposed Project may generate indirect population growth through an improvement in access to housing and employment opportunities in the greater Los Angeles region. However, reasonably foreseeable growth from an improvement in access and quality of life is anticipated to be within the growth projection under SCAG's 2019 Local Profiles and within the regional projection under SCAG's 2020-2045 RTP/SCS. Furthermore, since the existing roadway network currently provides access to all areas that would benefit from the alignment in the urban setting, the proposed Project is not expected to contribute development and population growth to any new undeveloped areas. Therefore, indirect impacts to population growth through an improvement to access and quality of life would be less than significant.

Employment

The proposed Project is anticipated to have a total direct employment of up to 150 full-time equivalent people. This would include workforce requirements for the operation and maintenance necessary for the proposed Project, including system engineers, operators, maintenance personnel, janitorial crews, security, and other jobs. These jobs would extend beyond construction and into oversight of long-term operations.

The Project would also require the replacement of certain existing uses in order to accommodate for various Project components (guideway, stations, and MSF). Existing sites to be replaced include the commercial/retail center (CVS plaza) at the southeast corner of Florence Avenue and Market Street that would be removed for the Market Street/Florence Avenue station, the commercial uses at 500 and 510 Manchester Boulevard (VONS plaza) that would be removed for the proposed MSF, and the commercial

46 City of Inglewood. *Transit and Intercity Rail Program Application for the Inglewood Transit Connector Project.* January 2020.

building (Hat Store) that would be removed to allow for the encroachment of the guideway at 150 S. Market Street. The existing work force for these uses include:

- The CVS plaza at Market Street and Florence Avenue with an estimated 284 workers employed at the various commercial and retail uses.
- The commercial use at 150 S. Market Street (Hat Store) with an estimated 37 workers; and
- Existing businesses at the commercial center at 500 and 510 Manchester Boulevard (grocery store, café, gym, bank, and a gas station) which have a combined estimated workforce of 172 workers.[47]

In total, the existing businesses within the proposed Project employs approximately 493 workers which would be displaced by the construction of the proposed Project (for existing employment details refer to **Table 4.11-6**).

The proposed Project would provide funding for the support and transition of jobs through the California Climate Investments (CCI) which facilitate GHG emission reductions and deliver a suite of economic, environmental, and public health co-benefits, including job co-benefits. The job co-benefits refer to California jobs supported, not created, by CCI. A job is defined as one full-time equivalent (FTE) employee position over one year, equal to approximately 2,000 hours of work. Jobs supported by CCI include direct, indirect, and induced employment.[48, 49] The Job Co-benefit Modeling Tool was created by the California Air Resources Board using regional input-output models to characterize the relationships between all industries in an economy, with the foundational assumption that an initial change in economic activity prompts additional spending. For instance, increased demand for the outputs of one industry generates demand for intermediate inputs from supporting industries. Greater employment and earnings in the affected industries lead to higher household spending, resulting in additional demand for goods and services throughout the region.

47 Number of employees generated by each commercial plaza area are calculated using the square footage of the facilities multiplied by a set factor. The factor used is 2.2371 employees per 1,000 SF, which is found in Inglewood Unified School District's Commercial Fee Justification Study 2018. The report can be located at: https://www.lbschools.net/Asset/Files/Business_Services/Developer_Fees/2018/2018-Commercial-Fee-Justification-Study.pdf. Accessed July 22, 2020. It is important to note that land areas and number of employees are rounded numbers used for estimates for analysis purposes only.

48 California Air Resources Board. CCI Co-benefit Assessment Methodologies. Job Co-Benefit Assessment Methodology. https://ww2.arb.ca.gov/resources/documents/cci-methodologies. Accessed 11/2/2020.

49 The three types of jobs supported by CCI are the following- Directly supported jobs refer to labor to complete California Climate Investments projects, through direct employment or contracted work paid with GGRF dollars; Indirectly supported jobs exist in the supply chains supporting California Climate Investments projects. Funding a project generates demand for intermediate inputs of materials and equipment needed to complete the project, leading to expanded production and employment in the relevant upstream industries; Induced jobs are linked to the spending of income from directly and indirectly supported jobs. The personal consumption expenditures of workers in jobs directly and indirectly supported by California Climate Investments projects (i.e., increased household spending) stimulate demand for goods and services in the wider California economy.

In 2009, the University of Utah's Metropolitan Research Center reviewed a wide set of literature and data on the job and economic impacts of transportation spending and reported five conclusions relevant to choosing transportation stimulus projects.[50] The key findings included investing in areas with high job needs improves employment faster than investing elsewhere. Putting or keeping public transportation in communities with high unemployment produces up to 2.5 times more jobs than putting public transportation in communities with low unemployment. CCI facilitate GHG emission reductions and deliver a suite of economic, environmental, and public health co-benefits, including job co-benefits.[51] A different mix of spending on materials, equipment, and labor is expected across various CCI project types and match funding arrangements. As such, some project types would support more jobs than others.

The proposed Project provided project inputs for assessment using the Job Co-benefit Modelling Tool under transit mode. The project input categories include the following:[52]

- The type of region that best encompasses the geographic location for the proposed Project type;
- TIRCP Funds Requested ($)/Total amount of TIRCP GGRF funds requested from this solicitation to implement the project;
- Total Project Cost ($) or Total amount of funding required to implement the project;
- The first year of service or the first year the facility or rolling stock would be in use;
- The final year of service or the final year the facility or rolling stock's useful life;
- The increase in unlinked passenger trips directly associated with the proposed Project in the first year;
- The increase in unlinked passenger trips directly associated with the proposed Project in the final year;
- Discount factor applied to annual ridership to account for transit-dependent riders; and the
- Annual passenger miles over unlinked trips directly associated with the proposed Project.

Calculation based on project inputs generated approximately 11,516 FTE jobs which would be benefitted through these funds and programs. The benefits would be provided through either directly supported jobs, indirectly supported jobs, or induced jobs. Estimated jobs supported by the CCI through the proposed Project can be found in the **Table 4.11-9: Estimated Job Co-Benefits.**[53]

50 Arthur C. Nelson et al., *The Best Stimulus for the Money: Briefing Papers on the Economics of Transportation Spending,* University of Utah's Metropolitan Research Center and Smart Growth America, April 2009. http://stimulus.smartgrowthamerica.org/484.

51 California Climate Change Investments, *About Climate Change Investments.* http://www.caclimateinvestments.ca.gov/about-cci accessed August 17, 2020.

52 City of Inglewood. Inglewood Transit Connector TIRCP Grant Application. January 16, 2020.

53 City of Inglewood. *Transit and Intercity Rail Program Application for the Inglewood Transit Connector Project*. January 2020.

Table 4.11-9
Estimated Job Co-Benefits

Category	Number of Jobs Co-Benefits
Total Full-Time Equivalent Jobs Supported by Project Budget	9,759
Total Full-Time Equivalent Jobs Supported by the Project GGRF* Funds	878
Full-Time Equivalent Jobs Directly Supported by the Project GGRF* Funds	413
Full-Time Equivalent Jobs Indirectly Supported by the Project GGRF* Funds	190
Full-Time Equivalent Induced Jobs Supported by the Project GGRF* Funds	276
Total Number of Jobs Supported	**11,516**

**Greenhouse Gas Reduction Funds*
Source: City of Inglewood. Transit and Intercity Rail Program Application for the Inglewood Transit Connector Project January 2020.

The proposed Project would generate approximately 150 full-time jobs for the operation and maintenance of the APM trains and would either directly or indirectly benefit 11,516 jobs. The proposed Project would also displace 493 jobs locally. This results in a net support for approximately 11,173[54] FTE jobs with the implementation of the proposed Project. Furthermore, ongoing and proposed developments along the alignment would also benefit from the implementation of the proposed Project. Nearby projects such as the Hollywood Park Specific Plan (HPSP) and the Los Angeles Sports and Entertainment District (LASED) would also provide additional jobs and employment opportunities. The HPSP is projected to generate approximately 517 net new jobs[55] while the IBEC is projected to generate 833 net new jobs,[56] resulting in a combined 1,350 net new jobs from adjacent projects. As such, the net loss of jobs resulting from the proposed Project can be absorbed by adjacent development.

As previously discussed, approximately 92 percent of the residents in the City currently commute to work outside of the City, with the remaining 8 percent of residents working within the City (**Table 4.11-5**). This pattern points to a regional spread in work locations for the City residents. Because of this, local fluctuations in job generation are unlikely to directly impact population growth within the City. Even though the proposed Project would either directly or indirectly support 11,173 jobs, the implementation of the proposed Project would only directly create 150 full-time equivalent jobs. Therefore, not all jobs supported by the proposed Project would translate into an increase in population growth for the local area or the region.

54 11,516 minus 493 in numbers of jobs displaced.
55 *Hollywood Park Specific Plan.* "Introduction Executive Summary." https://www.cityofinglewood.org/DocumentCenter/View/125/I-Introduction-Execitive-Summary-PDF. Accessed July 27, 2020.
56 City of Inglewood. *Summary.* https://www.cityofinglewood.org/DocumentCenter/View/13888/03-Summary. Accessed July 27, 2020.

Additionally, according to SCAG 2020-2045 RTP/SCS, approximately 8,389,000 jobs were available in 2016 across industries in the region and the number of jobs available would increase to 10,050,000 by 2045, an increase of approximately 0.62 percent or approximately 52,700 annually in jobs.[57] Similarly, SCAG projects the population in the region would increase from approximately 18,832,418 in 2016 to 22,507,188 in 2045, resulting in an increase of approximately 0.61 percent or approximately 115,290 population annually. The proposed Project would provide benefits to approximately 0.14 percent of the jobs in the region based on the 2016 jobs number or approximately 23 percent of new jobs added to the region annually. The jobs that would be supported by the proposed Project in the region is within the regional trends provided by the SCAG 2020-2045 RTP/SCS data and the jobs that would benefit from the proposed Project does not directly translate into population growth.

Based on SCAG's growth estimates[58] an adequate workforce exists and is projected to remain in existence, creating capacity to meet the employment needs of the proposed Project during operation. Further, with the current development of new employment opportunities in the City as well as the region, displacement of any existing workers would be absorbed.

Additionally, any businesses displaced would be compensated in accordance with California Government Code Section 7260-7277, the California Relocation Assistance Program. Compensation and compliance with the California Relocation Assistance Program would further minimize the effect of business displacement on business owners and the local community. It is important to note economic and social effects of a project are not be treated as significant effects on the environment as stated previously per CEQA Guidelines Section 15131(a). Nonetheless, the changes in employment identified in this section are used to trace a chain of cause and effect from a proposed decision on a project through anticipated economic or social changes resulting from the project to physical changes, such as population growth.

As a result of this analysis, the proposed Project would not substantially induce population growth beyond the regionally projected value. Therefore, there is a less than significant impact on employment and population growth from the operation of the proposed Project.

58 SCAG. Draft 2020-2045 ConnectSoCal Demographics And Growth Forecast. https://www.connectsocal.org/Documents/Draft/dConnectSoCal_Demographics-And-Growth-Forecast.pdf. Accessed July 27, 2020.

58 SCAG. Draft 2020-2045 ConnectSoCal Demographics And Growth Forecast. https://www.connectsocal.org/Documents/Draft/dConnectSoCal_Demographics-And-Growth-Forecast.pdf. Accessed July 27, 2020.

Summary of Impacts

The proposed Project does not include any residential uses or housing developments. Therefore, construction of the proposed Project would not directly contribute to population increase or an increase or loss of housing stock.

Construction activities would generate a temporary workforce for the duration of the construction period. However, due to the temporary and variable nature of construction activities, construction would not create temporary or permanent population increase at the City. Additionally, construction workforce needs for the proposed Project could be met by the existing local work force and would not contribute to population increase through relocation. Therefore, construction employment would not result in any significant impacts in terms of population increase.

Employment generated by the operation of the proposed Project would be less than the current jobs displaced for uses that would be removed. However, the proposed Project would either directly or indirectly benefit 11,173 jobs. The number of jobs that would be supported by the proposed Project is within the growth projections provided by existing studies. Therefore, operational impacts on substantially inducing employment and population growth is less than significant.

Impacts from construction and operation on substantially inducing population and employment growth would be less than significant.

Mitigation Measures

No mitigation is required.

Level of Significance after Mitigation

The proposed Project would have a less than significant impact on inducing substantial population or employment growth. Impacts would be less than significant.

4.11.8 CUMULATIVE IMPACTS

A cumulative impact analysis for population, employment, and housing evaluates whether impacts of a project and related projects, when taken as a whole, would have significant environmental impacts on population, employment, and housing resources. The geographic scope of this cumulative impact analysis is the City and the region. If the cumulative projects listed in **Section 4.0**, *Section 4.0.6: Cumulative Assumptions* would result in a significant impact, then the proposed Project contribution would need to be determined.

The proposed Project and potential future related development would not directly create population or employment growth in the City or region. The proposed Project does not include residential elements or housing development which would directly contribute to population growth.

Since the proposed Project would not significantly induce population, employment, or housing growth in the region, the proposed Project would not substantially contribute to cumulative population, employment, or housing growth in the area. The Project, combined with other reasonably probable future related developments would not result in a significant cumulative impact related to population, employment, and housing because the cumulative growth would not exceed the growth anticipated in City-wide and regional planning documents, including the 2020-2045 RTP/SCS.

4.11.9 CONSISTENCY WITH GENERAL PLAN

The City's General Plan contains goals within its Housing Element and Land Use Element that relates to the population, employment, and housing resources.

Housing Element

The Housing Element for the City[59] establishes policies to create and preserve quality residential neighborhoods along with establishing policies and programs to mitigate housing shortages. The following goals within the Housing Element directly relates to population, employment, and housing resources within the City:

Goal 2: Maintain the existing housing stock and neighborhoods by promoting the maintenance, rehabilitation, modernization, and energy efficient upgrades of existing housing as well as the beautification and security of residential neighborhoods.

Goal 3: Encourage the Production and Preservation of Housing for All Income Categories, particularly around high-quality transit, including workers in the City that provide goods and services.

Goal 7: Encourage Energy Efficiency and Greenhouse Gas Reductions.

Goals 2 and 3 relate directly to housing production, preservation, and upgrades. Since the proposed Project does not include any residential uses, housing development, or removal of existing housing stock, Goals 2 and 3 do not apply.

59 City of Inglewood. *Housing Element 2013-2021*. https://www.cityofinglewood.org/DocumentCenter/View/127/2013-2021-Housing-Element-Adopted-January-28-2014-PDF. Accessed July 22, 2020.

The proposed Project aligns with Goal 7 in improving local mass transit availability and providing transit to local neighborhoods, encouraging energy efficiency and greenhouse gas reduction by providing an alternative to travelling by automobiles. As such, the proposed Project is consistent with this goal.

Land Use Element

The Land Use Element for the City[60] also contains goals that apply to population, employment, and housing. The goals relating to population, employment and housing are listed below:

General

Goal: Help promote sound economic development and increase employment opportunities for the City's residents by responding to changing economic conditions.

Goal: Develop a land use element that facilities the efficient use of land for conservation, development and redevelopment.

Goal: Promote Inglewood's image and identify as an independent community within the Los Angeles Metropolitan area.

Commercial

Goal: Create and maintain a healthy economic condition within the present business community and assist new business to located within the City.

Goal: Protect local businessmen and encourage the importance of maintaining a strong commercial district in the downtown.

Goal: Promote the development of commercial/recreational uses which would complement those which already are located in Inglewood.

Downtown Transit Oriented District

Goal 1: Downtown is a place to live, work, shop, recreate, and be entertained.

Goal 3: Downtown provides a unique mix of accessibility options including light rail, pedestrians, bicycles, autos, buses and advanced technology local transit.

Goal 4: Downtown is a major economic engine providing jobs, sales tax and other revenues.

Goal 5: Downtown is a model for sustainable development.

The proposed Project is consistent with the Land Use Element goals by enhancing connectivity for the new commercial and residential developments. The proposed Project would provide a mass transit connection within the City and the new LASED and HPSP, as well as connect them to the broader region and the Metro

60 City of Inglewood. *Land Use Element.* https://www.cityofinglewood.org/DocumentCenter/View/132/Land-Use-Element-1980-Amended-1986-2009-2016-PDF. Accessed July 22, 2020.

Crenshaw Line. The location of the proposed Project in the City's downtown area along Market Street would assist in encouraging the importance of maintaining a strong commercial district in the downtown area.

The proposed Project would connect the Metro Crenshaw line with new commercial and entertainment developments in the City such as LASED, Sofi Stadium, and the Hollywood Park Specific Plan mixed-use development, promoting these entertainment and commercial developments to the region. The connection to entertainment, commercial, and residential developments would also assist in reducing future impacts associated with traffic, air quality, greenhouse gas, and noise from employees and patrons of these uses. Increasing existing mobility options would also remove vehicle traffic in downtown Inglewood, promoting sustainable development values.

Environmental Justice Element

The City's Environmental Justice Element[61] was adopted on June 30, 2020. Applicable Environmental Justice goals for the Population, Employment, and Housing section are as follows:

Goal: The community's exposure to pollution in the environment is minimized through sound planning and public decision making.

Goal: Adequate and equitably distributed public facilities are available in the community.

The proposed Project is consistent with the Environmental Justice Element goals through the reduction in community exposure to air pollutants by reducing VMT and vehicle related air pollutant emissions and providing adequate and equitably distributed public facilities in the community. The proposed Project would provide public transportation services to the local community from Downtown Inglewood to south Inglewood and connect the communities from Inglewood to the larger Los Angeles area through the connection with Metro LAX/Crenshaw line.

61 City of Inglewood. *Environmental Justice Element.* https://www.cityofinglewood.org/DocumentCenter/View/14211/Environmental-Justice-Element#:~:text=The%20Inglewood%20General%20Plan%20Environmental,City%2C%20particularly%20for%20disadvantaged%20communities. Accessed October 2, 2020.

4.12.1 INTRODUCTION

This section of the Draft Environmental Impact Report (Draft EIR) evaluates the surface transportation and circulation system in the Project area and the potential for the construction and operation of the proposed Inglewood Transit Connector Project (proposed Project or ITC Project) to result in transportation impacts. The assessment of transportation and circulation system impacts considers the existing traffic conditions, including existing street system, public transit service, and bicycle facilities, that may be affected by the ITC Project. The ITC Project is proposed to increase use of transit, reduce vehicle trips, and reduce per-capita vehicle miles traveled (VMT) associated with travel to and from the City's major housing, employment, and activity centers, with corresponding improvements in air quality, public health, and reductions in greenhouse gas emissions from transportation sources in accordance with the City's goals under Senate Bill (SB) 375 and State of California (State) policy with respect to climate change.

A quantified estimate of transportation impacts is provided for both construction and operations of the proposed Project. Transportation was analyzed using a variety of modeling techniques detailed within **Appendix 4.12.1: Transportation Assessment Study.**

Please see **Section 8.0** for a glossary of terms, definitions, and acronyms used in this Draft EIR.

4.12.2 REGULATORY FRAMEWORK

State, regional, and local laws, regulations, and policies pertaining to traffic and transportation in the Project area are summarized here. These provide the regulatory framework for addressing all aspects of transportation, planning, and infrastructure that would be affected by implementation of the proposed Project.

4.12.2.1 State Regulations and Directives

Senate Bill 743 (SB 743)

Senate Bill (SB) 743, passed in 2013, required that the California Governor's Office of Planning and Research (OPR) develop new CEQA guidelines that address traffic performance metrics. Per the legislation, "automobile delay characterized solely by level of service or similar measures of vehicular capacity or traffic congestion shall not be considered a significant impact on the environment".

The Natural Resources Agency subsequently adopted CEQA Guidelines Section 15064.3. Under this guideline, vehicle miles traveled (VMT) was chosen as the primary performance metric used to identify transportation impacts. As of July 1, 2020, Section 15064.3 became mandatory.

The primary goals of the Senate Bill 743 included the following:

1. Reduction of Greenhouse Gas (GHG) emissions
2. Development of multimodal transportation networks; and
3. Encouragement of diversity of land uses (mixed use development)

In December 2018, OPR published final technical guidance for implementing SB 743. The latest OPR technical guidance[1] specifically states that

> *Transit and Active Transportation Projects generally reduce VMTs and therefore are presumed to cause a less-than-significant impact on transportation. This presumption may apply to all passenger rail projects, bus and bus rapid transit projects, bicycle, and pedestrian infrastructure projects. Streamlining transit and other active transportation projects align with each of the statutory goals contained in SB 743 by reducing GHG emissions, increasing multimodal networks and facilitating mixed-use development.*

Assembly Bill 1358

Assembly Bill (AB) 1358, and the Complete Streets Act of 2008 require that cities and counties identify how they will provide for the routine accommodation of all users of roadways, including motorists, pedestrians, bicyclists, individuals with disabilities, seniors, and users of public transportation. Planning and building complete streets is one way that cities and counties can meet this requirement. A complete street is a transportation facility that is planned, designed, operated, and maintained to enable safe access for all roadway users. Pedestrians, bicyclists, motorists, and transit riders of all ages and abilities must be able to safely move along and across a complete street.

4.12.2.2 Regional Regulations and Directives

Southern California Association of Governments: Connect SoCal – The 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy

As the metropolitan planning organization for the region's six counties and 191 cities, Southern California Association of Governments (SCAG) develops a long-term regional transportation and sustainability plan every four years, as mandated by law. In September 2020, the Regional Council of Southern California Association of Governments adopted Connect SoCal-The 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). The 2020– 2045 RTP/SCS is a long-range visioning plan for the region's transportation system over the next 25 years that balances mobility and housing needs

[1] Governor's Office of Planning and Research*. Technical Advisory on Evaluating Transportation Impacts in CEQA.* December 2018.

with economic, environmental, and public health goals. Connect SoCal includes over 4,000 transportation projects ranging from highway improvements, railroad grade-separations, bicycle lanes, new transit hubs and replacement bridges to reduce bottlenecks, improve the efficiency of the region's network and expand the mobility choices for everyone in the six-county southern California region.

The Connect SoCal groups the RTP/SCS goals into four core categories – economy, mobility, environment, and healthy/complete communities. The plan explicitly addresses goals associated with housing, transportation technologies, equity and resilience reflecting enhanced importance of these topics in the region linking them to potential performance measures and targets.

The following ten goals are identified in SoCal Connect – The 2020-2045 RTP/SCS:

1. Encourage regional economic prosperity and global competitiveness
2. Improve mobility, accessibility, reliability, and travel safety for people and goods
3. Enhance the preservation, security, and resilience of the regional transportation system
4. Increase person and goods movement and travel choices within the transportation system
5. Reduce greenhouse gas emissions and improve air quality
6. Support healthy and equitable communities
7. Adapt to a changing climate and support an integrated regional development pattern and transportation network
8. Leverage new transportation technologies and data-driven solutions that result in more efficient travel
9. Encourage development of diverse housing types in areas that are supported by multiple transportation options
10. Promote conservation of natural and agricultural lands and restoration of habitats

4.12.2.3 Local Regulations and Directives

City of Inglewood Circulation Element

As part of the General Plan, the City adopted a Circulation Element in December 1992. The Circulation Element works to ensure that adequate street access and traffic capacity is considered for current and future land use needs. In order to accomplish this, the Circulation Element includes formal arterial and collector designations for street classifications and identifies specific street improvement efforts as needed.

City of Inglewood Environmental Justice Element

The Environmental Justice Element, adopted on June 30, 2020, provides guidelines to minimize pollution and its effects on the community, and ensure that all residents have a say in decisions that may affect their quality of life. Goals and policies applicable to the transportation planning are identified below:

Goal 2: The community's exposure to pollution in the environment is minimized through sound planning and public decision making.

Policy: General Environmental Health

EJ-2.4: Create land use patterns and public amenities that encourage people to walk, bicycle and use public transit.

EJ-2.5 Concentrate medium to high density residential development in mixed-use and commercial zones that can be served by transit.

EJ-2.7 Regularly update IMC Chapter 12 Transportation Demand Management requirements to reflect current transportation technologies in support of alternative modes of transportation.

EJ-2.8: Encourage new development to reduce vehicle miles traveled to reduce pollutant emissions.

Goal 6: Adequate and equitably distributed public facilities are available in the community.

EJ-6.2: Prioritize the City's capital improvement program to address the needs of disadvantaged communities.

EJ-6.3: Plan for the future public improvement and service needs of underserved communities.

EJ-6.8: Ensure that new public facilities are well designed, energy efficient and compatible with adjacent land uses.

EJ-6.10 Coordinate with the Inglewood Unified School District, transit agencies and other public agencies to provide adequate public facilities, improvements and programs to the City of Inglewood.

City of Inglewood Land Use Element

The Land Use Element[2] also includes goals related to the City's transportation system, including the following:

Goal: Ensure that proposed new uses can be accommodated by adequate and safe streets.

Goal: Promote and support adequate public transportation within the City and the region.

Goal: Develop modified traffic systems that would discourage through traffic from utilizing neighborhood streets.

Goal: Develop a safe and adequate pedestrian circulation system which is barrier-free for the handicapped.

Imagine Inglewood

The City of Inglewood is in the process of developing *Imagine Inglewood*, an Active Transportation Plan (ATP) that incorporates bicycle, pedestrian, ADA (Americans with Disabilities Act) considerations and Safe Routes to School (SRTS) analysis and planning. The ATP is intended to improve access and increase public transit connections to the rest of the Los Angeles region while addressing the needs of the transit-dependent, recreational users and those looking for an alternative.[3] The City is currently engaging community stakeholders in order to further develop ATP goals and initiatives.

4.12.3 EXISTING CONDITIONS

As shown in **Figure 4.12-1: Study Area**, the study area is generally bounded by Florence Avenue on the north, Lennox Boulevard – 108th Street on the south, La Brea Avenue – Hawthorne Boulevard on the west, and Van Ness Avenue on the east. The study area includes major corridors providing access to the proposed Project, encompassing approximately 6-square-miles. The existing street system within the study area consists of a regional roadway system including freeways, major and minor arterials and a local street system including collectors and local streets. The freeway network providing access to and from the study area includes of the San Diego (I-405) Freeway, the Glenn M. Anderson (I-105) Freeway and the Harbor (I-110) Freeway. The Average Daily Traffic (ADT) estimates at all roadway facilities within approximately ½ mile from the proposed Project alignment have also been prepared for all analysis scenarios, discussed further below, to quantify potential reduction in ADTs with the ITC Project.

2 City of Inglewood *General Plan*, "Land Use Element" (1980).

3 City of Inglewood, Imagine Inglewood, http://www.imagineinglewood.com/, accessed August 8, 2018.



SOURCE: Raja Associates, Inc. - 2020

FIGURE **4.12-1**

Study Area

251-003-20

4.12.3.1 Existing Street System

The existing street system within the study area consists of a regional roadway system including freeways, major and minor arterials and a local street system including collectors and local streets. The freeway network providing access to and from the study area includes of the San Diego (I-405) Freeway, the Glenn M. Anderson (I-105) Freeway and the Harbor (I-110) Freeway.

Brief descriptions of these facilities and additional collectors and local streets serving the study area including number of lanes, speed limits, parking availability, and functional classes are provided below.

Freeways

- San Diego (I-405) Freeway – The I-405 Freeway is a north-south freeway that transverses the Southern California region from its northern terminus at the I-5 Freeway in Sylmar to its southern terminus at the I-5 Freeway in Irvine. In the vicinity of the study area, this freeway provides six lanes (including one HOV lane) in each direction. There are ramps at Manchester Boulevard, La Cienega Boulevard, Century Boulevard, Imperial Highway, I-105 Freeway in the vicinity of the study area.
- Glenn Anderson (I-105) Freeway – The I-105 Freeway runs from its westerly terminus on Imperial Highway west of Sepulveda Boulevard to its easterly terminus at the San Gabriel (I-605) Freeway in the City of Norwalk. This freeway generally provides four mixed-flow traffic lanes and a carpool lane in each direction. A light rail line (the Metro C Line) runs along the I-105 Freeway in its center median. Ramps are located at La Cienega Boulevard/Aviation Boulevard, I-405 Freeway, Hawthorne Boulevard, Prairie Avenue, and Crenshaw Boulevard in the vicinity of the study area.
- Harbor (I-110) Freeway – The Harbor Freeway is a north-south freeway that extends from Gaffey Street in San Pedro to the City of Pasadena. North of Interstate 10 (I-10), the Harbor Freeway becomes California State Highway 110 (CA-110). In the vicinity of the study area this facility consists of two High Occupancy Toll (HOT) lanes, four general mixed-flow traffic lanes, and one auxiliary lane in each direction. The freeway's HOT lanes also include a designated busway facility that carries the Metro Silver Line Bus Rapid Transit (BRT), which connects the Los Angeles Harbor and San Pedro Area to Downtown Los Angeles and beyond. Ramps are located at Florence Avenue, Manchester Avenue, Century Boulevard, and Imperial Highway.

Major Arterials

- La Brea Avenue/Hawthorne Boulevard – This roadway runs in a north-south direction. The roadway segment that runs north of Century Boulevard is called La Brea Avenue, and the segment that runs south of Century Boulevard is called Hawthorne Boulevard. The roadway is classified as a major arterial within the study area. This roadway generally provides two travel lanes in each direction north of Spruce Avenue and three lanes in each direction south of Spruce Avenue, plus left-turn channelization at major intersections through the study area. Parking is generally allowed along many stretches of this roadway. The posted speed limit is 35 mph. Hawthorne Boulevard provides connections to the I-105 Freeway.

- Prairie Avenue – Prairie Avenue runs in a north-south direction and is classified as a major arterial in the study area. This roadway provides two travel lanes in each direction north of Manchester Boulevard and three travel lanes in each direction south of Manchester Boulevard, plus left-turn channelization at most major intersections through the study area. The posted speed limit is 40 mph. Parking is generally not allowed on Prairie Avenue within the study area. Prairie Avenue provides access to the I-105 Freeway.
- Crenshaw Boulevard – Crenshaw Boulevard is classified as a major arterial roadway in the City of Inglewood and a secondary arterial (Avenue I) in the City of Los Angeles within the study area. The roadway runs in a north-south direction. Within the study area, this roadway provides two lanes in each direction north of Manchester Boulevard and three lanes in each direction south of Manchester Boulevard, plus left-turn channelization at major intersections. Parking is allowed along many stretches of this roadway, and the posted speed limit is 40 mph. Crenshaw Boulevard provides access to the I-105 Freeway.
- Centinela Avenue – Centinela Avenue is classified as a major arterial roadway and generally runs in an east-west direction; it runs diagonally east of Hyde Park Place. The roadway generally provides two travel lanes in each direction plus left-turn channelization at major intersections. Parking is generally allowed along this roadway, and the posted speed limit is 40 mph.
- Florence Avenue – Florence Avenue is classified as a major arterial in the City of Inglewood and as a secondary arterial (Avenue I) in the City of Los Angeles. It runs east-west with two to three lanes in each direction with left-turn channelization at major intersections through the study area. Parking is generally not allowed along this roadway, although some parking is permitted east of West Boulevard. Bike lanes are provided along some stretches of this roadway between Locust Street and West Boulevard. The posted speed limit is 40 mph west of West Boulevard and 35 mph east of West Boulevard.
- Manchester Boulevard – Manchester Boulevard is classified as a major arterial roadway in the study area. It runs east-west and has generally two lanes in each direction west of Prairie Avenue and three lanes in each direction east of Prairie Avenue, plus left-turn channelization at major intersections through the study area. Parking is allowed along most of Manchester Boulevard with some restricted segments. The posted speed limit along Manchester Boulevard is 35 mph west of Prairie Avenue and 40 mph east of Prairie Avenue. Manchester Boulevard provides access to the I-405 Freeway and I-110 Freeway.
- Arbor Vitae Street – Arbor Vitae Street west of Prairie Avenue is classified as a major arterial roadway that runs in an east-west direction. Arbor Vitae Street between Prairie Avenue and Van Ness Avenue is classified as a collector roadway. Within the study area, this roadway west of Prairie Avenue generally provides one to two lanes in each direction with parking on both sides of the street. The posted speed limit is 35 mph.
- Century Boulevard – Century Boulevard is classified as a major arterial roadway in the study area and runs in an east-west direction. It provides one of the major direct access options into the LAX Central Terminal Area (CTA). Within the study area, this roadway generally provides three to four lanes in

each direction with left-turn lanes at key intersections. The posted speed limit is 40 mph. There is no parking allowed on either side of the street within the study area. Century Boulevard provides access to the I-405 Freeway and I-110 Freeway.

Minor Arterial / Secondary Arterial

- Market Street – Market Street is classified as a minor arterial roadway and runs in a north-south direction, beginning at Florence Avenue and terminating at La Brea Avenue. This roadway provides one lane in each direction between Florence Avenue and Hillcrest Boulevard, and two lanes in each direction between Hillcrest Boulevard and La Brea Avenue. On-street parking is permitted on both sides of the street. The prima facie speed limit is 25 mph.

Collectors & Local Streets

- Locust Street – Locust Street runs in a north-south direction beginning at Florence Avenue and terminating at the intersection of Hillcrest Boulevard and Nutwood Street. The roadway is classified as a collector roadway between Regent Street and Hillcrest Boulevard, and as a local street between Florence Avenue and Regent Street. This roadway provides one lane in each direction, with on-street parking generally permitted on both sides of the street. Bike lanes are generally provided on both sides of the street between Florence Avenue and Manchester Boulevard. The posted speed limit is 30 mph.
- Myrtle Avenue – Myrtle Avenue is a north-south roadway that is classified as a collector roadway between Arbor Vitae Street and Century Boulevard, and as a local street between Kelso Street and Arbor Vitae Street. This roadway generally provides one lane in each direction, with on-street parking available on both sides of the street. The posted speed limit is 30 mph.
- Doty Avenue – Dory Avenue is a north-south roadway that is classified as a collector roadway. The roadway provides one lane in each direction. On-street parking is available on both sides of the street south of 102nd Street. The prima facie speed limit is 25 mph.
- Yukon Avenue - Yukon Avenue is a north-south roadway that is classified as a collector roadway. The roadway generally provides one to two lanes in each direction. On-street parking is available on west side along some restricted segments in the study area. The posted speed limit is 30 mph.
- Regent Street – Regent Street is classified as a collector roadway and runs in an east-west direction, beginning west of Oak Street and terminating at Inglewood Park Cemetery. This roadway provides one lane in each direction with on-street parking available between La Brea Avenue and Prairie Avenue. It provides two lanes in each direction with on-street parking prohibited between Fir Avenue and La Brea Avenue. The posted speed limit is 35 mph.
- Hillcrest Boulevard – Hillcrest Boulevard is classified as a collector roadway. It runs in an east-west direction between Aviation Boulevard and Grevillea Avenue, diagonally between Grevillea Avenue and Manchester Boulevard, and in a north-south direction between Manchester Boulevard and Florence Avenue. Within the study area, Hillcrest Boulevard generally provides one travel lane in each direction and has on-street parking on both sides of the street. The posted speed limit is 30 mph.

- Spruce Avenue – Spruce Avenue is classified as a collector roadway that runs diagonally between La Brea Avenue and Manchester Boulevard, and runs in an east-west direction between Hindry Avenue and Fir Avenue. This roadway generally provides one lane in each direction with on-street parking on both sides of the street. The prima facie speed limit is 25 mph.
- Kelso Street – Kelso Street runs generally in an east-west direction and is classified as a collector roadway. It runs diagonally between Market Street and Myrtle Avenue. The roadway ends at Prairie Avenue where the street name changes to Pincay Drive. This roadway generally provides one lane in each direction with on-street parking on both sides of the street. The prima facie speed limit is 25 mph.
- Pincay Drive – Pincay Drive is classified as a collector roadway that begins at Prairie Avenue and ends at Crenshaw Boulevard where the street name changes to 90th Street. It runs in an east-west direction. This roadway generally provides two lanes in each direction. On-street parking is available on the south side of the street between Carlton Drive and Crenshaw Boulevard. The posted speed limit is 45 mph.
- Hardy Street – Hardy Street is classified as a collector roadway that runs in an east-west direction. West of LASED, it begins at Inglewood Boulevard and terminates at Prairie Avenue. East of LASED, it begins at Crenshaw Boulevard and ends at Van Ness Avenue. Hardy Street is discontinuous between Prairie Avenue and Crenshaw Boulevard. This roadway generally provides one lane in each direction with on-street parking available on both sides of the street. The posted speed limit is 30 mph.
- Queen Street – Queen Street is a local street that runs in an east-west direction. The roadway provides one lane in each direction with on-street parking available on both sides of the street. The posted speed limit is 25 mph.

4.12.3.2 Existing Average Daily Traffic Volumes

Seventy-five (75) segments within the study area were identified as key roadway segments for evaluation. The existing ADT on roadway segments were estimated using the Inglewood Travel Demand Forecasting (ITDF) Model for four time periods: Morning Peak Hour (AM), Midday (MD), Evening Peak Hour (PM) and Nighttime (NT).

The Inglewood Travel Demand Forecasting Model (ITDF), which is based on the Southern California Association of Governments (SCAG) Regional Travel Demand Model, was used to forecast the number daily trips on the roadway system. The SCAG 2020-2045 RTP/SCS socio-economic data was used as the base input and updated to include all the growth associated with the related projects. The ITDF Model, similar in structure to the SCAG Regional Travel Demand Model involves four-step models including Trip Generation, Trip Distribution, Mode Split, and Traffic Assignment procedures.

The results for all four time periods were aggregated to reflect the average daily conditions. The resulting ADT volumes, which reflect typical weekday operations under existing (2020) conditions, are presented in **Table 4.12-1: Weekday Daily Traffic Volumes – Existing Conditions**.

Table 4.12-1
Weekday Daily Traffic Volumes – Existing Conditions

Street	Facility Type	Segment		Existing ADT
		From	To	
North/South Streets				
La Brea Av	Major Arterial	Hyde Park Bl	Florence Av	20,930
		Florence Av	Manchester Bl	24,598
		Manchester Bl	Spruce Av/Market St	19,252
		Spruce Av/Market St	Arbor Vitae St	24,819
		Arbor Vitae St	Hardy St	28,459
		Hardy St	Century Bl	29,570
Hawthorne Bl	Major Arterial	Century Bl	104th St	43,049
		104th St	Lennox Bl	48,127
Prairie Av	Major Arterial	Florence Av	Regent St	21,787
		Regent St	Manchester Bl	21,853
		Manchester Bl	Pincay Dr/Kelso St	28,283
		Pincay Dr/Kelso St	Arbor Vitae St	37,215
		Arbor Vitae St	Hardy St	30,516
		Hardy St	97th St	32,712
		97th St	Century Bl	32,712
		Century Bl	102nd St	29,893
		102nd St	104th St	30,586
		104th St	Lennox Bl	31,691
Crenshaw Bl	Major Arterial	80th St	Manchester Bl	23,440
		Manchester Bl	Pincay Dr/90th St	25,921
		Pincay Dr/90th St	Arbor Vitae St	31,523
		Arbor Vitae St	Hardy St	30,078
		Hardy St	Century Bl	30,794
		Century Bl	104th St	27,245
Market St	Minor Arterial	Florence Av	Regent St	3,153
		Regent St	Manchester Bl	7,764
Myrtle Av	Collector	Arbor Vitae St	Hardy St	3,832
Doty Av	Collector	Century Bl	104th St	4,950
Yukon Av	Collector	Century Bl	104th St	10,123
Locust St	Collector	Florence Av	Manchester Bl	3,677
East/West Streets				
Centinela Av	Major Arterial	Hyde Park Bl	Florence Av	25,664
Florence Av	Major Arterial	Fir Av	La Brea Av	16,710

Street	Facility Type	Segment		Existing ADT
		From	To	
		La Brea Av	Market St	20,923
		Market St	Centinela Av	24,294
		Centinela Av	Prairie Av	40,560
		Prairie Ave	West Bl	39,882
Manchester Bl	Major Arterial	Grevillea Av	La Brea Av	21,396
		La Brea Av	Market St	21,690
		Market St	Locust St	18,782
		Locust St	Hillcrest Bl	20,035
		Hillcrest Bl	Spruce Av	24,352
		Spruce Av	Prairie Av	28,558
		Prairie Av	Kareem Ct	31,638
		Kareem Ct	Crenshaw Dr	36,400
		Crenshaw Dr	Crenshaw Bl	27,704
		Crenshaw Bl	Van Ness Av	31,036
Arbor Vitae St	Major Arterial	Grevillea Av	La Brea Av	13,506
		La Brea Av	Myrtle Av	9,066
		Myrtle Av	Prairie Av	8,205
Century Bl	Major Arterial	Grevillea Av	La Brea Av/Hawthorne Bl	50,447
		La Brea Av/Hawthorne Bl	Myrtle Av	40,914
		Myrtle Av	Freeman Av	37,612
		Freeman Av	Prairie Av	32,957
		Prairie Av	Doty Av	39,615
		Doty Av	HP Casino Dr	40,253
		HP Casino Dr	Yukon Av	40,253
		Yukon Av	Club Dr	39,608
		Club Dr	Crenshaw Bl	41,542
		Crenshaw Bl	Van Ness Av	35,913
Regent St	Collector	Grevillea Av	La Brea Av	5,149
		La Brea Av	Market St	16,068
		Market St	Prairie Ave	8,174
Hillcrest Bl	Collector	Grevillea Av	La Brea Av	8,677
		La Brea Av	Market St	7,287
		Market St	Nutwood St/Locust St	9,013
		Nutwood St/Locust St	Manchester Bl	4,941
		Manchester Bl	Florence Av	7,844
Spruce Av	Collector	La Brea Av	Manchester Av	2,944
Kelso St / Pincay Dr	Collector	Spruce Av	Prairie Av	5,493
		Prairie Av	Kareem Ct	18,768
		Kareem Ct	Crenshaw Bl	14,005
Hardy St	Collector	La Brea Av	Prairie Ave	4,394
104th St	Collector	Grevillea Av	Hawthorne Bl	6,769
		Hawthorne Bl	Prairie Ave	4,030

Street	Facility Type	Segment		Existing ADT
		From	To	
		Prairie Av	Doty Av	3,460

Source: Transportation Assessment Study for the Inglewood Transit Connector Project DEIR, Raju Associates, Inc., November 2020; refer to Table 2 (refer to Appendix 4.12.1 of this Draft EIR).

Daily traffic volumes along Prairie Avenue between Florence Avenue and Lennox Boulevard range between approximately 21,800 to 37,250 vehicles per day; along Manchester Boulevard between Grevillea Avenue and Van Ness Avenue range between approximately 18,800 to 36,400 vehicles per day; and along Century Boulevard between Grevillea Avenue and Van Ness Avenue range between approximately 51,000 to 61,200 vehicles per day.

4.12.3.3 Existing Public Transit Service

Fourteen (14) bus lines provide services in the study area including thirteen bus lines operated by the Los Angeles County Metropolitan Transportation Authority (MTA), and one bus line operated by the County of Los Angeles. Additionally, the Metro C Line (Green Line) is located south of the study area. These transit lines are shown in **Figure 4.12-2: Existing Transit System** and briefly described below:

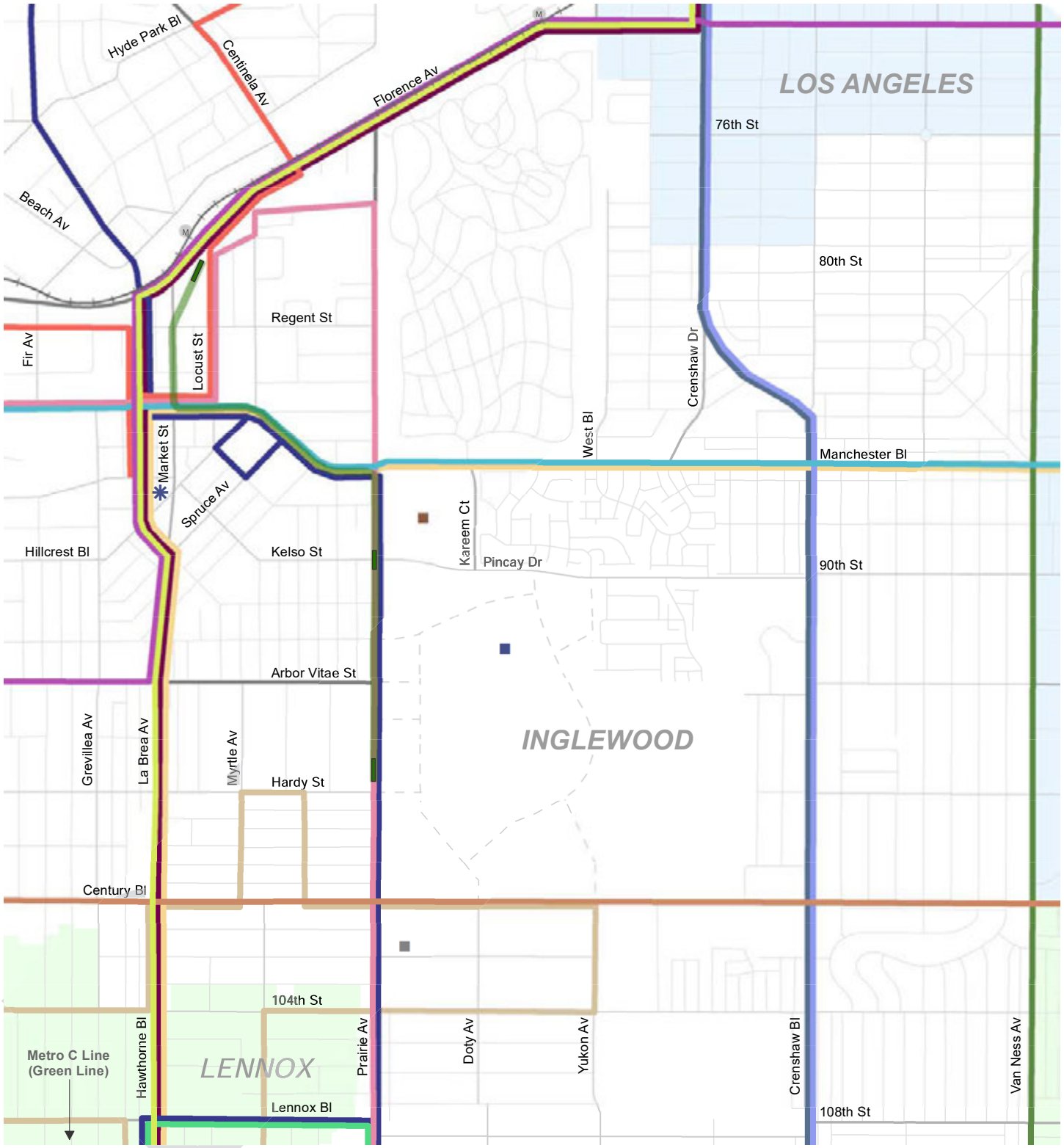
- MTA 40 – Line 40 is a local north/south line that provides service from Downtown Los Angeles to Redondo Beach and travels primarily along La Brea Avenue, Florence Avenue and Crenshaw Boulevard within the study area.
- MTA 111 - Line 111 is a local east/west line that provides service from Norwalk to the Los Angeles International Airport and travels primarily along Arbor Vitae Street, La Brea Avenue and Florence Avenue within the study area.
- MTA 115 - Line 115 is a local east/west line that provides service from Norwalk to Playa del Rey and travels primarily along Manchester Boulevard within the study area.
- MTA 117 – Line 117 is a local east/west line that provides service from Downey to the LAX Bus Center and travels primarily along Century Boulevard within the study area.
- MTA 126 - Line 126 is a local east/west line that provides service from Manhattan Beach to Hawthorne, and travels along Prairie Avenue, Lennox Boulevard, and Hawthorne Boulevard within the study area.
- MTA 209 – Line 209 is a local north/south line that provides service from Wilshire Center to Athens and travels primarily along Van Ness Avenue in the proximity of the study area.
- MTA 210 – Line 210 is a local north/south line that provides service from Hollywood to Redondo Beach and travels primarily along Crenshaw Boulevard within the study area.

- MTA 211/215 - Lines 211 and 215 are local north/south lines that provide service from Redondo Beach to Inglewood and travel primarily along Locust Street, Prairie Avenue, Manchester Boulevard, and Grace Avenue within the study area.
- MTA 212/312 – Line 212 is a local north/south line that provides service from Hollywood to Hawthorne and travels primarily along La Brea Avenue, Manchester Boulevard, Prairie Avenue, Lennox Boulevard, and Hawthorn Boulevard within the study area.
- TA 442 – Line 442 is a north/south express line that provides service from Downtown Los Angeles to Hawthorne and travels primarily along La Brea Avenue and Manchester Boulevard within the study area.
- MTA 607 – Line 607 is a circulator route that begins at the Inglewood Transit Center in Inglewood and goes clockwise with major stops at the intersections of Slauson Avenue / La Brea Avenue in Windsor Hills, and Crenshaw Boulevard/54th Street in Los Angeles.
- MTA 710 – Line 710 is a north/south 'Rapid Bus' line that provides service from Koreatown to Redondo Beach and travels along Crenshaw Boulevard within the study area.
- MTA 740 – Line 740 is a north/south 'Rapid Bus' line that provides service from Jefferson Park to Redondo Beach and travels primarily along La Brea Avenue, Hawthorne Boulevard, Crenshaw Boulevard, and Florence Avenue within the study area.
- Los Angeles County Lennox Link is a circulator route that begins at Lennox Park and travels in a counter-clockwise direction along Lennox Boulevard, Burin Avenue, 111th Street, Freeman Avenue, 104th Street, Yukon Avenue, Century Boulevard, Flower Street, Hardy Street, Myrtle Avenue and La Brea Avenue.
- Metro C Line (Green Line) – The Metro C Line is an east/west light rail line that provides service to Norwalk, Lynwood, Willowbrook, Hawthorne, El Segundo, and Redondo Beach. The C Line's Hawthorne / Lennox Station lies approximately 0.8 miles south of Century Boulevard.

The average ridership for Metro bus lines serving the study area was compiled using data provided by Metro in 2019.

Metro Bus Lines 40, 111 and 115 have an average daily bus ridership ranging from 14,561 (Line 40) to 15,653 (Line 111) passenger trips; while Metro Bus Lines 126, 209, 211/215, 442 and 607 have an average daily ridership ranging from 62 (Line 607) to 911 (Line 209) daily passengers. Additionally, Metro C line (Green) has an average of 30,236 daily ridership.

MTA is constructing the Metro Crenshaw/LAX Light-Rail Line from the existing Metro E Line (Exposition Line) at Crenshaw Boulevard/Exposition Boulevard, 8.5 miles south to connect with the Metro C Line (Green Line) at the Aviation/Imperial Station.



SOURCE: Raja Associates, Inc. - 2020

FIGURE **4.12-2**

Existing Transit System

251-003-20

The Crenshaw/LAX Line is projected to be completed and commence operations by 2021. The Crenshaw/LAX line includes the Fairview Heights, Downtown Inglewood, Westchester-Veteran and Crenshaw/Imperial stations within the City of Inglewood including. The Downtown Inglewood station at Florence Avenue and Market Street will serve as the transfer point between the proposed Project and the Crenshaw/LAX Line.

Transit Ridership Along Corridors

Transit ridership data for average weekday in October 2019 for transit lines serving the study area were obtained from Metro. This data includes the average daily bus boardings and deboardings at each stop and provided in **Table 4.12-2: Average Weekday Ridership at Bus Stops within Study Area**. Crenshaw Boulevard at the Florence Avenue stop has the highest boarding and deboarding activities with 997 boardings and 904 deboardings compared to other bus stops within the study area. La Brea Avenue – Hawthorne Boulevard appears to be the busiest transit corridors within the study area; the corridor has a daily average of 259 boardings and 269 deboardings.

Table 4.12-2
Average Weekday Ridership at Bus Stops within Study Area

Average Weekday Ridership at Bus Stops within Study AreaCorridor	Stops Crossing Street	Metro Lines Serving Stop	Boardings	Deboardings
La Brea Avenue - Hawthorne Boulevard	Hyde Park Boulevard	212	203	204
	Hazel Street	212	101	103
	Beach Avenue	212	82	87
	Florence Avenue	40/111/212	437	215
	Regent Street	40/111/212/740	532	913
	Queen Street	212/740	313	135
	Manchester Boulevard	40/111/607	168	240
	Inglewood Transit Center	40/111/442/607/740	626	551
	Market Street	40/111/442	92	114
	Tamarack Avenue	40/111/442	73	82
	Arbor Vitae Street	40/111/442	271	270
	Hardy Street	40/442	177	195
	Century Boulevard	40/442/740	603	562
	104th Street	40/442	92	120
	Lennox Boulevard	40/442	117	248
	Average		**259**	**269**
Prairie Avenue	Grace Avenue	211	3	0
	Howland Drive	211	6	0

Average Weekday Ridership at Bus Stops within Study AreaCorridor	Stops Crossing Street	Metro Lines Serving Stop	Boardings	Deboardings
	Regent Street	211	1	1
	Manchester Boulevard	211	7	13
	Kelso Street/Pincay Drive	211/212	27	38
	Arbor Vitae Street	211/212	72	78
	Hardy Street	211/212	69	73
	Century Boulevard	211/212	169	165
	104th Street	211/212	86	84
	Lennox Boulevard/108th Street	211/212	127	124
	Average		**57**	**58**
Crenshaw Boulevard	Florence Avenue	40/210/710/740	997	904
	76th Street	210	24	47
	78th Street	210	29	37
	80th Street	210	27	32
	82nd Street	210	26	35
	Manchester Boulevard	210/710	761	724
	Pincay Drive/90th Street	210	30	38
	Arbor Vitae Street	210	62	77
	Hardy Street	210	25	54
	Century Boulevard	210/710	750	788
	104th Street	210	93	95
	108th Street	210	91	110
	Average		**243**	**245**
Centinela Avenue	Hyde Park Boulevard	607	2	1
	Warren Lane	607	0	1
	Average		**1**	**1**
Florence Avenue	La Brea Avenue	40/111	252	191
	Market Street	40/111	85	37
	Hillcrest Boulevard	40/111/607	53	90
	Centinela Avenue	40/111/607/740	126	132
	Prairie Avenue	40/111	96	100
	West Boulevard	40/111	151	185
	Crenshaw Boulevard	111/740	562	505
	8th Avenue	111	141	159
	5th Avenue	111	63	82
	Van Ness Avenue	111	193	196

Average Weekday Ridership at Bus Stops within Study AreaCorridor	Stops Crossing Street	Metro Lines Serving Stop	Boardings	Deboardings
	Average		**172**	**168**
Manchester Boulevard	Fir Avenue	115/211	13	13
	Grevillea Avenue	115/211	174	210
	Market Street	115/211/212/442/607	519	603
	Hillcrest Avenue	115/212	321	353
	Spruce Avenue	115/212	17	53
	Tamarack Avenue	115/212	54	36
	Prairie Avenue	115/212/442	207	193
	Kareem Court	115	16	22
	Carlton Drive	115	4	4
	West Boulevard	115/442	25	26
	Crenshaw Drive	115	52	48
	11th Avenue	115	32	38
	Crenshaw Boulevard	115/442	548	589
	5th Avenue	115	70	79
	Van Ness Avenue	115/442	126	141
	Average		145	161
Arbor Vitae Street	Grevillea Avenue	111	39	36
	La Brea Avenue	111	90	89
	Average		**65**	**63**
Century Boulevard	Fir Avenue/Firmona Avenue	117	26	35
	La Brea Avenue/Hawthorne Boulevard	117	346	345
	Freeman Avenue	117	92	101
	Prairie Avenue	117	185	163
	Doty Avenue	117	41	43
	Yukon Avenue	117	130	153
	Club Drive	117	232	206
	11th Avenue	117	236	205
	Crenshaw Boulevard	117	394	398
	5th Avenue	117	15	14
	Van Ness Avenue	117	120	125
	Average		**165**	**163**

Source: Transportation Assessment Study for the Inglewood Transit Connector Project DEIR, Raju Associates, Inc., November 2020; refer to Table 4 (refer to Appendix 4.12.1 of this Draft EIR).

4.12.3.4 Existing Bicycle Facilities

The *Draft Inglewood Active Transportation and Safe Routes to School Plan (City of Inglewood, June 2019)* identifies existing bicycle facilities within the City. These facilities are classified as Bike Paths (Class I), Bike Lanes/Buffered Bike Lanes (Class II), Bike Routes/Bike Boulevards (Class III), and Protected Bike Lanes (Class IV).

Bicycle facilities are identified along the following streets:

Class II Bike Lanes / Buffered Bike Lanes

- Bike Lanes
  - Hawthorne Boulevard from Lennox Boulevard to 111th Street
  - Locust Street from Florence Avenue to Manchester Boulevard
  - Van Ness Avenue from 81st Street to Manchester Boulevard
  - Florence Avenue from Locust Street to Hillcrest Boulevard
  - Florence Avenue from Prairie Avenue to mid-way between Prairie Avenue and West Boulevard
- Buffered Bike Lanes
  - Florence Avenue from Hillcrest Boulevard to Centinela Avenue (westbound only)

Class III Bike Routes / Bike Boulevard

- Bike Routes with Sharrows
  - Van Ness Avenue from Century Boulevard to Imperial Highway
  - Florence Avenue from Hillcrest Boulevard to Centinela Avenue (eastbound only)
  - Florence Avenue from Centinela Avenue to Prairie Avenue
  - Florence Avenue from mid-way between Prairie Avenue and West Boulevard to West Boulevard
  - 76th Street from Crenshaw Drive to Vermont Avenue

4.12.3.5 Existing Pedestrian Facilities

The pedestrian circulation system includes crosswalks, crosswalk push buttons, intersection traffic control, and sidewalks available to serve pedestrians. Sidewalks are generally provided along all streets in the study area. Florence Avenue, Market Street, Locust Street and Regent Street offer pedestrian access and circulation possibilities to the proposed Market Street Station. Currently, sidewalks are available on the south side of Florence Avenue and on both sides of Market Street, Locust Street and Regent Street adjacent to and in the vicinity of the proposed Project station. Pedestrian crosswalks to the proposed

station are available at adjacent intersections of Florence Avenue/Market Street and Florence Avenue/Locust Street.

Prairie Avenue and Kelso Street-Pincay Drive offer pedestrian access and circulation possibilities to the proposed Station at the Forum. Sidewalks are available on both sides of Prairie Avenue and Kelso Street-Pincay Drive adjacent to and in the vicinity of the proposed Project station. Sidewalks are available on both sides of Prairie Avenue and Kelso Street-Pincay Drive adjacent to and in the vicinity of the proposed Project station. Pedestrian crosswalks to the proposed station are available at adjacent intersections of Prairie Avenue/Kelso Street–Pincay Drive and Prairie Avenue/Manchester Boulevard.

Prairie Avenue and Hardy Street offer pedestrian access and circulation possibilities to the proposed Project Station at Hardy Street. Sidewalks are available on both sides of Prairie Avenue and Hardy Street adjacent to and in the vicinity of the proposed Project station. Pedestrian crosswalks to the proposed station are available at adjacent intersections of Prairie Avenue/Hardy Street and Prairie Avenue/Arbor Vitae Street.

The majority of intersections near the proposed alignment and stations are signalized and generally provide pedestrian amenities.

A brief description of the pedestrian crossing locations and amenities, including traffic signals, intersection crosswalks, and crosswalks with push buttons, along the proposed Project alignment follows:

Pedestrian Crossings along Market Street

- Intersection of Market Street/Florence Avenue: This intersection is signalized with pedestrian indications. Standard parallel crosswalks are available on the west and south legs of the intersection. Crosswalks are not provided on the east leg of the intersection. Pedestrian call pushbuttons are provided on the west leg of the intersection. Pedestrian indications are actuated / automated on the south leg of the intersection.
- Intersection of Market Street/Regent Street: This intersection is signalized with pedestrian indications. Standard parallel crosswalks are available on the north, west and east legs of the intersection and a crosswalk with decorative design is available on the south leg. Pedestrian call pushbuttons are provided on all approaches.
- Intersection of Market Street/Queen Street: This intersection is signalized with pedestrian indications. Decorative crosswalks are available on all four legs. Pedestrian call pushbuttons are provided on all approaches.

Pedestrian Crossings along Manchester Boulevard

- Intersection of Market Street/Manchester Boulevard: This intersection is signalized with pedestrian indications. Decorative crosswalks are available on all four legs. Pedestrian call pushbuttons are provided on all approaches of the intersection.
- Intersection of Locust Street/Manchester Boulevard: This intersection is signalized with pedestrian indications. Standard parallel crosswalks are available on all four legs of the intersection. Pedestrian call pushbuttons are provided on the west and east legs of the intersection. Pedestrian signal calls are actuated/automated on the north and south legs of the intersection.
- Intersection of Hillcrest Boulevard/Manchester Boulevard: This intersection is signalized with pedestrian indications. Standard parallel crosswalks are available on all four legs of the intersection. Pedestrian call pushbuttons are provided on the west and east legs of the intersection. Pedestrian signal calls are actuated/automated on the north and south legs of the intersection.
- Intersection of Spruce Avenue/Manchester Boulevard: This intersection is signalized with pedestrian indications. Standard parallel crosswalks are available on west and south legs of the intersection. Crosswalks are not provided on the east leg of the intersection. Pedestrian call pushbuttons are provided on the west and south legs of the intersection.

Pedestrian Crossings along Prairie Avenue

- Intersection of Prairie Avenue/Manchester Boulevard: This intersection is signalized with pedestrian indications. Standard parallel crosswalks are available on all four legs of the intersection. Pedestrian call pushbuttons are provided on all approaches of the intersection.
- Intersection of Prairie Avenue/Nutwood Street: This intersection is unsignalized with the eastbound approach stopped at the intersection. A continental (ladder) crosswalk is available on the west leg of the intersection.
- Intersection of Prairie Avenue/Kelso Street–Pincay Drive: This intersection is signalized with pedestrian indications. Yellow school crosswalks are available on all four legs of the intersection. Pedestrian call pushbuttons are provided on all approaches of the intersection.
- Intersection of Prairie Avenue/La Palma Drive: This intersection is unsignalized and stop controlled on the eastbound approach. A continental crosswalk is available on the west leg of the intersection.
- Intersection of Prairie Avenue/Buckthorn Street: This intersection is unsignalized with the eastbound approach stopped at the intersection. A continental crosswalk is available on the west leg of the intersection.
- Intersection of Prairie Avenue/Arbor Vitae Street: This intersection is signalized with pedestrian indications. Standard parallel crosswalks are available on all four legs of the intersection. Pedestrian call pushbuttons are provided on all approaches of the intersection.
- Prairie Avenue/Hardy Street: This intersection is signalized with standard parallel crosswalks being available on the north and west legs of the intersection, and east leg from the HPSP area. A crosswalk

is not provided on the south leg of the intersection. Pedestrian call pushbuttons are provided on the north, west, and east legs of the intersection.

4.12.3.6 Existing On-Street Parking

A summary of the number of on-street parking spaces and parking restrictions along Market Street, Manchester Boulevard and Prairie Avenue along the proposed alignment are described below:

There are currently 104 on-street parking spaces located along Market Street between Florence Avenue and Manchester Boulevard with parking restrictions listed below.

Metered 2-hour on-street parking is allowed on both sides of Market Street between Florence Avenue and Regent Street, all day except from 3:00 A.M. to 7:00 A.M. There are 30 on-street parking spaces on west side of the street and 14 on-street parking spaces on the east side of the street.

Metered 2-hour on-street parking is allowed on both sides of Market Street between Regent Street and Manchester Boulevard. There are 31 on-street parking spaces on the west side of the street and 29 on-street parking spaces on the east side of the street.

There are currently 70 on-street parking spaces located along Manchester Boulevard between Market Street and Prairie Avenue with the parking restrictions listed below.

On-street parking is prohibited on both sides of Manchester Boulevard between Market Street and the alley to the east.

Metered 2-hour on-street parking is allowed on both sides of Manchester Boulevard between the alley (west of Locust Street) and Locust Street all day except from 3:30 AM to 7:00 A.M. There are four on-street parking spaces on the south side of the street and seven on-street parking spaces on the north side of the street.

Metered 2-hour on-street parking is allowed on both sides of Manchester Boulevard between Locust Street and Hillcrest Boulevard all day, except from 3:30 A.M. to 7:00 A.M. There are nine on-street parking spaces on the south side of the street and six on-street parking spaces on the north side of the street.

On-street parking is prohibited on south side of Manchester Boulevard between Hillcrest Boulevard and Spruce Avenue; metered 2-hour on-street parking is allowed on north side of Manchester Boulevard between Hillcrest Boulevard and Spruce Avenue all day, except from 3:30 A.M. to 7:00 A.M. There are 12 on-street parking spaces located on the north side of the street.

Metered 2-hour on-street parking is allowed on south side of Manchester Boulevard between Spruce Avenue and Tamarack Avenue with the exception of no parking allowed during the evening peak hours from 4:00 P.M. to 6:00 P.M. Metered 2-hour on-street parking is allowed on the north side of Manchester Boulevard between Spruce Avenue and Tamarack Avenue all day, except from 3:30 A.M. to 7:00 A.M. There are 10 on-street parking spaces on the south side of the street and 14 on-street spaces on the north side of the street.

Non-metered 2-hour on-street parking is allowed on south side of Manchester Boulevard between Tamarack Avenue and Osage Avenue with the exception of no parking allowed during the evening peak period (4:00 P.M. to 6:00 P.M.); metered 2-hour on-street parking is allowed on north side of Manchester Boulevard between Tamarack Avenue and Osage Avenue all day, except from 3:30 A.M. to 7:00 A.M. There are approximately four on-street parking spaces on the south side of street and four on-street parking spaces on the north side of the street.

On-street parking is prohibited on both sides of Manchester Boulevard between Osage Avenue and Prairie Avenue. There are no on-street parking spaces along Prairie Avenue between Manchester Boulevard and Hardy Street.

4.12.4 ADJUSTED BASELINE CONDITIONS

The Adjusted Baseline Environmental Setting is described in **Section 4.0: Environmental Analysis**. These environmental conditions included in the Adjusted Baseline Conditions include socio-economic and demographic components, and transportation network components that are currently under construction or have building permits issued by the City of Inglewood in the immediate vicinity of the ITC Project alignment. Accordingly, the travel demand forecasting model used in the process was updated as required to reflect these assumptions. The socio-economic databases used in the ITDF model were updated to include portions of Phase 1 of the Hollywood Park Specific Plan (HPSP). The City has issued permits for a substantial portion of HPSP Phase 1 uses including the 70,240-seat SoFi Stadium, the 6,000-seat Performance Venue, approximately 518,000 sf of retail and restaurant uses, approximately 466,000 sf of office use, 314 dwelling units and approximately 12 acres of open space. Additionally, the Metro Crenshaw/LAX line is assumed to be completed and operational as part of the Adjusted Baseline Conditions. The primary socio-economic data including population, households and employment within the City of Inglewood are estimated to be approximately 117,688, 38,958 and 37,763, respectively under Adjusted Baseline Conditions.

ITC ridership projections for Adjusted Baseline conditions were simulated using the latest SCAG Regional Model and Metro Mode Split Model including updates to the socio-economic databases and transit

networks to reflect the ITC Project, and the other transit network changes noted above. The estimated non-event daily ITC ridership under Adjusted Baseline conditions is approximately 2,126 daily passengers.

The projected weekday daily traffic volumes along the analyzed street segments in the study area for Adjusted Baseline non-event conditions without the Project were estimated using the model output on each of the individual segments of each of the arterials (major and minor) and collector streets within the study area.

Adjusted Baseline non-event conditions with Project scenario also projected weekday daily traffic volumes along the analyzed street segments using the model output on each of the individual segments of each of the arterials (major and minor) and collector streets within the study area.

4.12.5 THRESHOLDS OF SIGNIFICANCE

Pursuant to Senate Bill (SB) 743, the latest Technical Advisory from the California Governor's Office of Planning and Research (OPR) explicitly stated that transit projects including passenger rail projects (like the proposed ITC Project) would be presumed to not cause significant impacts since they would reduce vehicle miles traveled (VMTs), encourage development of multimodal transportation networks and encourage development of mixed-use projects (diversity of land uses), the three primary goals of SB 743. However, to quantify the magnitude of reduction of VMTs, and consequently GHG emissions and potential operational benefits associated with the proposed Project, evaluation of the proposed Project based on the following thresholds derived from Appendix G of the State CEQA Guidelines relative to transportation impacts. Significant transportation impacts would occur if the proposed Project would result in the following conflicts, thereby causing physical environmental impacts:

Threshold T-1 **Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities.**

Threshold T-2 **Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b).**

Threshold T-3 **Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).**

Threshold T-4 **Result in inadequate emergency access.**

CEQA Guidelines section 15064.3 establishes that, generally, VMT is the appropriate measure of transportation impacts. Construction impacts are temporary in nature and therefore are typically not considered as significant impacts for purposes of CEQA. Therefore, no significance criteria are established

for evaluation of impacts. However, based on the duration of construction and the extent of disruption during various construction activities, potential effects associated with construction are addressed in this section.

4.12.5 IMPACT ANALYSIS FOR THE PROPOSED PROJECT

4.12.5.1 Methodology

The Inglewood Travel Demand Forecasting Model (ITDF), which is based on the SCAG Regional Travel Demand Model, was used to estimate VMT in the City and assess the effect of the Project on VMT. The geographic scope for the evaluation of VMT included all of the traffic analysis zones (TAZs) within the City of Inglewood such that all trips and consequently, VMTs to and from areas within the City are included. Since the ITDF is based on the SCAG Regional Travel Demand Model, regional conditions are reflected in the model and the VMT analysis conducted with the model.

The ITDF Model and an event model, described in the following paragraph, were used to forecast the number of daily trips on the roadway system for both non-event and event-based traffic for the scenarios evaluated in this Draft EIR. Socio-economic data from the SCAG's 2020-2045 RTP/SCS was used as the base input and updated to include all the growth associated with related projects. The ITDF, which is similar in structure to the SCAG Regional Travel Demand Model involves four-step models including Trip Generation, Trip Distribution, Mode Split and Traffic Assignment procedures, implemented using TransCAD software package.

The event model includes a series of spreadsheet-based pivot tables using the Metro Mode-Split Model. The event model includes total attendance, average vehicle ridership, transit accessibility for both walk-access and drive-access and modal-split parameters to estimate the ITC ridership values for each of the different types of events at each of the major event venues in the area including the Forum, SoFi Stadium, and the IBEC. Vehicular traffic generation estimated in the event model was then distributed utilizing trip distribution based on season ticket data or mobile source data for each type of event at the various venues, and then assigned on the roadway network using specialized procedures in ArcGIS' network analyst extension.

The ITDF Model and the Metro Mode-Split Model were used to estimate the non-event based travel demand without and with the ITC Project, while the event model was utilized to estimate the event travel forecasts without and with the ITC Project. The non-event and event-based travel forecasts were aggregated on the various roadway segments identified within the study area to obtain average daily traffic (ADT) estimates for the following scenarios:

- Adjusted Baseline Conditions Non-Event Weekdays without Project

- Adjusted Baseline Conditions Non-Event Weekdays with Project
- Future Opening Year (2026) Conditions with Event without Project
- Future Opening Year (2026) Conditions with Event with Project
- Future Horizon Year (2045) Conditions with Event without Project
- Future Horizon Year (2045) Conditions with Event with Project

For evaluation of VMTs for these scenarios, the ITDF model was used with all Inglewood TAZs used as 'select-zones' in the model to determine the trips and associated VMTs to and from the City TAZs for non-event conditions under each of the scenarios analyzed in this study. For events of all types at each of the venues, VMTs were estimated including private vehicles, shuttles, and TNCs for both attendees and employees in the event model spreadsheets.

- The methodology for evaluating each of the above scenarios is described below:

Adjusted Baseline Conditions

Utilizing the updated socio-economic/demographic data and the transportation network detailed above, the ITDF model simulations were conducted to obtain Adjusted Baseline daily traffic volume forecasts and vehicle-miles traveled (VMT) estimates. These daily traffic volumes were estimated using the model output on each of the individual segments of each of the arterials (major and minor) and collector streets within the study area.

Future Opening Year (2026) Conditions

The ITDF Model was updated to reflect changes in demographic/economic and transportation network characteristics based on the latest SCAG 2020-2045 RTP/SCS model-based socio-economic databases and network assumptions. Next, socio-economic data growth associated with related projects identified in the area of influence of the study area was verified within the socio-economic data and further updated where required. Additional special generator input such as LAX-related trip tables including the forecasted Million Annual Passengers (MAP-level) growth, consistent with the SCAG 2020-2045 RTP/SCS, were also included in the ITDF in the overall estimation of travel demands under future opening year conditions.

The NFL-Game event-day traffic model [under future opening year conditions was utilized to prepare the NFL game day event traffic forecasts. A sold-out NFL afternoon game event on a weekday at the NFL Stadium (70,240 attendees and 6,000 employees per game) was assumed in the model. The NFL-Game event-day VMT model was also used to estimate the NFL game event-generated VMT. Attendee and employee vehicle trips by private vehicles, transportation network company (TNCs), and shuttles to and

from the parking facilities to the Stadium, were included in both the event traffic demand and VMT models.

Forecasts from the Future Opening Year (2026) ITDF model and NFL-Game event-day traffic model was aggregated to reflect event-day daily traffic volumes (ADTs) as well as the event-day daily VMTs under future opening year conditions.

Future 2026 Conditions also reflect related development projects anticipated to be constructed and occupied prior to the opening year of the proposed Project. A total of 395 related projects were identified. Of these related projects, 74 are located in the City of Inglewood, 91 are within the City of Los Angeles to the east and west of the City of Inglewood, 73 are in the City of Culver City to the north, 120 are in the South Bay cities of El Segundo, Lawndale, Hawthorne and Gardena to the south and south-west, and 37 projects are located within the unincorporated area of the County of Los Angeles scattered in the neighboring areas.

Notable among these development projects within the City of Inglewood is Hollywood Park Specific Plan (HPSP) Phase 2. When combined with the baseline development in Phase 1, it is assumed that there will be a total of 890,000 square feet of retail space, approximately 4.03 million square feet of office space, 2,500 dwelling units and a 300-room hotel, in addition to the SoFi stadium and the Performance Venue.

The primary socio-economic data variables including population, households and employment within the City of Inglewood are estimated to be approximately 152,774, 51,251, and 61,327, respectively, under future opening year conditions.

Future Opening Year (2026) Conditions with Event without Project

Future Opening Year (2026) non-event forecasted daily traffic volumes from the updated ITDF model were combined with a sold-out NFL Game Event-Only daily traffic volumes to obtain Future Opening Year (2026) with Event Day without ITC Project weekday daily traffic volumes.

Future Opening Year (2026) Conditions with Event with Project

Weekday 2026 non-event conditions with the ITC Project were simulated using the updated ITDF and ETDM models, including updates to socio-economic databases and transit networks to reflect the ITC Project, as well as associated transit base-network changes and operational parameters.

NFL Game event day conditions with the ITC Project were simulated using a spreadsheet-based model based on the METRO mode-split model and actual data related to the event attendees' zip-code information.

Future Horizon Year (2045) Conditions

The ITDF model was updated to reflect changes in demographic/socio-economic data and transportation network characteristics based on the latest SCAG 2020-2045 RTP/SCS based model data. Additional special generator input such as LAX-related trip tables including projected MAP growth, consistent with the latest SCAG 2020-2045 RTP/SCS were also included in the ITDF to produce travel demands under future horizon year conditions.

The NFL-Game event-day traffic model under future horizon year conditions was developed to prepare the event traffic forecasts. A sold-out NFL afternoon game event on a weekday at the NFL Stadium (70,240 attendees and 6,000 employees per game) was assumed in the model. Metro's mode-split model was used along with the event day characteristics. The NFL-Game event-day VMT model was also used to estimate the event-generated VMT. Attendee and employee vehicle trips including private vehicles, transportation network company (TNCs) vehicles, and shuttles to and from the parking facilities to the Stadium, were included in both the event travel demand and VMT models.

Results from the Future Horizon Year (2045) updated ITDF and NFL-Game event-day traffic models were combined to reflect event-day daily traffic under future horizon year conditions. Similarly, results from the 2045 ITDF model and NFL-Game event-day VMT model were combined to reflect cumulative event-day daily VMT under future horizon year conditions.

The socio-economic data describing demographic and socio-economic characteristics within the model area was updated based on the 2045 socio-economic databases from the 2020 SCAG RTP/SCS Regional Model data. This data was updated to account for growth from related projects. In addition to the list of development projects used under the Future Opening Year (2026) conditions, the Hollywood Park Specific Plan (HPSP) Phase 2 was included in the socio-economic databases used in the ITDF model for the future horizon year 2045 conditions. It has been assumed that by 2045, a total of 6.03 million square feet of office use would be in place in the overall HPSP area.

The primary socio-economic data variables including population, households and employment within the City of Inglewood are estimated to be approximately 165,618, 56,952 and 69,280, respectively, under Future Horizon Year (2045) conditions.

Future Horizon Year (2045) Conditions with Event Without Project

Weekday 2045 non-event conditions without the ITC Project were simulated using the ITDF model updated to include the latest SCAG 2020-2045 RTP / SCS Model data and growth associated with related projects in the study area.

Next, NFL Game event conditions without the ITC Project were simulated using the ETDM model based on the METRO's mode-split model and actual data related to the event attendees' zip-code information.

Future Horizon Year (2045) non-event forecasted daily traffic volumes from the updated ITDF model were combined with a sold-out NFL Game Event-Only daily traffic volumes without the ITC Project to obtain the cumulative Future Horizon Year (2045) with NFL Event without ITC Project weekday daily traffic volumes.

Future Horizon Year (2045) Conditions with Event with Project

Weekday 2045 non-event conditions with the ITC Project were simulated using the ITDF model updated to include data from the latest SCAG 2020-2045 RTP / SCS Model and transit network including the ITC Project and associated operational scenarios. NFL Game event with the ITC Project conditions were simulated using the ETDM model.

Travel Demand Model for Events

An Event Travel Demand Model (ETDM), a multistep model based on the Metro Mode-Split Model output including transit accessibility parameters, was used to estimate traffic generated by events at the event venues in the study area. The ETDM utilizes event type, attendance, and mode splits to provide estimates of the proposed Project transit ridership, as well as modal trip generation estimates for use in generating vehicle trip assignments on the roadway network.

The specific event-day traffic conditions were simulated using trip generation estimates from the ETDM and a trip distribution profile developed based on ticket sales or mobile source data that identified the zip codes of event attendees.

4.12.5.2 Project Improvements

The ITC Project components include elevated grade-separated guideway and three stations, among others, that traverse along Market Street, Manchester Boulevard and Prairie Avenue. A brief description of the existing and proposed characteristics of these roadway segments including number of lanes, intersection geometry, traffic control, on-street parking, sidewalks/crosswalks, and speed limits is provided below.

Market Street Segment

Market Street between Florence Avenue and Manchester Boulevard will include the same number of lanes as existing conditions (one lane in either direction). No change to roadway throughput or capacity is proposed as part of the Project. The speed limit along Market Street will remain at 25 mph, similar to existing conditions.

Lane configurations and traffic control at intersections will mostly remain similar to existing conditions at the intersections of Market Street/Florence Avenue and Market Street/Manchester Boulevard, resulting in very little to no changes to intersection capacities. Changes to intersection lane configurations due to the proposed Project would occur at the intersections of Market Street/Regent Street (removal of northbound left-turn lane) and Market Street/Queen Street (removal of northbound and southbound left-turn lanes). No changes to intersection traffic control are proposed at these intersections.

Manchester Boulevard Segment

Manchester Boulevard between Market Street and Prairie Avenue will include the same number of lanes as existing conditions, i.e., two lanes in either direction with turn lanes at intersections between Market Street and Hillcrest Boulevard; and two lanes / three lanes in the westbound / eastbound directions, respectively, with turn lanes at intersections between Hillcrest Boulevard and Prairie Avenue. No change to roadway capacity or traffic control is proposed as part of the Project. The speed limit along Manchester Boulevard will remain at 35 mph, similar to existing conditions.

Lane configurations at intersections will mostly remain similar to existing conditions at all locations within that stretch, resulting in no changes to intersection capacities. Additionally, no reductions in turn-lane storage lengths are proposed at any of the intersections within this stretch, as part of the ITC Project. Minor modifications to lane configurations at the Manchester Boulevard / Prairie Avenue intersection may be required or desired based on prevailing demands at the time of construction of the Project. This could be achieved by restriping at the time of implementation of the Project.

Prairie Avenue Segment

Prairie Avenue between Manchester Boulevard and Hardy Street will include the same number of lanes as existing conditions (three lanes in either direction with a central turn lane including the turn lanes at intersections). No change to roadway capacity is proposed as part of the Project. The speed limit along Prairie Avenue will remain at 40 mph, similar to existing conditions. No on-street parking will be allowed along Prairie Avenue within this stretch similar to existing conditions.

Lane configurations and traffic control at intersections will mostly remain similar to existing conditions at all locations within that stretch, resulting in no changes to intersection capacities. Additionally, no reductions in storage lengths are proposed at the intersection turn lanes as part of the ITC Project. Minor modifications to lane configurations at the Manchester Boulevard / Prairie Avenue intersection may be required or desired, based on prevailing traffic demands at the time of implementation of the Project.

Pick-Up/Drop Off Areas and Surface Parking Lots

Pick-up and drop-off areas would be provided along the west side of Locust Street south of Florence Avenue, as well as along the north-side of Regent Street between Locust Street and Market Street. A reduction in on-street parking spaces of approximately thirteen (13) spaces along Regent Street and seventeen (17) spaces along Locust Street would occur due to the Pick-up / Drop-off areas and the surface parking lot driveways proposed as part of the ITC Project.

A surface parking lot with approximately 650 public parking spaces is proposed at the adjacent Market Street/Florence Station site. This surface parking lot would provide the replacement parking spaces for the reduced parking along Locust Street and Regent Street where Pick-up/Drop-off areas are proposed and additional public parking to support use of the ITC and Downtown Inglewood in general.

There are currently 104 on-street parking spaces along Market Street between Florence Avenue and Manchester Boulevard. The Market Gateway Project (D3 Project) would reduce the on-street parking by 11 spaces along the west side of Market Street between Florence Avenue and Regent Street. The proposed Project would reduce an additional 32 on-street parking spaces along Market Street between Florence Avenue and Manchester Boulevard. These spaces will be offset by a surface parking lot at the ITC Market Street Station site located at the southeast corner of the intersection of Market Street and Florence Avenue. An additional off-street surface parking lot will also be provided at the northeast corner of Market Street and Manchester Boulevard to provide approximately 50 additional public parking spaces.

There are currently 70 on-street parking spaces along Manchester Boulevard. The ITC Project would result in reduction of approximately 47 metered on-street parking spaces. These spaces will be offset by a surface parking lot planned at the MSF site located at the southeast corner of the intersection of Manchester Boulevard/Hillcrest Boulevard. This surface parking lot at the MSF site will provide approximately 450 public parking spaces.

4.12.5.2 Impact Analysis

An evaluation of the impact criteria for the proposed Project under construction and in operation is provided in the following sections.

Impact T-1: **Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?**

Construction

Construction of the proposed Project would occur in four phases over an approximate five-year period between 2022 and 2026, with preconstruction activities occurring in 2021 and demolition beginning in 2022. A summary description of construction phasing is provided below:

- **Phase 1** would include, but not limited to, demolition of buildings and site improvements on properties acquired for construction of the Project and the beginning of construction of the MSF. The properties where existing buildings and site improvements will be demolished include at the existing retail commercial center at Market Street and Regent Street (CVS plaza), the commercial buildings located at 500 and 501 E. Manchester Avenue (retail commercial site and gas station buildings), and the commercial building at 150 S. Market Street on the northeast corner of Manchester and Market Street. Phase 1 would include utility relocations, if required, construction of cast-in-place (CIP) columns and slabs, foundations for the initial construction of the MSF facility. After demolition, the remaining asphalt flatwork areas at 500 E. Manchester (retail commercial site), the commercial plaza at Market Street and Regent Street (CVS Plaza) and the commercial building at 150 S. Market Street will provide suitable space for construction staging, including but not limited to, space for equipment storage, material staging and storage, contractor jobsite trailers, and on-site parking for construction staff throughout the entire project duration. The first phase of construction would occur in 2022 and 2023.
- **Phase 2** would include activities to enable the construction sequence of the guideway along Prairie Avenue from the Hardy Street intersection to Manchester Boulevard including the demolition of sidewalks, roadways and landscaping as needed, utility relocations, if necessary, foundations, CIP columns, straddle bents and the precast trapezoidal troughs and girders, and the construction of the MSF. The second phase of construction would occur in 2023 through 2025.
- **Phase 3** would include construction of an above-ground passenger access walkway from the Market Street/Florence Avenue Station to the Metro Crenshaw/LAX Line Downtown Inglewood Station, property acquisitions, building demolition, utility relocation (if necessary), foundations, CIP columns, straddle bents and the precast trapezoidal troughs and girders. This phase includes site work completion of the MSF. The third phase of construction would occur in 2024 through 2026.
- **Phase 4** would include completion of the aerial guideway construction elements including the installation of the operation and control systems, track work, station platform equipment and systems, completion of the TPSSs, testing and commissioning of the APM trains, completion of all surface construction activities including electrical, mechanical and utilities energizations, and all surface parking lots. Phase 4 will also include final roadway improvements and modifications, and re-striping of streets as required. The fourth phase of construction would occur in 2022 through 2026.

An estimate of the proposed manpower workforce, on-road on-site equipment (trucks) and on-road off-site equipment (trucks) for each phase of construction is included in the *Inglewood Transit Connector (ITC): Construction Scenarios for the Environmental Impact report, prepared by Pacifica Services, Inc., June*

2020. Utilizing the number of construction workers and on-road (both on-site and off-site) trucks, number of round trips and daily traffic volumes by construction phase was estimated. Approximately 682 daily trips are associated with Phase 1 construction, approximately 572 daily trips are associated with Phase 2 construction, approximately 604 daily trips are associated with Phase 3 construction and approximately 200 daily trips are associated with Phase 4 construction. The total trips include both the construction worker and truck trips broken down by each phase.

Assuming arrival patterns consistent with anticipated shift times at construction sites of this nature, most of the trips would occur outside of the peak hours of adjacent street traffic. Construction activity would primarily occur over a 16 hour/day schedule with two shifts, either a morning shift from approximately 7:00 a.m. to 3:00 p.m. and an evening shift from approx. 3:00 p.m. to 11:00 p.m., or a morning shift from approximately 7:00 a.m. to 3:00 p.m. and a night shift from approximately 11:00 p.m. to 7:00 a.m.

Additionally, construction of the APM guideway, columns and station components that could affect Prairie Avenue and Manchester Boulevard would involve construction-related traffic occurring during the off-peak hours and night hours in order to minimize effects to daily commuter traffic and potential event traffic. Delivery of construction materials could occur during the night shift. Construction activities during the day shift would primarily consist of work that could proceed without substantial disruption to daily commuter traffic and potential event traffic along Prairie Avenue and Manchester Boulevard. Additionally, some minor activity could potentially occur during periods in between construction shifts for logistics, moving equipment, etc.

The primary delivery routes include Florence Avenue, Manchester Boulevard, Prairie Avenue and Century Boulevard as shown in **Figure 4.12-3: Construction Haul/Delivery Routes and Staging Areas**. For materials delivered to and stored at designated construction staging areas, the contractor's haul routes to and from the Project area would be generally located on public streets. To minimize traffic effects to streets in and around the proposed Project site, excavated dirt materials/spoils will be hauled during off- peak and late-night hours to the extent possible.

Pedestrian Facilities

Sidewalks along the construction area's frontages generally will not be closed during Phase 1 construction. However, during certain construction activities (i.e., concrete pours), there may be potentially intermittent closure of the construction area's frontage sidewalks. Pedestrian access to buildings will be maintained at all times during Phase 1 construction. Stretches of sidewalks along the west side of Locust Street and north side Regent Street would be closed during construction of pick-up/drop-off areas. All existing crosswalk will be maintained unless infeasible. During Phase 1, potentially intermittent closure of

the sidewalks within the construction area may occur due to safety measures. Generally, a major portion of the common pedestrian routes to school will not be affected by the construction activities.

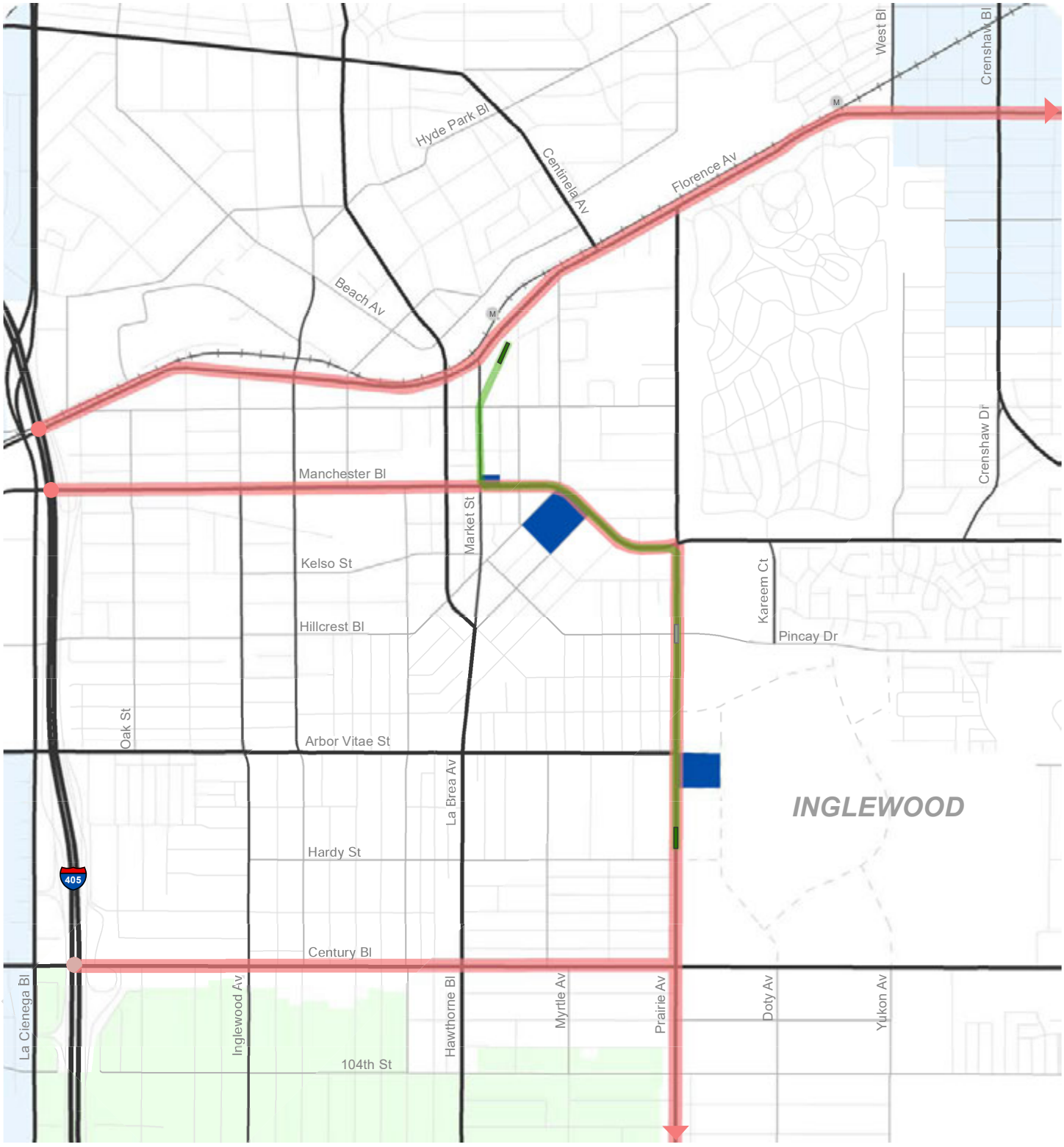
During Phase 2, existing sidewalks generally will be closed within construction area staging section. However, temporary pedestrian sidewalk canopies for the duration of the construction, in order to maintain pedestrian circulation would be provided. Temporary sidewalks shall meet all applicable safety standard including a minimum sidewalk width of five feet. Pedestrian access to buildings will be maintained at all times. All existing crosswalk will be maintained unless infeasible. During certain construction activities (i.e., concrete pours), there will potentially be intermittent closure of the sidewalks within the construction area.

Phase 3 construction along Manchester Boulevard includes removal of existing sidewalks as needed and includes new and/or temporary sidewalks. Existing sidewalks generally will be closed within construction area staging sections. However, there will be temporary pedestrian sidewalk canopies for the duration of the construction, in order to maintain pedestrian circulation. Temporary sidewalks shall meet all applicable safety standard including a minimum sidewalk width of five feet. Access to buildings will be maintained at all times. Crosswalk will be maintained unless infeasible. During certain construction activities (i.e., concrete pours), there will potentially be intermittent closure of the sidewalks within the construction area. The pedestrian access and circulation to all adjacent parcels will be mostly maintained within the construction areas. Potentially intermittent closure of the sidewalks within the construction area may occur due to safety measures. Generally, the pedestrian common routes to school will not be affected by the construction activities due to temporary sidewalks, maintaining crosswalks and providing crossing guards when crosswalks or sidewalks are closed.

Lastly, the Phase 4 construction area would not require closure of sidewalks on either side of the street. Sidewalks would remain open and pedestrian circulation would be maintained along the Phase 4 construction area.

Bicycle Facilities

Potential temporary closure of the southbound bicycle lane along Locust Street between Florence Avenue and Regent Street may occur due to Phase 1 construction activities. No temporary closures of bicycle facilities along Prairie Avenue would occur due to Phase 2 construction activities. No temporary closures of bicycle facilities along Market Street and Manchester Boulevard would occur due to Phase 3 construction activities. No temporary closures of bicycle facilities would occur due to Phase 4 construction activities.



SOURCE: Raja Associates, Inc. - 2020

FIGURE **4.12-3**

Construction Haul / Delivery Routes and Staging Areas

251-003-20

Transit Facilities

During Phase 1, the bus stop on the west side of Locust Street serving MTA Bus Lines 211 and 607 and the bus stop on the south side of Florence Avenue serving MTA Bus Lines 40 and 111 may need to be temporarily relocated during certain construction activities. The bus stop on the north side of Manchester Boulevard, east of Market Street, serving MTA Bus Lines 115, 211, 212, and 607 may need to be temporarily relocated.

The bus stops within the construction area during Phase 2 would potentially need to be temporarily relocated. Coordination with transit providers regarding the need to temporarily relocate bus stops, and rerouting of transit to La Brea Avenue would need to occur during temporary full closure of Prairie Avenue. Full street closure would occur during late night hours. It is not currently known, if these bus lines will continue to operate along the same routes when the Metro Crenshaw/LAX Light Rail Transit (LRT) Line commences operation. If these bus lines area shortened, terminated, or re-routed when the Crenshaw/LAX LRT Line commences operations, then no transit circulation/access may be affected.

No bus stops would be removed or relocated due to the Phase 3 construction along Market Street. Additionally, no transit bus rerouting would be required during the Market Street Phase 3 construction. However, rerouting of transit along Manchester Boulevard would need to occur during temporary full closure of Manchester Boulevard. Full street closure would occur mostly during off-peak late-night hours. Thus, the bus stops within the construction area may potentially need to be temporarily relocated during Phase 3. Coordination with transit providers (Metro) regarding the need to temporarily relocate bus stops will be conducted.

No bus stops would be removed or relocated due to the Phase 4 construction. No transit bus rerouting would be required during the Phase 4 construction.

While construction of the Project will have temporary affects on roadway, pedestrian, bicycle, and transit facilities, the ITC Project Construction Commitment Program includes a Construction Staging and Traffic Control Program to ensure access and circulation remains adequate for all modes of travel (vehicular, pedestrian, bicycle, and transit) and uses along the Project alignment during construction. The Construction Staging and Traffic Control Program includes the following:

1. The City of Inglewood would establish a Project Task Force for the ITC Project. This Project Task Force will provide input into worksite traffic control plans and other traffic management plans that are developed for the Project. The Project Task Force will review the traffic management plans to ensure the following topics are considered:
    - Coordination with other public infrastructure projects within the City's boundaries,

- Detour impact analysis for pedestrian, business, bicycle, and traffic flow,
- Coordinate closures and restricted access with all special events,
- Notification of the public with use of signage and web-based media,
- Coordinate with City of Inglewood and LA County police and fire personnel regarding maintenance of emergency access and response times,
- Monitor and coordinate deliveries,
- Establish detour routes,
- Work with residential and commercial neighbors regarding upcoming construction activities and,
- Analyze traffic conditions to determine the need for additional traffic signals, signs, lane restriping, signal modifications, etc.

2. The Contractor and its consultants and sub-contractors shall develop and submit Worksite Traffic Control Plans to the City of Inglewood that address the following:
   - Worksite Traffic Control Plans shall be designed to minimize traffic impacts on residential streets.
   - Except as provided in the work hours permit issued by the City, the minimum traffic lane requirements for arterial streets impacted by Construction shall maintain at least the full number of traffic lanes in the peak direction, and if feasible one traffic lane in the off-peak direction, with additional capacity provided through appropriate detour routes.
   - The minimum traffic requirements for all other commercial and residential streets impacted by construction activities shall be one lane in each direction, unless varied by a City-approved Worksite Traffic Control Plan that protects the surrounding residential and business neighborhoods and promotes the free flow of traffic along the arterial streets.
   - Access shall be maintained to and from all alleys at one or both ends of the alley. If an alley is obstructed at one end such that a turnaround by any vehicle is not feasible, then at its sole expense the Contractor will provide flaggers to control the alley.
   - Worksite Traffic Plans shall demonstrate that public safety vehicles, including police, fire, and emergency response vehicles, will have access on streets affected by construction or that an appropriate detour is provided
   - Worksite Traffic Control Plans shall provide adequate street access to City service vehicles, including but not limited to trash pickup and street sweeping service vehicles, during planned service times.
   - All existing bus stops must be maintained or if necessary, relocated nearby with appropriate signage working after review and approval by the affected transit providers.

- Sidewalk closures in accordance with an approved Construction Staging Plan or Worksite Traffic Control Plan are permitted only when necessary to facilitate the Contractor's Contract work and when approved by the City.
- Provide reasonable vehicular access to all businesses and community facilities, including parking needs.

3. Roadway Closures

- The City and Contractor shall meet and confer ninety (90) days prior to the planned date of the temporary full street closure to coordinate community outreach for the closure. Such community outreach will include at least one meeting with businesses and residents to discuss and receive comments for each temporary full street closure.
- Temporary directional street closures for ground improvement activities on residential streets may be permitted with prior approval from the City, provided that the Contractor gives thirty (30) days' notice.
- Temporary full street closures are permitted upon thirty (30) days' advance notice to the City only for work activities including but not limited to:
    - Installation of piles,
    - Underground utility work,
    - Installation of columns/substructure and superstructure
    - Installation of decking, and
    - Removal of decking
- If the City determines that traffic impacts have not been sufficiently mitigated, then, at any time, the City's traffic engineer may revise the Worksite Traffic Control Plans to incorporate additional mitigation measures or to modify traffic control.
- The Contractor shall reimburse the City for the cost of Traffic Control Officers (TCOs) to assist in mitigation cut-through traffic on residential streets. The Contractor shall also reimburse the City for the Cost of TCOs for all City-approved special events affected by construction.
- Detour routes during temporary street closures shall be subject to review and approval by the City, provided that the Contractor gives thirty (30) days' notice. Detour routes must not use residential streets unless authorized by the City. Advance public notification of street closures in accordance with the notification process required by the City, would be provided.
- Temporary directional street closures for ground improvement activities on residential streets may be permitted with prior approval from the City, provided that the Contractor gives thirty (30) days' notice. The minimum traffic lane requirements at all other times shall be one lane in each direction.

- Construction staging and traffic control requirements (including lane closures, street closures and hauling restrictions) shall be in accordance with the standards set forth in this Article; all Construction Staging Plans, Traffic Management Plans, and any conditions of approval included in a City-issued permit.

4. Preliminary Haul and Overload routes
    - Haul routes and overload/oversized vehicle routes must be reviewed and approved by the City.
    - To the extent possible, truck deliveries of bulk materials such as aggregate, bulk cement, dirt, etc. to the Project area, and hauling of material from the Project area, shall be scheduled during off-peak hours to avoid the peak commuter traffic periods on designated haul routes. For dirt, aggregate, bulk cement, and all other materials and equipment, truck deliveries would be on designated routes only (freeways and non-residential streets).
    - The City may restrict one or more of the approved haul routes during special events within the City or situations when lane restrictions affect a haul route.

Implementation of this program would ensure adequate circulation and access for all uses located along the proposed alignment of the APM system, including providing adequate vehicular access to businesses at all times. Transportation related inconveniences would be reduced to the extent feasible. The Worksite Traffic Control Plans required by the Construction Commitment Program would ensure the minimum traffic lane requirements for arterial streets impacted by Construction shall maintain at least the full number of traffic lanes in the peak direction except as provided in the work hours permit issued by the City, and if feasible one traffic lane in the off-peak direction, with additional capacity provided through appropriate detour routes. Thus, efforts would be made to keep all traffic lanes open for peak directional travel. If all lanes cannot remain open, one lane would be kept open for peak direction and supplemented by detour options. Advanced notice of road closures and detours would be provided to the City and the community.

Measures to minimize transportation impacts are not limited to private vehicles. As discussed above, bus stop relocation and bicycle/pedestrian detours facilitates access by other modes of transportation and ensures continued operation and connectivity to nearby communities. Multimodal access to local businesses would be provided throughout construction.

While access to some uses would be disrupted and detoured for short periods of time during construction, through implementation of the Worksite Traffic Control Plans, adequate access and circulation would continue to be available at all times and construction of the Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.

Operation

The proposed Project is consistent with the goals of Senate Bill 743 for reduction of GHG emissions, developing multimodal transportation networks; and encouraging and supporting mixed use development.

The ITC Project is consistent with Goals 1, 2, 4, 5, 6, 7 and 8 identified in SoCal Connect – The 2020-2045 RTP/SCS based on its promoting regional economic prosperity; improving mobility, accessibility, reliability and travel safety; increasing travel choices for person movement; reducing greenhouse gases and improving air quality; supporting active transportation and consequently supporting healthy and equitable communities; adapting to climate change and supporting integrated mixed-use development and transportation networks; and leveraging new transportation technologies and data-driven solutions resulting in more efficient travel. Goals 3, 9, and 10 are not applicable to the proposed Project. The proposed Project would further the objectives of the plan by increasing local and regional transportation options while minimizing greenhouse gas emissions locally and in the region. The proposed Project would be a reliable transportation system that would improve the security and resilience of the regional transportation system by increasing local transportation service capacity and options for transportation in the region. The increase in transportation service capacity would promote regional economic prosperity and competitiveness while serving major regional activity centers including Downtown Inglewood, SoFi Stadium, the Forum and the Inglewood Basketball and Entertainment Center (IBEC). Additional analysis of the consistency of the Project with the 2020-2045 RTP/SCS is presented in **Section 4.9, Land Use and Planning.**

The proposed Project would decrease local VMT and improve local air quality (See **Section 4.2, Air Quality**) in the City of Inglewood and reduce Greenhouse Gas Emissions (See **Section 4.7, Greenhouse Gas Emissions)** and would be consistent with the advisory and voluntary RTP/SCS Goals and Policies.

Additionally, **Section 4.9: Land Use and Planning** and subsection **4.12.7: Consistency with City General Plan**, below, discuss of the consistency of the proposed Project with the goals in the General Plan related to transportation. An amendment to the Circulation Element is proposed as part of the proposed Project that includes changes to text and diagrams. As discussed further below, with the changes to the text and diagrams, the proposed Project would continue to be consistent with the Circulation Element. The proposed Project would further the goals and objectives stated within the Element by providing reliable transit service and improving mobility of the local City residents while reducing the number of vehicles on the existing roadway. The City would continue outreach efforts during the construction period to inform communities and businesses of the latest project construction updates, to coordinate mitigation measures to local businesses for parking and access, and to provide additional signage, advertisements,

and support throughout the construction duration. The proposed Project would support and be consistent with the Environmental Justice Element. The proposed Project is consistent with these Land Use Element goals by increasing existing capacity and providing additional access to public transportation within the City and the region by adding a transit system to connect visitors and residents with Downtown Inglewood and activity centers in the City to the regional light rail system.

The proposed Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities and impacts associated with operation of the Project would be less than significant.

Mitigation Measures

No mitigation is required.

Level of Significance after Mitigation

Impacts would be less than significant.

Impact T-2: Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

An evaluation of the reduction in vehicle miles traveled (VMT) due to the proposed Project was prepared for using the ITDF Model as discussed above in Subsection 4.12.5.1: Methodology. For events of all types at each of the venues, VMTs were estimated including private vehicles, shuttles, and TNCs for both attendees and employees. Changes in VMT and traffic volumes on streets in the study area are discussed below. Adjusted Baseline Non-Event with Project Traffic Conditions.

As presented in **Table 4.12-3: Weekday Daily Traffic Volumes Adjusted Baseline Without and With Project**, with implementation of the ITC Project, daily traffic volumes are projected to decrease along key corridors including Prairie Avenue, Manchester Boulevard and Century Boulevard within the Study area, thereby improving traffic flows. Overall, the analyzed corridors would experience less congestion on a system-wide basis, particularly during the peak periods, with the implementation of the ITC Project.

Table 4.12-3
Weekday Daily Traffic Volumes Adjusted Baseline Without and With Project

		Segment		Daily Traffic Volumes	
Street	Facility Type	From	To	Adjusted Baseline without ITC Project	Adjusted Baseline with ITC Project
North/South Streets					
La Brea Av	Major Arterial	Hyde Park Bl	Florence Av	20,985	20,913
		Florence Av	Manchester Bl	24,680	24,626
		Manchester Bl	Spruce Av/Market St	19,362	19,350
		Spruce Av/Market St	Arbor Vitae St	24,983	24,917
		Arbor Vitae St	Hardy St	28,805	28,712
		Hardy St	Century Bl	29,976	29,899
Hawthorne Bl	Major Arterial	Century Bl	104th St	43,055	42,983
		104th St	Lennox Bl	48,207	48,135
Prairie Av	Major Arterial	Florence Av	Regent St	22,089	21,923
		Regent St	Manchester Bl	22,157	21,983
		Manchester Bl	Pincay Dr/Kelso St	29,251	28,942
		Pincay Dr/Kelso St	Arbor Vitae St	38,953	38,434
		Arbor Vitae St	Hardy St	32,546	32,021
		Hardy St	97th St	34,953	34,365
		97th St	Century Bl	34,953	34,365
		Century Bl	102nd St	31,452	31,011
		102nd St	104th St	31,954	31,531
		104th St	Lennox Bl	32,563	32,179
Crenshaw Bl	Major Arterial	80th St	Manchester Bl	23,668	23,596
		Manchester Bl	Pincay Dr/90th St	26,291	26,207
		Pincay Dr/90th St	Arbor Vitae St	32,019	31,906
		Arbor Vitae St	Hardy St	30,872	30,742
		Hardy St	Century Bl	31,682	31,535
		Century Bl	104th St	27,528	27,462
Market St	Minor Arterial	Florence Av	Regent St	3,219	3,211
		Regent St	Manchester Bl	7,790	7,740
Myrtle Av	Collector	Arbor Vitae St	Hardy St	3,881	3,825
Doty Av	Collector	Century Bl	104th St	5,557	5,453
Yukon Av	Collector	Century Bl	104th St	10,443	10,213
Locust St	Collector	Florence Av	Manchester Bl	3,728	3,691

Street	Facility Type	Segment From	Segment To	Daily Traffic Volumes Adjusted Baseline without ITC Project	Daily Traffic Volumes Adjusted Baseline with ITC Project
East/West Streets					
Centinela Av	Major Arterial	Hyde Park Bl	Florence Av	25,766	25,653
Florence Av	Major Arterial	Fir Av	La Brea Av	16,835	16,835
		La Brea Av	Market St	21,042	21,035
		Market St	Centinela Av	24,496	24,480
		Centinela Av	Prairie Av	40,740	40,667
		Prairie Ave	West Bl	40,093	40,012
Manchester Bl	Major Arterial	Grevillea Av	La Brea Av	21,435	21,325
		La Brea Av	Market St	21,733	21,623
		Market St	Locust St	18,821	18,730
		Locust St	Hillcrest Bl	20,190	20,117
		Hillcrest Bl	Spruce Av	24,505	24,358
		Spruce Av	Prairie Av	28,735	28,505
		Prairie Av	Kareem Ct	31,974	31,799
		Kareem Ct	Crenshaw Dr	36,748	36,517
		Crenshaw Dr	Crenshaw Bl	27,895	27,749
		Crenshaw Bl	Van Ness Av	31,211	31,071
Arbor Vitae St	Major Arterial	Grevillea Av	La Brea Av	13,751	13,640
		La Brea Av	Myrtle Av	9,251	9,159
		Myrtle Av	Prairie Av	8,426	8,386
Century Bl	Major Arterial	Grevillea Av	La Brea Av/Hawthorne Bl	50,609	50,460
		La Brea Av/Hawthorne Bl	Myrtle Av	41,279	41,101
		Myrtle Av	Freeman Av	37,897	37,752
		Freeman Av	Prairie Av	33,189	33,041
		Prairie Av	Doty Av	41,073	40,727
		Doty Av	HP Casino Dr	42,370	42,010
		HP Casino Dr	Yukon Av	42,370	42,010
		Yukon Av	Club Dr	41,153	40,771
		Club Dr	Crenshaw Bl	43,164	42,722
		Crenshaw Bl	Van Ness Av	36,633	36,384
Regent St	Collector	Grevillea Av	La Brea Av	5,199	5,177
		La Brea Av	Market St	16,175	16,041
		Market St	Prairie Ave	8,199	8,149

Street	Facility Type	Segment		Daily Traffic Volumes	
		From	To	Adjusted Baseline without ITC Project	Adjusted Baseline with ITC Project
Hillcrest Bl	Collector	Grevillea Av	La Brea Av	8,701	8,656
		La Brea Av	Market St	7,287	7,241
		Market St	Nutwood St / Locust St	9,060	8,975
		Nutwood St / Locust St	Manchester Bl	5,018	5,014
		Manchester Bl	Florence Av	7,946	7,878
Spruce Av	Collector	La Brea Av	Manchester Av	2,959	2,922
Kelso St / Pincay Dr	Collector	Spruce Av	Prairie Av	5,592	5,562
		Prairie Av	Kareem Ct	19,138	18,971
		Kareem Ct	Crenshaw Bl	14,364	14,253
Hardy St	Collector	La Brea Av	Prairie Ave	4,736	4,612
104th St	Collector	Grevillea Av	Hawthorne Bl	6,859	6,856
		Hawthorne Bl	Prairie Ave	4,102	4,100
		Prairie Av	Doty Av	3,581	3,571

Source: Transportation Assessment Study for the Inglewood Transit Connector Project DEIR, Raju Associates, Inc., November 2020; refer to Table 8 (refer to Appendix 4.12.1 of this Draft EIR).

Future Opening Year (2026) with Event and Project

NFL game event conditions with the ITC Project is estimated to generate approximately 23,540 daily trips. As presented in **Table 4.12-4: Weekday Daily Traffic Volumes Future Opening Year (2026) With Event and Project**, with implementation of the ITC Project, daily traffic volumes would decrease along these key corridors ranging between approximately 920 to 1,410 vehicle trips per day along Prairie Avenue between Manchester Boulevard and Century Boulevard; approximately 430 to 757 vehicle trips per day along Manchester Boulevard between La Brea Avenue and Crenshaw Boulevard; and approximately 1,078 to 1,170 vehicle trips per day along Century Boulevard between La Brea Avenue and Crenshaw Boulevard. Overall, the analyzed corridors would experience less congestion on a system-wide basis with the implementation of the ITC Project.

Table 4.12-4
Weekday Daily Traffic Volumes Future Opening Year (2026) With Event and Project

Street	Facility Type	Segment		Daily Traffic Volumes	
		From	To	Future Opening Year (2026) with Event without ITC Project	Future Opening Year (2026) with Event and ITC Project
North/South Streets					
La Brea Av	Major Arterial	Hyde Park Bl	Florence Av	26,222	26,071
		Florence Av	Manchester Bl	30,442	30,271
		Manchester Bl	Spruce Av/Market St	25,372	25,261
		Spruce Av/Market St	Arbor Vitae St	34,531	34,267
		Arbor Vitae St	Hardy St	33,430	33,206
		Hardy St	Century Bl	37,247	36,971
Hawthorne Bl	Major Arterial	Century Bl	104th St	54,238	53,909
		104th St	Lennox Bl	59,511	59,183
Prairie Av	Major Arterial	Florence Av	Regent St	25,969	25,421
		Regent St	Manchester Bl	25,280	24,721
		Manchester Bl	Pincay Dr/Kelso St	39,267	38,222
		Pincay Dr/Kelso St	Arbor Vitae St	42,582	41,661
		Arbor Vitae St	Hardy St	38,402	37,385
		Hardy St	97th St	47,068	45,658
		97th St	Century Bl	47,068	45,659
		Century Bl	102nd St	42,353	41,025
		102nd St	104th St	43,661	42,197
		104th St	Lennox Bl	43,735	42,309
Crenshaw Bl	Major Arterial	80th St	Manchester Bl	29,355	29,124
		Manchester Bl	Pincay Dr/90th St	35,388	34,954
		Pincay Dr/90th St	Arbor Vitae St	44,981	44,208
		Arbor Vitae St	Hardy St	43,220	42,466
		Hardy St	Century Bl	44,527	43,756
		Century Bl	104th St	41,333	40,488
Market St	Minor Arterial	Florence Av	Regent St	4,524	4,508
		Regent St	Manchester Bl	9,367	9,249
Myrtle Av	Collector	Arbor Vitae St	Hardy St	4,636	4,531
Doty Av	Collector	Century Bl	104th St	10,222	9,898
Yukon Av	Collector	Century Bl	104th St	11,859	11,591
Locust St	Collector	Florence Av	Manchester Bl	5,635	5,540

Street	Facility Type	Segment		Daily Traffic Volumes	
		From	To	Future Opening Year (2026) with Event without ITC Project	Future Opening Year (2026) with Event and ITC Project
East/West Streets					
Centinela Av	Major Arterial	Hyde Park Bl	Florence Av	28,683	28,500
Florence Av	Major Arterial	Fir Av	La Brea Av	21,600	21,437
		La Brea Av	Market St	26,077	25,899
		Market St	Centinela Av	32,034	31,662
		Centinela Av	Prairie Av	48,196	47,718
		Prairie Ave	West Bl	47,614	47,434
Manchester Bl	Major Arterial	Grevillea Av	La Brea Av	30,077	29,464
		La Brea Av	Market St	30,173	29,560
		Market St	Locust St	24,607	24,099
		Locust St	Hillcrest Bl	28,702	28,174
		Hillcrest Bl	Spruce Av	35,259	34,613
		Spruce Av	Prairie Av	39,409	38,699
		Prairie Av	Kareem Ct	40,188	39,758
		Kareem Ct	Crenshaw Dr	49,875	49,118
		Crenshaw Dr	Crenshaw Bl	37,283	36,759
		Crenshaw Bl	Van Ness Av	40,073	39,534
Arbor Vitae St	Major Arterial	Grevillea Av	La Brea Av	16,362	16,113
		La Brea Av	Myrtle Av	14,505	14,149
		Myrtle Av	Prairie Av	12,639	12,379
Century Bl	Major Arterial	Grevillea Av	La Brea Av/Hawthorne Bl	68,654	67,671
		La Brea Av/Hawthorne Bl	Myrtle Av	56,586	55,489
		Myrtle Av	Freeman Av	53,802	52,717
		Freeman Av	Prairie Av	49,113	48,035
		Prairie Av	Doty Av	57,910	56,766
		Doty Av	HP Casino Dr	57,392	56,234
		HP Casino Dr	Yukon Av	57,637	56,472
		Yukon Av	Club Dr	54,057	52,937
		Club Dr	Crenshaw Bl	55,755	54,585
		Crenshaw Bl	Van Ness Av	46,262	45,553
Regent St	Collector	Grevillea Av	La Brea Av	7,490	7,451
		La Brea Av	Market St	18,874	18,684
		Market St	Prairie Ave	9,189	9,134

Street	Facility Type	Segment		Daily Traffic Volumes	
		From	To	Future Opening Year (2026) with Event without ITC Project	Future Opening Year (2026) with Event and ITC Project
Hillcrest Bl	Collector	Grevillea Av	La Brea Av	11,360	11,291
		La Brea Av	Market St	9,049	9,003
		Market St	Nutwood St / Locust St	11,115	11,026
		Nutwood St / Locust St	Manchester Bl	6,570	6,568
		Manchester Bl	Florence Av	10,256	10,153
Spruce Av	Collector	La Brea Av	Manchester Av	8,153	7,979
Kelso St / Pincay Dr	Collector	Spruce Av	Prairie Av	7,250	7,147
		Prairie Av	Kareem Ct	24,905	24,449
		Kareem Ct	Crenshaw Bl	27,838	26,921
Hardy St	Collector	La Brea Av	Prairie Ave	7,370	7,165
104th St	Collector	Grevillea Av	Hawthorne Bl	8,326	8,324
		Hawthorne Bl	Prairie Ave	5,152	5,140
		Prairie Av	Doty Av	6,823	6,780

Source: Transportation Assessment Study for the Inglewood Transit Connector Project DEIR, Raju Associates, Inc., November 2020; refer to Table 20 (refer to Appendix 4.12.1 of this Draft EIR).

Future Opening Year (2026) with Event Project Ridership

The estimated non-event daily ridership under Future Opening Year (2026) conditions is 3,098 daily passengers.

The Future Opening Year (2026) with Event conditions includes a sold-out NFL football game at the SoFi Stadium. A sold-out NFL Game Event consist of 70,240 attendees and 6,000 employees on a weekday at the Sofi Stadium. As shown in **Table 4.12-5: ITC Weekday Daily Ridership Future Opening Year (2026)**, the estimated daily ridership under Future Opening Year (2026) with Event (NFL) conditions is 25,056 daily passengers.

Table 4.12-5
ITC Weekday Daily Ridership Future Opening Year (2026)

Scenario	Weekday Daily Ridership	
	Non-Event	with NFL Event*
Future Opening Year 2026 Conditions	3,098	25,056

** Includes ridership associated with non-event weekday conditions.*
Source: Transportation Assessment Study for the Inglewood Transit Connector Project DEIR, Raju Associates, Inc., November 2020; refer to Table 22 (refer to Appendix 4.12.1 of this Draft EIR).

Additionally, the ETDM model, was applied for each type of event at each of the venues in Inglewood to estimate the proposed Project ridership. The proposed Project ridership per event, daily and annually, under Future Opening Year (2026) conditions is presented in **Table 4.12-6: ITC Ridership Per Event – Future Opening Year (2026) Conditions**.

4.12-6
ITC Ridership Per Event – Future Opening Year (2026) Conditions

Venue/Event Type [1]	Number of Events/Year [1]	ITC Ridership per Event	Annual ITC Ridership
NFL Game	20	21,957	439,142
NFL - Mid-Size Event	8	9,850	78,797
Performance Arena - Concert	75	2,298	172,368
The Forum - Concert	75	6,793	509,443
IBEC - NBA Game	49	7,050	345,437
IBEC - Other Sporting Event	35	2,912	101,917
IBEC - Large Concert	5	7,159	35,793
IBEC - Medium Concert	8	5,581	44,644
IBEC - Small Concert	10	3,660	36,595
IBEC - Family Shows	20	3,295	65,894
IBEC - Corporate Events	100	739	73,884
IBEC - Plaza Events	16	1,469	23,497
Total	**421**	**-**	**1,927,411**

[1] Based on list of events as shown in Inglewood Basketball and Entertainment Center DEIR, ESA, December 2019 - Table 3.14-2: Overview of Common Event Types, Frequency, and Timing at Project, NFL Stadium, and The Forum.
Source: Transportation Assessment Study for the Inglewood Transit Connector Project DEIR, Raju Associates, Inc., November 2020; refer to Table 13 (refer to Appendix 4.12.1 of this Draft EIR).

Future Horizon Year (2045) with Event and Project

As shown in **Table 4.12-7 Future Horizon Year (2045) With Event and Project**, daily traffic volumes would decrease along key corridors with implementation of the proposed Project. The decreases in daily traffic range between approximately 1,085 to 1,725 vehicles per day along Prairie Avenue between Manchester Boulevard and Century Boulevard; approximately 575 to 985 vehicles per day along Manchester Boulevard between La Brea Avenue and Crenshaw Boulevard; and approximately 1,335 to 1,400 vehicles per day along Century Boulevard between La Brea Avenue and Crenshaw Boulevard. Overall, the analyzed corridors would experience less congestion on a system-wide basis resulting in improved flow during the peak periods with the implementation of the proposed Project.

Table 4.12-7
Future Horizon Year (2045) With Event and Project

		Segment		Daily Traffic Volumes	
Street	Facility Type	From	To	Future Opening Year (2045) with Event without ITC Project	Future Opening Year (2045) with Event and ITC Project
North/South Streets					
La Brea Av	Major Arterial	Hyde Park Bl	Florence Av	29,861	29,691
		Florence Av	Manchester Bl	33,924	33,726
		Manchester Bl	Spruce Av/Market St	29,068	28,933
		Spruce Av/Market St	Arbor Vitae St	39,767	39,457
		Arbor Vitae St	Hardy St	39,352	39,067
		Hardy St	Century Bl	44,527	44,175
Hawthorne Bl	Major Arterial	Century Bl	104th St	65,099	64,729
		104th St	Lennox Bl	71,544	71,176
Prairie Av	Major Arterial	Florence Av	Regent St	29,203	28,578
		Regent St	Manchester Bl	27,091	26,452
		Manchester Bl	Pincay Dr/Kelso St	45,088	43,797
		Pincay Dr/Kelso St	Arbor Vitae St	47,636	46,551
		Arbor Vitae St	Hardy St	44,534	43,270
		Hardy St	97th St	52,074	50,351
		97th St	Century Bl	52,074	50,351
		Century Bl	102nd St	47,960	46,268
		102nd St	104th St	49,501	47,616
		104th St	Lennox Bl	48,963	47,134
Crenshaw Bl		80th St	Manchester Bl	33,571	33,276

		Segment		Daily Traffic Volumes	
Street	**Facility Type**	**From**	**To**	**Future Opening Year (2045) with Event without ITC Project**	**Future Opening Year (2045) with Event and ITC Project**
	Major Arterial	Manchester Bl	Pincay Dr/90th St	39,937	39,384
		Pincay Dr/90th St	Arbor Vitae St	51,817	50,781
		Arbor Vitae St	Hardy St	49,168	48,179
		Hardy St	Century Bl	50,453	49,458
		Century Bl	104th St	46,870	45,757
Market St	Minor Arterial	Florence Av	Regent St	5,650	5,628
		Regent St	Manchester Bl	10,690	10,555
Myrtle Av	Collector	Arbor Vitae St	Hardy St	6,099	5,950
Doty Av	Collector	Century Bl	104th St	10,989	10,633
Yukon Av	Collector	Century Bl	104th St	12,823	12,530
Locust St	Collector	Florence Av	Manchester Bl	6,592	6,467
East/West Streets					
Centinela Av	Major Arterial	Hyde Park Bl	Florence Av	32,424	32,184
Florence Av	Major Arterial	Fir Av	La Brea Av	26,322	26,106
		La Brea Av	Market St	31,261	31,021
		Market St	Centinela Av	37,988	37,548
		Centinela Av	Prairie Av	55,160	54,598
		Prairie Ave	West Bl	55,224	55,012
Manchester Bl	Major Arterial	Grevillea Av	La Brea Av	32,931	32,122
		La Brea Av	Market St	32,771	31,961
		Market St	Locust St	26,664	25,981
		Locust St	Hillcrest Bl	31,551	30,842
		Hillcrest Bl	Spruce Av	39,895	39,043
		Spruce Av	Prairie Av	44,370	43,461
		Prairie Av	Kareem Ct	45,758	45,185
		Kareem Ct	Crenshaw Dr	58,090	57,104
		Crenshaw Dr	Crenshaw Bl	43,024	42,340
		Crenshaw Bl	Van Ness Av	45,395	44,701
Arbor Vitae St	Major Arterial	Grevillea Av	La Brea Av	19,238	18,983
		La Brea Av	Myrtle Av	16,361	15,972
		Myrtle Av	Prairie Av	14,304	14,017
Century Bl	Major Arterial	Grevillea Av	La Brea Av/Hawthorne Bl	82,484	81,243

Street	Facility Type	Segment		Daily Traffic Volumes	
		From	To	Future Opening Year (2045) with Event without ITC Project	Future Opening Year (2045) with Event and ITC Project
		La Brea Av/Hawthorne Bl	Myrtle Av	66,429	65,075
		Myrtle Av	Freeman Av	64,171	62,818
		Freeman Av	Prairie Av	58,322	56,975
		Prairie Av	Doty Av	67,296	65,905
		Doty Av	HP Casino Dr	65,876	64,488
		HP Casino Dr	Yukon Av	65,917	64,527
		Yukon Av	Club Dr	61,973	60,638
		Club Dr	Crenshaw Bl	64,050	62,652
		Crenshaw Bl	Van Ness Av	54,021	53,173
Regent St	Collector	Grevillea Av	La Brea Av	9,403	9,356
		La Brea Av	Market St	22,440	22,222
		Market St	Prairie Ave	10,836	10,771
Hillcrest Bl	Collector	Grevillea Av	La Brea Av	14,013	13,916
		La Brea Av	Market St	10,783	10,721
		Market St	Nutwood St / Locust St	13,115	12,997
		Nutwood St / Locust St	Manchester Bl	7,663	7,661
		Manchester Bl	Florence Av	11,716	11,586
Spruce Av	Collector	La Brea Av	Manchester Av	9,550	9,348
Kelso St / Pincay Dr	Collector	Spruce Av	Prairie Av	8,763	8,621
		Prairie Av	Kareem Ct	28,522	27,905
		Kareem Ct	Crenshaw Bl	32,184	30,935
Hardy St	Collector	La Brea Av	Prairie Ave	8,330	8,102
104th St	Collector	Grevillea Av	Hawthorne Bl	10,400	10,395
		Hawthorne Bl	Prairie Ave	6,495	6,477
		Prairie Av	Doty Av	8,146	8,093

Source: Transportation Assessment Study for the Inglewood Transit Connector Project DEIR, Raju Associates, Inc., November 2020; refer to Table 28 (refer to Appendix 4.12.1 of this Draft EIR).

Future Horizon Year (2045) with Event Project Ridership

A summary of the proposed Project ridership under non-event conditions is presented in **Table 4.12-8: ITC Weekday Daily Ridership Future Horizon Year (2045)**. The estimated non-event daily ridership under Future Horizon Year (2045) conditions is 4,405 daily passengers. The Future Horizon Year (2045) with NFL Game Event conditions includes a sold-out event with 70,240 attendees and 6,000 employees on a weekday at the Sofi Stadium. The event-day proposed Project ridership was estimated using the ETDM model. The daily ridership under Future Horizon Year (2045) with NFL Game Event conditions is estimated at approximately 31,089 daily passengers.

Table 4.12-8
ITC Weekday Daily Ridership Future Horizon Year (2045)

	Weekday Daily Ridership	
Scenario	**Non-Event**	**with NFL Event***
Future Horizon Year (2045) Conditions	4,405	31,089

** Includes ridership associated with non-event weekday conditions.*

Source: Transportation Assessment Study for the Inglewood Transit Connector Project DEIR, Raju Associates, Inc., November 2020; refer to Table 30 (refer to Appendix 4.12.1 of this Draft EIR).

The proposed Project ridership per event, daily and annually, under Future Horizon Year (2045) conditions is presented in **Table 4.12-9: ITC Ridership Per Event – Future Horizon Year (2045) Conditions**.

Table 4.12-9
ITC Ridership Per Event – Future Horizon Year (2045) Conditions

Venue/Event Type [1]	Number of Events/Year [1]	ITC Ridership per Event	Annual ITC Ridership
NFL Game	20	26,684	533,680
NFL - Mid-Size Event	8	11,837	94,694
Performance Arena - Concert	75	2,762	207,144
The Forum - Concert	75	8,163	612,226
IBEC - NBA Game	49	8,551	419,001
IBEC - Other Sporting Event	35	3,532	123,618
IBEC - Large Concert	5	8,601	43,007
IBEC - Medium Concert	8	6,705	53,643
IBEC - Small Concert	10	4,397	43,972
IBEC - Family Shows	20	3,959	79,175

Venue/Event Type [1]	Number of Events/Year [1]	ITC Ridership per Event	Annual ITC Ridership
IBEC - Corporate Events	100	888	88,776
IBEC - Plaza Events	16	1,765	28,233
Total	421	-	2,327,168

_____

[1] Based on list of events as shown in Inglewood Basketball and Entertainment Center DEIR, ESA, December 2019 - Table 3.14-2: Overview of Common Event Types, Frequency, and Timing at Project, NFL Stadium, and The Forum.

Source: Transportation Assessment Study for the Inglewood Transit Connector Project DEIR, Raju Associates, Inc., November 2020; refer to Table 14 in Appendix 4.12.1 of this Draft EIR).

Based on the analysis of these scenarios, the proposed Project would reduce daily traffic volumes along key roadway corridors on an average weekday basis. When an NFL game event at the Sofi Stadium is evaluated, the reduction is more substantial. This analysis demonstrates that traffic volumes would also be substantially reduced when events are held at the other sports and entertainment venues that would be served by the Project, including the Forum, IBEC, and the 6,000 seat entertainment venue at Hollywood Park. Additionally, the proposed Project is an APM System that would provide "first-mile / last-mile" connection to the rest of the regional mass-transit system to and from major activity centers and adjacent uses in the City of Inglewood.

Operation

Adjusted Baseline with Project Conditions Non-Event Daily VMT Analysis

An evaluation of the reduction in vehicle miles traveled (VMT) due to the proposed Project was prepared for typical weekday conditions using the ITDF Model as discussed above in **Subsection 4.12.5.1: Methodology**. For events of all types at each of the venues, VMTs were estimated including private vehicles, shuttles, and TNCs for both attendees and employees. Daily VMTs are shown in **Table 4.12-10: Daily VMT Adjusted Baseline Without and With Project**. As presented on **Table 4.12-10: Daily VMT Adjusted Baseline Without and With Project**, the daily VMT in the City of Inglewood would be reduced by approximately 20,566 vehicle-miles with the implementation of the proposed Project under Adjusted Baseline conditions.

Table 4.12-10
Daily VMT Adjusted Baseline Without and With Project

Scenario	Daily VMT	
	Without ITC	With ITC
Adjusted Baseline	3,132,256	3,111,690

Source: Transportation Assessment Study for the Inglewood Transit Connector Project DEIR, Raju Associates, Inc., November 2020; refer to Table 9 (refer to Appendix 4.12.1 of this Draft EIR).

Future Opening Year (2026) with Project Conditions Daily VMT Analysis

As discussed above in **Subsection 4.12.5.1: Methodology**, an evaluation of the reduction in VMT due to the proposed Project was prepared for Future Opening Year (2026) with an NFL Game Event at SoFi Stadium. The daily VMTs presented in **Table 4.12-11: Daily VMT Future Opening Year (2026) Without and With Project** are calculated with and without the proposed Project, for all trips to and from the City of Inglewood for a typical day when no major events are being held at the sports and entertainment venues in the City and for days when an NFL Game is hosted at SoFi Stadium. The weekday daily VMT would be reduced by approximately 227,739 vehicle-miles (4.3%) with the implementation of the proposed Project under Future Opening Year (2026) with a NFL Game Event.

Table 4.12-11
Daily VMT Future Opening Year (2026) Without and With Project

Scenario	Daily VMT	
	Without ITC	With ITC
Future Opening Year (2026) Non-Event	3,906,593	3,874,725
NFL Game Event	1,368,495	1,172,624
Future Opening Year (2026) with NFL Game Event	5,275,088	5,047,349

Source: Transportation Assessment Study for the Inglewood Transit Connector Project DEIR, Raju Associates, Inc., November 2020; refer to Table 21 in Appendix 4.12.1 of this Draft EIR).

Future Horizon Year (2045) with Project Conditions Daily VMT Analysis

An evaluation of the reduction in vehicle miles traveled (VMT) due to the proposed Project was prepared for Future Horizon Year (2045) with Event conditions. The daily VMTs were calculated with and without the proposed Project including all trips to and from the City of Inglewood. As shown in **Table 4.12-1213: Daily VMT Future Horizon Year (2045) Without and With Project**, the weekday VMT would be reduced

by approximately 297,080 vehicle-miles (5.2%), with the implementation of the proposed Project under cumulative Future Horizon Year (2045) with an NFL Game Event.

Table 4.12-1213
Daily VMT Future Horizon Year (2045) Without and With Project

Scenario	Daily VMT	
	Without ITC	With ITC
Future Horizon Year (2045) Non-Event	4,293,802	4,256,626
NFL Game Event	1,368,495	1,108,591
Future Horizon Year (2045) with NFL Game Event	5,662,297	5,365,217

Source: Transportation Assessment Study for the Inglewood Transit Connector Project DEIR, Raju Associates, Inc., November 2020; refer to Table 29 in Appendix 4.12.1 of this Draft EIR).

The proposed Project would result in a reduction of VMT under all scenarios and would not, therefore, conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b). Impacts would be less than significant.

Mitigation Measures

No mitigation is required.

Level of Significance after Mitigation

Impacts would be less than significant.

Impact T-3: **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)?**

The proposed Project is an APM System that would provide "first-mile / last-mile" connection to the rest of the regional mass-transit system to and from major activity centers and adjacent uses in the City of Inglewood. The proposed Project is a 1.6-mile, dual lane, elevated mass-transit system with three stations located at: Market Street – Florence Avenue, Prairie Avenue - Pincay Drive, and Prairie Avenue – Hardy Street.

The Market Street – Florence Avenue Station site would also include vertical circulation elements including an above-grade pedestrian bridge connecting with the Downtown Inglewood Station of the

Crenshaw/LAX LRT Line; a surface parking lot with approximately 650 public parking spaces; and two pick-up and drop-off areas for buses, shuttles and others located along the west side of Locust south of Florence Avenue and along the north side of Regent Street between Locust and Market Streets. The Prairie Avenue – Pincay Drive Station would include vertical circulation elements providing connections to both the Forum and the LASED, including SoFi Stadium and the 6,000 seat Performance Venue. The Prairie Avenue – Hardy Street Station would include pedestrian connections to the SoFi Stadium, Performance Venue and IBEC sites.

The ITC Project alignment traverses along Market Street, Manchester Boulevard and Prairie Avenue and would require certain changes to the location of the curb-to-curb roadways. Lane configurations and traffic control at intersections will mostly remain similar to existing conditions at the intersections of Market Street/Florence Avenue and Market Street/Manchester Boulevard, resulting in very little to no changes to intersection capacities. Changes to intersection lane configurations due to the Project would occur at the intersections of Market Street/Regent Street (removal of northbound left-turn lane) and Market Street/Queen Street (removal of northbound and southbound left-turn lanes). No changes to intersection traffic control are proposed at these intersections. At Manchester Boulevard between west of Market Street and Prairie Avenue, Lane configurations at intersections will mostly remain similar to existing conditions at all locations within that stretch, resulting in no changes to intersection capacities. Additionally, no reductions in turn-lane storage lengths are proposed at any of the intersections within this stretch, as part of the ITC Project. Minor modifications to lane configurations at the Manchester Boulevard / Prairie Avenue intersection may be required or desired based on prevailing demands at the time of construction of the Project. This could be achieved by restriping at the time of implementation of the Project. Lane configurations and traffic control at intersections along Prairie Avenue between Manchester Boulevard and Hardy Street will mostly remain similar to existing conditions at all locations within that stretch, resulting in no changes to intersection capacities. Additionally, no reductions in storage lengths are proposed at the intersection turn lanes as part of the ITC Project. Minor modifications to lane configurations at the Manchester Boulevard / Prairie Avenue intersection may be required or desired, based on prevailing traffic demands at the time of implementation of the Project. However, the lane capacities along all these streets will be retained to current conditions once the ITC Project is completed.

The proposed Project columns and station features would be located in the sidewalks and in the 30-foot setback areas along the Forum site, the Hollywood Park Specific Plan Development site and the City's Civic Center site. To accommodate the proposed Project columns and station features, Prairie Avenue roadway will be partially relocated to the east, while maintaining existing capacity and minimum sidewalk widths. The proposed Project also consists of an aerial guideway and stations, maintenance, and storage facility

(MSF) and traction power substations (TPSS). The proposed Project would include pedestrian access improvements, including mezzanine level at each station to provide connectivity to pedestrian bridges for traveling overactive roadways. The pedestrian bridges will be designed to improve both pedestrian access and comfort between the stations and the street level, in addition to providing multimodal access to adjacent bus facilities, pick-up and drop-off areas, and other adjacent resources. The proposed Project will also upgrade the existing sidewalks to ensure consistent ADA appliance along the transit corridor. The proposed Project would provide for the City to maintain streetscape consistent with the requirements of the Municipal Code. Accordingly, the proposed Project would not create or substantially increase safety hazards due to a design feature or incompatible uses. Impacts would be less than significant.

Mitigation Measures

No mitigation is required.

Level of Significance after Mitigation

Impacts would be less than significant.

Impact T-4: Would the project result in inadequate emergency access?

Construction

Construction of the proposed Project, particularly during Phases 2 and 3, would have the potential to result in temporary impacts on access and circulation. As discussed above under **Impact T-1,** the Construction Commitment Program required the preparation of Worksite Traffic Control Plans to ensure access and circulation remains adequate at all times along the Project alignment during construction. All Worksite Traffic Control Plans will be required to demonstrate that public safety vehicles, including police, fire, and emergency response vehicles, within the Project area or approved detours is adequate at all times. As part of developing the Worksite Traffic Control Plan, consultation will be conducted with City of Inglewood and LA County police and fire personnel to ensure that emergency access and response times are maintained. Worksite Traffic Plans will be required to demonstrate that public safety vehicles, including police, fire, and emergency response vehicles, will have access on streets affected by construction or that an appropriate detour is provided.

Operation

The Project has been designed to add the APM system in the public right-of-way on Market Street, Manchester Boulevard, and Prairie Avenue while maintaining the existing number of travel lane on these streets. As discussed above, the Project will reduce traffic volumes on streets throughout Inglewood and reduce roadway congestion. The proposed Project would not affect existing roadway lane capacities and

the speed limits. For these reasons, the proposed Project would not result in inadequate emergency access or impede existing emergency. Impacts during operation would be less than significant.

Mitigation Measures

No mitigation is required.

Level of Significance after Mitigation

Impacts would be less than significant.

4.12.6 CUMULATIVE IMPACTS

As discussed above, a list of related development projects was compiled in consultation with the City of Inglewood and other surrounding jurisdictions and traffic from these projects was considered in the transportation modeling along with growth in the area based on the socio-economic databases from the 2020 SCAG RTP/SCS Regional Model data to evaluate the potential for cumulative impacts. As discussed above under the discussion for Impact T-1, the Project will not contribute to any significant cumulative impacts.

4.12.7 CONSISTENCY WITH CITY GENERAL PLAN

The City's General Plan contains goals within its Circulation Element and Land Use Element that relates to transportation.

4.12.7.1 Circulation Element

The Circulation Element discusses other modes of transportation as alternatives to the individual automobile and an evaluation of Inglewood's street environment and possible improvements. As an APM system, the proposed Project would add to the City's range of alternative modes of transportation.

An amendment to the Circulation Element is proposed as part of the Project that includes changes to text and diagrams related to the following:

The "Street Classification" section of the General Plan Circulation Element of the General Plan would be updated and amended in order to reclassify Market Street, between Florence Avenue to the north and La Brea Avenue to the south, as a "Collector".

The Circulation Element identifies typical street sections for common right-of-way widths and sections of streets planned for widening within the "Streets Rights-of-Way" section. The second component of the proposed amendment includes the addition of Prairie Avenue, between Manchester Boulevard to the north and Hardy Street to the south, with a maximum right-of-way of up to 132 feet, to this section.

The “Street Widening” section would be updated and amended to include Prairie Avenue, from Manchester Boulevard to Hardy Street, as an arterial street in Inglewood selectively identified as a street that needs to be widened to accommodate current or anticipated traffic or public infrastructure needs.

A description of the proposed Project, including its connection to the Metro Crenshaw/LAX Line, would be added to the description of light rail facilities in the City.

The Circulation Element "Bicycle Route Plan" Map would be revised to remove Prairie Avenue as a “Type I” Designated Route.

The “Street Environment” section would be updated and amended to include the proposed Project as a factor that contributes to the quality of a community’s streetscapes and street environments within the public rights-of-way.

The “Parkway and Median Landscaping” section would be amended by adding the proposed Project corridor.

The “Parking Needs” section would be updated to include portions of streets presently used for parking may need to be used to accommodate infrastructure for higher-occupancy mass transit projects.

With these proposed amendments, the proposed Project would continue to be consistent with the Circulation Element.

4.12.7.2 Land Use Element

Circulation

Goal: Ensure that proposed new uses can be accommodated by adequate and safe streets.

Goal: Promote and support adequate public transportation within the City and the region.

Goal: Develop modified traffic systems that would discourage through traffic from utilizing neighborhood streets.

Goal: Develop a safe and adequate pedestrian circulation system which is barrier-free for the handicapped.

The proposed Project is consistent with these Land Use Element goals by increasing existing capacity and providing additional access to public transportation within the City and the region by adding a transit system to connect visitors and residents with Downtown Inglewood and activity centers in the City to the regional light rail system.

During construction of the proposed Project, right-of-way closures or diversions may occur along the length of the guideway. However, such closures would be temporary in nature and would adhere to a traffic construction management plan as approved by the City of Inglewood Transportation Division. Upon implementation of the proposed Project, the existing number of travel lanes in the area would be maintained and area roadways would continue to accommodate a range of transportation options.

The proposed Project would include pedestrian access at the ground level surrounding the stations along the proposed Project. Access to the stations would be accomplished through ADA-compliant pedestrian amenities such as escalators, elevators, stairs, signage, walkways, and mezzanine areas. Streetscape improvements along the guideway would ensure that sidewalks/walkways would be ADA-compliant surrounding stations, support columns, and other facilities. Implementation of the proposed Project would increase transit choices and reduce vehicle trips in the City.

Furthermore, as discussed above under **Impact T-1** the proposed Project would reduce daily traffic volumes along key roadway corridors on an average weekday basis. When an NFL game event at the Sofi Stadium is evaluated, the reduction is more substantial. Furthermore, the proposed Project would connect the activity center within the City of Inglewood with the Metro's Crenshaw/LAX Light Rail Transit (LRT) Line at the Downtown Inglewood Station. For these reasons, the proposed Project would not conflict with Inglewood General Plan policies related to transportation.

4.13.1 INTRODUCTION

This section of the Draft Environmental Impact Report (Draft EIR) evaluates the potential for implementation of the proposed Inglewood Transit Connector Project (proposed Project) to impact tribal cultural resources within the footprint of the proposed Project and in the immediate surrounding area.

Tribal cultural resources may include sites, features, places, cultural landscapes, sacred places, or objects with cultural value to a California Native American tribe that are listed or determined to be eligible for listing in the California Register of Historic Places (CRHR) or included in a local register of historical resources, or a resource determined by the lead California Environmental Quality Act (CEQA) agency, in its discretion and supported by substantial evidence, to be significant and eligible for listing on the CRHR. Such resources provide information on scientific progress, environmental adaptations, group ideology, or other human advancements.

Information from the following study of the proposed Project is incorporated into this section:

- *Cultural Resource Investigation*, Roberta Thomas, RPA, and Gena Granger, M.A., RPA, PaleoWest Archaeology, December 12, 2018 (included as **Appendix 4.4.1** of this Draft EIR).

Information regarding the AB 52 process is provided in the following appendices:

- AB 52 Summary of the AB 52 Consultation Process for the Inglewood Transit Connector Project, Meridian Consultants LLC, December 6, 2018 (included as **Appendix 4.13.1**); and
- *AB 52 Meeting Summary*, Meridian Consultants LLC, February 6, 2019 (included as **Appendix 4.13.2**).

Please see **Section 8.0** for a glossary of terms, definitions, and acronyms used in this Draft EIR.

Prior to the preparation of this Draft EIR, an Initial Study (included as **Appendix 2.0.2** of this Draft EIR) was prepared using the CEQA Guidelines Environmental Checklist Form to assess potential environmental impacts resulting from construction and operation of the proposed project associated with tribal cultural resources

According to the requirements of Public Resources Code (PRC) Section 21080.3.1 (Assembly Bill [AB] 52)[1], Native American tribes have the right to consult on a proposed public or private project prior to the release of an EIR should the tribe(s) be concerned there are potential impacts to tribal cultural resources. Four tribes notified the City and requested future notification of, with the possibility of providing consultation

1 State of California, Public Resources Code Section 21080.3.1.

on, any projects that proceed under CEQA. These tribes include the Gabrielino–Tongva Tribe, Gabrielino Tongva Indians of California Tribal Council, Gabrielino/Tongva Nation, and the Gabrieleno/Tongva San Gabriel Band of Mission Indians. Additionally, the Gabrieleno Band of Mission Indians–Kizh Nation was identified as a relevant party.

4.13.2TRIBAL CONSULTATION

A part of the AB 52 process, the City has been notified by tribes that may have interest in tribal cultural resources in the region. Four tribes had previously notified the City and requested future notification of, with the possibility of providing consultation on, any projects that proceed under CEQA. These tribes include the Gabrielino–Tongva Tribe, Gabrielino Tongva Indians of California Tribal Council, Gabrielino/Tongva Nation, and the Gabrieleno/Tongva San Gabriel Band of Mission Indians. Additionally, the Gabrieleno Band of Mission Indians–Kizh Nation was identified as a relevant party.

In accordance with AB 52, the City sent notification letters on July 31, 2018, notifying the four tribes identified above that the City was planning the proposed Project. Additionally, the Gabrieleno Band of Mission Indians–Kizh Nation (Tribe) was mailed a Notice of Preparation of this Draft EIR. Each tribe notified has 30 days from receipt of the letter to notify the City that they wish to engage in the AB 52 consultation process on the proposed Project. As of December 6, 2018, the City had received only one response requesting consultation vie email from Brandy Salas, Administrative Specialist for the Tribe.[2] The Tribe indicated that if there were to be any ground disturbance activity associated with the proposed Project, they would like to consult.

Consultation between the Tribe and the City, and the City's consultant team was initiated vie conference call on February 6, 2019.[3] As part of the consultation, the City noted that it completed record searches to date to identify existing archaeological records, and that that information would be made available to the Tribe if the requested. A summary of the AB 52 meeting with the Tribe is provided in **Appendix 4.13.2.**

Members of the Tribe provided an overview of the Tribe's experience with other projects in the Los Angeles Basin, including work that the Tribe has completed for LA Metro and other transit efforts. As part of the other projects, the Tribe noted that artifacts had been unearthed as part of ground disturbing activities. The Tribe also noted that many of these discoveries were the result of many of the transit routes following historic roads and routes in the Los Angeles Basin. They noted that the existing networks of major roadways followed historic and prehistoric trading routes in the area that were used by Native American tribes that resided in the area and along the west coast.

2 See **Appendix 4.13.1,** *AB 52 Tribal Notification and Outreach Summary Memorandum*.

3 *AB 52 AB 52 Consultation Summary*, Meridian Consultants LLC, February 6, 2019. **Appendix 4.13-2**.

As a result of consultation, the Tribe shared information including maps of the area that depict the historic and prehistoric trading routes, and suggested mitigation measures that may be considered to assist in reducing potential impacts from the proposed Project to any cultural resources that could be unearthed during ground disturbing activities.

4.13.3 METHODOLOGY

4.13.3.1 Tribal Cultural Resources

The analysis of impacts to tribal cultural resources is based on the consultation between the City and the Tribe, information provided by the Tribe and a *Cultural Resource Investigation Report* (see **Appendix 4.4.1).** The potential for the proposed Project to contain tribal cultural resources (TCRs). As previously discussed, during the AB 52 consultation (see **Appendix 4.13.2**), information on tribal resources was provided by the Tribe; this was supplemented by the cultural resource records search (i.e., presence and proximity of known resources), the Sacred Lands File (SLF) search, land use history research, subsurface geological conditions, and the proposed excavation parameters for the proposed Project.

4.13.3.2 Archival Research

A records search for the proposed Project was conducted on June 20, 2018 at the South Central Coastal Information Center of the California Historical Resource Information System housed at California State University, Fullerton and is provided as part of the *Cultural Resource Investigation* (see **Appendix 4.4.1**). The records search included a review of all recorded historic, prehistoric archaeological resources and previous studies within the footprint and a 0.5-mile radius of the proposed Project.

The records search results indicate that 21 previous studies have been conducted within a 0.5-mile radius of the proposed Project; however, none of these studies appear to include the guideway, stations and support facilities (MSF and TPSSs).[4] The records search results indicate that no archaeological or historical archaeological resources have been previously recorded within the proposed Project or within one half mile.[5]

The California Native American Heritage Commission (NAHC) maintains a confidential SLF which contains sites of traditional, cultural, or religious value to the Native American community. The NAHC was contacted on June 15, 2018 to request a search of the SLF of the area of the proposed Project. Results of the SLF search indicate that there are no known Native American cultural resources within the immediate area of the proposed Project.

4 See **Appendix 4.4.1** of this Draft EIR.
5 See **Appendix 4.4.1** of this Draft EIR.

4.13.3.3 Human Remains

The analysis of impacts to human remains is based on the consultation between the City and the Tribe and the *Cultural Resource Investigation* (see **Appendix 4.4.1**). The potential for the proposed Project to contain human remains was assessed based on the cultural resource records search (i.e., presence and proximity of known resources), the SLF search, land use history research, subsurface geological conditions, and the proposed excavation parameters.

4.13.3.4 Windshield Survey

A windshield/reconnaissance survey of the proposed Project's guideway, stations and support facility sites was conducted on July 20, 2018.[6] No prehistoric or historic archaeological resources were identified during the survey. However, ground visibility in the area was very poor due the high degree of urban development disturbance.

4.13.3.5 Additional Sources

Additional sources consulted during the cultural resource records search include the National Register of Historic Places, the Office of Historic Preservation Archaeological Determinations of Eligibility, and the Office of Historic Preservation Directory of Properties in the Historic Property Data File. There are no listed historical resources recorded within one half mile of the proposed Project.[7]

4.13.4 REGULATORY FRAMEWORK

Cultural historic resources are regulated at the federal, State, and local levels of government. Federal laws establish broad frameworks for cultural resource identification and protection, while State and local jurisdictions actively identify, document, and protect resources within their boundaries. The National Historic Preservation Act of 1966,[8] the California Register of Historical Resources, the California Public Resources Code,[9] and CEQA are the primary federal and State laws regulating the preservation of cultural historic resources of national and State significance.

6 See **Appendix 4.4.1** of this Draft EIR.

7 See **Appendix 4.4.1** of this Draft EIR.

8 National Historic Preservation Act of 1966 amend thru 1992, Public Law. Approved October 15, 1966 (Public Law 89-665; 80 STAT.915; 16 U.S.C. 470) as amended by Public Law 91-243, Public Law 93-54, Public Law 94-422, Public Law 94-458, Public Law 96-199, Public Law 96-244, Public Law 96-515, Public Law 98-483, Public Law 99-514, Public Law 100-127, and Public Law 102-575)

9 California Public Resources Code Sections 5020-5029.5, 5079-5079.65, and 5097.9-5097.998

4.13.4.1 Federal Regulations

National Historic Preservation Act

The National Historic Preservation Act of 1966 (NHPA) authorized formation of the NRHP and coordinates public and private efforts to identify, evaluate, and protect the nation's historic and archaeological resources.[10] The NRHP includes districts, sites, buildings, structures, and objects that are significant in American history, architecture, archaeology, engineering, and culture.

Section 106 (Protection of Historic Properties) of the NHPA requires federal agencies to take into account the effects of their undertakings on historic properties. A Section 106 Review refers to the federal review process designed to ensure that historic properties are considered during federal project planning and implementation.[11] Section 106 requires tribal consultation in all steps of the process when a federal agency project or effort may affect historic properties that are either located on tribal lands, or when any Native American tribe or Native Hawaiian organization attaches religious or cultural significance to the historic property, regardless of the property's location.

The Advisory Council on Historic Preservation, an independent federal agency, administers the review process, with assistance from State Historic Preservation Offices (SHPOs). If any impacts are identified, the agency undergoing the project must identify the appropriate SHPO to consult with during the process. A tribe may assume all or any part of the functions of SHPO in accordance with subsections (b)(2) and (b)(3) of Section 101 of the NHPA.[12]

National Register of Historic Places

Section 106 of the NRHP[13] requires federal agencies to take into account the effects of an undertaking on historic properties, which are defined as cultural resources included in or eligible for listing in the NRHP. Determination of NRHP eligibility for cultural resources prior to making a finding of effect is made according to the following criteria:

10 National Historic Preservation Act of 1966 amend thru 1992, Public Law. Approved October 15, 1966 (Public Law 89-665; 80 STAT.915; 16 U.S.C. 470) as amended by Public Law 91-243, Public Law 93-54, Public Law 94-422, Public Law 94-458, Public Law 96-199, Public Law 96-244, Public Law 96-515, Public Law 98-483, Public Law 99-514, Public Law 100-127, and Public Law 102-575)

11 U.S. General Services Administration, "NHPA Section 106 Tribal Consultation," accessed March 2019, https://www.gsa.gov/resources-for/native-american-tribes/nhpa-section-106-tribal-consultation

12 U.S. General Services Administration, "NHPA Section 106 Tribal Consultation," accessed March 2019, https://www.gsa.gov/resources-for/native-american-tribes/nhpa-section-106-tribal-consultation

13 U.S. General Services Administration, Section 106, 16 U.S.C. 470f) accessed June 2020, https://www.nps.gov/history/local-law/nhpa1966.htm.

The quality of significance in American history, architecture, archaeology, engineering, and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association, and,

a. that are associated with events that have made a significant contribution to the broad patterns of our history; or
b. that are associated with the lives of persons significant in our past; or
c. that embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
d. that have yielded, or may be likely to yield, information important in prehistory or history.

If cultural resources do not meet the above criteria, they are not historic properties and are not further considered in the Section 106 process. In addition to having significance, resources must have integrity for the period of significance. The period of significance is the date or span of time within which significant events transpired or significant individuals made their important contributions.

Secretary of the Interior's Standards

The Secretary of the Interior's Standards for the Treatment of Historic Properties (Standards) are intended to promote responsible preservation practices that help protect irreplaceable cultural resources.[14] They cannot be used to make essential decisions about which features of the historic building should be saved and which can be changed. Choosing the appropriate treatment Standard, or approach, requires careful decision making and depends on a number of considerations, including level of historical significance, physical condition, proposed use, and code or regulatory requirements. Once the Standard is selected, whether it's preservation, rehabilitation, restoration, or reconstruction, the Standards provide philosophical consistency when treatment work is undertaken.

Rehabilitation, the most common treatment approach, is the process of making possible a compatible use for a property through repair, alterations, and additions while preserving those portions or features which convey its historical, cultural, or architectural values. The Standards for Rehabilitation are as follows:

14 U.S. Department of the Interior, National Park Services, Technical Preservation Services, *The Secretary of The Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring & Reconstructing Historic Buildings*, 2017, accessed June 2018 at https://www.nps.gov/tps/standards/treatment-guidelines-2017.pdf.

1. A property shall be used for its historic purpose or be placed in a new use that requires minimal change to the defining characteristics of the building and its site and environment.
2. The historic character of a property shall be retained and preserved. The removal of historic materials or alteration of features and spaces that characterize a property shall be avoided.
3. Each property shall be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features or architectural elements from other buildings, shall not be undertaken.
4. Most properties change over time; those changes that have acquired historic significance in their own right shall be retained and preserved.
5. Distinctive features, finishes, and construction techniques or examples of craftsmanship that characterize a property shall be preserved.
6. Deteriorated historic features shall be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature shall match the old in design, color, texture, and other visual qualities and, where possible, materials. Replacement of missing features shall be substantiated by documentary, physical, or pictorial evidence.
7. Chemical or physical treatments, such as sandblasting, that cause damage to historic materials shall not be used. The surface cleaning of structures, if appropriate, shall be undertaken using the gentlest means possible.
8. Significant archeological resources affected by a project shall be protected and preserved. If such resources must be disturbed, mitigation measures shall be undertaken.
9. New additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property. The new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment.
10. New additions and adjacent or related new construction shall be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

4.13.4.2 State Regulations

Office of Historic Preservation

The Office of Historic Preservation (OHP), an office of the California Department of Parks and Recreation, implements the policies of the NRHP on a Statewide level. The OHP works to preserve California's heritage resources by ensuring that projects and programs carried out or sponsored by federal, State, and local agencies comply with federal and State historic preservation laws.

California Register of Historical Resources

The California Register of Historical Resources (CRHR)[15] is the authoritative guide to the State's significant archaeological and historical resources. It closely follows the eligibility criteria of the NRHP but deals with State and local-level resources. The CRHR serves to identify, evaluate, register, and protect California's historical resources. For purposes of CEQA, a historical resource is any building, site, structure, object, or historic district listed in or eligible for listing in the CRHR (Public Resources Code, Section 21084.1). A resource is considered eligible for listing in the CRHR if it meets any of the following criteria:

a. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.
b. Is associated with the lives of persons important in our past.
c. Embodies the distinctive characteristics of type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.
d. Has yielded, or may be likely to yield, information important in prehistory or history [Public Resources Code Section 5024.1(c)].[16]

Historical resources meeting one or more of the criteria listed above are eligible for listing in the CRHR. In addition to significance, resources must have integrity for a period of significance-the date or span of time within which significant events transpired or significant individuals made important contributions. Important archaeological resources are required to be at least 50 years old to be considered. "Integrity is the authenticity of a historical resource's physical identity evidenced by the survival of characteristics that existed during the resource's period of significance." Simply put, resources must "retain enough of their historic character or appearance to be recognizable as historical resources and to convey the reasons for their significance."

California Environmental Quality Act

CEQA also requires the lead agency to consider whether there is a significant effect on unique archaeological resources that are not eligible for listing in the California Register. As defined in CEQA,[17] a unique archaeological resource is:

> *an archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:*

15 State of California, Office of Historic Preservation, California Historical Resources, https://ohp.parks.ca.gov/listedresources
16 Public Resources Code (PRC), *Division 5. Parks and Monuments[5001 - 5873],* "CHAPTER 1. State Parks and Monuments," Article 2. Historical Resources (5024.1).
17 PRC Section 21083.2(a)

1. *Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information.*
2. *Has a special and particular quality such as being the oldest of its type or the best available example of its type.*
3. *Is directly associated with a scientifically recognized important prehistoric or historic event or person.*

If an archaeological resource is found eligible for listing in the CRHR, then it is considered under CEQA to be a historic resource that needs to be protected. This may also apply to unique archaeological resources. If a historic resource may be impacted by activity, under CEQA, avoidance and preservation in place is the preferred alternative. If that is not possible, then a data recovery plan will need to be created and enacted to lessen impacts to the environment to a less than significant level. If the archaeological resource is not eligible for listing in the CRHR, and it is not a unique archaeological resource, then no further action is required to protect or mitigate possible impacts to it.

California Health and Safety Code

The discovery of human remains is regulated per California Health and Safety Code, Section 7050.5,[18] which states the following:

> *In the event of discovery or recognition of any human remains in any location other than a dedicated cemetery, there shall be no further excavation…until the coroner…has determined…that the remains are not subject to…provisions of law concerning investigation of the circumstances, manner and cause of any death, and the recommendations concerning the treatment and disposition of the human remains have been made to the person responsible… The coroner shall make his or her determination within two working days from the time the person responsible for the excavation, or his or her authorized representative, notifies the coroner of the discovery or recognition of the human remains. If the coroner determines that the remains are not subject to his or her authority and…has reason to believe that they are those of a Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission.*

California Public Resources Code Section 5097.98

Tribal cultural resources are protected pursuant to a number of State policies and regulations enumerated under PRC Section 5097.98.[19] In addition, tribal cultural resources are recognized as a nonrenewable resource.

18 California Health and Safety Code, Division 7, Dead Bodies, Section 7050.5

19 Public Resources Code, *Division 5. Parks and Monuments*, "Chapter 1.75. Native American Historical, Cultural, and Sacred Sites," Section 5097.98.

Section 5097.98 provides procedures in the event human remains of Native American origin are discovered during project implementation. The statute requires that no further disturbances occur in the immediate vicinity of the discovery, that the discovery is adequately protected according to generally accepted cultural and archaeological standards, and that further activities take into account the possibility of multiple burials. The statute further requires the NAHC, upon notification by a County Coroner, designate and notify a Most Likely Descendant (MLD) regarding the discovery of Native American human remains. Once the MLD has been granted access to the site by the landowner and inspected the discovery, the MLD then has 48 hours to provide recommendations to the landowner for the treatment of the human remains and any associated grave goods.

In the event that no descendant is identified, or the descendant fails to make a recommendation for disposition, or if the land owner rejects the recommendation of the descendant, the landowner may, with appropriate dignity, reinter the remains and burial items on the property in a location that will not be subject to further disturbance.

Assembly Bill 52

AB 52 applies specifically to projects for which a Notice of Preparation (NOP) or a Notice of Intent to Adopt a Negative Declaration or Mitigated Negative Declaration (MND) is filed.[20] The primary intent of AB 52 is to include California Native American tribes early in the environmental review process and to establish a new category of resources related to Native Americans, known as tribal cultural resources, that require consideration under CEQA. CEQA defines tribal cultural resources as "sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe" that are either included or determined to be eligible for inclusion in the California Register or included in a local register of historical resources, or a resource that is determined to be a tribal cultural resource by a lead agency, in its discretion and supported by substantial evidence.[21] PRC Section 21080.3.1[22] requires that within 14 days of a lead agency determining that an application for a project is complete, or a decision by a public agency to undertake a project, the lead agency provide formal notification to the designated contact, or a tribal representative, of California Native American tribes that are traditionally and culturally affiliated with the geographic area of the project (as defined in PRC section 21073) and who have requested in writing to be informed by the lead agency (PRC section 21080.3.1(b)). Tribes interested in consultation must respond in writing within 30 days from receipt of the lead agency's formal notification

20 AB-52 Native Americans: California Environmental Quality Act., An act to amend Section 5097.94 of, and to add Sections 21073, 21074, 21080.3.1, 21080.3.2, 21082.3, 21083.09, 21084.2, and 21084.3 to, the Public Resources Code, relating to Native Americans.

21 PRC, Division 13. Environmental Quality Section 21080.3.2, "Chapter 2.4. Definitions."

22 PRC, Division 13. Environmental Quality Section 21080.3.1, "Chapter 2.6. General, Tribal Consultation."

and the lead agency must begin consultation within 30 days of receiving the tribe's request for consultation (PRC sections 21080.3.1(d) and 21080.3.1(e)).

PRC section 21080.3.2(a)[23] identifies the following as potential consultation discussion topics: the type of environmental review necessary; the significance of tribal cultural resources; the significance of the project's impacts on the tribal cultural resources; project alternatives or appropriate measures for preservation; and mitigation measures. Consultation is considered concluded when either: (1) the parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or (2) a party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached (PRC section 21080.3.2(b)).

If a California Native American tribe has requested consultation pursuant to PRC section 21080.3.1 and has failed to provide comments to the lead agency, or otherwise failed to engage in the consultation process, or if the lead agency has complied with Section 21080.3.1(d) of the statute and the California Native American tribe has failed to request consultation within 30 days, the lead agency may certify an EIR or adopt an MND.[24] The statute further states that any information, including, but not limited to, the location, description, and use of the tribal cultural resources, that is submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public without the prior consent of the tribe that provided the information. If the lead agency publishes any information submitted by a California Native American tribe during the consultation or environmental review process, that information shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public.

Senate Bill 18

Senate Bill 18 (SB 18),[25] which went into effect January 1, 2005, requires local governments (city and county) to consult with Native American tribes prior to making certain planning decisions and to provide notice to tribes at certain key points in the planning process. The intent is to "provide California Native American tribes an opportunity to participate in local land use decisions at an early planning stage, for the purpose of protecting, or mitigating impacts to, cultural places."

23 PRC, *Division 13. Environmental Quality* Section 21080.3.2, "Chapter 2.6."

24 PRC, *Division 13. Environmental Quality* Section 21080.3.2, "Chapter 2.6."

25 Senate Bill No. 18 (Burton), An act to amend Section 815.3 of the Civil Code, to amend Sections 65040.2, 65092, 65351, 65352, and 65560 of, and to add Sections 65352.3, 65352.4, and 65562.5 to the Government Code, relating to traditional tribal cultural places.

The purpose of involving tribes at these early planning stages is to allow consideration of cultural places in the context of broad local land use policy, before individual site-specific, project-level, land use designations are made by a local government. The consultation requirements of SB 18 apply to general plan or specific plan processes proposed on or after March 1, 2005.

According to the *Tribal Consultation Guidelines: Supplement to General Plan Guidelines,*[26] the following are the contact and notification responsibilities of local governments:

- Prior to the adoption or any amendment of a general plan or specific plan, a local government must notify the appropriate tribes (on the contact list maintained by the NAHC) of the opportunity to conduct consultations for the purpose of preserving, or mitigating impacts to, cultural places located on land within the local government's jurisdiction that is affected by the proposed plan adoption or amendment. Tribes have 90 days from the date on which they receive notification to request consultation unless a shorter timeframe has been agreed to by the tribe.
- Prior to the adoption or substantial amendment of a general plan or specific plan, a local government must refer the proposed action to those tribes that are on the NAHC contact list and have traditional lands located within the city or county's jurisdiction. The referral must allow a 45-day comment period. Notice must be sent regardless of whether prior consultation has taken place. Such notice does not initiate a new consultation process.
- Local governments must send a notice of a public hearing at least 10 days prior to the hearing to tribes who have filed a written request for such notice.

4.13.4.3 Local Regulations

City of Inglewood

The City of Inglewood's (City) General Plan does not identify any goals or policies related specifically to tribal resources or tribal cultural preservation ordinance or program in effect.

4.13.5 EXISTING CONDITIONS

4.13.5.1 Environmental Setting

Geological Setting

The City is located in the Los Angeles Basin, a structural depression approximately 50 miles long and 20 miles wide in the northernmost Peninsular Ranges Geomorphic Province.[27] The Los Angeles Basin developed as a result of tectonic forces and the San Andreas fault zone, with subsidence occurring 18–3

26 State of California, Office of Planning and Research, *Tribal Consultation Guidelines, Supplement to General Plan Guidelines,* November 2005.

27 Ingersoll, R. V., and P. E. Rumelhart, *Three-stage basin evolution of the Los Angeles basin, Southern California*, Geology 27: 593-596, 1999.

million years ago (Ma).[28] While sediments dating back to the Cretaceous (66 Ma) are preserved in the basin, continuous sedimentation began in the middle Miocene (around 13 Ma).[29] Since that time, sediments have been eroded into the basin from the surrounding highlands, resulting in thousands of feet of accumulation. Most of these sediments are marine, as they eroded from surrounding marine formations, until sea level dropped in the Pleistocene Era and deposition of the alluvial sediments that compose the uppermost units in the Los Angeles Basin began.

The Los Angeles Basin is subdivided into four structural blocks, with the proposed Project occurring in the Central Block, where sediments range from 32,000 to 35,000 feet thick.[30] The Central Block is wedge-shaped, extending from the Santa Monica Mountains in the northwest, where it is about 10 miles wide, to the San Joaquin Hills to the southeast, where it widens to around 20 miles across. Specifically, however, in the Baldwin and Rosecrans hills are geomorphic features associated with uplift along the Newport–Inglewood structural zone.

The Quaternary rocks consist of shallow marine sandstone and siltstone as well as continental siltstone, mudstone, and gravel.[31] Older Quaternary units are exposed in these strongly dissected hills, and elevations range from approximately 75 feet to over 400 feet.[32] To the east, Holocene alluvium lies upon the regional coastal basin, also known as the Downey Plain. The sediments overlie an erosional surface of late Pleistocene age. To the west of the Rosecrans Hills is an elevated plain underlain by older Quaternary alluvium.

This area contains a drainage basin, with Holocene sediments, that narrows to the south into the Dominguez Channel. Southwest of the proposed Project, Pleistocene dune sand overlies older alluvial deposits. The main drainage courses within the area are the Dominguez Channel, Compton Creek, and Centinela Creek.[33]

28 Critelli, S. P. Rumelhart, and R. Ingersoll, *Petrofacies and provenance of the Puente Formation (middle to upper Miocene), Los Angeles Basin, Southern California: implications for rapid uplift and accumulation rates*, Journal of Sedimentary Research A65: 656-667, 1995.

29 Yerkes, R. F., T. H. McCulloh, J. E. Schollhamer, and J. G. Vedder, *Geology of the Los Angeles Basin – an introduction*, Geological Survey Professional Paper 420-A, 1965.

30 Yerkes, R. F., T. H. McCulloh, J. E. Schollhamer, and J. G. Vedder, *Geology of the Los Angeles Basin – an introduction*, Geological Survey Professional Paper 420-A, 1965.

31 City of Inglewood, *General Plan Update Technical Background Report*, August 2006.

32 California Department of Conservation, Division of Mines and Geology, *Seismic Hazard Zone Report for the Inglewood 7.5-Minute Quadrangle*, Los Angeles County, California, 1998.

33 California Department of Conservation, Division of Mines and Geology (now California Geological Survey), *Seismic Hazard Zone Report for the Inglewood 7.5-Minute Quadrangle*, Los Angeles County, California, 1998.

Prehistoric Setting

According to recent research in the region,[34] the following prehistoric chronology has been divided into four general time periods: the Paleocoastal Period (12,000 to 8,000 Before Present [B.P.]), the Millingstone Period (8,000 to 3,000 B.P.), the Intermediate Period (3,000 to 1,000 B.P.), and the Late Period (1,000 B.P. to the time of Spanish contact in A.D. 1542).

While it is not certain when humans first came to California, their presence in Southern California by about 11,000 B.P. has been well documented. At Daisy Cave, on San Miguel Island, cultural remains have been radiocarbon dated to between 11,100 and 10,950 B.P.[35] During the Paleocoastal period, the climate of Southern California became warmer and more arid and the human population, residing mainly in coastal or inland desert areas, began exploiting a wider range of plant and animal resources.[36]

During the Millingstone period, there is evidence for the processing of acorns for food and a shift toward a more generalized economy. The first definitive evidence of human occupation in the Los Angeles area dates to at least 9,000 years B.P. and is associated with the Millingstone cultures.[37,38]

Millingstone cultures were characterized by the collection and processing of plant foods, particularly acorns, and the hunting of a wider variety of game animals.[39,40] Millingstone cultures also established more permanent settlements that were located primarily on the coast and in the vicinity of estuaries, lagoons, lakes, streams, and marshes where a variety of resources, including seeds, fish, shellfish, small mammals, and birds, were exploited. Early Millingstone occupations are typically identified by the presence of handstones (manos) and millingstones (metates), while those Millingstone occupations dating later than 5,000 B.P. contain a mortar and pestle complex as well, signifying the exploitation of acorns in the region.

34 Homburg, Jeffrey A., John G. Douglass, and Seeths N. Reddy (editors), "Paleoenvironment and Culture History," *In People in a Changing Land: The Archaeology and History of the Ballona in Los Angeles*, California, Volume 1, series edited by D.R. Grenda, R. Ciolek-Torello and J.H. Altschul. Statistical Research, Redlands, California, 2014.

35 Byrd, Brian F., and L. Mark Raab, *Prehistory of the Southern Bight: Models for a New Millennium*, in *California Prehistory: Colonization, Culture, and Complexity*, edited by Terry L. Jones and Kathryn A. Klar, pp. 215-227, 2007.

36 Byrd, Brian F., and L. Mark Raab, *Prehistory of the Southern Bight: Models for a New Millennium*, in *California Prehistory: Colonization, Culture, and Complexity*, edited by Terry L. Jones and Kathryn A. Klar, pp. 215-227, 2007.

37 Wallace, W. J., *A Suggested Chronology for Southern California Coastal Archaeology*, Southwestern Journal of Anthropology 11(3):214-230, 1955.

38 Warren, C. N., *Cultural Traditions and Ecological Adaptation on the Southern California Coast*, *Archaic Prehistory in the Western United States*, edited by Cynthia Irwin-Williams, Eastern New Mexico University Contributions in Anthropology 1(3):1-14, 1968.

39 Byrd, Brian F., and L. Mark Raab, *Prehistory of the Southern Bight: Models for a New Millennium*, in *California Prehistory: Colonization, Culture, and Complexity*, edited by Terry L. Jones and Kathryn A. Klar, pp. 215-227, 2007.

40 Wallace, W. J., *A Suggested Chronology for Southern California Coastal Archaeology*, Southwestern Journal of Anthropology 11(3):214-230, 1955.

During the Intermediate period, many aspects of Millingstone culture persisted, but a number of socioeconomic changes occurred.[41,42,43] The native populations of Southern California were becoming less mobile and populations began to gather in small sedentary villages with satellite resource-gathering camps. Increasing population size necessitated the intensified use of existing terrestrial and marine resources.[44] Evidence indicates that the overexploitation of larger, high-ranked food resources may have led to a shift in subsistence, towards a focus on acquiring greater amounts of smaller resources, such as shellfish and small-seeded plants.[45]

This period is characterized by increased labor specialization, expanded trading networks for both utilitarian and nonutilitarian materials, and extensive travel routes. Although the intensity of trade had already been increasing, it now reached its zenith, with asphaltum (tar), seashells, and steatite being traded from Southern California to the Great Basin. Use of the bow and arrow spread to the coast around 1,500 B.P, largely replacing the dart and atlatl.[46] Increasing population densities, with ensuing territoriality and resource intensification, may have given rise to increased disease and violence between 3,300 and 1,650 B.P.[47]

The Late Period is associated with the florescence of the Gabrielino, who are estimated to have had a population numbering around 5,000 in the pre-contact period. The Gabrielino occupied what is presently Los Angeles County and northern Orange County, along with the southern Channel Islands, including Santa Catalina, San Nicholas, and San Clemente.[48] This period saw the development of elaborate trade networks and use of shell-bead currency. Fishing became an increasingly significant part of subsistence strategies at this time, and investment in fishing technologies, including the plank canoe, are reflected in the archaeological record.[49,50] Settlement at this time is believed to have consisted of dispersed family groups

41 Erlandson, Jon M., *Early Hunter-Gatherers of the California Coast*, Plenum Press, New York, 1994.
42 Wallace, W. J., *A Suggested Chronology for Southern California Coastal Archaeology*, Southwestern Journal of Anthropology 11(3):214-230, 1955.
43 Warren, C. N., *Cultural Traditions and Ecological Adaptation on the Southern California Coast*, *Archaic Prehistory in the Western United States*, edited by Cynthia Irwin-Williams, Eastern New Mexico University Contributions in Anthropology 1(3):1-14, 1968.
44 Erlandson, Jon M., *Early Hunter-Gatherers of the California Coast*, Plenum Press, New York, 1994.
45 Byrd, Brian F., and L. Mark Raab, *Prehistory of the Southern Bight: Models for a New Millennium*, in *California Prehistory: Colonization, Culture, and Complexity*, edited by Terry L. Jones and Kathryn A. Klar, pp. 215-227, 2007.
46 Homburg, Jeffrey A., John G. Douglass, and Seeths N. Reddy (editors), *Paleoenvironment and Culture History*, *People in a Changing Land: The Archaeology and History of the Ballona in Los Angeles*, California, Volume 1, series edited by D.R. Grenda, R. Ciolek-Torello and J.H. Altschul. Statistical Research, Redlands, California, 2014.
47 Raab, L. Mark, Judith F. Porcasi, Katherine Bradford, and Andrew Yatsko, *Debating Cultural Evolution: Regional Implications of Fishing Intensification at Eel Point, San Clemente Island*, Pacific Coast Archaeological Society Quarterly 31(3):3–27, 1995.
48 Kroeber, A. L., *Handbook of the Indians of California*, Dover Publications, Inc., New York, 1925, reprinted 1976.
49 Erlandson, Jon M., *Early Hunter-Gatherers of the California Coast*, Plenum Press, New York, 1994.
50 Raab, L. Mark, Judith F. Porcasi, Katherine Bradford, and Andrew Yatsko, *Debating Cultural Evolution: Regional Implications of Fishing Intensification at Eel Point, San Clemente Island*, Pacific Coast Archaeological Society Quarterly 31(3):3–27, 1995.

that revolved around a relatively limited number of permanent village settlements that were located centrally with respect to a variety of resources.

Ethnographic Setting

The ethnographic history ranges from A.D 1542 to 1771 and is referred to as the Protohistoric period. This period covers the occupation of the area by native American tribes. The City is located in a region traditionally occupied by the Gabrielino Indians.

Traditionally, the Gabrielino occupied a large territory, including the entire Los Angeles Basin, the coast from Malibu to Aliso Creek, parts of the Santa Monica Mountains, the San Fernando Valley, the San Gabriel Valley, the San Bernardino Valley, the northern part of the Santa Ana Mountains, and much of the middle and lower Santa Ana River reaches. In addition, the Gabrielino also inhabited the islands of Santa Catalina, San Clemente, and San Nicolas. The term "Gabrielino" is a general term that refers to those Native Americans who were administered by the Spanish at the Mission San Gabriel Arcángel. Their neighbors included the Chumash and Tataviam to the north, the Juañeno to the south, and the Serrano and Cahuilla to the east. The Gabrielino are reported to have been second only to the Chumash in terms of population size and regional influence.[51] The Gabrielino language is part of the Takic branch of the Uto-Aztecan language family.

Trade was an important element of the Gabrielino economy. While the principal Gabrielino-produced commodity—steatite vessels from centers on Catalina Island—originated well outside the defined study region, trade in steatite items was conducted throughout local territory and involved external relations with desert, Southwestern, mountain, and coastal groups beyond Gabrielino borders.[52] Additionally, Olivella shell callus beads, manufactured on the northern Channel Islands by the Chumash and their predecessors, were reportedly used quite frequently as a currency or as a status symbol by the Gabrielino and other Southern California groups.[53]

At the time of Spanish contact in A.D. 1542, also the beginning of what is known as the Protohistoric Period (A.D. 1542 to 1771), many Gabrielino practiced a religion that was centered around the mythological figure Chinigchinich.[54] This religion may have been relatively new when the Spanish arrived, and at that time was spreading to other neighboring Takic groups. The Gabrielino practiced both cremation and inhumation

51 Bean, L.J., and C.R. Smith, *Gabrielino, in California*, edited by R.F. Heizer, pp. 538-549 Handbook of North American Indians, Vol. 8, W. C. Sturtevant, general editor, Smithsonian Institution, Washington, D.C., 1978.

52 See **Appendix 4.4.1** of this Draft EIR.

53 See **Appendix 4.4.1** of this Draft EIR.

54 Bean, L.J., and C.R. Smith, *Gabrielino, in California*, edited by R.F. Heizer, pp. 538-549 Handbook of North American Indians, Vol. 8, W. C. Sturtevant, general editor, Smithsonian Institution, Washington, D.C., 1978.

of their dead. A wide variety of grave offerings, such as stone tools, baskets, shell beads, projectile points, bone and shell ornaments, and otter skins, were interred with the deceased.

Coming ashore on Santa Catalina Island in October of 1542, Juan Rodriguez Cabrillo was the first European to make contact with the Gabrielino; the 1769 expedition of Portolá also passed through Gabrielino territory.[55] Native Americans suffered severe depopulation and their traditional culture was radically altered after Spanish contact. Nonetheless, Gabrielino descendants still reside in the greater Los Angeles and Orange County areas and maintain an active interest in their heritage.

Historic Setting

Spanish Period

Although Spanish explorers made brief visits to the region in 1542 and 1602, sustained contact with Europeans did not commence until the onset of the Spanish Period. In 1769 Gaspar de Portolá led an expedition from San Diego, passing through the Los Angeles Basin and the San Fernando Valley, on its way to the San Francisco Bay.[56] Father Juan Crespi, who accompanied the 1769 expedition, noted the suitability of the Los Angeles area for supporting a large settlement. This was followed in 1776 by the expedition of Father Francisco Garcés.[57]

In the late 18th century, the Spanish began establishing missions in California and forcibly relocating and converting native peoples as well as exposing them to diseases that they had no resistance to. Mission San Gabriel Arcángel was founded on September 8, 1771 and Mission San Fernando Rey de España on September 8, 1797. By the early 1800s, the majority of the surviving Gabrielino had entered the mission system, either at San Gabriel or San Fernando. Mission life offered some degree of security in a time when traditional trade and political alliances were failing and epidemics and subsistence instabilities were increasing. This lifestyle change also brought with it significant negative consequences for Gabrielino health and cultural integrity.

A Gabrielino village, or "rancheria" (known as Guaspet, Guasna, or Gaucha), appears to have been located northwest of the City. Based on mission baptism records, the rancheria appears to have been occupied from about 1790 to 1820. At least 193 people are known to have lived at the rancheria and been baptized. Records suggest that recruitment into the mission system did not occur until native populations in closer proximity to Mission San Gabriel had been assimilated, and after grazing expanded into the vicinity of the

55 Bean, L.J., and C.R. Smith, *Gabrielino, in California*, edited by R.F. Heizer, pp. 538-549 Handbook of North American Indians, Vol. 8, W. C. Sturtevant, general editor, Smithsonian Institution, Washington, D.C., 1978.

56 McCawley, William, *The First Angelinos: The Gabrielino Indians of Los Angeles*, Malki Museum Press, Banning, California, 1996.

57 Johnson, J. R., and D. D. Earle, *Tataviam Geography and Ethnohistory*, Journal of California and Great Basin Anthropology, Vol. 12, No. 2, pp. 191-214, 1990.

proposed Project, bringing native inhabitants of the region into closer contact with Spanish-era ranchers.

A 1938 map titled The Kirkman-Harriman Pictorial and Historical Map of Los Angeles County 1860 A.D.-1937 A.D. (Kirkman map) depicts approximate locations of Gabrielino villages in Los. It depicts the location of unnamed villages about 2 to 5 miles north of the proposed Project but does not show any roads, landforms, or locations overlapping with the proposed Project.

Mexican Period

After Mexico gained its independence from Spain in 1821, Los Angeles became the capital of the California territory in 1835.[58] Mexico continued to promote settlement of California with the issuance of land grants. In 1833, Mexico began the process of secularizing the California missions, reclaiming the majority of mission lands, and redistributing them as land grants throughout California. According to the terms of the Secularization Law of 1833 and Regulations of 1834, at least a portion of the lands would be returned to the Native populations, but this did not always occur.[59] Because of the disbursement that the Gabrielino populations suffered during the Mission period no land was returned to the Gabrielino Tribes.

During the Mexican Period, many ranchos continued to be used by settlers for cattle grazing. Hides and tallow from cattle became a major export for Mexican settlers in California, known as Californios, many of whom became wealthy and prominent members of society. The Californios led generally easy lives, leaving the hard work to vaqueros and Indian laborers.[60,61]

American Period

Mexico ceded California to the United States as part of the Treaty of Guadalupe Hildalgo in 1848. California officially became one of the United States in 1850. While the treaty recognized the right of Mexican citizens to retain ownership of land granted to them by Spanish or Mexican authorities, the claimant was required to prove their right to the land before a patent was given. The process was lengthy and generally resulted in the claimant losing at least a portion of their land to attorney's fees and other costs associated with proving ownership.[62]

58 Gumprecht, Blake, *Los Angeles River: Its Life, and Possible Rebirth*, The Johns Hopkins University Press, Baltimore, 1999, reprinted 2001.

59 Milliken, Randall, Laurence H. Shoup, and Beverly R. Ortiz, *Ohlone/Costanoan Indians of the San Francisco Peninsula, and their Neighbors, Yesterday and Today*, prepared by Archaeological and Historical Consultants, Oakland, California, prepared for National Park Service Golden Gate National Recreation Area, San Francisco, California, June 2009.

60 Pitt, Leonard, *The Decline of the Californios: A Social History of the Spanish-speaking Californians, 1846-1890*, University of California Press, Berkeley, 1994.

61 Starr, Kevin, *California: A History, Modern Library*, New York, 2007.

62 Starr, Kevin, *California: A History,* Modern Library, New York, 2007.

When the discovery of gold in northern California was announced in 1848, an influx of people from other parts of North America flooded into California and the population of Los Angeles tripled between 1850 and 1860. The increased population led to additional demand of the Californios' cattle. As demand increased, the price of beef skyrocketed and Californios reaped the benefits. However, a devastating flood in 1861, followed by droughts in 1862 and 1864, led to a rapid decline of the cattle industry; over 70 percent of cattle perished during these droughts.[63,64]

These natural disasters, coupled with the burden of proving ownership, caused many Californios to lose their lands during this period. Former ranchos were subsequently subdivided and sold for agriculture and residential settlement.[65,66]

During the rancho period, the City was part of the *Rancho Aguaje de la Centinela* and the *Rancho Sausal Redondo*. A year after Mexico gained independence from Spain and control of California in 1822, Los Angeles resident Antonio Avila received a land grant for *Rancho Sausal Redondo* and grazed cattle there as well. The rancho encompassed the areas that are now the Cities of Redondo Beach, Inglewood, Hawthorne, El Segundo, Lawndale, Manhattan Beach and Hermosa Beach. In 1834, Ygnacio Machado, one of the original leather jacket soldiers that escorted settlers to Los Angeles, built the Centinela Adobe. The Centinela Adobe, located approximately 2.5 miles from the proposed Project was in the center of what became a 2,200-acre ranch on a portion of the *Rancho Sausal Redondo*. Machado had moved onto what he claimed was still public land, which was granted to him as the *Rancho Aguaje de la Centinela*. Soon after, Machado traded the *Rancho Aguaje de la Centinela* for a keg of whiskey and a home in the Pueblo of Los Angeles. The property traded hands many times and was eventually acquired by a Scottish noble man named Robert Burnett who eventually added the much larger *Rancho Sausal Redondo* to his holdings, once again combining the ranchos. Burnette eventually returned to Scotland and leased the ranch to a Canadian immigrant who was considered by many to be the founding father of Inglewood: Daniel Freeman. In spite of drought and other hardship Freeman successfully farmed barley on the ranch, and purchased it from Burnette with gold in 1885. Freeman went on to become a major land developer in Inglewood.[67]

Centinela Springs (California Historical Landmark 363), or *Aguaje de Centinela*, was a valued source of spring water for the *Rancho Aguaje de la Centinela* and the spring is described as continuously existing

63 McWilliams, Carey, *Southern California: An Island on the Land*, Gibbs Smith, Layton, Utah, 1946.
64 Dinkelspiel, Frances, *Towers of Gold*, St. Martin's Press, New York, 2008.
65 Gumprecht, Blake, *Los Angeles River: Its Life, and Possible Rebirth*, The Johns Hopkins University Press, Baltimore, 1999, reprinted 2001.
66 McWilliams, Carey, *Southern California: An Island on the Land*, Gibbs Smith, Layton, Utah, 1946.
67 Kielbasa, John, 1998. Historic Adobes of Los Angeles County. Dorrance Publishing Co. Pittsburg, Pennsylvania.

since the Pleistocene Era. The spring is memorialized and is still located at the corner of Centinela Avenue and Florence Boulevard, approximately 2 miles north of the proposed Project.[68]

4.13.5.2 Adjusted Baseline

Section 4.13: Tribal Cultural Resources assumes the Adjusted Baseline Environmental Setting as described in **Section 4.0: Environmental Impact Analysis**, *4.0.5: Adjusted Baseline*. Related to tribal cultural resources, the changes associated with the Adjusted Baseline projects include excavation and construction of new uses on the HPSP site.

There is no evidence that development in the HPSP would affect the baseline for analysis of the tribal cultural resources. No tribal resources have been discovered and documented during construction of the Adjusted Baseline projects that would provide additional information on the presence or sensitivity of these resources in the area.

4.13.5.3 Project Setting

The proposed Project is located within the fully urbanized City, and thus includes a high degree of development disturbance. The proposed Project would begin at approximately the Metro Crenshaw/LAX Line just north of the Florence Avenue and Market Street intersection with a pedestrian bridge that would connect to the Market Street/Florence Avenue Station located at the northeast corner of Market Street and Regent Avenue. The guideway would extend from the station and travel south through downtown Inglewood along Market Street, where it be adjacent to existing commercial retail, office, restaurant, parking, residential, and mixed uses. The guideway would turn east onto Manchester Boulevard and be bordered by commercial retail, office, mixed-use, and residential uses on both sides of the Manchester Boulevard segment. After turning south onto Prairie Avenue, the guideway would be bordered by commercial and multifamily residential uses to the west, while uses to the east include commercial/recreational uses associated with the Forum and entertainment, retail, and residential uses under development within the HPSP as part of the Los Angeles Stadium and Entertainment District (LASED). The guideway would terminate at the intersection of Prairie Avenue and Hardy Street and the proposed Prairie Avenue/Hardy Street Station just north of Hardy Street.

There are no known tribal resources within the footprint of the proposed Project. However, as part of the AB 52 tribal consultation process,[69] it was noted that the existing networks of major roadways followed historic and prehistoric trading routes in the area that were used by Native American tribes that resided in the area and along the west coast. Significant among these historic and pre-historic trading routes were

68 Office of Historic Preservation, 2019. http://ohp.parks.ca.gov/ListedResources/Detail/363. Accessed January 9, 2019.
69 AB 52 Consultation Summary, Meridian Consultants LLC, February 6, 2019.

those that Rancho Sausal Redondo (translated as “round clump of willows”), Rancho Ajuaje de la Centinela (the name means "Sentinel of Waters" in Spanish, and refers to the artesian water in the area exemplified by Centinela Springs).[70] Rancho Ajuaje de la Centinela included parts of present-day Westchester and Inglewood; and Rancho Centinela included the present-day cities of El Segundo, Gardena, Hawthorne, Hermosa Beach, Inglewood, Lawndale, Manhattan Beach, and Playa del Rey.

The natural steams of the area near the La Brea tar pits were used to collect materials that would line baskets and boats. The traditional landscape, which including the tribal trading routes, have numerous burial sites that have been discovered as part of other projects and excavations in the area. The tribal traditions were to bury individuals who died on the trading route at the location of their passing.

Further, as part of the AB 52 consultation process,[71] it was noted that the location of the proposed Project is in an area that known for these historic and pre-historic trading routes. It was added that there are known streams to the east and trading routes to the west.

4.13.6 THRESHOLDS OF SIGNIFICANCE

Criteria outlined in Appendix G of the State *CEQA Guidelines* were used to determine the level of significance of impacts to tribal cultural resources. A project would have a significant impact if it would:

Threshold TCR-1 **Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 21074 as either a site, feature, place, or cultural landscape that is geographically defined in terms of size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:**

i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k); or

ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

70 Centinela Springs was registered as Historical Landmark on October 9, 1939 and is located in the City of Inglewood. It’s description on the Office of Historic Preservation (OHP0 website notes that bubbling springs once flowed here from their source in a deep water basin that has existed continuously since the Pleistocene Era. Prehistoric animals, Indians, and early Inglewood settlers were attracted here by the pure artesian water. The springs and valley were named after sentinels guarding cattle in the area.

71 AB 52 Consultation Summary, Meridian Consultants LLC, February 6, 2019.

4.13.7 IMPACT ANALYSIS FOR THE PROPOSED PROJECT

Impact TCR-1: **Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 21074 as either a site, feature, place, or cultural landscape that is geographically defined in terms of size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:**

i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k); or

ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

For purposes of this impact analysis, a tribal cultural resource (TCR) is considered a site, feature, place, cultural landscape, sacred place, or object which is of cultural value to a California Native American Tribe and is either on or eligible for the California Register or a local historic register.

As previously noted, the Tribe shared with the City that the location of the proposed Project may be surrounded by historic and pre-historic trading routes and village activity. Tribal members described historical landmarks in the region, including Rancho Sausal Redondo (translated as “round clump of willows”) and Rancho Ajuaje de la Centinela (translated as "Sentinel of Waters,” and refers to the artesian water in the area exemplified by Centinela Springs),[72] which included parts of present-day Westchester and Inglewood, and Rancho Centinela, which included the present-day cities of El Segundo, Gardena, Hawthorne, Hermosa Beach, Inglewood, Lawndale, Manhattan Beach, and Playa del Rey. The Tribe further added that there are known streams to the east and trading routes to the west of the proposed Project that could contain TCRs.[73] The Tribe stated that, due to these trading routes and historical activity centers and the tribal tradition of burying their deceased along the routes and near waterways over thousands of years, these activities could result in the proposed Project having a high sensitivity for TCRs and human remains.

72 Centinela Springs was registered as Historical Landmark on October 9, 1939 and is located in the City of Inglewood. It’s description on the Office of Historic Preservation (OHP website notes that bubbling springs once flowed here from their source in a deep water basin that has existed continuously since the Pleistocene Era. Prehistoric animals, Indians, and early Inglewood settlers were attracted here by the pure artesian water. The springs and valley were named after sentinels guarding cattle in the area.

73 See **Appendix 4.13.2** of this Draft EIR.

The Tribe explained that railroads were placed on top of traditional tribal trade routes due to the favorable topographical conditions of the paths, having been flattened by human travel over thousands of years.

Inland and coastal waterways, the Tribe described, create unique habitats and riparian corridors that provide an abundance of food and medicine resources along with aesthetically peaceful areas with running water, shade trees, and shelter. The Tribe stated that areas near watercourses and water bodies housed seasonal or permanent hamlets, seasonal or permanent trade depots, ceremonial and religious prayer sites, and burials and cremation sites of their ancestors. Larger water bodies were high attractants for human activity and the banks and shores of these water bodies have a higher-than-average potential for encountering TCRs of artifacts and human remains during ground disturbing activities. The waterway immediately east of the proposed Project is a landscape feature that was heavily used for life sustenance, homesites, ceremonies, and regular daily activities.

Since the Project site was a land area of confluence, it would have been heavily used for human travel, movement of trade items, visiting of family, going to ceremonies, accessing recreation areas, and accessing foraging areas. Further, within and around these routes contained seasonal or permanent ramadas or trade depots, seasonal and permanent habitation areas, and often still contain isolated burials and cremations from Tribal members who died along the trail. These isolated burials are not associated with a village community burial site or ceremonial burial site, rather the location is simply where the person died and was buried where they died. Therefore, isolated burials are more concentrated and likely to occur in proximity to Tribal trade routes, particularly near major trade routes.

Because the proposed Project is located within and around a sacred village site, adjacent to sacred water courses, major traditional trade routes, and within a sacred landscape for ceremonies and homesites, the Tribe indicated that there is a high potential to impact TCRs still present within the soil from the thousands of years of prehistoric activities that occurred within and around these Tribal cultural landscapes.

Construction

Implementation of the proposed Project would include demolition, grubbing, and grading, possible subterranean utility relocation and installation, and excavation and installation of piles for the guideway and stations including structural support columns and excavations for guideway and stations foundations and as part of the construction of support facilities, including the MSF and TPSSs.

Historic maps provided to the City by the Tribe were reviewed as part of the background research for the proposed Project to identify previous geographical features and historic land uses, including the location

of historical Native American trading routes and villages.[74] Because the Project is located in the vicinity of areas identified during the AB 52 tribal consultation, there may be unanticipated discovery of TCRs as defined in Public Resources Code Section 21074. As such, there is the potential for loss of artifact and TCR and/or the diminishment in value to the Tribe of TCRs to occur during ground disturbing activities. A such, the proposed Project could result in a substantial adverse change in the significance of a TCR pursuant to the criteria in subdivision (c) of PRC Section 5024.1. These potential impacts would be potentially significant.

During the Rancho period, the settlers resided near Centinela Creek north of the proposed Project. The likelihood of unmarked graves associated with the Rancho period is low as the preference would have been to bury family members at the Mission or in the Pueblo near the church. The area was developed around the turn of the century, at which time (i.e., in 1905) the Inglewood Park Cemetery was established. The cemetery is still in operation and located near the proposed Project at the northeast corner of Manchester Boulevard and Prairie Avenue. Because the cemetery is close by, available, and in use, the likelihood of unmarked historic-age graves is low. However, due to the current development and disturbance in the cumulative context area, it is not currently possible to identify any sites or resources that may exist subsurface.

Ground disturbing activities that would be employed during construction of the proposed Project, including demolition, borings, drilling, grading, and excavations would extend into previously undisturbed subsurface areas or other locations where there is the possibility that they may encounter buried human remains. As a result, these activities may disturb human remains, including those interred outside of dedicated cemeteries.

Lands within the footprint of the proposed Project are not known to contain any unmarked graves or human remains. However, the loss of any previously unknown human remains, including native American remains, may be significant, and the proposed Project would have a potentially significant impact.

Operation

While the operations of the proposed Project would introduce different land uses, these uses would not involve activities related to ground disturbance. As such, impacts related to a substantial adverse change in the significance of a TCR would occur from the operation of the proposed Project would be less than significant.

[74] See Appendix 4.13.2.

Mitigation Measures

As indicated previously, impacts related to TCRs during ground disturbing construction activities would be potentially significant. The following Mitigation Measures (MMs) have been identified and are based on information and suggestions received from Tribes during the AB 52 consultation process with the City.

Construction

MM TCR-1: Retention of a Tribal Cultural Resources Monitor/Consultant.

Prior to the commencement of any ground disturbing activity at the project site, the project applicant shall retain a qualified archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for archaeology (US Department of the Interior, 2008) to carry out all mitigation related to cultural resources. In addition, a Native American Monitor shall be designated by the Gabrieleno Band of Mission Indians-Kizh Nation – the tribe that consulted on this project pursuant to Assembly Bill A52 (the "Tribe" or the "Consulting Tribe"). If no Native American Monitor is designated within a reasonable period of time (not to exceed 30 days), the activity can commence without the designated Monitor. A copy of the executed contract shall be submitted to the City of Inglewood Planning and Building Department prior to the issuance of any permit necessary to commence a ground-disturbing activity. The Tribal monitor will only be present on- site during the construction phases that involve ground-disturbing activities. Ground disturbing activities are defined by the Tribe as activities that may include, but are not limited to, pavement removal, potholing or auguring, grubbing, tree removals, boring, grading, excavation, drilling, and trenching, within the project area. The Tribal Monitor will complete daily monitoring logs that will provide descriptions of the day's activities, including construction activities, locations, soil, and any cultural materials identified. The on-site monitoring shall end when all ground-disturbing activities on the Project Site are completed, or when the Tribal Representatives and Tribal Monitor have indicated that all upcoming ground- disturbing activities at the Project Site have little to no potential for impacting Tribal Cultural Resources. Upon discovery of any Tribal Cultural Resources, construction activities shall cease in the immediate vicinity of the find (not less than the surrounding 50 feet) until the find can be assessed. All Tribal Cultural Resources unearthed by project activities shall be evaluated by the qualified archaeologist and Tribal monitor approved by the Consulting Tribe. If the resources are Native American in origin, the Consulting Tribe will retain it/them in the form and/or manner the Tribe deems appropriate, for educational, cultural and/or historic purposes.

If human remains and/or grave goods are discovered or recognized at the Project Site, all ground disturbance shall immediately cease, and the county coroner shall be notified per Public Resources Code Section 5097.98, and Health & Safety Code Section 7050.5. Human remains and grave/burial goods shall be treated alike per California Public Resources Code section 5097.98(d)(1) and (2). Work may continue on other parts of the Project Site while evaluation and, if necessary, mitigation takes place (CEQA Guidelines Section 15064.5[f]). If a non-Native American resource is determined by the qualified archaeologist to constitute a "historical resource" or "unique archaeological resource," time allotment and funding sufficient to allow for implementation of avoidance measures, or appropriate mitigation, must be available. The treatment plan established for the resources shall be in accordance with CEQA.

Guidelines Section 15064.5(f) for historical resources and PRC Sections 21083.2(b) for unique archaeological resources. Preservation in place (i.e., avoidance) is the preferred manner of treatment. If preservation in place is not feasible, treatment may include implementation of archaeological data recovery excavations to remove the resource along with subsequent laboratory processing and analysis. Any historic archaeological material that is not Native American in origin shall be curated at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County or the Fowler Museum, if such an institution agrees to accept the material. If no institution accepts the archaeological material, it shall be offered to a local school or historical society in the area for educational purposes.

MM TCR-4 and **MM TCR-5** will supplement **MM TCR-1**.

MM TCR-2: **Monitoring and Mitigation Program**.

Prepare, design, and implement a monitoring and mitigation program for the Project. The Plan shall define pre-construction coordination, construction monitoring for excavations based on the activities and depth of disturbance planned for each portion of the Project area, data recovery (including halting or diverting construction so that archaeological remains can be evaluated and recovered in a timely manner), artifact and feature treatment, procurement, and reporting. The Plan shall be prepared and approved by a qualified archaeologist prior to the issuance of the first grading permit.

MM TCR-3: Cultural Resources Sensitivity Training.

The qualified archaeologist and Native American Monitor shall conduct construction-worker archaeological resources sensitivity training at the Project kick-off meeting prior to the start of ground disturbing activities (including vegetation removal, pavement removal, etc.) and will present the Program as outlined in **MM TCR-2**, for all construction personnel conducting, supervising, or associated with demolition and ground disturbance, including utility work, for the Project. In the event construction crews are phased or rotated, additional training shall be conducted for new construction personnel working on ground-disturbing activities. Construction personnel shall be informed of the types of prehistoric and historic archaeological resources that may be encountered, and of the proper procedures to be enacted in the event of an inadvertent discovery of archaeological resources or human remains. Documentation shall be retained by the qualified archaeologist demonstrating that the appropriate construction personnel attended the training.

MM TCR-4: Archaeological and Native American Monitoring

The qualified archaeologist will oversee archaeological and Native American monitors who shall be retained to be present and work in tandem, monitoring during construction excavations such as grading, trenching, or any other excavation activity associated with the Project and as defined in the Monitoring and Mitigation Plan. If, after advanced notice, the Native American representative declines, is unable, or does not respond to the notice, construction can proceed under supervision of the qualified archaeologist. The frequency of monitoring shall be based on the rate of excavation and grading activities, the materials being excavated, and the depth of excavation, and if found, the quantity and type of archaeological resources encountered. Full-time monitoring may be reduced to part-time inspections, or ceased entirely, if determined adequate by the qualified archaeologist and the Native American monitor.

1. In the event of the discovery of any archaeological materials during implementation of the Project, all work shall immediately cease within 50 feet of the discovery until it can be evaluated by the qualified archaeologist. Construction shall not resume until the qualified archaeologist has made a determination on the significance of the resource(s) and provided recommendations regarding the handling of the find. If the resource is determined to be significant, the qualified archaeologist will confer with the project applicant regarding recommendation for treatment and ultimate disposition of the resource(s).

2. If it is determined that the discovered archaeological resource constitutes a historical resource or a unique archaeological resource pursuant to CEQA, avoidance and preservation in place is the preferred manner of mitigation. Preservation in place may be accomplished by, but is not limited to, avoidance, incorporating the resource into open space, capping, or deeding the site into a permanent conservation easement.

3. In the event that preservation in place is demonstrated to be infeasible and data recovery through excavation is the only feasible mitigation available, a Cultural Resources Treatment Plan shall be prepared and implemented by the qualified archaeologist in consultation with the project applicant, and appropriate Native American representatives (if the find is of Native American origin). The Cultural Resources Treatment Plan shall provide for the adequate recovery of the scientifically consequential information contained in the archaeological resource through laboratory processing and analysis of the artifacts. The Treatment Plan will further make recommendations for the ultimate curation of any archaeological materials, which shall be curated at a public, non-profit curation facility, university or museum with a research interest in the materials, if such an institution agrees to accept them. If resources are determined to be Native American in origin, they will first be offered to the Tribe for permanent curation, repatriation, or reburial, as directed by the Tribe. If no institution or Tribe accepts the archaeological material, then the material shall be donated to a local school or historical society in the area for educational purposes.

4. If the resource is identified as a Native American, the qualified archaeologist and the City shall consult with appropriate Native American representatives, as identified through the AB 52 consultation process in determining treatment for prehistoric or Native American resources to ensure cultural values ascribed to the resource, beyond that which is scientifically important, are considered.

5. Prepare a final monitoring and mitigation report for submittal to the City, and the South Central Coastal Information Center (SCCIC), in order to document the results of the archaeological and Native American monitoring. If there are significant discoveries, artifact and feature analysis and final disposition shall be included with the final report, which will be submitted to the SCCIC and the applicant. The final monitoring report shall be submitted to the applicant within 90 days of completion of excavation and other ground disturbing activities that require monitoring.

MM TCR-5: Inadvertent Discoveries Related to Human Remains.

In the event of the unanticipated discovery of human remains during excavation or other ground disturbance related to the proposed Project, all work shall immediately cease within 150 feet of the discovery and the County Coroner shall be contacted in accordance

with PRC Section 5097.98[75] and Health and Safety Code Section 7050.5.[76] Additionally, the contractor shall notify the City, and the tribal cultural resources monitor and archaeological monitor.

The City, as the Project sponsor, and the contractor shall ensure that the immediate vicinity where the discovery occurred is not disturbed by further activity, is adequately protected according to generally accepted cultural and tribal standards or practices, and that further ground-disturbing activities take into account the possibility of multiple burials.

No further excavation or disturbance of the discovery or any nearby area reasonably suspected to overlie adjacent remans (as determined by the qualified archaeologist and/or tribal cultural resources monitor) shall occur until the coroner has made the necessary findings as to origin and disposition pursuant to PRC Section 5097.98. If such a discovery occurs, a temporary construction exclusion zone shall be established surrounding the area of the discovery so that the area would be protected (as determined by the qualified archaeologist and/or cultural resources monitor), and consultation and treatment could occur as prescribed by law. As required by law, the coroner would determine within two working days of being notified if the remains are subject to his or her authority.

If the coroner recognizes the human remains to be those of a Native American or has reason to believe that they are those of a Native American, he or she shall contact, by telephone within 24 hours, the NAHC. In accordance with Health and Safety Code Section 7050.5, subdivision (c), and PRC Section 5097.98 (as amended by AB 2641), the NAHC would make an MLD determination.

If the Tribe is designated MLD, the following standards shall apply and the following requirements and treatment measures shall be implemented.

1. To the Tribe, the term “human remains” encompasses more than human bones. In ancient as well as historic times, Tribal Traditions included, but were not limited to, the burial of funerary objects with the deceased, and the ceremonial burning of human remains. These remains are to be treated in the same manner as bone fragments that remain intact. Associated funerary objects are objects that, as part of

75 NAGPRA, Title 43. Public Lands: Interior, Subtitle A. Office of the Secretary of the Interior, Part 10. Native American Graves Protection and Reparation Regulations, § 5097.98 – Notification of discovery of Native American human remains, descendants; disposition of human remains and associated grave goods.

76 California / Health and Safety Code - HSC / CHAPTER 2. General Provisions [7050.5. - 7055.] / Section 7050.5.

the death rite or ceremony of a culture, are reasonably believed to have been placed with individual human remains either at the time of death or later; other items made exclusively for burial purposes or to contain human remains can also be considered as associated funerary objects.

2. Prior to the continuation of ground disturbing activities, the land owner shall arrange a designated site location within the footprint of the project for the respectful reburial of the human remains and/or ceremonial objects. In the case where discovered human remains cannot be fully documented and recovered on the same day, the remains shall be covered with muslin cloth and a steel plate that can be moved by heavy equipment placed over the excavation opening to protect the remains. If this type of steel plate is not available, a 24-hour guard should be posted outside of working hours. As stated by the Tribe as part of the Project's AB 52 consultation, "[t*]he Tribe will make every effort to recommend diverting the project and keeping the remains in situ and protected. If the project cannot be diverted, it may be determined that burials will be removed. The Tribe will work closely with the qualified archaeologist to ensure that the excavation is treated carefully, ethically and respectfully*."

3. If data recovery is approved by the Tribe, documentation shall be taken which includes at a minimum detailed descriptive notes and sketches. Additional types of documentation shall be approved by the Tribe for data recovery purposes. Cremations must either be removed in bulk or by means as necessary to ensure completely recovery of all material. If the discovery of human remains includes four or more burials, the location is considered a cemetery and a separate treatment plan shall be created. Once complete, a final report of all activities is to be submitted to the Tribe and the NAHC. Scientific study or the utilization of any invasive diagnostics on human remains of Native American origin.

4. Each occurrence of human remains and associated funerary objects will be stored using opaque cloth bags. All human remains, funerary objects, sacred objects and objects of cultural patrimony will be removed to a secure container on site if feasible. These items shall be retained and reburied within six months of recovery if feasible. The site of reburial/repatriation shall be on the Project area, but at a location agreed upon between the Tribe and the landowner at a site to be protected in perpetuity. There shall be no publicity regarding any cultural materials recovered.

If the Tribe is not designated MLD, each occurrence of human remains and associated funerary objects shall be stored using opaque cloth bags. All human remains, funerary objects, sacred objects, and objects of cultural patrimony shall be preserved in place where feasible and to consult with the tribal cultural resources monitor and/or the MLD about appropriate treatment if removal is required. If remains are removed, they shall be removed to a secure container on site if possible, with consultation with of the qualified archaeologist and/or tribal cultural resources monitor. These items shall be retained and reburied within six months of recovery or as directed by the qualified archaeologist and/or tribal cultural resources monitor. The site of reburial/repatriation shall be within the proposed Project footprint, or at a location agreed upon between the MLD and the landowner at a site to be protected in perpetuity. There shall be no publicity regarding any cultural materials recovered.

Operation

No mitigation is required during operation of the proposed Project.

Level of Significance after Mitigation

Construction

With implementation of **MMs TCR-1**, **TCR-2**, **TCR-3**, **TCR-4**, and **TCR-5**, potentially significant impacts to TCRs, including related, unanticipated discovery of human remains, would be reduced to a level that is less than significant. These measures would work to prevent the destruction and loss of sensitive TCRs and ensure the proper disposition of human remains.

Operation

There are no significant impacts associated with the operation of the proposed Project; impacts would be less than significant.

4.13.8 CUMULATIVE IMPACTS

In addition to the proposed Project, there are numerous projects within the City of Inglewood and within the corresponding ethnographic territory of the Gabrielino Tribe, 48 of which are in the City of Inglewood, that have been taken into consideration when developing the cumulative context, as described in **Section 4.0**, *4.0-6: Cumulative Assumptions*.

The closest active cumulative projects are the SoFi Stadium and associated developments, located adjacent to the proposed Project east of Prairie Avenue, and the proposed Inglewood Basketball and Entertainment Center located south of the proposed Project along Century Boulevard.

Tribal Cultural Resources

The City implements the AB 52 process on all projects as required CEQA Section 21080.3.1.[77] This requires that prior to the release of a negative declaration, mitigated negative declaration, or environmental impact report for a project, the City, as lead agency, shall begin consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project if: (1) the California Native American tribe requested to the lead agency, in writing, to be informed by the lead agency through formal notification of proposed projects in the geographic area that is traditionally and culturally affiliated with the tribe, and (2) the California Native American tribe responds, in writing, within 30 days of receipt of the formal notification, and requests the consultation. Further, within 14 days of determining that an application for a project is complete or a decision by a public agency to undertake a project, the City, as lead agency provides formal notification to the designated contact of, or a tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice. Based on the individual consultations with Tribes, the City incorporates into the conditions and mitigation of each project, as applicable, considerations for the protection of TRCs.

The cumulative context for Tribal cultural resources is within the Gabrielino Tribal territory which encompasses land within Los Angeles County north to Thousand Oaks, east to Pomona, west to the coast and south to Long Beach. Their territory also extends into Orange County as far south as Costa Mesa. The City is included within the Gabrielino Tribal territory and has been subject to historic development within the City since the rancho period, with more wide scale development occurring at the turn of the century. The Gabrielino Tribal territory has been subject to wide scale development and redevelopment projects over the past several decades and is currently experiencing a high level of redevelopment projects. Known Tribal village locations, trade routes, and known significant prehistoric archaeological sites that have a higher potential to represent a Tribal cultural resource are mapped and documented between 2 and 5 miles from the proposed Project. As such, development in these areas could have a significant impact to a Tribal cultural resource. Cumulatively, the large amount of development within the Tribal territory, especially development within known village locations, trade routes, and known significant prehistoric archaeological sites could have a cumulatively significant impact to Tribal cultural resources. All related projects would, like the proposed Project, be required to comply with regulatory requirements governing Tribal cultural resources, including consultation with California Native American Tribes where required under AB 52. Should an impact be identified the related projects would be required to comply with PRC section 21084.3, which would require avoidance and preservation or mitigation as defined in PRC section 21084.3(b).

77 CEQA Section 21080.3.1.

As described above, construction of the proposed Project could result in a significant impact on a previously unknown Tribal cultural resource. While there are no Tribal cultural resources identified within the proposed Project, the City has consulted with Tribal representatives and recognizes the potential sensitivity.

Some of the cumulative development projects in the vicinity of the proposed Project are near historical Native American trade routes or villages or waterways and could result in potentially significant due to substantial adverse changes in the significance of TCRs. Prior to mitigation, the proposed Project would result in similar potentially significant impacts. Cumulatively, this large amount of development within the Tribal territory could have a cumulatively significant impact to TCRs.

Based on the above considerations, the proposed Project, in conjunction with cumulative development within the vicinity and in the City, could result in cumulatively significant impacts to Tribal cultural resources. The proposed Project's incremental contribution to this cumulatively significant impact would be less than cumulatively considerable, however, because the proposed Project would include mitigation to prevent or substantially minimize the destruction or loss of TCRs, consistent with the mitigation measures recommended by the Tribe through the Project's AB 52 consultation.

With regulatory adherence and incorporation of required mitigation the proposed Project would not result in a cumulatively considerable impact on TCRs.

Unknown Human Remains

In regard to impacts to previously unknown human remains, including those buried outside a formal cemetery, there are no known burial grounds or unmarked cemeteries within the footprint of the proposed Project or a 0.5-mile radius based on the SLF search and sensitivity analysis for cultural resources. The proposed Project and other cumulative projects would be required to comply with Health and Safety Code Section 7050.5, subdivision (c), and PRC Section 5097.98 (as amended by AB 2641) related to the proper disposition of human remains.

The related projects would, like the proposed Project, be required to comply with regulatory requirements governing TCRs, including consultation with California Native American Tribes where required under AB 52. Should an impact be identified, the related projects would be required to comply with PRC Section 21084.3 which would require avoidance and preservation or mitigation as defined in PRC Section 21084.3(b). As such, with regulatory adherence and incorporation of required mitigation, other area projects in combination with the proposed Project would have a less-than-significant cumulative impact on human remains associated with TCRs.

4.13.9 CONSISTENCY WITH CITY OF INGLEWOOD GENERAL PLAN

The City's General Plan does not identify any goals or policies related specifically to TCRs. Accordingly, the proposed Project would not conflict with any goals, objectives, strategies, or policies of the City's General Plan related to this topic area.

4.14 UTILITIES AND SERVICE SYSTEMS

4.14.1 INTRODUCTION

This section of the Draft Environmental Impact Report (Draft EIR) addresses the available capacities of existing utility-related infrastructure, including water and wastewater services, storm water drainage, dry utilities (electrical, natural gas, and telecommunications), and solid waste management, as well as the potential for conflicts between the proposed Inglewood Transit Connector Project (proposed Project) and utility-related infrastructure that would result in environmental impacts. The existing conditions relevant to utilities in the proposed Project area are described, along with the methodology and the regulatory framework that guided the evaluation of utility-related infrastructure. Impacts to utilities and service systems that would result from the proposed Project are identified. Information from the following is incorporated into this section:

- *Conceptual Design Utility Impacts*, Pacifica Services, Incorporated, December 2019.

A complete copy of this study is included in the Appendices to this Draft EIR as **Appendix 4.14.1**. Please see **Section 8.0** for a glossary of terms, definitions, and acronyms using in this Draft EIR.

Prior to the preparation of this Draft EIR, an Initial Study (included in **Appendix 2.0.2** of this Draft EIR) was prepared using the California Environmental Quality Act (CEQA) Environmental Checklist Form to assess potential environmental impacts on utilities and service systems. For five of these screening thresholds, the Initial Study found that the proposed Project would have a "Less than Significant Impact;" thus, no further analyses of these topics were required in an EIR. The following Initial Study screening criteria do not require any additional analysis in this Draft EIR:

- Potential impacts related to a substantial adverse effect on the proposed Project's ability to comply with wastewater treatment requirements of the Los Angeles Regional Water Quality Control Board (LARWQCB) were evaluated and determined to have a "Less Than Significant Impact" in the Initial Study. Though the proposed Project would generate more wastewater than is currently generated within the proposed Project, pollutant loads would be typical of urban wastewater already processed by the Los Angeles Bureau of Sanitation's Joint Water Pollution Control Plant (JWPCP) and no significant impacts to wastewater treatment requirements of the LAWQCB would occur.
- Potential impacts related to a substantial adverse effect on the permitted capacity of water or wastewater treatment facilities were evaluated and determined to have a "Less Than Significant Impact" in the Initial Study. As discussed therein, although water and wastewater lines may need to be relocated, no aspect of the construction or operation of the proposed Project would require new or expanded water or wastewater treatment facilities.
- Potential impacts related to a substantial adverse effect on the availability of water supplies was evaluated and determined to have a "Less Than Significant Impact" in the Initial Study. As discussed

therein, it was determined in the City of Inglewood's (City) Urban Water Management Plan that sufficient water supplies existed so that a nonwater-intensive project, such as the one proposed, would not result in a strain on existing water supplies. Because water supplies in the area are more than sufficient, impacts would be less than significant.

- Potential impacts related to a substantial adverse effect on the capacity of wastewater treatment provider which serves or may serve the proposed Project to accommodate the projected demand in addition to the provider's existing commitments were evaluated and determined to have a "Less Than Significant Impact" in the Initial Study. The proposed Project includes an elevated guideway, stations and support facilities (MSF and TPSSs) that would not involve water-intensive activities. Therefore, impacts regarding wastewater treatment would be less than significant.
- Water supplies was evaluated and determined to have a "Less Than Significant Impact" in the Initial Study. As discussed therein, it was determined in the City Urban Water Management Plan that sufficient water supplies existed so that a nonwater-intensive project, such as the one proposed, would not result in a strain on existing water supplies. Because water supplies in the area are more than sufficient, impacts would be less than significant.
- Potential impacts related to a substantial adverse effect on the permitted capacity of Los Angeles County (County) landfills that would accommodate the proposed Project's solid waste disposal needs were evaluated and determined to have a "Less than Significant Impact" in the Initial Study. As discussed therein, the total remaining permitted inert waste capacity in the County is sufficient to accommodate the proposed Project's solid waste disposal needs from construction and demolition activities. Further, the proposed Project would comply with federal, State of California (State), and local statutes and regulations related to solid waste and no significant impacts to landfill capacity would occur.
- Potential impacts related to a substantial adverse effect on the proposed Project's ability to comply with federal, State, and local statutes and regulations related to solid waste were evaluated and determined to have a "Less Than Significant Impact" in the Initial Study. The proposed Project would comply with federal, State, and local statutes and regulations related to solid waste and no significant impact related to compliance with solid waste statutes and regulations would occur.

Impacts found to be less than significant are further discussed in **Section 6.0: Other Environmental Considerations** of this Draft EIR.

Please see **Section 8.0** for a glossary of terms, definitions, and acronyms used in this Draft EIR.

4.14.2 METHODOLOGY

The analysis contained in this section represents identification of existing utilities based on information and record drawings acquired from utility providers and the City. Obtained data included existing and planned major utilities within the area of the proposed Project. Data and utility maps were prepared for major identified utilities using existing information. A distance of 10 feet was used to identify utilities that

may be impacted from construction activities that involve excavation. All utility locations are appropriate based on best available map data. Available data did not provide for exact utility locations in terms of plan and profile; rather, exact utility locations would be determined prior to construction by potholing, utilizing ground penetrating radar, and/or other methods.

The location of proposed Project component has been compared to the location of existing utility infrastructure to identify potential points of conflict. This analysis also considers the ability of the proposed Project to avoid or reduce demand placed on utilities and service systems through conservation programs and efficiency features.

4.14.3 REGULATORY FRAMEWORK

4.14.3.1 Federal Regulations and Directives

Clean Water Act

The Clean Water Act[1] established the basic structure for regulating discharges of pollutants into "waters of the U.S." The act specifies a variety of regulatory and nonregulatory tools to manage stormwater runoff. Clean Water Act Section 402 is relevant to drainage within the footprint of the proposed Project. Section 402 regulates point- and nonpoint-source discharges to surface waters through the National Pollutant Discharge Elimination System (NPDES) program. In California, the State Water Resources Control Board (SWRCB) oversees the NPDES program, which is administered by the RWQCBs. The NPDES program provides for both general permits (those that cover a number of similar or related activities) and individual permits.

Safe Drinking Water Act

The United States Environmental Protection Agency (USEPA) administers the Safe Drinking Water Act[2] (SDWA), which is the primary federal law that regulates the quality of drinking water and establishes standards to protect public health and safety. The Department of Health Services (DHS) implements the requirements of the SDWA and oversees public water system quality Statewide. DHS establishes legal drinking water standards for contaminates that could threaten public health.

National Pollutant Discharge Elimination System

NPDES[3] is a program created to implement the Clean Water Act. In November 1990, USEPA published final regulations that establish requirements for specific categories of industries, including construction projects that encompass greater than or equal to 5 acres of land. The Phase II Rule became final in

1 USEPA, *Summary of the Clean Water Act,* accessed June 2020, https://www.epa.gov/laws-regulations/summary-clean-water-act.
2 USEPA, Safe Drinking Water Act (SDWA), accessed June 2020, https://www.epa.gov/sdwa.
3 USEPA, National Pollutant Discharge Elimination System (NPDES), accessed June 2020, https://www.epa.gov/npdes.

December 1999, expanding regulated construction sites to those greater than or equal to 1 acre. The regulations require that stormwater and nonstormwater runoff associated with construction activity, which discharges either directly to surface waters or indirectly through municipal separate storm sewer systems (MS4), must be regulated by an NPDES permit.

The EPA has delegated management of California's NPDES program to the State Water Resources Control Board (SWRCB) and the nine regional water quality board (RWQCB) offices, which grant permits to regulate point source discharges of industrial and municipal wastewater into the waters of the United States. The NPDES program was established in 1972 to regulate the quality of effluent discharged from easily detected point sources of pollution such as wastewater treatment plants and industrial discharges. The 1987 amendments to the Clean Water Act recognized the need to address nonpoint-source stormwater runoff pollution and expanded the NPDES program to operators of municipal separate storm sewer systems (MS4s), construction projects, and industrial facilities.[4]

The State of California adopted a NPDES Permit for General Construction Activity (Construction General Permit) on September 2, 2009 (Order No. 2009-0009-DWQ, as amended by 2010-0014-DWQ and 2012-0006-DWQ).[5] The last Construction General Permit amendment became effective on February 16, 2012. The Construction General Permit regulates construction site storm water management. Dischargers whose projects disturb one or more acres of soil, or whose projects disturb less than one acre but are part of a larger common plan of development that in total disturbs one or more acres, are required to obtain coverage under the general permit for discharges of storm water associated with construction activity.

The proposed Project is under the jurisdiction of the Los Angeles Regional Water Quality Control Board (LARWQCB), also known as Region 4. The SWRCB administers the NPDES permit program regulating stormwater from construction activities for projects greater than 1 acre in size. This is known as the General Permit for Storm Water Discharges Associated with Construction Activities, Order No. 2009-0009-DWQ, as amended by Order No. 2012-0006-DWQ, NPDES No. CAS000002.[6]

The main compliance requirement of NPDES permits is the development and implementation of a Storm Water Pollution Prevention Plan (SWPPP). The purpose of a SWPPP is to identify potential pollutants and identify and implement appropriate stormwater pollution prevention measures to reduce or eliminate discharge of pollutants to surface water from stormwater and nonstormwater discharges. Stormwater best

4 Clean Water Act, *33 Code of Federal Regulations,* sec. 402(p) (2008).
5 State Water Resources Control Board (SWRCB), *Storm Water,* accessed June 2020, https://www.waterboards.ca.gov/water_issues/programs/stormwater/constpermits.shtml.
6 SWRCB, *Storm Water*, accessed June 2020, https://www.waterboards.ca.gov/water_issues/programs/stormwater/constpermits.shtml.

management practices (BMPs) to be implemented during construction and grading, as well as post-construction BMPs, will be outlined in the SWPPP prepared for the proposed Project.

Resource Conservation and Recovery Act

The Resource Conservation and Recovery Act[7] (RCRA) is the nation's primary law governing the disposal of solid and hazardous waste. The RCRA set national goals for reducing the amount of waste generated and for ensuring that wastes are managed in an environmentally sound manner. The Solid Waste Program encourages states to develop comprehensive plans to manage nonhazardous industrial solid waste and municipal solid waste, sets criteria for municipal solid waste landfills, and prohibits the open dumping of solid waste. RCRA regulations encourage source reduction and recycling and promote the safe disposal of municipal waste.

4.14.3.2 State Regulations and Directives

State Drinking Water Act

The 2014 transfer of the California Department of Public Health Drinking Water Program[8] (DWP) to the SWRCB brought with it not only the primary enforcement authority to enforce federal and State SDWAs, and the regulatory oversight of approximately 8,000 public water systems throughout California, but also the responsibility for completing the next Safe Drinking Water Plan.

With the transfer of DWP to the SWRCB, while the role and responsibility remained unchanged, the name was changed to the Division of Drinking Water (DDW). DDW has been granted primary enforcement responsibility for the federal SDWA. California enacted its own SDWA. The DDW is responsible for implementing the federal SDWA and its updates, as well as California statutes and regulations related to drinking water. As part of their efforts, the DDW inspects and provides regulatory oversight for public water systems within California. The RWQCB also has the responsibility for protecting the beneficial uses of the State's waters, including groundwater, and these include municipal drinking water supply, as well as various other uses.

California Administrative Code Title 22,[9] establishes DDW authority and stipulates drinking water quality and monitoring standards. These standards are equal to, or more stringent than, the federal standards. Public water system operators are required to monitor their drinking water sources regularly for microbiological, chemical, and radiological contaminants to show that drinking water supplies meet the

7 USEPA, Resource Conservation and Recovery Act (RCRA) Laws and Regulations, accessed June 2020, https://www.epa.gov/rcra.

8 SWRCB, "Drinking Water Programs," accessed June 2020, https://www.waterboards.ca.gov/drinking_water/programs/.

9 California Department of Substances Control, Official California Code of Regulations (CCR), *Title 22, Division 4.5*, accessed June 2020, https://dtsc.ca.gov/title22/.

regulatory requirements listed in California Code of Regulations (CCR) Title 22 as primary maximum contaminant levels.

Recycled Water Policy (Policy for Water Quality Control for Recycled Water)

The Recycled Water Policy[10] was first adopted in 2009, and then subsequently amended in 2013 and 2018. The purpose of the Recycled Water Policy is to increase the use of recycled water from municipal wastewater sources that meets the definition in California Water Code (CWC) section 13050(n),[11] in a manner that implements federal and State water quality laws. More specifically, recycled water is the reuse of treated wastewater derived from municipal sources (i.e., water that is covered under CCR Title 22, Water Recycling Criteria).[12] The Recycled Water Policy provides goals for recycled water use in California, guidance for use of recycled water that considers protection of water quality, criteria for streamlined permitting of recycled water projects, and requirements for monitoring recycled water for constituents of emerging concern (CECs).

Title 22

The CWC requires the DDW to establish water reclamation criteria. In 1975, the DDW prepared Title 22[13] regulations to satisfy this requirement. Title 22 regulates production and use of reclaimed water in California by establishing three categories of reclaimed water: primary effluent, secondary effluent and tertiary effluent. Primary effluent typically includes grit removal and initial sedimentation or settling tanks. Secondary effluent is adequately disinfected, oxidized effluent, which typically involves aeration and additional settling basins. Tertiary effluent is adequately disinfected, oxidized, coagulated, clarified, filtered effluent which typically involves filtration and chlorination. In addition to defining reclaimed water uses, Title 22 also defines requirements for sampling and analysis of effluent and specifies design requirements for treatment facilities.

California Green Buildings Standards Code

Adopted in 2010, and updated annually, the California Green Building Standards Code (CALGreen) is found in Part 11, Title 24 of the CCR.[14] The purpose of CALGreen is to cause a reduction in GHG emissions; promote environmentally responsible, cost effective, healthier places to live and work; and reduce energy

10 SWRCB, Recycled Water Policy, accessed June 2020, https://www.waterboards.ca.gov/water_issues/programs/water_recycling_policy/.

11 California Legislative Information, Water Code, accessed June 2020, https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=WAT&sectionNum=13050#:~:text=(d)%20%E2%80%9CWaste%E2%80%9D%20includes,nature%20prior%20to%2C%20and%20for.

12 SWRCB, California Drinking Water-Related Laws, accessed June 2020, https://www.waterboards.ca.gov/drinking_water/certlic/drinkingwater/Lawbook.html.

13 California Department of Substances Control, Official California Code of Regulations (CCR), *Title 22, Division 4.5, a*ccessed June 2020, https://dtsc.ca.gov/title22/.

14 California Department of General Services, CalGreen, accessed June 2020, https://www.dgs.ca.gov/BSC/Resources/Page-Content/Building-Standards-Commission-Resources-List-Folder/CALGreen.

and water consumption. CALGreen identifies mandatory building measures and voluntary measures that may be incorporated into the design of buildings. Relative to water usage, CALGreen contains specific requirements for plumbing fixtures and general requirements for indoor and outdoor water usage. Effective January 1, 2017, CALGreen requires developers of newly constructed buildings to develop a waste management plan to divert 65 percent of the construction waste generated by construction. Builders or developers are required to submit a construction waste management plan to the appropriate jurisdiction's enforcement agency.

Urban Water Management Planning Act

The State of California's Urban Water Management Planning Act[15] of 1983 requires all public water suppliers that provide municipal and industrial water to more than 3,000 customers, or supply more than 3,000 acre-feet per year (AFY) of water, to prepare and adopt a UWMP. The UWMP must be prepared every 5 years and submitted to the Department of Water Resources (DWR) for review. An UWMP is intended to forecast future water demand and supply under normal and dry conditions. The Urban Water Management Planning Act has been modified several times in response to water shortages, droughts, and other factors. The Water Conservation Act of 2009 amended the Urban Water Management Act to call for a Statewide reduction of 20 percent in urban water use by the year 2020. An amendment in 2014 requires water suppliers to provide narrative descriptions of their water demand management measures and account for system water losses.

Senate Bill 7 of the Seventh Extraordinary Session of 2009

SB 1 (or SB X7 1)[16] from the Extraordinary Legislative Session of the fall of 2009 established a statutory framework intended to achieve the co-equal goals of providing a more reliable water supply to California and restoring and enhancing the Sacramento-San Joaquin River Delta ecosystem. The co-equal goals will be achieved in a manner that protects the unique cultural, recreational, natural resource, and agricultural values of the Delta.

The Water Conservation Act of 2009 (SB X7-7), amended and repealed CWC section 10631.5 to add Part 2.55 (commencing with section 10608)[17] to CWC Division 6, and repealed and added Part 2.8 (commencing with section 10800) of CWC Division 6, relating to water. Specific text from CWC Part 2.55 for urban water suppliers as it relates to water conservation and water use efficiencies is listed below.

15 California Legislature, Urban Water Management Planning Act (Division 6 Part 2.6 of the Water Code §§10610 – 10656).

16 California Legislative Information, SB-1 Public resources, accessed June 2020, https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=200920107SB1.

17 SWRCB, SB X7-7, accessed June 2020, https://water.ca.gov/Programs/Water-Use-And-Efficiency/SB-X7-7.

Specifically, SB X7-7 from this Extraordinary Session requires each urban retail water supplier to develop urban water use targets to help meet the 20 percent reduction goal by 2020 (20x2020), and an interim water reduction target by 2015.

Model Water Efficient Landscape Ordinance, CCR Title 23, Waters Division 2, Department of Water Resources Chapter 2.7

In 2015, Executive Order B-29-15[18] charged DWR with revising the 2010 MWELO to increase water efficiency standards for new and retrofitted landscapes through encouraging the use of more efficient irrigation systems, graywater usage, and stormwater capture, and by limiting the portion of landscapes that can be covered in turf. The Executive Order B-29-15 also required that agencies report on their implementation and enforcement of local ordinances.

Making Conservation a Way of Life, Implementing Executive Order B-37-16

After the most recent drought, in 2018 the California State Legislature enacted to policy bills: SB 606 and Assembly Bill (AB) 1168[19] to establish a new foundation for long-term improvements in water conservation goals and drought planning to adapt to the longer and more intense droughts climate change is causing in California.

Collectively, these efforts provide a road map for all Californians to work together to ensure that we will have enough water now and in the future. The 2018 legislation applies to the actions of DWR, the SWRCB, and water suppliers.

Urban water suppliers must stay within annual water budgets based on these standards for their service areas. The 2018 legislation also supports drought planning. In urban areas, drought plans will be primarily led by local water suppliers. DWR and the SWRCB will develop recommendations to strengthen drought planning in rural areas and areas served by small water systems by coordinating with counties and other stakeholders.

Governor Brown's Executive Order B-29-15

On April 1, 2015, Governor Brown issued Executive Order B-29-15,[20] which calls for actions to save water, increase enforcement to prevent waste of water resources, streamline the State's drought response and invest in technologies that will make California more drought resilient. Most notably, for the first time in

18 SWRCB, Governor's Conservation Executive Orders and Proclamations, accessed June 2020, https://www.waterboards.ca.gov/water_issues/programs/conservation_portal/executive_orders.html.

19 SWRCB, California Statutes Making Conservation a California Way of Life, accessed June 2020, https://www.waterboards.ca.gov/water_issues/programs/conservation_portal/california_statutes.html.

20 SWRCB, Governor's Conservation Executive Orders and Proclamations, accessed June 2020, https://www.waterboards.ca.gov/water_issues/programs/conservation_portal/executive_orders.html.

State history, Governor Brown directed the SWRCB to implement mandatory water reductions of various amounts in cities and towns across California to reduce overall State water usage by 25 percent through February 2016, as compared to the amount used in 2013. On July 15, 2015, the SWRCB released the water-use-reduction targets that were imposed on each individual urban water supplier. The City's reduction goal was set at 12 percent and was reduced to 11 percent in February 2016 after the City received a climate consideration. City water use has decreased a cumulative 15.7 percent for the first twelve recording months (June 2015 through May 2016) relative to year 2013 water usage in response to the City's conservation goal set by the State, which has been extended as long as the drought continues.

Sustainable Groundwater Management Act

The Sustainable Groundwater Management Act[21] (SGMA) is a legislative package to establish a framework for sustainable groundwater management that can be planned for, implemented, and maintained without undesirable results in the future.

SGMA requires governments and water agencies of high and medium priority basins to halt overdraft and bring groundwater basins into balanced levels of pumping and recharge. Under SGMA, these basins should reach sustainability within 20 years of implementing their sustainability plans. For critically over-drafted basins, that will be 2040. For the remaining high and medium priority basins, 2042 is the deadline. In his signing statement, the governor emphasized that "groundwater management in California is best accomplished locally." Through the Sustainable Groundwater Management Program, DWR provides ongoing support to local agencies through guidance and financial and technical assistance.

SGMA empowers local agencies to form Groundwater Sustainability Agencies (GSAs) to manage basins sustainably and requires those GSAs to adopt Groundwater Sustainability Plans (GSPs) for crucial groundwater basins in California.

Sewer System Management Plan

The federal Clean Water Act requires the City to adopt a wastewater facilities plan in accordance with USEPA Rules and Regulations, 40 CFR, Section 35.917. In addition, the Statewide General Waste Discharge Requirements[22] (WDRs) for publicly owned sanitary sewer systems requires the City to develop and implement a Sewer System Management Plan (SSMP). In 2015, the City adopted the Sewer System Management Plan in order to comply with State and federal requirements, setting forth goals and actions

21 California Department of Water Resources, "SGMA Groundwater Management," accessed June 2020, https://water.ca.gov/Programs/Groundwater-Management/SGMA-Groundwater-Management.

22 SWRCB, Waste Discharge Requirements Program, accessed June 2020, https://www.waterboards.ca.gov/water_issues/programs/waste_discharge_requirements/.

to be followed and guidelines for various activities involved in managing, operating, maintaining, repairing, replacing and expanding the sewer system.[23]

California Water Resources Control Board Low Impact Development Policy

The SWRCB adopted the Low Impact Development (LID) Policy[24] which, at its core, promotes the idea of "sustainability" as a key parameter to be prioritized during the design and planning process for future development. The SWRCB has directed its staff to consider sustainability in all future policies, guidelines, and regulatory actions. LID is a proven approach to manage stormwater. The RWQCBs are advancing LID in California in various ways, including provisions for LID requirements in renewed Phase I municipal stormwater NPDES permits.

California Integrated Waste Management Act of 1989 (AB 939)

In response to reduced landfill capacities, the State of California passed AB 939, the California Integrated Waste Management Act,[25] in 1989. This legislation requires cities and counties to reduce the amount of solid waste entering existing landfills through recycling, reuse, and waste prevention efforts. AB 939 also established the California Integrated Waste Management Board (CIWMB), the State agency designated to oversee, manage, and track California's solid waste generation each year. AB 939 requires jurisdictions to maintain 50 percent waste diversion. The purpose of AB 939 is to "reduce, recycle, and reuse solid waste generated in the State to the maximum extent feasible." AB 939 requires jurisdictions to utilize "integrated waste management," which includes a variety of waste management practices to handle the municipal solid waste stream safely and effectively, with the least adverse impact on human health and the environment.

CalRecycle is the State of California department concerned with the State's recycling and waste reduction efforts, including the implementation of AB 939. Officially known as the Department of Resource Recycling and Recovery, CalRecycle is a part of the California Natural Resources Agency and administers programs formerly managed by the California Integrated Waste Management Board and Division of Recycling.

23 City of Inglewood, *Sewer System Management Plan,* August 31, 2015,accessed June 2020, https://www.cityofinglewood.org/DocumentCenter/View/986/Sewer-System-Management-Plan-PDF.

24 SWRCB, Low Impact Development – Sustainable Storm Water Management, accessed June 2020, https://www.waterboards.ca.gov/water_issues/programs/low_impact_development/.

25 CalRecycle, Enforcement, accessed June 2020, https://www.calrecycle.ca.gov/lgcentral/enforcement.

California Solid Waste Reuse and Recycling Access Act of 1991 (AB 1327)

The California Solid Waste Reuse and Recycling Access Act of 1991,[26] as amended, requires each local jurisdiction to adopt an ordinance requiring commercial, industrial, or institutional buildings; marinas; or residential buildings having five or more living units to provide an adequate storage area for the collection and removal of recyclable materials. The sizes of these storage areas are to be determined by the appropriate jurisdictions' ordinance. If no such ordinance exists with the jurisdiction, the CalRecycle model ordinance shall take effect. The City of Los Angeles passed such an ordinance in 1997.

Assembly Bill 341

AB 341,[27] which took effect on July 1, 2012, was designed to help meet California's recycling goal of 75 percent by the year 2020. AB 341 makes "a legislative declaration that it is the policy goal of the State that not less than 75 percent of solid waste generated be source reduced, recycled, or composted by the year 2020." AB 341 requires a business, defined to include a commercial or public entity that generates more than 4 cubic yards of commercial solid waste per week or a multifamily residential dwelling of 5 units or more to arrange for recycling services. Such business/residential development must: 1) source separate recyclable materials from the solid waste they are discarding, and either self-haul or arrange for separate collection of the recyclables; and 2) subscribe to a service that includes mixed waste processing that yields diversion results comparable to source separation.

Construction and Demolition Waste Materials Diversion Requirements (SB 1374)

Construction and Demolition Waste Materials Diversion Requirements[28] passed in 2002 added Section 42912 to the California Public Resources Code. SB 1374 requires that jurisdictions include in their annual AB 939 report a summary of the progress made in diverting construction and demolition waste. The legislation also requires that CalRecycle adopt a model ordinance for diverting 50 to 75 percent of all construction and demolition waste from landfills.

Zero Waste California

Zero Waste California is a State program launched by CalRecycle in 2002 to promote a new vision for the management of solid waste. Zero Waste provides that wasting resources is inefficient and that the efficient use of natural resources should be achieved. The concept requires maximizing existing recycling and reuse efforts, while ensuring that products are designed for the environment and have the potential to be

26 California Legislative Information, California Solid Waste Reuse and Recycling Access Act of 1991 [42900 - 42912] , accessed June 2020, https://leginfo.legislature.ca.gov/faces/codes_displayText.xhtml?lawCode=PRC&division=30.&title=&part=3.&chapter=18.&article=1.

27 CalRecycle, Mandatory Commercial Recycling, accessed June 2020, https://www.calrecycle.ca.gov/recycle/commercial.

28 CalRecycle, *Construction and Demolition (C&D) Diversion Informational Guide,* accessed June 2020, https://www.calrecycle.ca.gov/lgcentral/library/canddmodel.

repaired, reused, or recycled. The Zero Waste California program promotes the goals of market development, recycled product procurement, and research and development of new and sustainable technologies.

4.14.3.3 Regional Regulations and Directives

Metropolitan Water District of Southern California Planning Efforts

The Metropolitan Water District of Southern California (Metropolitan) is a regional wholesaler that delivers water to 26-member public agencies—14 cities, 11 municipal water districts, one county water authority—which, in turn provide water to 19 million people in Los Angeles, Orange, Riverside, San Bernardino, San Diego, and Ventura counties.[29] Metropolitan is governed by a 38-member board of directors who represent their respective member agencies ensuring each member agency is part of the governance of Metropolitan. In fiscal year (FY) 2016–2017, Metropolitan supplied approximately 78 percent of the West Basin Municipal Water District's (WBMWD) water supply through imported water,[30] which, in turn supplies the City with potable water (approximately 80 percent of its supply as recently as 2015).[31] Metropolitan has undertaken a number of planning and reporting efforts focused on regional water supply reliability, including as follows:

Integrated Water Resources Plan

The Integrated Water Resources Plan (IRP) is a blueprint for long-term water supply reliability in Southern California. It was first developed in 1996 to address the complexity of developing, maintaining, and delivering water to meet changing demands in the face of growing challenges. It established targets for a diversified portfolio of supply investments. Water Tomorrow works to balance the use of local resources and conservation with imported supplies to meet future needs.[32] The IRP has been updated several times since its inception.

The most recent update occurred in 2015 and focused on ascertaining how conditions have changed in the region since 2010 when the last IRP was adopted. The 2015 Update involved developing new reliability targets to meet the evolving outlook of the region's reliability needs, assessing strategies for managing short and long-term uncertainty and communicating technical findings. The 2015 IRP Update also identified areas where policy development and implementation approaches are needed.[33]

29 Metropolitan Water District of Southern California, "Overview," accessed June 2020, http://www.mwdh2o.com/WhoWeAre/Mission/Pages/default.aspx.
30 West Basin Municipal Water District (WBMWD), *2015 Urban Water Management Plan*, June 2016.
31 City of Inglewood, 2015 Urban Water Management Plan, August 2016.
32 Metropolitan, "Planning Documents," accessed June 2020, http://www.mwdh2o.com/AboutYourWater/Planning/Planning-Documents/Pages/default.aspx.
33 Metropolitan, "Planning Documents," accessed June 2020, http://www.mwdh2o.com/AboutYourWater/Planning/Planning-Documents/Pages/default.aspx.

Urban Water Management Plan

Metropolitan's 2015 UWMP[34] describes and evaluates sources of water supply, efficient uses of water, demand management measures, implementation strategies and schedules, and other relevant information and programs. The plan is updated every 5 years.

Information from Metropolitan's UWMP is used by local water suppliers in the preparation of their own plans. The information included in Metropolitan's UWMP represents the district's most current planning projections of demand and supply capability developed through a collaborative process with the member agencies.

Water Surplus and Drought Management Plan

Metropolitan's Water Surplus and Drought Management Plan[35] was developed to outline policies that guide water surplus and shortage management and establish a basis for dealing with shortages in an equitable and efficient manner. It provides policy guidance for managing regional water supplies during surplus and shortage conditions. It identifies a sequence of management actions to minimize the probability of severe shortages and reduce the possibility of extreme shortages and water allocations. Each year Metropolitan evaluates available water supplies and existing water storage levels to determine the appropriate management actions identified in the WSDM Plan.

Long-Term Conservation Plan

Metropolitan's Long-term Conservation Plan[36] provides a framework for achieving the water use efficiency goals in the 2010 Integrated Resources Plan. Through market transformation, the plan seeks to reduce per capita water use 20 percent by 2020 using several key strategies:

- Providing incentives to guide consumer choice;
- Encouraging action through outreach and education;
- Developing regional technical capabilities;
- Building strategic alliances; and
- Advancing water efficiency standards.

34 Metropolitan, "Planning Documents," accessed June 2020, http://www.mwdh2o.com/AboutYourWater/Planning/Planning-Documents/Pages/default.aspx.
35 Metropolitan, "Planning Documents," accessed June 2020, http://www.mwdh2o.com/AboutYourWater/Planning/Planning-Documents/Pages/default.aspx.
36 Metropolitan, "Planning Documents," accessed June 2020, http://www.mwdh2o.com/AboutYourWater/Planning/Planning-Documents/Pages/default.aspx.

West Basin Municipal Water District Planning Efforts

The West Basin Municipal Water District (WBMWD) is a wholesale water agency that provides imported drinking water to 17 cities and unincorporated areas of Los Angeles County throughout its 185 square mile service area.[37] WBMWD currently manages a water supply portfolio that includes imported water from the Colorado River and Northern California, locally-produced recycled water, desalted groundwater and conserved water. WBMWD develops viable plans and initiatives to ensure reliability of the region's water supplies and work to reduce the region's dependence on imported water by expanding the local water supply portfolio in an economically feasible manner. As mentioned previously, WBMWD supplies the City with 80 percent of its potable water supply. WBMWD has undertaken a number of planning and reporting efforts focused on regional water supply reliability, including as follows:

Water Use Report

The WBMWD Water Use Report,[38] last completed for FY 2016–2017, outlines the WBMWD service area; accomplishments and strategies regarding finance, water recycling operations; the capital improvement program; public information; water policy and resource development; conservation; the water quality monitoring program; water use tabulations; facilities overview; and water rates.

Drought Rationing Plan

Based closely on Metropolitan's methodology, WBMWD's Drought Rationing Plan model,[39] adopted by the Board of Directors in April 2009 and amended in March 2015, determines each customer agency's share of WBMWD's allocation from MWD. Fairness in allocation and minimizing regional hardship to retail water consumers remained central themes in the development of a specific formula for allocating shortages across Southern California. The formula uses different adjustments and credits to balance impacts of shortage at the retail level, where local supplies can vary dramatically, and provide equity on the wholesale level among member agencies. It also attempts to take into account; growth in demand, local investments, changes in local supply conditions, the reduction in potable water demand from recycled water, and the implementation of water conservation programs.

Urban Water Management Plan

In compliance with the Urban Water Management Planning Act, WBMWD's 2015 Urban Water Management Plan[40] provides a detailed summary of present and future water resources and demands within WBMWD's service area and assesses West Basin's water resource needs. Specifically, the UWMP provides water supply planning for a 25-year planning period in five-year increments and identifies water

37 WBMWD, "About Us," accessed June 2020, http://www.westbasin.org/about-us.
38 WBMWD, Water Use Report: Fiscal Year 2016–2017, November 9, 2017.
39 WBMWD, "Reports & Plans," accessed June 2020, http://www.westbasin.org/policy-planning/reports-plans.
40 WBMWD*, 2015 Urban Water Management Plan,* June 2016.

supplies needed to meet existing and future demands. The demand analysis must identify supply reliability under three hydrologic conditions: an average year, a single dry year, and multiple dry years. West Basin's 2015 UWMP updates the 2010 UWMP in compliance with the requirements of the UWMPA as amended in 2009.

Enhanced Watershed Management Programs (EWMP)

The Los Angeles County MS4 Permit[41] allows Permittees the flexibility to develop Watershed Management Programs (WMPs) or Enhanced Watershed Management Programs (EWMPs) to implement the requirements of the Permit on a watershed scale through customized strategies, control measures, and best management practices (BMPs). Participation in a Watershed Management Program is voluntary and allows a Permittee to address the highest watershed priorities. The City is a Permittee to the following two EWMPs: the Ballona Creek Watershed EWMP and the Dominguez Channel Watershed Management Area EWMP.

Los Angeles County Standard Urban Storm Water Mitigation Plan

Development in the City is subject to the Los Angeles County Standard Urban Storm Water Mitigation Plan[42] (SUSMP), adopted March 2000, which provides drainage regulations for specific types of development projects.

The County lists example BMPs to be implemented that would aid in stormwater drainage; examples of these include using minimum pavement widths and permeable pavement, directing of rooftop runoff to pervious areas, and including vegetated swales and strips and infiltration basins throughout the development.[43]

County of Los Angeles Integrated Waste Management Plan

The County of Los Angeles Integrated Waste Management Plan[44] (CoIWMP), approved by the CIWMB in June 1999, is a set of planning documents that sets forth a regional approach for the management of solid waste through source reduction, recycling and composting, and environmentally safe transformation and disposal. The CoIWMP recognizes that landfills will remain an integral part of the County's solid waste management system in the foreseeable future and ensures that the waste management practices of cities and other jurisdictions in the County are consistent with the solid waste diversion goals of AB 939. The

41 SWRCB, *Storm Water-Municipal Permits,* accessed June 2020, https://www.waterboards.ca.gov/losangeles/water_issues/programs/stormwater/municipal/.

42 SWRCB, *Standard Urban Storm Water Mitigation Plan (SUSMP),* accessed June 2020, https://www.waterboards.ca.gov/losangeles/water_issues/programs/stormwater/susmp/susmp_details.shtml.

43 County of Los Angeles, *Standard Urban Storm Water Mitigation Plan For Los Angeles County and Cities In Los Angeles County,* March 8, 2000.

44 Los Angeles County Public Works, *County of Los Angeles Countywide Integrated Waste Management Plan,* accessed June 2020, https://pw.lacounty.gov/epd/swims/ShowDoc.aspx?id=6530&hp=yes&type=PDF.

CoIWMP includes approaches such as source reduction, recycling and composting programs, household hazardous waste management programs, and public education awareness programs. The plan concludes that landfill disposal will remain an integral part of the waste management system and calls for the establishment of 50 years of in-County permitted landfill capacity, as well as the County's support for the development of disposal facilities out of the County.

The County continually evaluates landfill needs and capacity through the preparation of the CoIWMP annual reports. Within each annual report, future landfill disposal needs over the next 15-year planning horizon are addressed, in part, by determining the available landfill capacity. Landfill capacity is determined by several factors, including: (1) the expiration of various landfill permits (e.g., land use permits, waste discharge requirements permits, solid waste facilities permits, and air quality permits); (2) restrictions to accept waste generated only within a landfill's particular jurisdiction and/or watershed boundary; and (3) operational constraints. The most recent annual report is the 2018 report, completed in December 2019.

As part of the CoIWMP, the County prepared the Countywide Siting Element, which identifies goals, policies, and strategies for the proper planning and siting of solid waste disposal and transformation facilities for the next 15 years. The Siting Element was approved by CalRecycle in June 1998. The County is currently updating the Siting Element to reflect remaining landfill disposal capacities and the County's current strategy for maintaining adequate disposal capacities. The Los Angeles County Department of Public Works is currently revising the Siting Element.[45]

4.14.3.4 Local Regulations and Directives

Inglewood General Plan

The City General Plan Conservation Element contains several policies related to water production and wastewater that can assist in the maintenance of water standards and the efficient utilization of water as a scarce resource. These policies fall under the following three categories:[46]

- Protect acquirers and water sources by preventing contamination of ground water from surface contaminants and treating ground water pumped from City wells to ensure the water meets safe drinking water standards.
- Reduce the ever-increasing demand being placed on the aquifers and on the Statewide water sources through cumulative conservation efforts, reuse of water, and using reclaimed water where potable water is not needed (namely, irrigation and landscaping).

45 Los Angeles County Public Works, "Countywide Siting Element," accessed June 2020, https://dpw.lacounty.gov/epd/cse/AboutUs/.

46 City of Inglewood General Plan, "Conservation Element" (1997).

- Maintain a water quality monitoring system to ensure continues compliance with State standards.

Further, the General Plan Conservation Element includes the following policies related to stormwater relevant to the proposed Project:

- Visit businesses to educate owners about stormwater regulations and the penalties for illegally dumping into storm drains.
- Require periodic sweeping to remove oil, grease, and debris from parking lots of 25 spaces or more.
- Increase the frequency of sampling storm drain pollution by County agencies to assess which measures are more successful.
- Continue to stencil warnings over individual storm drain openings that advise against discarding litter into the drains.

Additionally, the General Plan Conservation Element discusses ways to achieve solid waste conservation. This includes conserving remaining landfill capacity and reducing the generation of waste materials through measures such as charging for refuse pickup by weight for commercial and industrial businesses and residences, instituting commercial and residential curbside recycling pickup services, linking waste generators with commercial recyclers, and educating the public about the benefits of composting.[47]

Inglewood Municipal Code

City of Inglewood Municipal Code (IMC) Stormwater Management and Discharge Control, Section 10-208, Low Impact Development Requirements for New Development and Redevelopment[48] provides for the use of low impact development (LID) requirements and additional revisions pursuant to the NPDES permit requirements for the municipal separate sewer system. Among the provisions of the LID ordinance are requirements for existing properties, industrial/commercial and construction activities to prevent runoff and the maintenance of a *Low-Impact Development (LID) Standards Manual* (LID Manual)[49] for development and redevelopment activities within the City. Appropriate erosion-control BMPs may include but are not limited to silt fencing, fiber rolls, sandbag barriers, gravel bag berms, stabilized construction site entrances/exits, and any other practices laid out in the City's LID Manual.

In regard to wastewater, IMC Section 10-89,[50] Determination of Capacity, states that the size and grade of each public sewer must be such as to provide at all times sufficient capacity for peak flow rates of discharge. The Public Works Director shall determine what capacity is necessary in each public sewer to

47 *City of Inglewood General Plan,* "Conservation Element" (1997).
48 City of Inglewood, *IMC,* Ordinance No. 15-14 revised Article 16 of "Chapter 10, Stormwater Management and Discharge Control," Section 10-208, Low Impact Development Requirements for New Development and Redevelopment.
49 Inglewood, California, *Municipal Code,* "Chapter 10, Article 16, Stormwater Management and Discharge Control," Section 10-208, Low Impact Development Requirements for New Development and Redevelopment.
50 Inglewood, California, *Municipal Code,* "Chapter 10, Article 7, Sewer Connect, Section 10-89. Determination of Capacity."

provide for the proper collection of sewage in the City. In the event a lot in the City is to undergo development or redevelopment, and the anticipated sewage from the proposed use is found by the Public Works Director to exceed the capacity available in the public sewer, the building permit for such development or redevelopment shall not be issued until such time as capacity in the public sewer is available or can be made available before the building is occupied.

IMC Section 10-89,[51] Determination of Capacity, establishes a basis for computing average daily flow to the sanitary sewer. All other land uses not included are classified by the occupancy it most nearly resembles as determined by the Public Works Director or computed by him or her in accordance with the anticipated use. The daily flow to the sanitary sewer for a building containing mixed occupancies is determined by adding the peak flow characteristics of the various occupancies as set forth in the above table. The daily flow from a room or building which is used for different occupancies at different times as determined by the occupancy which gives the largest peak flow.

City Ordinance No. 18-10[52] established a Construction and Demolition Recycling Program (CDRP) which requires applicants to divert a minimum of 65 percent, or the State-mandated diversion percentage, whichever is greater, of the Construction and Demolition Debris from all covered projects as defined in IMC Section 7-63, 100 percent of land clearing debris from nonresidential newly constructed buildings, and all universal waste from nonresidential and alteration projects, in compliance with State and local statutory goals and policies and to create a mechanism to secure compliance with the stated diversion requirement.

City of Inglewood Urban Water Management Plan

In compliance with the Urban Water Management Planning Act[53] (Water Code Section 10610-10610.4), the City most recently adopted the 2015 Urban Water Management Plan (UWMP) which serves as a master plan for water supply and resources management consistent with the City's goals and objectives.[54] The UWMP provides a framework for long term water planning and informs the public of the suppliers' plans to ensure adequate water supplies for existing and future demands. The UWMP projects City per-capita water use to increase slightly by 2020, then decrease by 2040.

4.14.4 EXISTING CONDITIONS

The existing utility and service system infrastructure networks are described herein pertaining to water supply and demand, wastewater, stormwater, and solid waste. Current demands placed on these systems

51 Inglewood, California, *Municipal Code,* "Chapter 10, Article 7, Sewer Connect, Section 10-89. Determination of Capacity."
52 Inglewood, California, *Municipal Code*, "Chapter 7, Article 7, Construction and Demolition Recycling Program (CDRP)."
53 Urban Water Management Planning Act, Water Code Section 10610-10610.4.
54 City of Inglewood, *2015 Urban Water Management Plan,* August 2016.

and their respective carrying capacities are identified. In addition, existing conditions relative to specific utility locations in the area.

4.14.4.1 City of Inglewood

Water Supply and Demand

City of Inglewood Water Supply Overview

The City's potable water system includes 152 miles of pipe varying in diameter from 3 to 30 inches, four groundwater wells, two booster pump stations, a groundwater treatment plant, two reservoirs, two imported water connections to Metropolitan, and a total of eight emergency interties with the Los Angeles Department of Water and Power (DWP) and the Golden State Water Company (GSWC).[55]

The City of Inglewood provides water to 86 percent of the residences and businesses in the City. Water is provided in the remaining areas by Golden State Water Company and Cal America Water.[56] The water provided by the City is pumped from City-owned wells, treated, and blended with water purchased from the West Basin Municipal Water District (WBMWD) through Metropolitan Water District of Southern California (MWD) pipe connections. The City also purchases recycled water from WBMWD which is used for irrigation and landscaping purposes at City parks, cemeteries, and schools. Recently, the City Council approved the use of recycled water for street sweeping and sewer flushing purposes. The recycled water project will conserve approximately 1.5 million gallons of drinking water per year.

The City has two reservoirs: North Inglewood and Morningside. The North Inglewood Reservoir was constructed in 1974 and has a total capacity of 4.6 million gallons; the North Inglewood Reservoir is a covered, underground concrete water storage reservoir with an associated pump station containing four pumps. The Morningside Reservoir, currently out of service due to structural issues, was constructed in 1954 and has a total capacity of 16 million gallons. This facility is an above-ground, concrete water storage reservoir with an associated pump station containing ten pumps.

The Sanford M. Anderson Treatment Plant (Anderson Treatment Plant), located in northern Inglewood, processes raw groundwater pumped from the City's wells for the removal of iron and manganese[57] and monitors water for 103 federally-regulated possible contaminants.[58] The Anderson Treatment Plant has a treatment capacity of 8.64 million gallons per day (mgd) and storage capacity of 500,000 gallons. Treated groundwater leaving the Anderson Treatment Plant is pumped into one of the two storage reservoirs, when active. While in route to the reservoirs, treated water supply from the MWD enters through the two

55 City of Inglewood, *2015 Urban Water Management Plan*, August 2016.
56 City of Inglewood. Water Works. https://www.cityofinglewood.org/463/Water-Works.
57 City of Inglewood, *2015 Urban Water Management Plan,* August 2016.
58 City of Inglewood, "Water Works," accessed June 2020, https://www.cityofinglewood.org/463/Water-Works.

imported water connections and blends with the treated groundwater leaving the Anderson Treatment Plant. Water is then distributed from the City reservoirs to users.

In 2015, 74 percent of the City's potable water supply—7,063 acre-feet (af)—came from imported water purchased from MWD through its regional water supplier and the WBMWD. The remaining 26 percent of the City's potable water supply came from groundwater pumping from the West Coast Groundwater Basin (Basin) and the purchase of recycled water from the WBMWD for nonpotable uses (1,764 af and 726 af, respectively). Recycle water is distributed to 18 recycled water users within the City, constituting approximately 8 percent of its total water supply.

The amount of water the City is permitted to pump from the Basin is limited by a 1961 Order of the Los Angeles Superior Court (adjudication) to 4,450 AFY. Generally, the City is entitled to pump up to its maximum allowable extraction right along with any carryover or unused water rights from the previous years and any net leases or exchanges of water rights per agreements with other parties owning those rights.[59]

Total groundwater production in the Basin has been declining over the past 10 years, from a high of 53,870 AFY in the water year 2000/01 to a low of 36,809 AFY in 2005/06, and 36,328 AFY being pumped in 2014/15.[60] In 2015, the City pumped 1,763 AFY of water from the Basin, which left 2,687 AFY (60 percent) of the City's water pumping rights unused. With well rehabilitation and new construction, City groundwater production capacity is projected to increase to 5,300 AFY by the year 2017. It is estimated that the City will rehabilitate and replace wells as required to maintain average annual well supply at approximately 4,450 AFY. Due to the Basin adjudication, groundwater supplies are actively managed pursuant to regulations that prevent the occurrence of overdraft conditions. Under multiple dry year conditions, imported supplies can be purchased to meet an annual increase in demand.

The City's UWMP provides projections for water supply and demand for years 2020 through 2040. In 2020, for multiple dry water year (3-year) conditions. It is estimated that the City would have a total water supply (including recycled water) of 11,751 AFY and a total demand of 11,751 AFY. Furthermore, it is forecasted that the MWD would have a water surplus for all years through 2040 during normal year, single dry year, and multiple dry year conditions. The City's projected water supplies and demands in multiple dry years are shown in **Table 4.14-1: Projected Water Supply and Demand in Multiple Dry Years**. Given Metropolitan's determination that it can meet all full-service demands of its member agencies through 2040 with surplus supplies, and the City's goal to regularly upgrade and rehabilitate its well supply system

59 City of Inglewood, *2010 Urban Water Management Plan,* June 2011.
60 City of Inglewood, *2015 Urban Water Management Plan*, August 2016.

to maintain groundwater supply equivalent to its groundwater rights of 4,500 afy, it is projected the City can meet all normal year, single dry year, and multiple dry year demands through the year 2040.[61]

Table 4.14-1

Projected Water Supply and Demand in Multiple Dry Years

	2020	2025	2030	2035	2040
			afy		
Total Supply	11,751	11,946	11,832	11,718	11,604
Total Demand	11,751	11,945	11,832	11,718	11,604
Difference	0	0	0	0	0

Source: City of Inglewood 2015 UWMP.

Existing Water Consumption

The proposed Project is located within a heavily developed area of the City which utilizes water supplies for a variety of land uses. Moreover, there are several existing developments which contribute to existing water demand that would be removed and demolished as part of the Project. Specifically, development of the Market Street/Florence Avenue Station would remove a variety of commercial, restaurant, and retail uses. These uses total approximately 126,912 SF of operational space. Additionally, development of the Maintenance and Storage Facility (MSF) site would result in the removal of a grocery store and gas station. The proposed Project would also include the demolition of retail space located at 150 S. Market Street to accommodate the guideway. These existing uses currently generate water demand for building operation as well as landscaping irrigation.

In the absence of any standard water usage factors, water consumption estimates were developed for long-term existing operational use based on land use wastewater generation factors developed by the Los Angeles County Sanitation District (LACSD), with 20 percent added to account for evaporation and absorption losses. As shown in **Table 4.14-2: Water Demand from Existing Uses to be Removed**, notes that currently existing uses to be removed consume approximately 54,600.1 gallons of water per day (gpd) or 0.06 million gallons per day (mgd); this is equivalent to 61.2 afy.

61 City of Inglewood, *2015 Urban Water Management Plan*, August 2016.

Table 4.14-2

Water Demand from Existing Uses to be Removed

Property Address	Use Type	Quantity	Demand Factor (GPD/1,000 SF)[a]	Daily Demand (gpd)	Daily Demand (mgd)	Annual Demand (afy)
310 E. Florence Ave	Restaurant	1,200 SF	1,200	1,400.0	0.001	1.61
300 E. Florence Ave	Restaurant	4,762 SF	1,200	5,714.4	0.006	6.40
254 N. Market St	Restaurant	4,608 SF	1,200	5,529.6	0.006	6.19
250 N. Market St	Auto Service	44,000 SF	120	5,280.0	0.005	5.91
240 N. Market St	Shopping Center	12,300 SF	390	4,797.0	0.005	5.37
230 N. Market St	Store	22,194 SF	120	2,663.3	0.003	2.98
224 N. Market St	Store	5,000 SF	120	600.0	0.001	0.67
222 N. Market St	Shopping Center	25,500 SF	390	9,945.0	0.010	11.14
210 N. Market St	Shopping Center	7,348 SF	390	2,865.7	0.003	3.21
150 S. Market St	Store	16,575 SF	120	1,989.0	0.002	2.23
500 E. Manchester Blvd	Supermarket	76,402 SF	180	13,752.4	0.014	15.40
510 E. Manchester Blvd	Gas Station	202 SF	120	24.2	<0.001	0.03
Total	—	**220,091 SF**	—	**54,600.1**	**0.055**	**61.16**

Note: SF = square feet; gpd = gallons per day; mgd = million gallons per day; afy = acre-feet per year

Source: LACSD, Will Serve Program, accessed June 2020, https://www.lacsd.org/services/wastewater/willserveprogram.asp.

[a] *All water consumption factors are wastewater generation factors provided by LACSD, with 20 percent added to account for evaporation and absorption losses.*

Wastewater

The City served a population of approximately 118,000 in 2008.[62] The City's Public Works Department manages the City's sanitary sewer collection system. The sewer collection system consists of about 145 miles of gravity sewer pipe ranging in size from 4 to 16 inches in diameter and approximately 3,100 manholes. The sewers are primarily constructed of vitrified clay pipe with approximately 95 percent of the pipes sized at 8-inch in diameter. The majority of the existing sewer system was constructed before 1960. Due to the general age of the sewer system, the City is implementing a proactive sewer rehabilitation program that prioritizes and replaces sewer lines that have been identified as deficient, through its sewer inspection program. The City inspected 91 miles of sewer lines (62 percent of the system) in 2008 and is initiating a new inspection program for the remaining portion of the sewer system so that needed

62 City of Inglewood, *2015 Sewer System Management Plan*, August 31, 2015.

rehabilitation of sewer lines can be identified. In addition, the City performs video inspection of its entire sewer system every 5 years.

Wastewater flow via gravity and is generally from north to south and east to west. The majority of sewers tie directly into one of the LACSD trunk sewers crossing through the City, which are located primarily in larger streets and convey sewage to LACSD sewage treatment plants. There are approximately 203 connections to the LACSD, which convey the City's wastewater out of the City to the south and continue to flow by gravity to the LACSD Joint Water Pollution Control Plant located in the City of Carson for treatment and disposal.[63] The JWPCP facility processes both primary and secondary treatment for an average flow of 256.8 MGD with a design capacity of 400 MGD. Prior to discharge, the treated wastewater is disinfected with sodium hypochlorite and sent to the Pacific Ocean through a network of outfalls. These outfalls extend 1½ miles off the coast of Southern California into the Palos Verdes Peninsula to a depth of 200 feet.[64]

Existing Wastewater Generation

There are several existing developments which contribute to existing wastewater generation that would be demolished as previously noted. Wastewater generation estimates were developed for long-term existing operational use by LACSD. As shown in **Table 4.14-3: Wastewater Generation from Existing Uses to be Removed** notes that currently existing uses within the footprint of the proposed Project that will be removed generate approximately 45,500.5 gpd or 0.05 mgd (51.0 afy) of wastewater.

Stormwater

The main storm drain lines within the area of the proposed Project are owned and maintained by the Los Angeles County Flood Control District (LACFCD) and the City. The City owns and maintains approximately 12 miles of drainage pipelines and 464 catch basins; and the LACFCD has approximately 42 miles of storm drain pipelines and 889 catch basins within the City.[65]

The proposed Project is located within two watersheds in the southern California Coastal Subregion. The portion located north of Market Street is located approximately 1.3 miles (as the crow flies) from the headwaters of Centinela Creek, in the Ballona Creek Watershed. Centinela Creek flows to Ballona Creek Reach 2, which eventually flows to the Santa Monica Bay. The remaining portions along Manchester Boulevard and Prairie Avenue are located approximately 1.3 miles upstream of the headwaters of the

63 City of Inglewood, *2015 Sewer System Management Plan,* August 31, 2015.

64 City of Inglewood, *Final Environmental Impact Report for the Transit Oriented Development Plan for Downtown Inglewood and Fairview Heights*, September 2016. Prepared by Metis Environmental Group.

65 City of Inglewood, *Final Environmental Impact Report for the Transit Oriented Development Plan for Downtown Inglewood and Fairview Heights*, September 2016. Prepared by Metis Environmental Group.

upper Dominguez Channel watershed. The Dominguez Channel eventually drains south toward Alamitos and ultimately the Los Angeles Harbor.

Table 4.14-3

Wastewater Generation from Existing Uses to be Removed

Property Address	Use Type	Quantity	Generation Factor (GPD/1,000 SF)	Daily Generation (gpd)	Daily Generation (mgd)	Annual Generation (afy)
310 E. Florence Ave	Restaurant	1,200 SF	1,000	1,200.0	0.001	1.34
300 E. Florence Ave	Restaurant	4,762 SF	1,000	4,762.0	0.005	5.33
254 N. Market St	Restaurant	4,608 SF	1,000	4,608.0	0.005	5.16
250 N. Market St	Auto Service	44,000 SF	100	4,400.0	0.004	4.93
240 N. Market St	Shopping Center	12,300 SF	325	3,997.5	0.004	4.48
230 N. Market St	Store	22,194 SF	100	2,219.4	0.002	2.49
224 N. Market St	Store	5,000 SF	100	500.0	0.001	0.56
222 N. Market St	Shopping Center	25,500 SF	325	8,287.5	0.008	9.28
210 N. Market St	Shopping Center	7,348 SF	325	2,388.1	0.002	2.68
150 S. Market St	Store	16,575 SF	100	1,657.5	0.002	1.86
500 E. Manchester Blvd	Supermarket	76,402 SF	150	11,460.3	0.011	12.84
510 E. Manchester Blvd	Gas Station	202 SF	100	20.2	<0.001	0.02
Total	—	**220,091 SF**	—	**45,500.5**	**0.046**	**50.97**

Note: SF = square feet; gpd = gallons per day; mgd = million gallons per day; afy = acre-feet per year

Source: LACSD, Will Serve Program, accessed June 2020, https://www.lacsd.org/services/wastewater/willserveprogram.asp.

There are existing storm drain inlets and storm drains along the proposed Project. The drains would convey stormwater runoff downstream, and ultimately, to the respective water bodies. The stormwater drainage system drains into the various tributaries of each watershed discussed above. Typically, these areas are predominately channelized and highly developed with both commercial and residential properties. Most of the drainage networks are controlled by structural flood control measures, including debris basins, storm drains, underground culverts, and open concrete channels.

Electrical Power

As further discussed in **Section 4.5: Energy**, electricity within the City is supplied by Southern California Edison (SCE), which serves approximately 15 million people in a 50,000-square-mile service area.[66] Electricity within the area of the proposed Project is primarily used for lighting, cooling, and operation of businesses and restaurants. Electricity is also used indirectly in the delivery, treatment, and distribution of water used within the Project boundary, as well as for the treatment of wastewater. There are several electrical lines documented along the proposed Project as further discussed below.

Natural Gas

As further discussed in **Section 4.5**, Southern California Gas Company (SoCalGas) is the natural gas purveyor within the City. The SoCalGas service area reaches 21.8 million consumers through 5.9 million meters in more than 500 communities, covering an area of approximately 24,000 square miles throughout Central and Southern California.[67] Natural gas is primarily used within the Project boundary for space heating, food preparation, and maintenance activities. There are several natural gas lines documented along the proposed Project as further discussed below.

Telecommunications

The Telecommunications Division of the Information Technology and Communications Department is responsible for all of the voice-related services for the City of Inglewood. There are 22 locations, both large and small which require service from the Telecommunications staff. Moreover, the Telecommunications Division has over 1,100 phones, 850 voice mailboxes, and many incoming and outgoing lines, which provide service to the citizens of Inglewood.[68] Additionally, Spectrum Business is the primary cable provider in the area and may provide telecommunication services to the proposed Project. Telecommunications cable lines along the proposed Project would be installed in the same utility trenches as undergrounded electrical service.

Solid Waste

City of Inglewood Solid Waste Generation and Collection

The City's Department of Public Works is responsible for developing plans and strategies to manage solid waste disposal and recycling for the City. Solid waste is collected curbside from properties within the City

66 Southern California Edison, "Newsroom Fact Sheet," April 29, 2019, accessed July 2020, https://newsroom.edison.com/internal_redirect/cms.ipressroom.com.s3.amazonaws.com/166/files/20193/SCE%20Service%20Area%20Fact%20Sheet_Ver2_04252019.pdf.

67 Southern California Gas Company, "Company Profile," Accessed May 2020, https://www.socalgas.com/about-us/company-profile.

68 City of Inglewood, "Telecommunications," accessed September 2020, https://www.cityofinglewood.org/327/Telecommunications.

by Consolidated Waste Services (CDS), a private waste handler, and processed at CDS's American Waste Transfer Station in the City of Gardena, where it is sorted; residual garbage is taken to the Consolidated Volume Transport Disposal and Recycling Center (CVT) in the City of Anaheim; and recycling and green waste is taken to CDS's Compton Transfer Station in the City of Compton.[69]

There are three types of disposal facilities for nonhazardous waste within Los Angeles County: Class III Landfills (Municipal Solid Waste Landfills); Unclassified (Inert) Landfills; and Transformation (waste to energy) Facilities. A Class III Landfill accepts nonhazardous household waste. Unclassified Landfills accept materials such as soil, concrete, asphalt, and other construction and demolition debris. Transformation Facilities involve the incineration, pyrolysis, destructive distillation, gasification, or the chemical or biological processing of municipal solid waste in order to generate energy, reduce volume, or produce synthetic fuel. Materials Recovery Facilities are available to recover recyclable materials from waste to provide for the efficient transfer of the residual waste to permitted landfills for proper disposal. Hazardous waste cannot be disposed of at Class III or Unclassified Landfills. The California Hazardous Waste Control Law requires that these hazardous materials be transported and disposed of or treated at a licensed facility.

Regional Landfill Capacity

The County of Los Angeles (County) is responsible for regional landfill services. Regional planning for landfill services is provided by the County of Los Angeles. In response to the 1989 California Integrated Waste Management Act, the County prepared and administers a ColWMP.

The County continually evaluates landfill disposal needs and capacity through preparation of ColWMP annual reports. Within each annual report, future landfill disposal needs over the ensuing 15-year planning horizon are addressed, in part by determining the available landfill capacity.[70] As discussed in the ColWMP, while the economy has shown signs of improvement in recent years, the amount of waste that residents and businesses have generated and disposed of in the County continues to remain relatively low.

In 2018, the County disposed of approximately 10.48 million tons of materials.[71] It is estimated by the County that this disposal amount represents the generation of approximately 29.95 million tons with a 65 percent diversion rate. Of that amount, the majority was accommodated by in-County Class III landfills (5.00 million tons), followed by exports to out-of-County landfills (5.12 million tons), and transformation facilities (0.37 million tons). The 2018 County average daily disposal rate was 16,414 tons per day, and the maximum daily capacity was 22,549 tons per day. The remaining disposal capacity for the County's Class

69 City of Inglewood, "Waste Collection FAQs," accessed June 2020, https://www.cityofinglewood.org/FAQ.aspx?TID=30.

70 Los Angeles County Department of Public Works, *Los Angeles County Integrated Waste Management Plan, 2018 Annual Report*, December 2019.

71 Los Angeles County Department of Public Works, *Los Angeles County Integrated Waste Management Plan, 2018 Annual Report*, December 2019.

III landfills is estimated at approximately 163.39 million tons as of December 31, 2018. It is estimated by the County that in 2022 cumulative demand for disposal will be approximately 58.8 million tons, or approximately 35 percent of the remaining capacity.

Of the various landfills serving the City of Los Angeles, Sunshine Canyon Landfill is the largest recipient of nonhazardous solid waste disposal materials (i.e. Class III waste materials). This landfill had a remaining capacity of 65.27 million tons in 2018, with an expected life expectancy of 19 years. The maximum daily capacity for the landfill is 12,100 tons per day and the 2018 disposal rate was 7,012 tons per day.[72] In 2018, the annual amount of inert waste materials, such as earth, landscaping, concrete and asphalt, disposed of within the County was 0.292 million tons. The Azusa Land Reclamation is the primary Inert Waste Landfill serving the County. The remaining capacity of this landfill is estimated at 57.71 million tons. Given the remaining permitted capacity and the 2018 average disposal rate of 1,148 tons per day, this capacity would be exhausted in approximately 28 years.

In addition to the County-permitted facility, there are a number of inert debris engineered fill operation facilities operating under State permit provisions that provide additional capacity in the County, processing approximately 2.60 million tons in 2018.[73] Countywide waste reduction and diversion programs have reduced disposal levels at the County's landfills. The County is updating its CoIWMP, including annual reports and a master plan for meeting waste disposal needs for a 15-year planning period.

The most recent Annual Report indicates that the County can adequately meet future Class III disposal needs through 2033 through scenarios that include a combination of all or some of the following: (1) utilizing the permitted in-county disposal capacity only, (2) keeping to the status quo (3) meeting CalRecycle's Statewide Disposal Target of 2.7 PPD (Pounds per Person per Day); (4) expansion of existing in-County Class III landfills; (5) utilization of additional alternative technology capacity; and (6) increase in exports to out-of-County landfills.[74]

Table 4.14-4: County of Los Angeles Annual Disposal Tonnage for 2018 provides a list of solid waste facilities, including transfer stations, compost facilities, and disposal sites and indicates that approximately 11,016,800 tons of solid waste was disposed of in these facilities. **Table 4.14-5: In-County Class III Landfills Servicing the City of Inglewood** shows four landfills located in the County which could serve the proposed Project. As of 2018, the four landfills had a combined estimated remaining capacity of approximately 147.25 million tons. Waste that is currently generated in the area is disposed of at the Sunshine Canyon

72 Los Angeles County Department of Public Works, *Los Angeles County Integrated Waste Management Plan, 2018 Annual Report*, December 2019.

73 Los Angeles County Department of Public Works, *Los Angeles County Integrated Waste Management Plan, 2018 Annual Report*, December 2019.

74 Los Angeles County Department of Public Works, *Los Angeles County Integrated Waste Management Plan, 2018 Annual Report*, December 2019.

landfill. As described in the County's most recent landfill disposal capacity report, a shortfall in permitted solid waste disposal capacity within the County is not anticipated to occur under forecasted growth and ongoing municipal efforts at waste reduction and diversion within the next 15 years.[75]

Existing Solid Waste Generation

The proposed Project is located within a heavily developed area of the City which generates solid waste from a variety of land uses. As previously noted, there are several existing developments which generate solid waste that would be demolished and removed.

As shown in **Table 4.14-6: Existing Solid Waste Generation from Existing Uses to be Removed**, the existing uses to be removed currently generate approximately 5,328.7 pounds (2.7 tons) of solid waste per day, and approximately 972.5 tons of solid waste per year.

Table 4.14-4
County of Los Angeles Annual Disposal Tonnage for 2018

Landfill Type	Amount (tons)
In-County Class III Landfills	5,121,209
Transformation Facilities	416,464
Exports to Out-of-County Landfills	5,120,871
Subtotal Solid Waste Exposed:	*10,658,546*
Permitted Inert Waste Landfill	358,*254*
Solid Waste Disposed Grand Total	**11,016,800**

Source: Los Angeles County Department of Public Works, Los Angeles County Integrated Waste Management Plan, 2018 Annual Report, December 2019.

75 Los Angeles County Department of Public Works, *Los Angeles County Integrated Waste Management Plan, 2016 Annual Report*, September 2017.

Table 4.14-5
In-County Class III Landfills Servicing the City of Inglewood

Landfill	Maximum Daily Capacity (tons)	2018 Average Daily Disposal (tons)	Total Disposal Yearly Equivalent (million tons)	2018 Remaining Permitted Capacity (million tons)
Antelope Valley Landfills I and II	3,600	1,677	1.12	12.00
Chiquita Canyon Landfill	12,000	2,307	3.74	59.75
Lancaster Landfill	3,000	376	0.94	10.23
Sunshine Canyon City/County Landfill	12,100	7,012	3.78	65.27

**Calculated or assumed quantities based on proposed expansion.*
Source: Los Angeles County Department of Public Works, Los Angeles County Integrated Waste Management Plan, 2018 Annual Report, December 2019.

Table 4.14-6
Existing Solid Waste Generation from Existing Uses to be Removed

Property Address	Use Type	Quantity	Generation Factor (lb./100 SF/day)	Daily Generation (lbs./day)	Daily Generation (tons/day)	Annual Generation (tons/year)
310 E. Florence Ave	Restaurant	1,200 SF	0.5	6.0	0.003	1.10
300 E. Florence Ave	Restaurant	4,762 SF	0.5	23.8	0.012	4.35
254 N. Market St	Restaurant	4,608 SF	0.5	23.0	0.012	4.20
250 N. Market St	Auto Service	44,000 SF	0.9	396.0	0.198	72.27
240 N. Market St	Shopping Center	12,300 SF	2.5	307.5	0.154	56.12
230 N. Market St	Store	22,194 SF	3.12	692.5	0.346	126.37
224 N. Market St	Store	5,000 SF	3.12	156.0	0.078	28.47
222 N. Market St	Shopping Center	25,500 SF	2.5	637.5	0.319	116.34
210 N. Market St	Shopping Center	7,348 SF	2.5	183.7	0.092	33.53
150 S. Market St	Store	16,575 SF	3.12	517.1	0.259	94.38
500 E. Manchester Blvd	Supermarket	76,402 SF	3.12	2,383.7	1.192	435.03
510 E. Manchester Blvd	Gas Station	202 SF	0.9	1.8	0.001	0.33
Total		**220,091 SF**	—	**5,328.7**	**2.664**	**972.49**

Notes: SF = square feet; lb. = pounds.
Source: CalRecycle, Estimated Solid Waste Generation Rates, accessed June 2020, https://www2.calrecycle.ca.gov/wastecharacterization/general/rates.

4.14.4.2 Project Area

The proposed Project would begin at the Market Street/Florence Avenue Station, largely situated in the public right-of-way in between Florence Avenue and Regent Street, and would extend south along Market Street. At Market Street's intersection with Manchester Boulevard, the guideway would shift onto Manchester Boulevard and proceed east. At Manchester Boulevard's intersection with Prairie Avenue, the guideway then shifts onto Prairie Avenue and proceeds south until its intersection with Hardy Street. A number of utility lines follow and transect the roadways in the area due to their status as major rights-of-way.

As discussed in *4.14.2: Methodology* above, the following is a discussion of utilities known to be located within the rights-of-way of streets in the area and their approximate location. Since this represents the best available information at the time of analysis, there may be additional utility lines within the area, or specific locations of identified utility lines may slightly differ. As mentioned previously, exact utility locations would be determined prior to construction by potholing, utilizing ground penetrating radar, and/or other methods. Discussions related to water, wastewater, stormwater, electrical, and gas lines and infrastructure are included below.

Water, Wastewater, and Stormwater Infrastructure

The proposed Project consists of an elevated guideway approximately 1.6 miles long and primarily located within the public right-of-way along Market Street, Manchester Boulevard, and Prairie Avenue with limited encroachments. The guideway is supported by columns ranging in size from approximately 6 feet by 12 feet to 6 feet by 9 feet in diameter depending on the locations, spacing, and guideway configuration.

The proposed Project extends southwest from the intersection with the Metro Crenshaw/LAX Line north of downtown Inglewood, for approximately a quarter of a mile to the intersection of Market Street and Regent Street, continuing south on Market Street, east on Manchester Boulevard, then turning south on Prairie Avenue until its intersection with Hardy Street.

Market Street Segment

The Market Street segment starts from the intersection with the Metro Crenshaw/LAX Line north of downtown Inglewood, southwest for approximately a quarter of a mile to the intersection of Market Street and Regent Street, continuing south on Market Street until Manchester Avenue.

Within this portion of the alignment, water and wastewater lines ranging from 4 to 24 inches in diameter are located in the streets and alleys following and traversing the alignment. The existing water lines are generally older pipelines made of asbestos cement; however, some pipelines consist of cast iron, polyvinyl

chloride (PVC), reinforced concrete cylinder, or galvanized steel. Additionally, a number of storm drains fed by on-street storm drain inlets are located within this segment.

Water Lines

As shown in **Table 4.14-7: Existing Water and Sewer Utilities**, several different water lines exist within the right-of-way of the Market Street segment. These include:

- A 24-inch east–west water distribution line follows Florence Avenue and transitions to an 8-inch water line at the Florence Avenue and Market Street intersection, proceeding south along the western side of Market Street. The line then transitions to the eastern side of Market Street approximately 75 feet south of the Florence Avenue and Market Street intersection and continues south, within approximately 25 feet of the eastern curb face.
- An 8-inch water line, 6-inch recycled water line, and storm drain run east–west along the northern side of Regent Street and all transect Market Street at the intersection of those streets; the north–south traveling water line ties into the 8-inch east–west water line at this point.
- An additional 24-inch east–west water line runs along the southern side of Regent Street through the Market Street intersection.
- A 12-inch water line continues out of the 8-inch east–west line and proceeds south along Market Street from Regent Street to Queen Street, transitioning from the eastern side of Market Street to the western side within 12 feet of the curb and approximately 100 feet north of Queen Street; this water line continues along Market Street past Manchester Boulevard.
- An 8-inch east–west water line runs along the northern side of Queen Street and transects the segment at that street's intersection with Market Street.

Wastewater Lines

As shown in **Table 4.14-7**, within the Market Street segment an 8-inch east–west sewer line runs along the southern side of portions of Regent Street to the east and west of Market Street, approximately 100 feet and 25 feet from the curb line on Market Street, respectively.

No sewer lines transect the alignment along the Market Street segment.

Stormwater Lines

Within the Market Street segment, the following stormwater drains occur: [76]

- An east–west stormwater main drain runs along the southern side of Queen Street and transects Market Street at the intersection of those two roadways.
- a lateral connection to the northeastern corner of the Market Street and Queen Street intersection. Storm drain inlets are situated along curbs on Market Street at the northeastern and southeastern corners of that street's intersection with Queen Street.77
- At the intersection of Market Street and Manchester Boulevard, an east–west stormwater main drain follows the northern side of Manchester Boulevard and transects Market Street; this drain contains lateral connections to both the northeastern corner of the intersection where storm drain inlets are situated on both Market Street and Manchester Boulevard, and the northwestern corner where a storm drain inlet is situated on Market Street.

76 Los Angeles County Department of Public Works, *Los Angeles County Storm Drain System*, interactive map, accessed June 2020, https://pw.lacounty.gov/fcd/StormDrain/index.cfm.

77 Los Angeles County Department of Public Works, *Los Angeles County Storm Drain System*, interactive map, accessed June 2020, https://pw.lacounty.gov/fcd/StormDrain/index.cfm.

Table 4.14-7

Existing Water and Sewer Utilities

Segment	Utility	Description
Market Street		
Florence Avenue to Regent Street	8-inch water pipe	• An 8-inch water service pipe transitions from a 24-inch water main at the intersection of Market Street and Florence Avenue. • The 8-inch pipe runs along the west side of the Market Street centerline just south of Florence Avenue for approximately 150-200 feet before transitioning to the east side of the centerline. • The 8-inch line then ties into an east–west water line at Regent Street.
	8-inch water pipe	• Follows the northern side of Regent Street and transects the alignment at the Market Street and Regent Street intersection.
	6-inch recycled water pipe	• Follows the northern side of Regent Street and transects the alignment at the Market Street and Regent Street intersection.
	Storm drain	• A storm drain runs perpendicular to Market Street along the northern curb of Regent Street. • An 8-inch water pipe runs parallel with the storm drain along the northern curb of Regent Street. • The storm drain continues along Regent Street.
Regent Street to Queen Street	12-inch water pipe	• South of Regent Street, a north–south 12-inch pipe is initiated from a tie-in with the previously mentioned 8-inch east–west water line. • The 12-inch water pipe runs along the eastern side of Market Street but transitions to the western side of the centerline about 100 feet north of Queen Street and continues south.
	24-inch water pipe	• A 24-inch water pipe runs along the southern curb of Regent Street. • The line crosses Market Street and continues east along Regent Street.
Queen Street to Manchester Boulevard	12-inch water pipe	• 12-inch water pipe runs along the western side of Market Street between Queen Street and Manchester Boulevard. • The 12-inch line continues south beyond Manchester Boulevard along the western side of the roadway.
	8-inch water pipe	• An 8-inch water pipe travels along the northern side of Queen Street and crosses the segment. • The pipe continues east–west on Queen Street.
	8-inch sewer pipe	• An 8-inch sewer pipe runs along the southern side of Queen Street west of Market Street and along the centerline east of Market Street, but does not transect the alignment
	Storm drain	• A storm drain runs perpendicular to Market Street along the southern portion of Queen Street and transects the alignment at this intersection, heading west.

Segment	Utility	Description
Manchester Boulevard		
Market Street to Locust Street	12-inch water pipe	• A 12-inch pipe begins approximately 200 feet west of the Market Street and Manchester Boulevard intersection and transects Market Street at the intersection of these two roadways. • This 12-inch pipe follows the southern side of Manchester Boulevard.
	10-inch sewer pipe	• A 10-inch north–south sewer pipe enters the segment though an alleyway between Market Street and Locust Street.
	8-inch sewer pipe	• An 8-inch east–west sewer pipe initiates from a tie-in connected to the 10-inch sewer pipe and continues east along the center of Manchester Boulevard.
	24-inch water pipe	• A 24-inch north–south water pipe runs along the western curb of Locust Street. • The pipe crosses Manchester Boulevard and continues south along Locust Street.
Locust Street to Hillcrest Boulevard	12-inch water pipes	• The 12-inch east–west water pipe continues from the previous segment, along the southern side of Manchester Boulevard through the segment. • A 12-inch north–south water pipe runs along the eastern portion of Locust Street and transects the alignment at the Locust Street and Manchester Boulevard intersection.
	8-inch sewer pipe	• An 8-inch north–south sewer pipe ties into the previously mentioned east–west 8-inch sewer pipe and follows the eastern side of Spruce Avenue where it proceeds north at the intersection with Manchester Boulevard. • The 8-inch east–west sewer pipe continues through the segment at approximately the centerline. • The 8-inch east–west sewer pipe then turns north onto Hillcrest Boulevard at the Hillcrest Boulevard and Manchester Boulevard intersection and follows the approximate centerline of that roadway.
	Storm drain	• An east–west storm drain crosses Locust Street where it meets Manchester Boulevard and extends for approximately 100 feet. • The storm drain extends near northern curb of Manchester Boulevard heading east.
Hillcrest Boulevard to Spruce Avenue	12-inch water pipe	• The 12-inch north–south water pipe continues from the previous segment along the south side of Manchester Boulevard approximately 20 feet from the curb line at its closest point.
	8-inch water pipe	• An 8-inch north–south water pipe follows the eastern side of Hillcrest Boulevard and transects the alignment at the Hillcrest Boulevard and Manchester Boulevard intersection.
	6-inch water pipe	• A 6-inch water pipe travels east–west under the southern curb of Manchester Terrace. • The 6-inch water pipe meets Manchester Boulevard and transitions to the southern/southwestern side of Manchester Boulevard. • The 6-inch water pipe ties into the 12-inch water pipe mentioned previously.
	8-inch sewer pipe	• An 8-inch sewer pipe branch initiates just south of the Hillcrest intersection. • The 8-inch sewer pipe runs along the southern portion of Manchester Boulevard.

Segment	Utility	Description
Spruce Avenue to Tamarack Avenue	12-inch water pipe	• The 12-inch water pipe from the previous segment continues along Manchester Boulevard along the southern portion of the street.
	8-inch sewer pipe	• Another 8-inch sewer pipe branch transects the alignment at Spruce Avenue's intersection with Manchester Boulevard, traveling in a northeast–southwest direction. • An additional 8-inch sewer pipe branch transects the alignment at Manchester Drive, just south of the Spruce Avenue intersection. • All three previously mentioned 8-inch sewer line branches tie in together at the Spruce Avenue intersection and proceed southwest along the Spruce Avenue centerline.
	6-inch water pipe	• A 6-inch water pipe travels east–west under the southern curb of Manchester Drive. • The 6-inch water pipe meets Manchester Boulevard and transitions to the southern/southwestern side of Manchester Boulevard. • The 6-inch water pipe ties into the 12-inch water pipe mentioned previously.
	Storm drain	• A northeast–southwest storm drain transects Manchester Boulevard at the Spruce Avenue intersection and parallels the sewer line branch that extends northeast to properties across Manchester Boulevard, while to the southwest the storm drain borders the side and rear property line of the parcel located at the southern corner of the Manchester Boulevard and Spruce Avenue intersection.
Tamarack Avenue to Prairie Avenue	12-inch water pipe	• The 12-inch east–west water pipe from the previous segment continues along Manchester Boulevard along the southern/southwestern portion of the street and ties into a 12-inch north–south water line on Prairie Avenue.
	8-inch sewer pipe	• An 8-inch sewer pipe enters the segment coming northeast from Tamarack Avenue and continues east along Manchester Boulevard, located approximately five feet from the southern curb line at its closest point. • This line crosses to the northern side of Manchester Boulevard approximately 80 feet before Prairie Avenue and extends to the northeast towards Inglewood Park Cemetery.
Prairie Avenue		
Manchester Boulevard to Nutwood Street	60-inch DWP pipe	• A 60-inch north–south DWP pipe runs along the eastern side of Prairie Avenue. • The line continues south onto the next segment.
	36-inch recycled water pipe	• A 36-inch north–south recycled water pipe enters the segment about midway between Manchester Boulevard and Nutwood Street. • The line continues south onto the next segment.
	8-inch water pipe	• An 8-inch north–south water pipe travels south down Prairie Avenue on the western side of the street. • The line continues south onto the next segment.

Segment	Utility	Description
	24-inch sewer pipe	• A 24-inch east–west sewer pipe runs along the western side of the street, close to the center line • The line continues south onto the next segment.
	10-inch sewer pipe	• A 10-inch north–south sewer pipe runs along the eastern side of Prairie Avenue. • The line continues south onto the next segment.
	Storm drain	• A storm drain runs in an east–west direction though the segment, midway between Manchester Boulevard and Nutwood Street.
Nutwood Avenue to Kelso Street/Pincay Drive	60-inch DWP pipe	• A 60-inch DWP water pipe runs along the eastern side of Prairie Avenue. • The line continues south onto the next segment.
	36-inch recycled water pipe	• The 36-inch recycled water pipe continues from the previous segment. • The 36-inch recycled water pipe continues through the center of the segment. • It shifts slightly west and then east a few feet and then continues south along Prairie Avenue.
	8-inch water pipe	• The 8-inch water pipe continues from the previous segment on the western side of the street.
	24-inch sewer pipe	• A 24-inch sewer pipe runs along the western side of Prairie Avenue proximate to the curb line. • The line continues south onto the next segment.
	10-inch sewer pipe	• A 10-inch sewer pipe runs along the eastern side of Prairie Avenue proximate to the curb line. • The line continues south onto the next segment.
Kelso Street/Pincay Drive to La Palma Drive	60-inch DWP pipe	• The 60-inch DWP pipe continues from the previous segment just east of the center line of Prairie Avenue • Midway through the segment, the pipe shifts under the eastern curb of Prairie Avenue where it continues south until Century Boulevard.
	36-inch recycled water pipe	• The 36-inch recycled water pipe continues from the previous segment. • The 36-inch recycled water pipe continues just east of the center line south down Prairie Avenue.
	east–west water pipes	• An east–west water pipe travels along the southern portion of Kelso Street/Pincay Drive and transects the alignment at this intersection. • Additionally, an east–west running water line follows the southern side of Kelso Street/Pincay Drive beneath the sidewalks; this water line pivots south of the Kelso Street/Pincay Drive intersection and extends approximately 200 feet south on both sides of Prairie Avenue before transecting the right-of-way and meeting.
	8-inch north–south water pipe	• The 8-inch north–south water pipe continues from the previous segment on the western side of the street. • The line continues south onto the next segment

Segment	Utility	Description
	24-inch sewer pipe	• The previously mentioned 24-inch north–south sewer pipe continues from the previous segment on the western portion of Prairie Avenue. • This pipe ties into a 10-inch east–west sewer line following the northern portion of Kelso Street/Pincay Drive west of Prairie Avenue. This east-west sewer line also includes a branch sewer line extending from the center of the Prairie Avenue and Kelso Street/Pincay Drive intersection to the southeastern corner of that intersection.
	10-inch sewer pipe	• The previously mentioned 10-inch north–south sewer pipe continues from the previous segment on the eastern portion of Prairie Avenue. • This pipe ties into a 10-inch east–west sewer line following the approximate centerline of Kelso Street/Pincay Drive east of Prairie Avenue. This east-west sewer line also includes a branch sewer line extending from the center of the Prairie Avenue and Kelso Street/Pincay Drive intersection to the southeastern corner of that intersection. • Past the Kelso Street/Pincay Drive intersection, the 10-inch north–south sewer line extends for approximately 180 feet along the eastern side of the right-of-way before proceeding east into the adjacent Hollywood Park property.
La Palma Drive to Arbor Vitae Street	60-inch DWP pipe	• The 60-inch water pipe continues from the previous segment through this segment, under the eastern curb of Prairie Avenue. • The line continues south onto the next segment.
	36-inch recycled water pipe	• The 36-inch recycled water pipe continues from the previous segment. • The 36-inch recycled water pipe continues just east of the center line down Prairie Avenue.
	8-inch water pipe	• An 8-inch water pipe travels from the previous segment, just west of the center line on Prairie Avenue. • Tie-ins are located to the west along La Palma Drive, Buckthorn Street, and Arbor Vitae Street.
	Storm drain	• At Buckthorn Street's intersection with Prairie Avenue, a 33-inch north–south storm drain begins in the eastern portion of the right-of-way, approximately 30 feet from the eastern curb line. • An additional tie-in is located at Arbor Vitae Street; this tie-in includes three branches.
	10-inch sewer pipe	• The 10-inch sewer pipe continues from the previous segment within the adjacent Hollywood Park property to the east, approximately 43 feet east of the existing eastern curb line along Prairie Avenue. This line continues south until Arbor Vitae Streets, whereupon it proceeds east along the centerline of that roadway.
Arbor Vitae Street to Hardy Street	60-inch DWP pipe	• The 60-inch water pipe continues from the previous segment through this segment, under the eastern curb of Prairie Avenue. • Just south of the Arbor Vitae Street intersection, the pipe shifts to the western curb, where it continues south through the remainder of the segment and onto the next segment.

Segment	Utility	Description
	36-inch recycled water pipe	• The 36-inch recycled water pipe continues from the previous segment along the center line of Prairie Avenue. • Just north of Hardy Street the pipe shifts toward the eastern side of Prairie Avenue where it continues onto the next segment.
	8-inch water pipe	• The 8-inch water pipe from the previous segment shifts west just south of Arbor Vitae Street. • The line continues south onto the next segment under the western side of Prairie Avenue.
	8-inch sewer pipe	• The sewer pipe begins just south of the Arbor Vitae Street intersection, under the western curb along Prairie Avenue. • The line continues south onto the next segment.
	Storm drain	• The 33-inch north–south storm drain continues south; a tie-in is located approximately 400 feet north of the Hardy Street intersection. • Approximately 25 feet after the tie-in north of Hardy Street, the storm drain main expands to a 39-inch line. • Two additional drain branch tie-ins are located at the Hardy Street intersection.

Source: Conceptual Design Utility Impacts, Pacifica Services, Incorporated, December 2019.

Manchester Boulevard Segment

The Manchester Boulevard segment run within the right-of-way from Market Street east on Manchester Boulevard, turning south on Prairie Avenue.

Water Lines

As shown in **Table 4.14-7**, several different water lines exist within the Manchester Boulevard segment. These include:

- A 12-inch east–west water pipe runs along the southern side of Manchester Boulevard within 12 feet of the southern curb face, then continues throughout the Manchester Boulevard segment until it meets a tie-in at the Manchester Boulevard and Prairie Avenue intersection.
- At the Manchester Boulevard and Locust Street intersection, a 24-inch north–south water line runs along the western side of Locust Street and transects Manchester Boulevard at the intersection of the two roadways.
- A 12-inch north–south water line runs along the eastern side of Locust Street, crosses Manchester Boulevard at this intersection, and continues along Locust Street in both directions.
- An 8-inch north–south water line follows the eastern side of Hillcrest Boulevard and transects Manchester Boulevard at the intersection of those two roadways.
- Proceeding east on Manchester Boulevard, the alignment is transected at Manchester Terrace by a 6-inch east–west water line that ties into the 12-inch east–west water line along the southern/southwestern edge of Manchester Boulevard; the 6-inch east–west water line continues east along the southern curb of Manchester Terrace.
- At Manchester Boulevard's intersection with Manchester Drive, the alignment is again transected by a 6-inch east–west water line that ties into the 12-inch water line along the southern/southwestern edge of Manchester Boulevard; the 6-inch water line continues east along the southern curb of Manchester Drive.

Wastewater Lines

As shown in **Table 4.14-7**, within the Manchester Boulevard segment the following wastewater lines occur within the right-of-way:

- A 10-inch north–south sewer line follows the alley approximately midpoint in between Market Street and Locust Street; this sewer line transects Manchester Boulevard approximately 210 feet east of Market Street.
- An 8-inch east–west sewer line ties into this north–south sewer line and extends east along the approximate centerline of Manchester Boulevard. This sewer line also connects with two north-south sewer lines at Locust Street and Hillcrest Boulevard as described below.

- The above noted 8-inch east–west sewer line in the centerline of Manchester Boulevard ties in with another 8-inch north–south sewer at Locust Street, which continues northbound on the eastern side of Locust Street.
- The above noted 8-inch east–west sewer line on Manchester Boulevard extends east from Locust Street until Hillcrest Boulevard, where it proceeds north and follows the approximate centerline of Hillcrest Boulevard.
- An 8-inch north–south sewer line follows the eastern side of Hillcrest Boulevard south of Manchester Boulevard, approximately 35 feet southwest of the proposed Project.
- An 8-inch east–west sewer line branch is located along the southern/southwestern edge of Manchester Boulevard beginning at the Manchester Terrace intersection and continuing until Spruce Avenue.
- At Spruce, the above east–west 8-inch sewer line meets three additional sewer lines which proceed within the roadway rights-of-way in the following directions: 1) a branch extending northeast to properties across Manchester Boulevard, 2) a branch extending southeast to the Manchester Drive centerline, and 3) a sewer line main extending southwest along the Spruce Avenue centerline.
- At Tamarack Avenue an 8-inch east–west sewer line extends in a northeastern–southwestern direction into the alignment. This line follows the southern edge of the Manchester Boulevard right-of-way and proceeds east. Approximately 80 feet before Prairie Avenue, this line shifts to the northern side of Manchester Boulevard and extends to the northeast towards Inglewood Park Cemetery.

Stormwater Lines

Within the Manchester Boulevard segment, the following stormwater drains occur:[78]

- At the Locust Street and Manchester Boulevard intersection, an east–west storm drain parallels the northern edge of Manchester Boulevard for approximately 100 feet; additionally, storm drain inlets are located at the northeastern and southeastern corners of this intersection along Manchester Boulevard.
- At the Manchester Boulevard and Spruce Avenue intersection, a northeast–southwest storm drain transects the alignment and parallels the sewer line extending northeast to properties across Manchester Boulevard, while to the southwest the storm drain borders the side and rear property line for the parcel located at the southern corner of the Manchester Boulevard and Spruce Avenue intersection. Storm drain inlets are located on Manchester Boulevard at the eastern and southern points of this intersection.

78 Los Angeles County Department of Public Works, *Los Angeles County Storm Drain System,* interactive map, accessed June 2020, https://pw.lacounty.gov/fcd/StormDrain/index.cfm.

Prairie Avenue Segment

The Prairie Avenue segment extends from its intersection with Manchester Boulevard south to the intersection at Hardy Street, as shown in **Figure 3.0-3: Project Vicinity Map**. The proposed Project would not extend past the Prairie Avenue and Hardy Street intersection.

Water Lines

As shown in **Table 4.14-7**, The following water lines occur within the right-of-way of the Prairie Avenue segment:

- A 60-inch north–south DWP water pipe runs along Prairie Avenue for the length of the alignment segment. The DWP line runs just east of the centerline on Prairie Avenue until approximately 250 feet south of the Kelso Street/Pincay Drive intersection. At this point, the line shifts to the eastern side of Prairie Avenue beneath the existing sidewalk and continues in this location until Century Boulevard.
- From Manchester Boulevard, an 8-inch north–south water pipe travels south down Prairie Avenue towards the western side of the street approximately 25 feet from the western curb, transitioning further west under the western curb of Prairie Street at the Arbor Vitae Street intersection.
- This 8-inch water pipe continues down Prairie Avenue until it terminates just south of 99th Street and north of Century Boulevard. Along its length on Prairie Avenue, water lines of varying diameters tie into the 8-inch water pipe from its west at Nutwood Street, Kelso Street, La Palma Drive, Buckthorn Street, Arbor Vitae Street, Hardy Street, 97th Street, and 99th Street.
- An east–west running water line follows the southern side of Kelso Street/Pincay Drive beneath the sidewalks; this water line pivots south of the Kelso Street/Pincay Drive intersection and extends approximately 200 feet south on both sides of Prairie Avenue before transecting the right-of-way and joining the other side.

Wastewater Lines

The following wastewater lines occur with the right-of-way of the Prairie Avenue segment:

- From Manchester Boulevard until Kelso Street/Pincay Drive a 10-inch sewer line and a 24-inch north–south sewer line run on the eastern and western edges of Prairie Avenue, respectively, whereupon they tie into an east–west sewer line that follows Kelso Street/Pincay Drive.
- Along Pincay Drive east of Prairie Avenue, the east–west sewer line follows the approximate centerline; west of Prairie Avenue along Kelso Street this sewer line follows the northern edge of the roadway. This east-west sewer line also includes sewer line branch that extends from the center of the Prairie Avenue and Kelso Street/Pincay Drive intersection to the southeastern corner of the Prairie Avenue and Kelso Street/Pincay Drive intersection.
- Past the Kelso Street/Pincay Drive intersection, the 10-inch north–south sewer line extends south for approximately 180 feet along the eastern side of the right-of-way before proceeding east into the

adjacent Hollywood Park property. The 10-inch sewer line continues south within the adjacent Hollywood Park property, approximately 43 feet east of the existing eastern curb line along Prairie Avenue, until Arbor Vitae Street, whereupon it continues east along the centerline of Arbor Vitae Street.

- A 36-inch north–south recycled water pipe runs along Prairie Avenue in the centerline from Manchester Boulevard until it shifts to the eastern portion of the right-of-way just north of the Hardy Street intersection in between the 60-inch DWP line and storm main (discussed below); this 36-inch line extends further south through the segment past Century Boulevard and 102nd Street.

Stormwater Lines

Similar to other segments along the alignment, all storm drains and mains in this segment are gravity flow and consist of reinforced concrete pipe.[79] The following stormwater drains occur along the Prairie Avenue segment:

- Approximately midway between Manchester Boulevard and Nutwood Street, a storm drain transects the alignment in an east–west direction. This drain diverges in the southeastern direction into the Forum property after exiting the right-of-way.
- At Buckthorn Street's intersection with Prairie Avenue, a 33-inch north–south storm drain begins in the eastern portion of the right-of-way, approximately 30 feet from the eastern curb line, and extends through the length of the Manchester Boulevard segment. The storm drain includes branch tie-ins at multiple points along its length; these consist of points at Arbor Vitae Street, Hardy Street, 97th Street, 99th Street, Century Boulevard, 101st Street, and 102nd Street. Additionally, the storm drain increases in diameter as it proceeds south; the pipe expands from 33 inches to 39 inches at Hardy Street. Previously mentioned branch tie-ins to the storm drain are described as follows:
- At Arbor Vitae Street, three stormwater drain branches tie into the main drain at the Arbor Vitae Street intersection. At the northern portion of Prairie Avenue and Arbor Vitae Street, two of these branches tie in to the main line; the remaining branch extends to the northeastern corner of the intersection and the other to the northwest. At the southern portion of the intersection, a third branch ties in and extends to the northeastern corner of the intersection. Storm drain inlets are located along Prairie Avenue at the northeastern and northwestern corners of the intersection and along Arbor Vitae Street at the northwestern corner.
- At Hardy Street, a stormwater drain branch tie-in is located approximately 400 feet north of the Hardy Street intersection and extends northeast into the Hollywood Park property. Approximately 25 feet after this point the storm drain main expands to a 39-inch line.
- The Hardy Street intersection includes two branch tie-ins to the main drain at northern and southern points of the intersection; the northern tie-in extends to the northwestern corner of the intersection

79 County of Los Angeles Department of Public Works, *Los Angeles County Storm Drain System*, interactive map, accessed June 2020, https://pw.lacounty.gov/fcd/StormDrain/index.cfm.

while the southern tie-in extends to the northeast and follows the Hardy Street centerline into the adjacent Hollywood Park property.

- Storm drain inlets are located on the eastern side of Prairie Avenue approximately 400 feet north of Hardy Street, as well as on the northeastern and northwestern corners of the Hardy Street intersection along Prairie Avenue.
- Moving south, an 8-inch north–south sewer pipe begins along Prairie Avenue approximately 100 feet south of the Arbor Vitae Street intersection and travels under the western curb. The 8-inch sewer pipe continues south in the same location, and would continue under Hardy Street where the guideway would end at the Prairie Avenue/Hardy Street Station.

Electrical Utilities

Within the proposed Project's alignment, electrical lines occur as noted.

Market Street Segment

The guideway would begin at the Market Street/Florence Avenue Station, situated in the public right-of-way in between Florence Avenue and Regent Street, and would extend south along Market Street. According to Southern California Edison (SCE), there is one existing 16 kva circuit currently available along Market Street.[80]

Manchester Boulevard Segment

The guideway would shift east onto Manchester Boulevard at the intersection with Market Street. As shown in **Table 4.14-8: Existing Electrical Utilities**.

Prairie Avenue Segment

At Prairie Avenue, the guideway would then proceed south until Hardy Street. As shown in **Table 4.14-8**, three large electrical lines, sizes 16 kilo-volt-ampere (kva), 17.5 kva, and 50 kva, run north-south under Prairie Avenue from Manchester Boulevard to Hardy Street where the guideway would end at the Prairie Avenue/Hardy Street Station.

80 Lea+Elliott, Inc. *Inglewood Transit Connector EIR Operating Systems Conceptual Planning EIR Project Definition DRAFT* - June 2020.

Table 4.14-8
Existing Electrical Utilities

Segment	Description	Provider
Prairie Avenue		
Manchester Boulevard to Nutwood Street	Large electrical lines (16 kva, 17.5 kva, 50 kva)	SCE
Nutwood Avenue to Kelso Street/Pincay Drive	Large electrical lines (16 kva, 17.5 kva, 50 kva)	SCE
Kelso Street/Pincay Drive to La Palma Drive	Large electrical lines (16 kva, 17.5 kva, 50 kva)	SCE
La Palma Drive to Arbor Vitae Street	Large electrical lines (16 kva, 17.5 kva, 50 kva)	SCE
Arbor Vitae to Hardy Street	Large electrical lines (16 kva, 17.5 kva, 50 kva)	SCE

Source: Conceptual Design Utility Impacts, Pacifica Services, Incorporated, December 2019.

Gas Utilities

Market Street Segment

The guideway would begin at the Market Street/Florence Avenue Station, situated in the public right-of-way in between Florence Avenue and Regent Street, and would extend south along Market Street. There are no existing gas utilities within the Market Street segment.

Manchester Boulevard Segment

The guideway then shifts to run down Manchester Boulevard at the intersection with Market Street. As shown in **Table 4.14-9: Existing Gas Utilities**, a gas line runs across the alley between Market Street and Locust Street, tie-ins are shown stemming west for approximately 100 feet along the southern curb and east for approximately 100 feet along the northern curb of Manchester Boulevard. A gas line runs down the eastern side of Locust Street; a tie-in stems off under the southern curb of Manchester Boulevard and extends for approximately 185 feet. A gas line follows Hillcrest Boulevard in a northeast–southwest direction and transects Manchester Boulevard at the intersection of the two roadways; this gas line contains a tie-in to the Maintenance and Storage Facility (MSF) along Hillcrest Boulevard, approximately 275 feet southwest of the Manchester Boulevard and Hillcrest Boulevard intersection.

The north–south gas line along Hillcrest Boulevard contains a tie-in to an east–west gas line which follows under the northern curb of Manchester Boulevard; this tie-in travels under the northern sidewalk of Manchester Boulevard in between Hillcrest Boulevard and Manchester Terrace.

An east–west gas line enters the segment from Manchester Drive and crosses along Manchester Boulevard just south of Spruce Avenue. The line continues under the southern curb of Manchester Boulevard

throughout the remainder of the segment and terminates approximately 195 feet of the Prairie Avenue intersection.

Prairie Avenue Segment

The guideway then shifts to run down Prairie Avenue at the intersection with Manchester Boulevard. As shown in **Table 4.14-9**, a gas line travels south along the western side of Prairie Avenue, continuing throughout the segment past Century Boulevard.

There are no high-pressure distribution lines within the footprint of the proposed Project. The closest high-pressure distribution line is located within the street right-of-way along Pincay Drive, starting from the intersection at Crenshaw Boulevard and ending approximately 500 feet before the intersection at South Prairie Avenue. Minor laterals connect these lines to points of service. Two 30-inch gas transmission lines run beneath the rights-of-way of local roadways; one runs along Crenshaw Boulevard from north to south, approximately 1 mile east of South Prairie Avenue and the other runs along West 104th Street from east to west, approximately 0.25 miles south of West Century Boulevard.[81]

A gas line tie-in from the northern curb of Kelso Street/Pincay Drive extends just north onto the western curb of Prairie Avenue, but does not transect the alignment. The north–south gas line contains an additional gas line tie-in from its west at Arbor Vitae Street, which follows the northern portion of that roadway. At the Century Boulevard intersection, east–west gas lines follow both the northern and southern portions of Century Boulevard and transect the alignment to tie in with the north–south gas line; the east–west gas line on the northern side of Century Boulevard meets the north–south gas line near the center of the intersection. The east–west gas line on the southern side of Century Boulevard meets the north–south gas line near the southern end of the intersection.

81 Southern California Gas Company, "Los Angeles County: Gas Transmission and High Pressure Distribution Pipeline Interactive Map," accessed July 2020, https://socalgas.maps.arcgis.com/apps/webappviewer/index.html?id=c85ced1227af4c8aae9b19d677969335.

Table 4.14-9

Existing Gas Utilities

Segment	Description
Manchester Boulevard	
Market Street to Locust Street	• A north–south gas line runs along the alley and through the segment approximately midway between Market Street and Locust Street. • Gas line tie-ins are shown stemming west along the southern curb of Manchester Boulevard and east along the northern curb of Manchester Boulevard.
Locust Street to Hillcrest Boulevard	• A gas line crosses Manchester Boulevard at Locust Street and Hillcrest Boulevard along the eastern sides of those roadways. • A gas line branch stems from the line on Locust Street and follows under the southern side of Manchester Boulevard; this branch terminates prior to Hillcrest Boulevard. • The gas line on Hillcrest Boulevard ties in to an east–west gas line that follows the northern side of Manchester Terrace; this tie-in follows under the sidewalk on the northern side of Manchester Boulevard in between Hillcrest Boulevard and Manchester Terrace.
Spruce Avenue to Tamarack Avenue	• A gas line enters the segment from Manchester Drive and crosses along Manchester Boulevard just south of Spruce Avenue. • The line continues under the southern curb of Manchester Boulevard throughout the remainder of the Manchester Boulevard alignment segment.
Tamarack Avenue to Prairie Avenue	• The gas line continues from the previous segment under the south curb of Manchester Boulevard. • The gas line terminates just before the Prairie Avenue intersection.
Manchester Boulevard to Prairie Avenue	• A gas line travels south along the western side of Prairie Avenue and enters the alignment at Manchester Boulevard. • This gas line travels south through the remainder of the Prairie Avenue alignment segment.
Prairie Avenue	
Nutwood Avenue to Kelso Street/Pincay Drive	• A gas line tie-in from the northern curb of Kelso Street/Pincay Drive extends just north onto the western curb of Prairie Avenue, but does not transect the alignment.

Source: Conceptual Design Utility Impacts, Pacifica Services, Incorporated, December 2019.

4.14.4.3 Adjusted Baseline

This section assumes the Adjusted Baseline Environmental Setting as described in **Section 4.0: Environmental Impact Analysis**, *4-5: Adjusted Baseline*. Specifically, operation of land uses included in the Hollywood Park Specific Plan (HPSP) would require additional utility services for water, wastewater treatment or storm water drainage, electric power, natural gas, and telecommunications. The HSPS would utilize similar service providers as the proposed Project for utility supplies and infrastructure. Similar to the proposed Project, the HPSP was required to analyze impacts to utility services and infrastructure prior to approval.

As shown in **Figure 3.0-2: City of Inglewood**, a segment of the proposed Project would be adjacent to the Hollywood Park Specific Plan (HPSP) along Prairie Avenue. The HPSP provides guidelines and standards for improvements in the public right-of-way within the Specific Plan, which includes approximately 0.5 miles of street frontage along Prairie Avenue. Within the HPSP, minimum building setback requirements involve 30 feet of separation from the roadway along Prairie Avenue extending from Pincay Drive/Kelso Street to approximately midblock between Hardy Street and 97th Street.[82] Portions of the guideway and stations, and support columns would be situated within the 30-foot setback of the HPSP along Prairie Avenue; this 30-foot setback area would be available for use by the proposed Project. Currently, no operational utility infrastructure is located within the 30-foot setback area; however, an abandoned oil line has been identified within the setback area south of Arbor Vitae Street and north of Hardy Street. This abandoned line would not require any action for use of this area.

4.14.5 THRESHOLDS OF SIGNIFICANCE

Significant utility and service system impacts would occur if the proposed Project would result in the following conflict, thereby causing physical environmental impacts:

Threshold U-1: **Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects.**

This threshold is derived from Appendix G of the State CEQA Guidelines relative to utilities and service systems.

Prior to the preparation of this Draft EIR, an Initial Study (included in **Appendix 2.0.2** of this Draft EIR) was prepared using the California Environmental Quality Act (CEQA) Environmental Checklist Form to assess

82 City of Inglewood, *Hollywood Park Specific Plan, "*Exhibit 6-5- Minimum Building Setbacks," 6-30, adopted July 8, 2009, amended September 23, 2014, and further amended February 24, 2015.

potential environmental impacts on utilities and service systems. For five of these screening thresholds, the Initial Study found that the proposed Project would have a "Less than Significant Impact." The following impacts related to utilities are considered less than significant: :

- Potential impacts related to a substantial adverse effect on the proposed Project's ability to comply with wastewater treatment requirements of the LARWQCB.
- Potential impacts related to a substantial adverse effect on the permitted capacity of water or wastewater treatment facilities.
- Potential impacts related to a substantial adverse effect on the availability of water supplies.
- Potential impacts related to a substantial adverse effect on the capacity of wastewater treatment provider which serves or may serve the proposed Project.
- Potential impacts related to water supplies.
- Potential impacts related to a substantial adverse effect on the permitted capacity of Los Angeles County (County) landfills that would accommodate the proposed Project's solid waste disposal needs.
- Potential impacts related to a substantial adverse effect on the proposed Project's ability to comply with federal, State, and local statutes and regulations related to solid waste.

Impacts found to be less than significant are further discussed in **Section 6.0** of this Draft EIR.

4.14.6 IMPACT ANALYSIS FOR THE PROPOSED PROJECT

Impact U-1: **Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?**

The proposed Project is a fully elevated guideway and stations that accommodate an automated people mover (APM) train. The guideway spans a total length of approximately 1.6 miles with dual set of tracks (for train travel in both directions and connecting three, center-platform stations, as shown in **Figure 3.0-4: Proposed Project Alignment**. The technology will be self-propelled, rubber-tire APM train or monorail.

The APM train tracks are spaced as close together as possible with tracks diverging at approaches to/from stations and at stations and to accommodate switches. The elevated guideway would be supported by single or double column/bents (depending on the train track separations and the guideway location relative to potential column placements). While the final column locations and designs will be by the selected design/build/fiancé/operate/maintain (DBFOM) contractor, the alignment has been optimized to minimize the number of columns and potential double column/bents to the extent feasible. The

procurement documents for the DBFOM contractor would identify the known utility locations and require the DBFOM contractor to locate columns to avoid and/or minimize impacts to existing utilities.

As noted in **Tables 4.14-7**, **4.14-8**, and **4.14-9**, multiple utilities exist under Market Street, Manchester Boulevard, and Prairie Avenue.

Construction

Relocation or Construction of Utilities

For planning purposes, a distance of 10-feet from the location of utilities based on the review of existing conditions[83] was used to identify utilities that may be impacted from construction activities that involve excavation. Existing roadways and infrastructure along the alignment will require some reconfiguration to accommodate new elevated guideway structures and stations. In addition to surface improvements, utility infrastructure under the roadway surface may need to be relocated to accommodate the guideway columns, footings, and other components. As discussed in **Section 3.0: Project Description**, *3.5.4: Roadway Improvements* of the Project Description, the roadway reconfiguration along Market Street, Manchester Boulevard and Prairie Avenue are necessary to ensure that the existing roadway travel capacity is not diminished or reduced in the final as-built conditions for the proposed Project. The column locations and spacings will be defined by the DBFOM contractor as part of their final designs to be guided by aesthetic principles defined and adopted as part of the EIR. The columns, for the most part, will be required to be located within the public right of way, either within sidewalks or parking lanes.

Market Street/Florence Avenue Segment

The Market Street/Florence Avenue Station would be supported by dual-span columns from the northern terminus to just north of Regent Street. At this point, the dual lane tracks are separated to accommodate the Market Street/Florence Avenue Station's center platform and turn-back switches that facilitate in-bound APM trains to switch to the other track for its outbound journey. As the guideway approaches Regent Street, the dual lane tracks converge and are supported by single columns until Manchester Avenue. From Manchester Avenue, the guideway turns eastward towards Prairie Avenue The columns would be primarily located in the existing median along Market Street between Regent Street to Manchester Avenue. As discussed previously, the column locations and spacings will be defined by the DBFOM contractor as part of their final designs to be guided by aesthetic principles defined and adopted as part of the EIR.

83 *Conceptual Design Utility Impacts,* Pacifica Services, Incorporated, December 2019.

There are several major utility lines identified within the Market Street segment of the proposed Project including water, sewer, stormwater, and electrical lines. Based upon preliminary review, it appears that all utilities within this segment can be avoided and no major utilities will require relocation. However, the location of utilities is based on a review of existing documentation[84] and the exact locations have not been field verified. Additionally, several storm drains have been identified along Market Street which may require relocation due to column placement.

In addition, SCE has determined that the proposed Project would likely utilize the existing 16 kva circuit located within the right-of-way of Market Street to provide power for the proposed. SCE has also noted that utilization of this existing circuit would require infrastructure upgrades to accommodate the proposed Project.[85]

Because the locations of utilities identified based on review of existing documentation may not be accurate, utility lines could occur within areas that require excavation for foundations or drilling for columns. Construction could require the potential relocation of utility lines to accommodate the support structure foundations or columns. The potential for relocation of utility lines would be potentially significant.

Manchester Boulevard Segment

As the guideway turns east onto Manchester Boulevard, the guideway would transition from single columns to dual spans to support the turn onto Manchester Boulevard. The dual columns will span across the northern and eastern portions of the intersection of Market Street and Manchester Boulevard. From the intersection of Market Street and Manchester Avenue to Locust Street, singular columns would be arranged within the public right-of-way on the southern side of Manchester Boulevard. Some columns may be located within the existing parking lane on the southern side of Manchester Boulevard, requiring the elimination of parking.

Columns would shift back to a dual-span placement as the guideway transitions to span both sides of the right-of-way approaching the Locust Street and Hillcrest Boulevard intersections prior to the MSF facility, located between Manchester Boulevard's intersections with Hillcrest Boulevard and Spruce Avenue. Dual-column spans on each side of Manchester Boulevard would continue from the MSF facility until Spruce Avenue, whereupon the guideway would shift back to a single column support structure within the public right-of-way along the northern side of Manchester Boulevard.

84 *Conceptual Design Utility Impacts*, Pacifica Services, Incorporated, December 2019.

85 Lea+Elliott, Inc. Inglewood Transit Connector EIR Operating Systems Conceptual Planning EIR Project Definition DRAFT-June 2020.

Singular columns would continue on the northern side of Manchester Boulevard until just past midblock in between Osage Avenue and Prairie Avenue, where the columns would shift back to dual spans as the guideway begins to turn south onto Prairie Avenue. Just prior to Manchester Boulevard's intersection with Osage Avenue, dual-column spans would be necessary to provide guideway support to allow it to make the turn south on to Prairie Avenue.

Several major utility lines have been identified within the Manchester Boulevard segment of the alignment including water, sewer, wastewater, stormwater, and gas lines. Based upon preliminary review, it appears that all utilities within this segment of the alignment can be avoided and no major utilities will require relocation. However, the location of utilities is based on a review of existing documentation[86] and the exact locations have not been field verified. Additionally, several storm drains have been identified along Manchester Boulevard which may require relocation due to column placement.

Because the locations of utilities identified based on review of existing documentation may not be accurate, utility lines could occur within areas that require excavation for foundations or drilling for columns. Construction could require the potential relocation of utility lines to accommodate the support structure foundations or columns. The potential for relocation of utility lines would be potentially significant.

Prairie Avenue Segment

Dual-span columns would continue as the guideway proceeded south onto Prairie Avenue and past Nutwood Street, the Prairie Avenue/Pincay Drive Station, and Pincay Drive. Just past the Pincay Drive intersection, columns would shift at Prairie Avenue's intersection with La Palma Drive to support a single guideway on the western side of Prairie Avenue to accommodate a similar shift in guideway track along the west side of the roadway.

Columns would continue in this manner until just south of Arbor Vitae Street, where they would transition back to a dual span on opposite sides of the right-of-way as the guideway approached the Prairie Avenue/Hardy Street Station. The dual-span columns will continue until the terminus of the guideway system, just north of the Prairie Avenue and Hardy Street intersection.

Several major utility lines have been identified within the Prairie Avenue segment of the alignment including water, sewer, wastewater, stormwater, electrical, and gas lines. Based upon preliminary review, it appears that all utilities within this segment of the alignment can be avoided and no major utilities will require relocation. However, the location of utilities is based on a review of existing documentation[87] and

86 *Conceptual Design Utility Impacts*, Pacifica Services, Incorporated, December 2019.
87 *Conceptual Design Utility Impacts,* Pacifica Services, Incorporated, December 2019.

the exact locations have not been field verified. Additionally, several storm drains have been identified along Prairie which may require relocation due to column placement.

Because the locations of utilities identified based on review of existing documentation may not be accurate, utility lines could occur within areas that require excavation for foundations or drilling for columns. Construction could require the potential relocation of utility lines to accommodate the support structure foundations or columns.

The potential for relocation of utility lines would be potentially significant.

Telecommunication

Construction activities, including the construction of new buildings and hardscape, typically do not have the need for the construction of telecommunication facilities. Construction impacts associated with the installation of new telecommunication infrastructure would primarily involve trenching in order to place the lines below ground surface. When considering impacts resulting from the installation of any required telecommunications infrastructure, all impacts are of a relatively short duration and would cease to occur when installation is complete. Installation of new telecommunications infrastructure would be limited to on-site telecommunications distribution and minor off-site work associated with connections to the public system. No upgrades to off-site telecommunications facilities are anticipated. Any work that may affect services to the existing telecommunications lines would be coordinated with service providers.

Since the locations of existing telecommunication infrastructure has not been determined, telecommunication infrastructure could occur within areas that require excavation for foundations or drilling for columns. Although unlikely, construction could require the potential relocation of telecommunication infrastructure to accommodate the support structure foundations or columns. The potential for relocation of telecommunication infrastructure be potentially significant.

Solid Waste

The City is served by CDS, which transfers solid waste to the Sunshine Canyon Landfill in Sylmar, California. The Sunshine Canyon Landfill currently receives an average of 3 million tons per year of solid waste, and is permitted to receive a maximum of 4.4 million tons per year of solid waste. The landfill has approximately 62,082,860 tons of remaining capacity. Based on the landfill's throughput and availability of land, the landfill has a cease operation date of 2037. Construction of the proposed Project would include demolition of existing buildings as previously noted and would result in the generation of various construction waste including scrap lumber, scrap finishing materials, various scrap metals, and other recyclable and nonrecyclable construction-related wastes. Recyclable construction materials, including concrete, metals, wood, and various other recyclable materials would be diverted to recycling facilities. Given the remaining

existing capacity at the Sunshine Canyon Landfill, the proposed Project would not require construction of new or expanded solid waste facilities.

The City is required to maintain the 50 percent diversion rate required by the State through the California Solid Waste Management Act. The DBFOM contractor would contract with CDS for bin removal activities. Compliance with construction and operational debris removal and recycling requirements would occur with the City's Environmental Services Department and CDS's Sunshine Canyon Landfill. The proposed Project would not conflict with federal, State, or local statues and regulations related to management and reduction of solid waste. Therefore, the impact of solid waste generated by construction of the Project would be less than significant.

Operation

Telecommunication

The MSF command, control, and communications (CCC) facilities, including the Central Control Room (CCR) and the CCC equipment room, are planned to be co-located at the MSF.[88] CCC equipment is required for train control and supervision, power control and supervision, station doors, dynamic graphics, closed-circuit television (CCTV), public address, radio, fire detection, and other system-related elements. Additional CCC equipment is located at stations and along the wayside. The CCR provides for the supervision of the overall APM operation. It houses all display, safety, and communications equipment required to monitor and control the APM system. Typical equipment includes large work consoles and monitor banks (for system overview, CCTV, etc.). The CCC equipment room would be adjacent to the CCR and houses all servers and equipment for the control of the APM system. The equipment room is also sized to house the uninterruptible power supplies (UPS) required for the operation of the system equipment. The UPS powers low voltage system equipment at the CCR and CCC equipment rooms. Once operational, the proposed Project would not require additional telecommunication infrastructure and no upgrades to off-site telecommunications facilities are anticipated. Any work that may affect services to the telecommunications lines would be coordinated with service providers. Therefore, this impact would be less than significant.

88 Lea+Elliott, Inc. *Inglewood Transit Connector EIR Operating Systems Conceptual Planning EIR Project Definition DRAFT* – June 2020.

Water and Wastewater

Existing utility lines for water and sewer lines are located within the footprint of the proposed Project along Market Street, Manchester Boulevard, and Prairie Avenue. Project components including the MSF and stations would utilize these existing water and sewer lines as needed to connect for restrooms, water fountains and janitorial cleaning purposes.

The MSF would also provide for cleaning via an automatic washing of the vehicle exteriors at a Vehicle Wash Facility. The vehicle wash is typically a stationary system located in/near/adjacent to the MSF building where trains can be either manually or automatically moved through the wash facility. Assuming each car gets washed 1 time per week, it is estimated that on average, 230 gallons of water per day (gpd) will be used per day.[89] An on-site water recycling system will be used to collect and recycle water at the wash facility only (for estimation purposes, a recycling value of 80 percent is assumed); the amount of water recycling is determined by the APM System operator and local requirements. Based on the 280 gpd and 80 percent recycling; the annual water usage for the APM wash system is approximately 0.5 acre-feet per year.[90] The APM procurement documents will specify the amount to water recycling that is required. The MSF would connect to existing water and sewer lines located along Manchester Boulevard.

Other water demand requirements for the MSF would include restrooms, water fountains, showers, cleaning, etc. Water demand for the stations would include restrooms and water fountains. Water demand for the proposed Project is shown in **Table 4.14-10: Proposed Project Water Demand**. Based on the 97,000 SF of the MSF, and approximately 8,000 SF for each of the three stations (for a total of 24,00 SF), the total water demand for the Project would be approximately 52.62 afy.

The existing commercial center on the site of the proposed MSF is currently served by existing utility lines. Existing water demand for the existing uses to be removed (see **Table 4.14-2**) is approximately 61.16 afy. The proposed Project (stations and MSF) would use approximately 8.5 afy less water than the current uses. Therefore, this impact would be less than significant.

89 Email correspondence with Iris Yuan, Lea+Elliott, June 29, 2020.

90 Annual water demand is calculated as 280 gpd reduced by 80 percent to account for recycled water. The result is 56 gpd of fresh water per day for 365 days, or approximately 20,440 gallons of water per year.

Table 4.14-10
Proposed Project Water Demand

Project Component	Square Footage	Demand Factor (gpd)	Water Demand (gpd)
Stations (3 total)	8,000 SF each 24,000 SF total	0.05	1,200
MSF	97,000 SF	0.05	4,850
MSF Train wash			230
Total Daily Demand			6,280
Total Annual Demand			2,292,200 gal/yr. 52.62 afy

_____
Demand factor is based on LADWP demand factors for industrial uses of 0.05 gpd per SF
Stations and MSF use include restrooms, showers and water fountains and janitorial water use.

Electrical Power

In 2019, SCE was contacted to begin coordination related to the power demand requirements for the proposed Project (including the stations, MSF and APM trains).[91] The following requirements and assumptions were given to SCE regarding the proposed Project:

- The proposed Project would require approximately 10 MVA to power the system (trains, traction power, etc.) and infrastructure (station lighting and vertical circulation, guideway lighting, etc.)
- Fully redundant power feeds are requested; and
- Feeds to be provided at a single location; the proposed Project would distribute power as needed.

Using these assumptions, SCE completed a high-level Distribution Study to determine the amount of load that SCE could accommodate and required infrastructure upgrades in order to meet the proposed Project's recommended full redundancy design.[92] SCE's analysis assumed the use of the existing single (nonredundant) 16 kva circuit currently available along Market Street as it may be the most likely used circuit for the proposed Project.

The results of SCE's analysis found that:[93]

- The maximum load that can be accommodated at the present time is 10 MVA.

91 Lea+Elliott, Inc. *Inglewood Transit Connector EIR Operating Systems Conceptual Planning EIR Project Definition DRAFT* – June 2020.
92 Lea+Elliott, Inc. *Inglewood Transit Connector EIR Operating Systems Conceptual Planning EIR Project Definition DRAFT* - June 2020.
93 Lea+Elliott, Inc. *Inglewood Transit Connector EIR Operating Systems Conceptual Planning EIR Project Definition DRAFT* - June 2020.

- To accommodate the 10 MVA load with full redundancy, the following upgrades would be required:
  - 1,500 feet of new civil work/duct banks,
  - 1,860 feet of new 1000 JCN cable,
  - 1,700 feet of upgrading/re-cabling the existing SCE primary cable to 1000 JCN, and
  - Two new gas switches.

Moreover, SCE estimated that normal operation of the proposed TPSS at the MSF Site would have a peak power load flow of 2,008 kilowatts (kW) and normal operation of the proposed TPSS at the Civic Center Site would have an estimated peak power load flow of 2,119 kW for a total of 4,127 kW.

The aforementioned upgrades would be completed by SCE and would be subject to its procedures and requirements for construction and environmental clearance. It should be noted that these values and upgrades are based on the current projected loads for 2026. SCE's distribution system is dynamic and is subject to change prior to the 2026 opening date of the proposed Project. However, as the design of the proposed Project finalizes, SCE can effectively plan for this new load. Therefore, this impact would be less than significant. Although this impact is considered less than significant, Mitigation Measure UT-2 is recommended to ensure that the Project is re-evaluated by SCE so as to allow for final design.

Stormwater

Existing storm drains are located within the alignment along Market Street, Manchester Boulevard, and Prairie Avenue. It is anticipated that the proposed Project would not interfere with these storm drains during operation. Moreover, storm drains would be kept and maintained by the LACFCD and the City. Therefore, this impact would be less than significant.

Natural Gas

No new gas connections to serve the proposed Project elements would be required except at the proposed MSF. Natural gas would be used at the MSF to serve the pressure wash system, and for space and water heating. It is anticipated that the MSF would connect to existing gas infrastructure along Manchester Boulevard at the discretion of the SoCalGas. As further discussed in **Section 4.5**, the proposed Project would result in a net decrease in natural gas usage compared to the current uses. Therefore, this impact would be less than significant.

Summary

Based on current information and analysis by utility providers for operations, the proposed Project would not require additional utility installation which may require the relocation or construction of utility

facilities. However, because the opening year for operation is 5 years away, the potential exists that additional utility upgrades may be necessary to meet operational demand. Utility upgrades would be determined and completed by the appropriate utility company. Operational impacts would be potentially significant if additional utility upgrades are required.

Mitigation Measures

The following mitigation measures have been identified to reduce potentially significant impacts.

Construction

MM UT-1: Prior to the award of the DBFOM contract, and start of any demolition or construction activities, the City shall be responsible for identifying the locations of existing utilities potentially affected by the Project. This shall include coordinating with all existing utility providers for wet and dry utilities (water, sewer, gas ,electric, and telecommunications) to obtain documentation of existing utility locations. Field verification (i.e., potholing and other methods as appropriate) shall be conducted to document the locations of all utilities within 20 feet of the proposed Project's guideway and station foundations.

Based on the information from the field investigations, the DBFOM contractor shall be responsible for coordinating with the appropriate utility owners/operators to determine specific set back requirements for each utility line and the need for any stabilization for protection in place or relocation measures.

Operation

MM UT-2: Prior to the award of the DBFOM contract, and start of construction, the City shall contact SCE and request an updated system Distribution Study to determine the amount of load that SCE could accommodate and required infrastructure upgrades in order to meet the proposed Project's recommended full redundancy design. Should SCE determine that additional system upgrades are required, such upgrades shall be the responsibility of the DBFOM contractor and/or the City to complete (including design and any additional environmental clearance), subject to the review and approval of SCE and the City, as applicable.

Level of Significance After Mitigation

Construction

With the implementation of **Mitigation Measure MM UT-1** impacts related to the relocation or replacement of utilities would be less than significant.

Operation

Impacts would be less than significant.

Implementation of **Mitigation Measure MM UT-1** would ensure that the Project is re-evaluated by SCE so as to allow for final design.

4.14.7 CUMULATIVE IMPACTS

Implementation of the proposed Project including the related projects identified in **Section 4.0**, *4.0.6: Cumulative Assumptions*, would further increase demands for utilities and may require the construction or relocation of utility lines.

Water

As discussed previously, the City of Inglewood provides water to 86 percent of the residences and businesses in the City. Water is provided in the remaining areas by Golden State Water Company and Cal America Water.[94] There are approximately 74 related projects within the City of Inglewood that would be within the same service area as the Project. Development of the proposed Project and related projects could cumulatively increase demands on the existing water infrastructure system. However, each project will require a site-specific assessment to determine any impacts to existing water infrastructure. Specifically, all related projects would be required to assess impacts to existing water infrastructure and coordinate with the City prior to project approval. Moreover, utility upgrades would be determined and completed by the City and would be subject to its procedures and requirements for construction and environmental clearance. Additionally, under multiple dry year conditions, imported supplies can be purchased to meet an annual increase in demand. Additional water would be purchased through the City's Metropolitan member agency West Basin Municipal Water District (WBMWD). The purchase will draw primarily through two major water supply systems: the Colorado River Aqueduct and through the State Water Project.[95,96] The proposed Project (stations and MSF) would use approximately 8.5 afy less water than the current uses. Therefore, cumulative impacts related to water infrastructure would be less than significant.

94 City of Inglewood. Water Works. https://www.cityofinglewood.org/463/Water-Works.

95 City of Inglewood Public. Public Works. Urban Water Management Plan 2015. https://www.cityofinglewood.org/DocumentCenter/View/14954/ING-2015-UWMP-Report-Final. Accessed November 4, 2020.

96 Colorado River Aqueduct was constructed and operated by Metropolitan, which transports water from the Colorado River. The State Water Project is owned and operated by the Department of Water Resources, which transports water from the Sacramento-San Joaquin Delta through the California Aqueduct.

Wastewater

As discussed previously, the City's Public Works Department manages the City's sanitary sewer collection system. There are approximately 74 related projects within the City of Inglewood that would be within the same service area as the Project. Development of the proposed Project and related projects could cumulatively increase demands on the existing wastewater infrastructure system. However, each project will require a site-specific assessment to determine any impacts to existing wastewater infrastructure. Specifically, all related projects would be required to assess impacts to existing water infrastructure and coordinate with the City prior to project approval. Moreover, utility upgrades would be determined and completed by the City and would be subject to its procedures and requirements for construction and environmental clearance. Moreover, the proposed Project (stations and MSF) would use approximately 8.5 afy less water than the current uses. As such, the proposed Project would generate less wastewater than current uses. Therefore, cumulative impacts related to wastewater infrastructure would be less than significant.

Stormwater

As discussed previously, the main storm drain lines within the area of the proposed Project are owned and maintained by the LACFCD and the City. There are approximately 394 related projects within the County of Los Angeles that would be within the same service area as the Project. Development of the proposed Project and related projects could cumulatively increase demands on the existing stormwater infrastructure system. However, each project will require a site-specific assessment to determine any impacts to existing stormwater infrastructure. Specifically, all related projects would be required to assess impacts to existing water infrastructure and coordinate with the LACFCD and the City prior to project approval. Moreover, utility upgrades would be determined and completed by the LACFCD and the City and would be subject to their procedures and requirements for construction and environmental clearance. Therefore, cumulative impacts related to stormwater infrastructure would be less than significant.

Electric Power

As discussed previously, electricity within the City is supplied by SCE. There are approximately 304 related projects that would be within the same service area as the Project. Development of the proposed Project and related projects could cumulatively increase demands on the existing electrical infrastructure system. However, each project will require a site-specific assessment to determine any impacts to existing electrical infrastructure. Specifically, all related projects would be required to assess impacts to existing electrical infrastructure and coordinate with SCE prior to project approval. Similar to the Project, utility upgrades for the related projects would be determined and completed by SCE and would be subject to its procedures and requirements for construction and environmental clearance. Therefore, cumulative impacts related to electrical infrastructure would be less than significant.

Natural Gas

As discussed previously, SoCalGas is the natural gas purveyor within the City. There are approximately 394 related projects that would be within the same service area as the Project. Development of the proposed Project and related projects could cumulatively increase demands on the existing natural gas infrastructure system. However, each project will require a site-specific assessment to determine any impacts to existing natural gas infrastructure. Specifically, all related projects would be required to assess impacts to existing natural gas infrastructure and coordinate with SoCalGas prior to project approval. Similar to the Project, utility upgrades for the related projects would be determined and completed by SoCalGas and would be subject to its procedures and requirements for construction and environmental clearance. Therefore, cumulative impacts related to natural gas infrastructure would be less than significant.

Telecommunications

As discussed previously, the Telecommunications Division of the Information Technology and Communications Department is responsible for all of the voice-related services for the City. Moreover, Spectrum Business is the primary cable provider in the Project area. There are approximately 74 related projects within the City of Inglewood that would be within the Telecommunications Division service area. An additional 320 related projects would be within the Spectrum Business service area. Development of the proposed Project and related projects could cumulatively increase demands on the telecommunication systems. However, each project will require a site-specific assessment to determine any impacts to existing telecommunication infrastructure. Similar to the Project, utility upgrades for the related projects would be determined and completed by the appropriate utility service provider and would be subject to its procedures and requirements for construction and environmental clearance. Therefore, cumulative impacts related to telecommunication infrastructure would be less than significant

4.14.8 CONSISTENCY WITH CITY OF INGLEWOOD GENERAL PLAN

The City's General Plan includes policies that relate to utilities including water production and wastewater and pertinent to utilities and service systems. These include:[97]

- Protect aquifers and water sources by preventing contamination of groundwater from surface contaminants and treating groundwater pumped from City wells to ensure the water meets safe drinking water standards.
- Reduce the ever-increasing demand being placed on the aquifers and on the Statewide water sources through cumulative conservation efforts, reuse of water, and using reclaimed water where potable water is not needed (namely, irrigation and landscaping).

97 *City of Inglewood General Plan,* "Conservation Element" (1997).

- Maintain a water quality monitoring system to ensure continues compliance with State standards.

Further, the General Plan Conservation Element includes the following policies related to stormwater relevant to the proposed Project:

- Visit businesses to educate owners about stormwater regulations and the penalties for illegally dumping into storm drains.
- Require periodic sweeping to remove oil, grease, and debris from parking lots with 25 spaces or more.
- Increase the frequency of sampling storm drain pollution by County agencies to assess which measures are more successful.
- Continue to stencil warnings over individual storm drain openings that advise against discarding litter into the drains.

Additionally, the General Plan Conservation Element discusses ways to achieve solid waste conservation.

These policies seek to ensure the City maintains a diversity of water sources to prevent over-reliance on aquifers and Statewide water sources, and to attain safe drinking water standards for water pumped from City wells, in part through monitoring, periodic maintenance measures, and public education efforts.

The proposed Project responds to the City's vision by incorporating a range of both mandatory and potential but feasibly-integrated sustainability measures (see **Table 3.0-5**) for the proposed Project related to the areas of energy efficiency and renewable energy, water efficiency and conservation, material conservation and resource efficiency, environmental quality, planning and integrated design, and site planning. These measures apply on a component-by-component basis for the guideway and stations, MSF, and TPSSs. Among the sustainability measures related to limiting water consumption and preventing wastewater generation are mandatory efforts to filter and reuse wash/rinse water from the APM train wash, xeriscape landscaping, weather-based irrigation control, low flow faucets and fixtures, and using best available water efficiency technologies for cooling towers, among others.

Given that the proposed Project includes the aforementioned features and components, it is consistent with the policies of the General Plan.

5.0 ALTERNATIVES

5.1 INTRODUCTION

The California Environmental Quality Act (CEQA) Guidelines require an Environmental Impact Report (EIR) to include a discussion of a reasonable range of alternatives to a project that would "feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the proposed Project and evaluate the comparative merits of the alternatives" (State CEQA Guidelines Section 15126.6). An EIR is not required to consider every conceivable alternative to a proposed project. Rather, a reasonable range of potentially feasible alternatives needs to be considered that will foster informed decision-making and public participation.

Key provisions of the State CEQA Guidelines on alternatives (Section 15126.6(b) through (f)) are excerpted below to explain the foundation and legal requirements for the analysis of alternatives in this Draft EIR.

- *[T]he discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the proposed objectives, or would be more costly. (15126.6(b))*
- *The specific alternative of "no project" shall also be evaluated along with its impact. (15126.6(e)(1))*
- *The "no project" analysis shall discuss the existing conditions at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced, as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services. If the environmentally superior alternative is the "no project" alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives. (15126.6(e)(2))*
- *The range of alternatives required in an EIR is governed by a "rule of reason" that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project. The range of feasible alternatives shall be selected and discussed in a manner to foster meaningful public participation and informed decision making. (15126.6(f))*
- *Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent). (15126.6(f)(1))*

- *[For alternative locations,] only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR. (15126.6(f)(2)(A))*
- *If the lead agency concludes that no feasible alternative locations exist, it must disclose the reasons for this conclusion, and should include the reasons in the EIR. For example, in some cases there may be no feasible alternative locations for a geothermal plant or mining project which must be in close proximity to natural resources at a given location. (15126.6(f)(2)(B))*
- *An EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative. (15126.6(f)(3)).*

5.2 SIGNIFICANT IMPACTS OF THE INGLEWOOD TRANSIT CONNECTOR PROJECT

In accordance with Section 15126.6(b) of the State CEQA Guidelines, the alternatives in this section have been selected to evaluate means for avoiding or substantially reducing the significant impacts of the proposed Inglewood Transit Connector Project (proposed Project or ITC Project) identified in **Section 4.0: Environmental Impact Analysis** of this Draft EIR.

Table 5.0-1: Environmental Impact Summary presents a summary of findings for each topic analyzed in this EIR for the proposed Project. As shown, impacts related to aesthetics, air quality, biological resources, cultural resources, hazards and hazardous materials, hydrology and water quality, noise and vibration, tribal cultural resources, and utilities and service systems were determined to have significant impacts prior to mitigation.

Table 5.0-1
Environmental Impact Summary

Topic	Significant Impact?	Mitigated to Less than Significant?	Unavoidable Significant Impact?
Aesthetics	Yes	No	Yes
Air Quality	Yes	No	Yes
Biological Resources	Yes	Yes	No
Cultural Resources	Yes	No	Yes
Energy Resources	No	N/A	No
Geology and Soils	Yes	Yes	No
Greenhouse Gas Emissions	No	N/A	No
Hazards and Hazardous Materials	No	N/A	No
Land Use and Planning	No	N/A	No
Noise and Vibration	Yes	Yes	No
Population, Employment and Housing	No	N/A	No
Transportation	No	N/A	No
Tribal Cultural Resources	Yes	Yes	No
Utilities and Service Systems	Yes	Yes	No

Measures are identified to mitigate Project impacts to less than significant, with the exception of short term air emissions during construction of the Project and impacts to two buildings located on Market Street in Downtown Inglewood identified as historic resources. The proposed demolition of the commercial building at 150 South Market street, identified as a historic resource, would be an unavoidable significant impact of the proposed Project. The APM guideway would also limit or block views of the primary façade of the former Fox Theater building on Market Street. Because the ability of the former Fox Theater to convey its historic significance would be impaired following the implementation of the proposed Project, this indirect visual impact on the former Fox Theater is also considered an unavoidable significant cultural resource and aesthetic impact of the proposed Project.

5.3 PROJECT OBJECTIVES

As identified in the State CEQA Guidelines, the achievement of Project objectives was considered in determining potentially feasible alternatives that would avoid or substantially lessen any significant effects of the proposed Project.

The City's goals and objectives for the Inglewood Transit Connector Project are as follows:

- Provide direct and convenient connection to the Metro regional transit system for local residents and the region to access the City's new major employment, commercial, and activity centers;
- Provide sufficient transit connection capacity between the Metro regional transit system and the City's new major activity centers with enhanced travel time certainty and sufficient capacity to meet peak ridership demands to encourage transit as a travel mode choice;
- Maintain existing roadway capacity;
- Reduce the City's traffic congestion and alleviate growing demand on the existing roadway network on both major arterials and residential streets for both nonevent and event days;
- Encourage intermodal transportation systems by providing convenient, reliable time-certain transit;
- Increase transit mode split, reduce vehicle trips, and reduce per-capita vehicle miles traveled to the City's major activity centers, with corresponding improvement in air quality, public health, and reductions in greenhouse gas emissions from transportation sources in accordance with the City's goals under SB 375 and State policy with respect to climate change;
- Support the ongoing economic revitalization, including through the creation of public parking facilities;
- Encourage redevelopment and investment within the City in areas served by the proposed Project;
- Provide safe, reliable, and convenient access to businesses in the City so that they are accessible to their workforce and customers;

- Connect the Inglewood community and citizens to jobs, education, services, and destinations within the City and within the region by providing transit within safe and accessible walking distances; and
- Support regional efforts to become more efficient, economically strong, equitable, and sustainable.

5.4 ALTERNATIVES

Alternatives presented in this section consist of potential alternatives that were initially considered but screened-out from further consideration due to their infeasibility or inability to meet the basics objectives of the Project, and) design alternatives/variations selected for further evaluation. As required by CEQA, the No Project alternative is also addressed in this section.

5.4.1 Alternatives Eliminated from Further Consideration

This section describes preliminary alternatives to the proposed Project initially considered early in the planning process for the ITC Project and the reasons why these alternatives are not evaluated further in this EIR.

Alternative Alignments

As part of the Envision Inglewood planning study,[1] the City evaluated several independent last-mile, fixed-guideway transit connector options in the Locally Preferred Alternative (LPA) Report,[2] comparing these options against key screening criteria and evaluating each option against the City's stated goals and objectives. The LPA Report evaluated the following four conceptual transit alternatives, all consisting of elevated Automated People Mover (APM) systems:

- Alternative A: Market-Manchester Street Alignment (proposed Project)
- Alternative B: Fairview Heights Alignment
- Alternative C: Arbor Vitae Alignment
- Alternative D: Century Blvd Alignment

Alternative A was selected based on the review of these alternatives as the proposed Project.

As described in detail below, Alternatives B, C, and D were eliminated from further consideration.

---

1 City of Inglewood, *Envision Inglewood: Connecting People, Places, and the Future (May 2018)*, accessed March 2019, http://envisioninglewood.org/.

2 City of Inglewood, *Envision Inglewood: Locally Preferred Alternative Report (June 2018),* accessed March 2019, http://envisioninglewood.org/wp-content/uploads/2018/07/Envision-Inglewood-Locally-Preferred-Alternative-Report.pdf.

Alternative B: Fairview Heights Alignment

The City identified an independent elevated APM system alternative connecting directly to the Fairview Heights Metro Crenshaw/LAX Line station along Prairie Avenue as shown in **Figure 5.0-1: Location of Alternative Alignments in the LPA Report**. The Fairview Heights Alignment (Alternative B) would be an aerial alignment running approximately one-half mile along Florence Avenue between Prairie Avenue and West Boulevard, transitioning south and then running along Prairie Avenue for approximately one and three-quarter miles between Florence Avenue to Century Boulevard for a total length of approximately 2.2 miles providing service to the Forum, the Los Angeles Sports and Entertainment District (LASED), and the Inglewood Basketball and Entertainment Center (IBEC).

This alternative would be dual lane and include four stations. The station locations were identified based on connections to traffic generators/development. This alternative includes potential intermodal center locations to capture road-based traffic, such as buses, transportation network companies (TNCs), taxis, and private vehicles, and facilitate a convenient transfer to the ITC. These potential intermodal centers would provide an opportunity to limit the amount and type of road-based traffic into the area, especially during special events.

As outlined in the LPA Report, this alternative was eliminated from further consideration for a variety of reasons including conflicts with, and impacts to, a variety of utility facilities. Based on preliminary research, utilities as well as lateral connections to these pipes from adjacent properties were identified along Florence Avenue. These existing utilities include sewer, gas, and water mains along these streets, which would pose obstacles for placement of guideway columns. In addition, various utility crossings at the curve alignment transition at Florence Avenue and Prairie Avenue would need to be avoided. While Alternative B would be located primarily within the street right-of-way, limited roadway width exists on Prairie Avenue between Florence Avenue and Manchester Boulevard to accommodate the elevated APM structure. Potentially significant property impacts to the Inglewood Cemetery are anticipated because the alignment transitions from Florence Avenue, which has a wide right-of-way of 125 feet, to Prairie Avenue, which has a right-of-way of 78 feet. Furthermore, the right-of-way on Prairie Avenue decreases to less than 70 feet south of Regent Street. This would potentially further impact the Inglewood Cemetery and potentially conflict with utility infrastructure.

Alternative C: Arbor Vitae Alignment

The Arbor Vitae Alignment (Alternative C) concept would be an aerial alignment running approximately 2 miles along Arbor Vitae Street from Aviation Boulevard to Prairie Avenue, where it transitions north to the Forum, and south along Prairie Avenue for approximately one-half mile to Century Boulevard as shown in **Figure 5.0-1**. This alignment would provide service to the Forum, LASED and SoFi Stadium and the IBEC. Additionally, Alternative C presents the opportunity to directly connect to the Los Angeles International

Airport (LAX) and its Landside Access Modernization Program (LAMP), which includes parking opportunities; a consolidated rental car center; and a planned regional multimodal hub served by Metro's Crenshaw/LAX and Green Lines, various Metro, and municipal bus lines, and the LAX APM system. Although this alternative connects to a planned multimodal hub, it would not provide development opportunities are limited in the downtown/commercial district of Inglewood because it will not serve the area.

As with other alternatives, Alternative C also provides opportunities for possible intermodal center locations to capture road-based traffic, such as buses, TNCs, taxis, and private vehicles, and to facilitate a convenient transfer to the ITC.

As outlined in the LPA Report, this alternative was eliminated from further consideration for the following reasons:

- Crossing over and under the I-405 would require coordination with the California Department of Transportation, Los Angeles Department of Transportation, and Los Angeles World Airports. This alignment does not present the opportunity for integration with local economic activity, current and future transit-oriented development, and other initiatives in the downtown/commercial district of Inglewood.
- The right-of-way along Arbor Vitae ranges from 100 feet to 66 feet, with a narrowing of the right-of-way east of Eucalyptus Avenue. Given the narrow right-of-way, this concept would potentially require acquisition of existing small business and possibly cause residential displacement. While the proposed Project would require some small business acquisition, the scale of the acquisition for this alternative, and its impact to residential properties, would be more extensive.
- Alternative C may potentially have adverse economic and fiscal impacts to local businesses along Arbor Vitae Street due to potentially reduced visibility, potential loss of on-street parking during construction, and potential permanent removal of on-street parking spaces to accommodate the alignment. The narrow width of the right of way would further reduce visibility of with project implementation as compared to the proposed alignment. Additionally, while the proposed Project is anticipated to remove some on-street parking spaces as well, the narrow right-of-way of this alternative is anticipated to impact existing on-street parking more extensively.
- Substantial utility lines were identified as part of preliminary research for this alignment alternative in addition to overlapping footprints with the selected alignment, including an 8- to 10-inch sewer pipe along the centerline of Arbor Vitae Street between Eucalyptus Avenue and La Brea Avenue. Therefore, impacts to utilities would be more significant than the proposed alignment.
- Together, these utilities pose significant obstacles as they may require either realignment of the APM guideway or utility relocation would not be considered infeasible at this stage. Underground electrical lines, including vaults, are primarily concentrated along or adjacent to sidewalks and do not pose a major impediment. Nongravity-flow utilities, including water service lines, may be required to be relocated.



SOURCE: City of Inglewood - 2018; Meridian Consultants - 2019

FIGURE **5.0-1**

Location of Alternative Alignments in the LPA Report

208-001-18

Alternative D: Century Boulevard Alignment

The Century Boulevard Alignment (Alternative D) would be an aerial alignment running for approximately two miles along Century Boulevard from Aviation Boulevard to Prairie Avenue, where it transitions north along Prairie Avenue for approximately 1 mile to south of Manchester Boulevard (see **Figure 5.0-1**). This alternative would provide service to the Forum, LASED, and IBEC. Alternative D provides the opportunity to directly connect to a regional multimodal hub served by Metro's Crenshaw/LAX and Green Lines, various Metro, and municipal bus lines, and the LAX APM system.

As with other alternatives, Alignment D also provides opportunities for possible intermodal center locations to capture road-based traffic, such as buses, TNCs, taxis, and private vehicles, and to facilitate a convenient transfer to the ITC.

As outlined in the LPA Report, this alternative was eliminated from further consideration for the following reasons:

- To connect to the multimodal hub, Alternative D would be required to cross the I-405 on the south side of the new consolidated rental car facility under development west of the I-405 Freeway and north of Century Boulevard as part of the LAX Landside Access Modernization. The transition from an elevated segment to below grade under the I-405 or above-grade over the I-405 would not be feasible due to the short distance available and the real estate constraints between Century Boulevard and the LAX Manchester Square development. Additionally, a bridge crossing over I-405 onto Century Boulevard would impede over or under clearance.
- Crossing over and under the I-405 would require coordination with the California Department of Transportation, Los Angeles Department of Transportation, and Los Angeles World Airports. This alignment does not present the opportunity for integration with local economic activity, current and future transit-oriented development, and other initiatives in the downtown/ commercial district of Inglewood.

APM At-Grade Alignment

An at-grade transit system along Market Street was initially considered but determined to be infeasible because it would result in significant traffic impacts, would not have the capacity to meet peak ridership demands, and would be more costly to build and/or operate than the proposed Project. The at-grade system presented many engineering challenges. An at-grade transit system was considered from Florence with a trench into a tunnel at Manchester Blvd to avoid traffic impact intersections. The 700-1,000 feet transition trench from at-grade to a tunnel would bifurcate Market Street with a 20-25 feet track level change, and the direct transition from grade to an elevated guideway was deemed infeasible given the minimum ramp length required 700-1,000 feet (not including transitions).

East/west traffic from Manchester Boulevard to the 405 freeway would be significantly impacted by an at-grade system. Congestion during peak periods could create conflicts with an at-grade, fixed-guideway transit service, which would degrade transit service. Controlled crossings would be required for pedestrians across the at-grade line. An at-grade system would also bifurcate Market Street from just south of Regent Street to Manchester Avenue, creating a long guideway trench and physical barrier in downtown Inglewood, since the structure of the tracks would physically disconnect existing connections between different parts of a community. To avoid these impacts, a tunnel would be needed to allow Manchester Boulevard to cross under the at-grade guideway. Construction of this tunnel would increase the construction cost for this alternative and also result in indirect land use impacts to the character of Market Street, particularly to the southern portion of Market Street in downtown. Tunneling may also adversely impact existing faults in and around the City.

An at-grade system would require a 3-car train at least 210 to 270 feet long. The capacity of this train would require headways during events that could not be achieved. Due to this constraint, this system could not meet peak capacity demands. A Driver/Operator would also be required for an at-grade system, which would further add to the cost to operate the system.

Interlined Operability (Subway) Scenario

An Interlined Operability Scenario was also initially studied by LA Metro and the City of Inglewood, and determined to be infeasible due to the cost and complexity of this type of system and extension of the Crenshaw/LAX Line. . The scenario studied included a connection from the Crenshaw/LAX Line in a subway under Prairie Avenue, which also would jointly operate on a portion of the Crenshaw/LAX Line.

Existing and proposed operations on the Metro Crenshaw/LAX and Green Lines constrain the modification or expansion of service required to allow an interlined system. The Crenshaw/LAX Line is designed to support up to 5-minute minimum headways. This maximizes the service potential for these lines but does not allow for additional capacity to serve a new branch for the Project. For this reason, Metro concluded that any scenario involving integration with the Crenshaw/LAX Line or the Green Line would require upgrades to the entire Metro system to accommodate increased train frequency. City's activity centers at the Forum and LASED area; and was ultimately determined to be infeasible.

Alternative Technologies

The City evaluated a range of driverless transit technologies to determine the viable classes of technologies that could potentially meet the anticipated requirements for the ITC, as outlined in the LPA

Report.[3] These requirements include the ability to meet projected ridership demand in terms of peak-hour demand or line capacity. The projected ridership demands vary between 500 passengers per hour per direction (pphpd) during the weekday commute hours to approximately 9,000-10,000 pphpd during special events.

Only driverless technologies were analyzed because their shorter (more frequent) headways are more likely to meet the anticipated line capacity demands, as well as fit within the geometric constraints given the short system route and the high peak ridership demands from special events and game days at the key ridership generators. The range of such technologies are considered to be a class of Automated Guideway Transit or APM Systems. Differentiation is primarily based on the size of the vehicles, guideway mounting, and propulsion and guidance systems.

The Project's transit technology is a form of light rail technology that can be steel-wheel/steel rail, rubber tired or magnetically levitated, supported on dual rails (that may be steel rail or concrete plinths) or straddling or suspended from a single beam/rail such as in a monorail type technology that will operate within a dedicated trainway. Power distribution will be through a third rail instead of overhead catenary to avoid additional visual impacts due to the overhead catenary system wires and support structures. It will be fully automated (i.e., driverless) which is necessary to operate at the tight headways to meet the projected ridership needs. The vehicles are smaller than traditional heavy rail technology so as to successfully maneuver the tight curves driven by the site-specific conditions. This type of technology is often times also referred to as automated guideway transit, automated people movers or simply monorails; regardless of the terminology used, it is a form of a light rail technology.

The driverless technologies considered were evaluated against the following criteria to provide a preliminary assessment of viable systems suitable for further evaluation and consideration:

- Ability to fit within the site-specific constraints;
- Ability to meet anticipated ridership demand in terms of peak-hour demand or line capacity;
- Flexibility of operations in terms of different train lengths, which would be longer during peak periods and shorter during off-peak periods to maintain the appropriate frequency and service levels.
- Ability to expand the fleet size with minimal or no disruption to ongoing normal passenger service during peak operational hours;
- Technical ability to meet the intended purpose; and

3 City of Inglewood, *Envision Inglewood: Locally Preferred Alternative Report*.

- Viability/availability of technology suppliers as measured by (1) longevity of business providing new systems and continued operations and maintenance; (2) at least one technology application proven in passenger service; and (3) applications of comparable size/scale to the proposed ITC Project.

As discussed in the LPA Report and summarized below, transit technologies ruled out from further consideration included Personal Rapid Transit (PRT), Small Monorails, and Cable-propelled APMs.

Personal Rapid Transit (PRT)

PRT systems are designed to provide nonstop, origin-to-destination service to individuals or small groups of passengers via multiple cars operating in a network. Vehicles are typically 10 to 15 feet long, include a four- to six-passenger seated capacity, and have low headroom. PRT systems operate at low speeds (less than 25 miles per hour [mph]) and, to date, network size has been very limited.

To accommodate such a high-vehicle volume that would be necessary for anticipated ridership of the proposed Project, the infrastructure at the stations and bypass lanes would be substantially larger than for larger vehicle APM systems. For these reasons, this alternative technology was eliminated from further consideration.

The City's Downtown TOD Plan envisioned an aerial personal rapid transit system, noted as SKY Tran, and stated that it could travel at-grade and at slow speeds along Market Street, could detach from guideway and run on wheels on the ground, and then system could then travel above-grade or in a dedicated lane on Manchester Blvd and through the Forum and Hollywood Park parking lots. The system could then return to a low-speed, at-grade alignment through the commercial areas of Hollywood Park. Finally, the system could continue in an aerial alignment east along Century Boulevard, serving the shopping centers there, and south along Crenshaw Boulevard to the Metro Green Line Crenshaw station. Additionally, the TOD noted that a potential route would be along La Brea Avenue instead of Market Street and had a capacity of 12,000 persons per hour per direction and could cost up to $10 million per mile.

The Sky Tran is a suspended system that uses small pods suspended from a monorail. While there are some agreements for future installations, Sky Tran does have an operational system either in the US or abroad at this time. Additionally, it is not proven that Sky Tran's capability has the capacity to carry 12,000 pphpd and the dual-mode (suspended and street modes) operations. Additionally, Sky Tran's current design does not meet ASCE APM standards and does not have any provisions for emergency evacuation from the pods, as is required by NFPA. While not the Sky Tran is not precluded from future procurement, all technology providers must demonstrate compliance with technical specifications, proven track record and demonstrate is capable of carrying about 500 pphpd to 9,000 pphpd.

It should be noted that in the last decade other innovative technologies such as autonomous vehicles (AVs) have proposed very high frequency operations, but they have not been able to meet the anticipated timeline of development and the projected performance. AVs are currently in pilot projects and have been able to demonstrate very limited operations and very low capacities (about 300- 500 pphpd). These pilot AV systems run on simple dedicated routes outside public roads and typically have speeds limited to 15 mph. For these reasons, this alternative technology was eliminated from further consideration.

Small Monorail

Small monorail technology provides line-haul-type service connecting multiple stations. These systems may be operated as a shuttle or pinched loop, with multiple trains following each other and stopping at every station before turning back at the end of the line. Small monorail systems are applied in geographically compact areas and may either operate on top of the guideway or be suspended from the guideway. Vehicles on these systems are typically 15 to 20 feet long and include capacity for 12 to 20 passengers, with operating speeds ranging from 20 to 30 mph.

As determined in the LPA Report, small monorail systems would not be able to meet peak-hour ridership demand and are not a sufficiently flexible length for train operation; thus, such a system would provide adequate capacity. For these reasons, this alternative technology was eliminated from further consideration.

Cable-Propelled System

Cable-propelled systems provide line-haul service connecting multiple stations. These systems are applied in geographically compact areas and are typically operated as a shuttle where trains operate on their track shuttling back and forth between the end-of-line stations. Trains are pulled by cables with cars attached to the cable with grips, with vehicles 35 to 55 feet long and running 25 to 30 mph. This orientation requires that station pair distances be roughly uniform to maintain synchronized operations. Given that the stations for the alignment alternatives are not roughly uniform, this system would not serve the Project's objectives.

This system technology would not be able to meet peak-hour travel demand because the system would not maintain flexibility along train length operation and system extension or expansion. For these reasons, this alternative technology was eliminated from further consideration.

Maintenance and Storage Facility (MSF) Relocation Alternative

The Maintenance and Storage Facility (MSF) Relocation Alternative was initially considered but not carried forward for further analysis because it would not avoid or substantially lessen any of the significant impacts identified for the proposed Project.

With this alternative, the MSF and traction power substation (TPSS) would be located on the 9-acre site at 250 N. Market Street adjacent to the proposed Market Street/Florence Avenue station rather than at the 5.5-acre site at 500 E. Manchester Boulevard. All other Project components would remain the same.

Under the proposed Project, the site at 500 E. Manchester Boulevard would be acquired and the existing commercial building and site improvements would be demolished to accommodate the MSF and TPSS. Under this alternative, this property would not be acquired. This would avoid the temporary construction impacts associated with these demolition activities and the construction of the MFS and TPSS at this location. However, demolition of the commercial buildings and site improvements would occur at 250 N. Market Street and the new MFS and TPSS would be built on this property. As a result, the temporary construction impacts resulting from demolition activities and construction of the MSF and TPSS would not be avoided or substantially lessened but would occur at the property as 250 N. Market Street. Additionally, the MSF and TPSS would reduce the proposed public parking in the Market Street area that is designed to support ridership and access to the ITC Project and the downtown Market Street area.

5.4.2 Alternatives Considered

Alternatives carried forward for further consideration include the following:

- Alternative 1: No Project
- Alternative 2: Bus Rapid Transit (BRT) System
- Alternative 3: Market Street Pedestrian Promenade
- Alternative 5: 4th Station Alternative
- Alternative 5: Prairie Avenue Single Station Alternative

5.4.2.1 Alternative 1: No Project

The No Project Alternative considers conditions if the proposed Project is not built. No new transportation infrastructure would be built within the Project study area, aside from transportation projects that are currently under construction or funded for construction and operation by 2026. These projects include transit projects funded by Measure R, Measure M, and specified in the Southern California Association of

Governments (SCAG) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). Existing infrastructure and future planned and funded projects assumed under the No Project alternative include:

- Metro Crenshaw/LAX Line –Currently under construction (2020), operating start date (Fall 2021)
- Implementation of the Citywide Event Transportation Management and Operations Plan
- Street improvements being constructed as part of the Los Angeles International Airport Landside Access Modernization Program and the Inglewood Basketball and Entertainment Center (IBEC) projects.
- Existing Bus Service – Metro Rapid and Metro Local

Existing public transit and private transportation operators would continue to provide service. Public transit operators would likely increase service in response to the projected growth in the number of visitors and residents that would occur as result of new and proposed major activity centers being developed in the City in the Downtown and Hollywood Park areas.

The LASED at Hollywood Park includes SoFi Stadium and additional development allowed by the Hollywood Park Specific Plan. Higher density mixed-use development is also planned in the vicinity of the Metro Downtown Inglewood station near Florence Avenue and Market Street being developed within the Crenshaw/LAX TOD Plan Area. These projects and improvements would reasonably be expected to occur in the foreseeable future if the proposed Project were not approved based on current plans.

Throughout 2020, the City of Inglewood developed a Citywide Transportation Management and Operations Plan (TMOP) focused on addressing future traffic demands that may result from events at the stadium. The Inglewood TMOP establishes a plan that provides public information, reduces unwarranted traffic through adjacent neighborhoods, and promotes the use of alternative modes of transportation as described below.

City of Inglewood Event Park and Ride Shuttle Program and Intermodal Transit Facility at Hollywood Park

To address the limited pre-sold on-site parking available at SoFi Stadium, the City is proactively establishing a remote parking and shuttle program that considers comprehensive access, circulation and traffic management for residents, visitors, and businesses on NFL game days and during large special events.

The City's Event Park and Ride Shuttle Program is structured to allow for maximum flexibility, and meet the following goals:

- Support an effective and comprehensive access, circulation, and traffic management plan for major events at the Forum, SoFi Stadium, the IBEC when this facility opens, and other entertainment venues planned as part of the HPSP project;
- Ease traffic congestion in the City and surrounding areas on NFL game and major event days;
- Offer clean, safe, secure, and reliable remote parking and shuttle operations; and
- Ensure flexibility to accommodate major events occurring at Hollywood Park venues and meet varying demand.

Event Transit Service

The City has established a partnership and received support from Metro, Big Blue Bus (Santa Monica), GTrans (Gardena), and Torrance Transit to expand transit service. Under the No Project alternative, the City would work cooperatively with Metro and other municipal bus operators to increase and enhance transit service to City of Inglewood destinations through more frequent headways, additional route options, and other improvements by 2021, if possible. The TMOP addresses both Pre-Event and Post-Event conditions associated with SoFi Stadium at Hollywood Park. The Pre-Event scenario includes bus routes along Pincay Drive, Kareem Court, and Century Boulevard. The Post-Event scenario includes bus routes along Prairie Avenue, Manchester Avenue, Crenshaw Boulevard, Pincay Drive, Kareem Court, and Century Boulevard.

5.4.2.2 Alternative 2: Bus Rapid Transit (BRT) System

Bus rapid transit (BRT) is a public transit system designed to provide improved capacity and reliability relative to a conventional bus system. Typically, a BRT system includes roadway lanes that are dedicated to buses, with signal priority to buses at intersections where buses may interact with other traffic, with enhanced coordinated flow. BRT systems typically include design features to optimize passenger boarding and alighting activities, as well as ticket purchases. A BRT corridor is a section of roadway or contiguous roadways served by the uniquely-branded buses along routes with a minimum length of approximately 1.5 to 2 miles.

Under this alternative, the City would construct and operate a BRT system that would connect the Forum, the SoFi Stadium, the Performance Arena, the IBEC and the Hollywood Park mixed uses to the Crenshaw/LAX Line Downtown Inglewood station. The proposed route of this alternative would be a loop route starting along Florence Avenue to travel east to North Prairie Avenue where it would turn south along Prairie Avenue to the Inglewood Transit Center Facility at Prairie Avenue and Arbor Vitae adjacent to the Hollywood Park site, and then return via Prairie Avenue northbound to travel westbound along Manchester Boulevard to Market Street to traverse northbound to Florence Avenue. The BRT would be located entirely within the public right-of-way. This route is generally consistent with the route as

described in the City's New Downtown and Fairview Heights Transit Oriented Development Plan and Design Guidelines.[4]

Along the alignment, one eastbound travel lane along Florence Avenue between Market Street and Prairie Avenue; one southbound travel lane along Prairie Avenue between Florence Avenue and Manchester Boulevard; two lanes (one lane in each direction) along Prairie Avenue between Manchester Boulevard and the Inglewood Transit Center Facility; one westbound travel lane along Manchester Boulevard between Prairie Avenue and Market Street; and one northbound lane along Market Street between Manchester Boulevard and Florence Avenue would all be converted (from the existing mixed flow traffic lanes) to provide the Bus-only lane to accommodate the BRT alternative thereby reducing roadway lane capacities for mixed-flow traffic.

BRT systems typically include the following features:

- Dedicated lanes and alignment:
  - Separate lanes to avoid congested roadways.
  - Dedicated bus-only lanes for faster travel and ensure that buses are not delayed by mixed traffic congestion. Separate rights of way may be used. Transit malls or 'bus streets' may also be created in city centers.
- Off-board fare collection
  - Fare prepayment at the station, instead of on board the bus, eliminates the delay caused by passengers paying on board.
- Intersection treatment
  - Prohibit turns for mixed-flow traffic across the bus lane to reduce delays to the buses, in most cases. Transit Bus priority will often be provided at signalized intersections (using Transit Priority System (TPS) modules at all upgraded signal controllers at intersections along the alignment) to coordinate them to reduce delays by extending the green phase or reducing the red phase in the required direction compared to the normal sequence. Potential additional communication equipment to transmit and receive signals between the intersections and the City's Transportation Management Center may also be provided, as part of this alternative. Equipment to track the locations of the buses and CCTV cameras may also be required / provided at the intersections along the alignment to provide the required monitoring.

---

4 City of Inglewood, *New Downtown and Fairview Heights Transit Oriented Development Plan and Design Guidelines,* November 1, 2016

- Platform-level boarding
  - Station platforms/stops would be convenient for quick and easy boarding, making them fully accessible for wheelchairs and baby strollers, with minimal delays.

Passenger loading areas would include stops at the following locations:

- Market Street/Florence Avenue in close proximity to the Metro Crenshaw/LAX Downtown Inglewood Station. This BRT stop would provide connections to and from the regional light rail system.
- The Forum on Prairie Avenue.
- The City's Intermodal Transit Facility at Hollywood Park providing access to the SoFi Stadium, Hollywood Park Development Site, and IBEC.

High-capacity bus vehicles such as articulated buses may be used; these may have multiple doors for fast entry and exit. To reduce greenhouse gas emissions, vehicles may be electric or alternative fuel technology.

Under the BRT alternative, the proposed Project would not be built and none of the transit infrastructure, street provisions and activities would occur.

5.4.2.3 Alternative 3: Market Street Pedestrian Promenade

Under the Market Street Pedestrian Promenade Alternative, the proposed Project and all of its components would be constructed and operate. With this alternative, Market Street between Florence Avenue and Manchester Boulevard would be entirely closed to vehicular traffic as shown **in Figure 5.0-2, Alternative 3: Market Street Pedestrian Promenade.** Regent and Queen streets would have barricades to prevent traffic turning onto Market Street in both directions. East-west traffic along Regent Street and Queen Street would be allowed without being able to turn on to Market Street. Traffic would be diverted to surrounding streets including La Brea Avenue and Locust Street. The establishment of this pedestrian promenade would encourage pedestrian activity by improving walkability within Downtown Inglewood.

5.4.2.4 Alternative 4: 4th Station Alternative

This alternative considers the addition of a fourth station to the APM system as proposed at Manchester Boulevard, east of the Market Street/Manchester Boulevard intersection as shown in **Figure 5.0-3, Alternative 4: 4th Station Alternative – Manchester Boulevard Station**.

The station configuration would consist of a center platform with vertical circulation to a pedestrian bridge located under the station platform level. Passengers would have the ability to access the station through a pedestrian bridge. As with the other ITC stations, this additional station would consist of a center platform configuration with the platform located at level 3 (approximately 50 feet above the existing

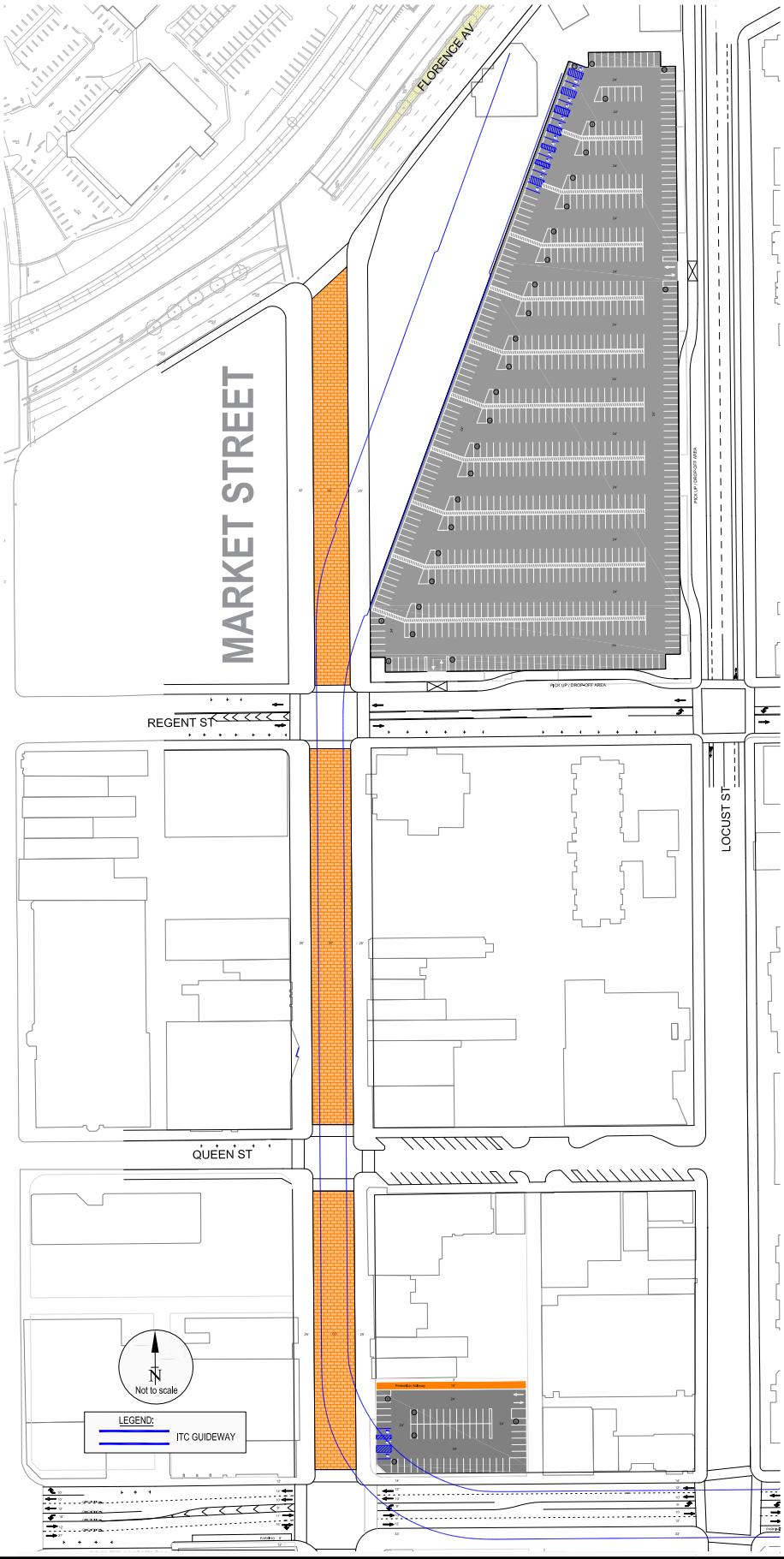
grade). Passengers would access the platform from a mezzanine (at level 2) connected by pedestrian bridges to vertical circulation elements to provide access to the sidewalk (at level 1) on the north side of Manchester Boulevard. Providing this additional station in Downtown would:

1. Support ongoing economic revitalization in Downtown Inglewood;
2. Provide a direct connection from Downtown Inglewood to the regional rail system, the Forum, the LASED, including SoFi Stadium, and the IBEC; and
3. Enhance the connection of Inglewood and residents to jobs, education, services, and destinations within the City and within the region; and support regional efforts to become more efficient, economically strong, equitable, and sustainable.

5.4.2.5 Alternative 5: Prairie Avenue Single Station Alternative

The proposed Project modifies and relocates Prairie Avenue to the east to maintain the current roadway capacity. The relocation of Prairie Avenue and the need for a passenger station connection on the sidewalk/ground level affects properties located east of Prairie Avenue. This Alternative avoids affecting these properties by consolidating the two proposed stations on Prairie Avenue into a single station that would be located adjacent to the City's Intermodal Transit Facility at the City's Civic Center site. Passengers would connect to the ground/sidewalk level within the City-owned Civic Center site. **Figure 5.0-4: Alternative 5: Prairie Avenue Single Station Alternative** illustrates this alternative.

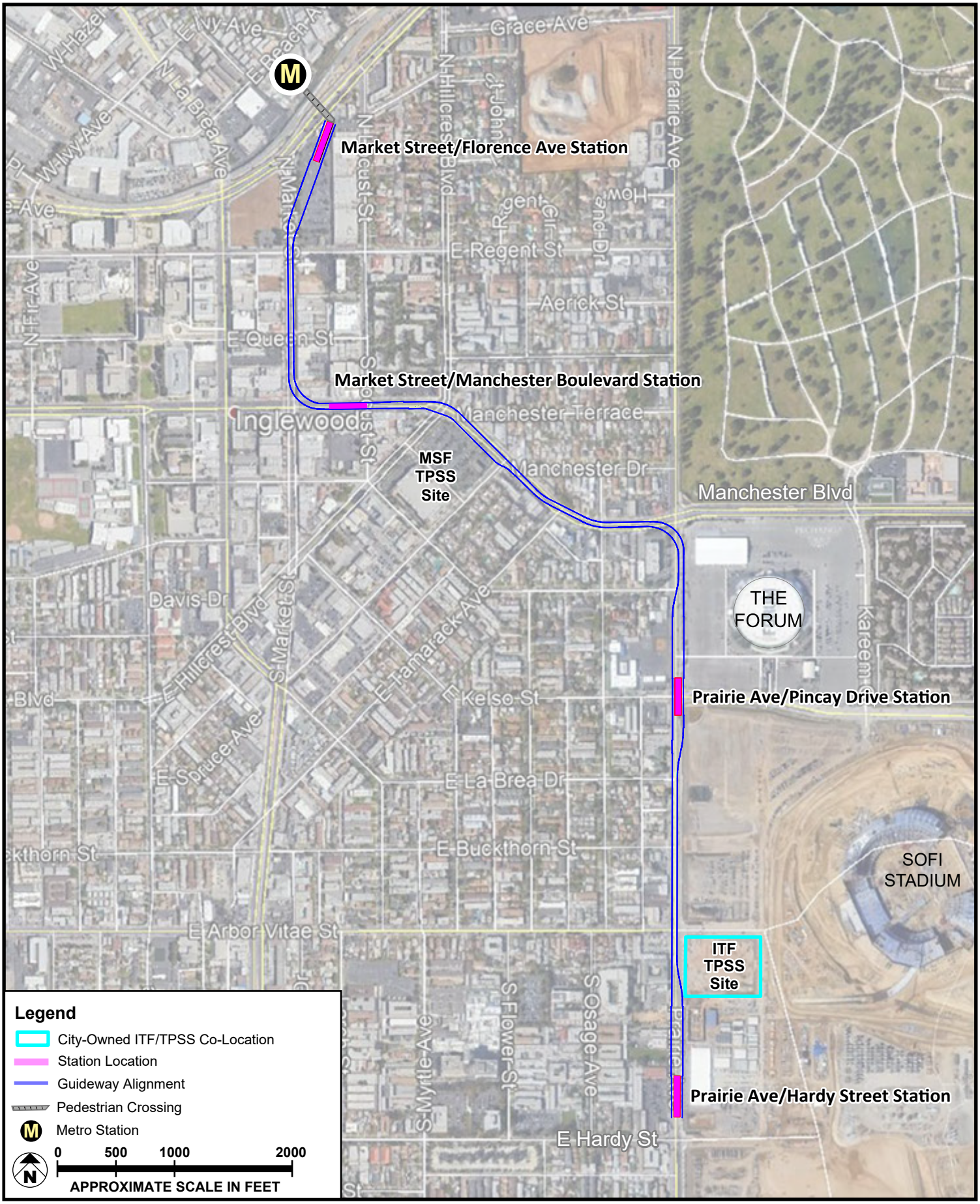
This Alternative maintains Prairie Avenue within its existing right-of-way; however, one to two lanes would be lost, thereby reducing the capacity of the roadway. Specifically, one travel lane in each direction along Prairie Avenue between Arbor Vitae and La Palma, one lane in the southbound direction between La Palma and Pincay Drive, and one lane in each direction between Pincay Drive and Manchester Boulevard would be lost under this Alternative 5: Prairie Avenue Single Station Alternative.



SOURCE: Google Earth - 2020; Meridian Consultants LLC - 2020

FIGURE **5.0-2**

Figure 5.0-2: Alternative 3: Market Street Pedestrian Promenade

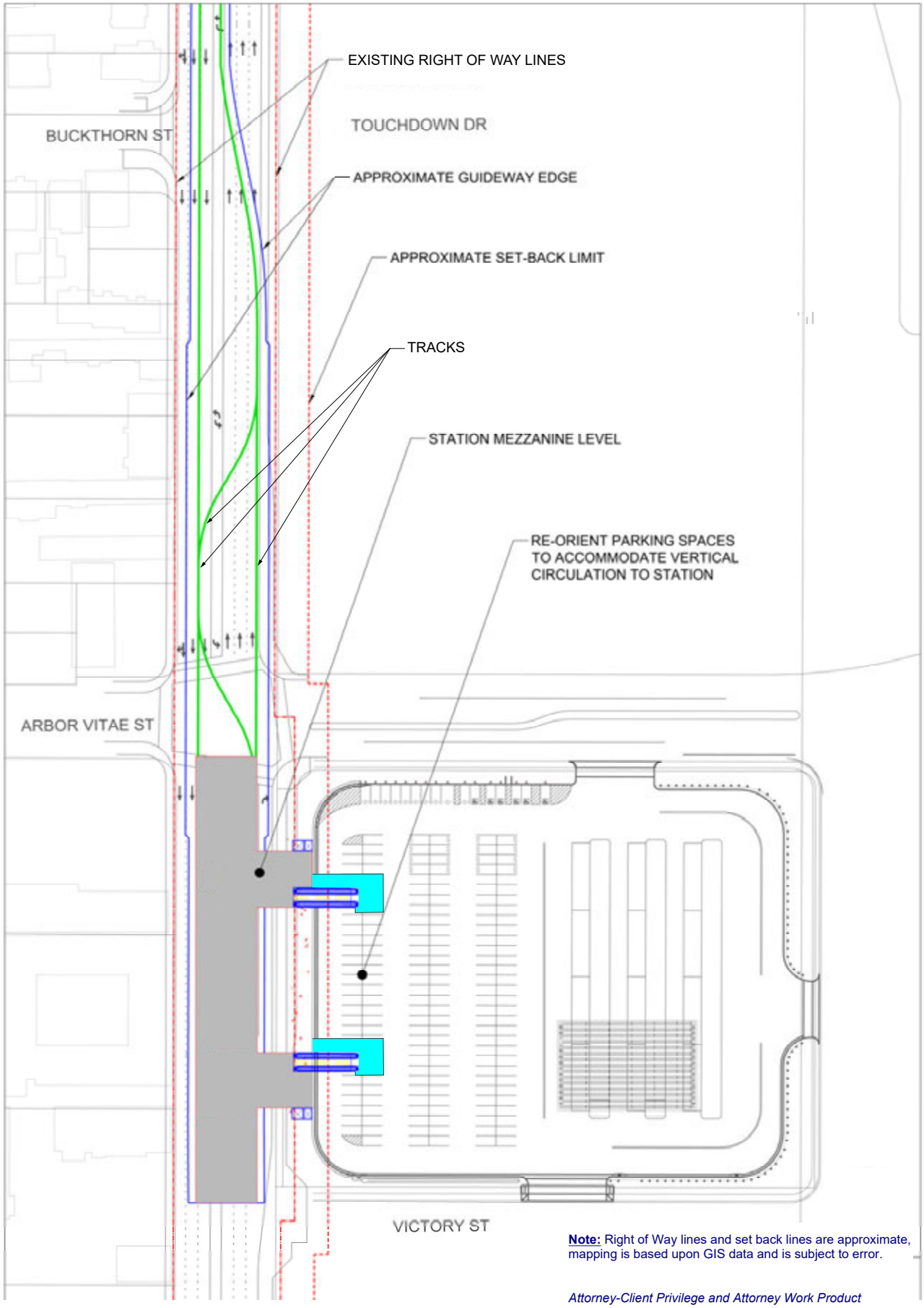


SOURCE: Google Earth - 2020; Meridian Consultants LLC - 2020

FIGURE **5.0-3**

Alternative 4 - 4th Station on Current Alignment

208-001-18



SOURCE: Google Earth - 2020; Meridian Consultants LLC - 2020

FIGURE **5.0-4**

Alternative 5 - Prairie Ave Single Station Alternative

5.5 EVALUATION OF ALTERNATIVES

5.5.1 Alternative 1: No Project

1. Aesthetics

The proposed Project would not result in significant impacts to the aesthetic character of the community during construction or operation with implementation of the project design features in the ITC Construction Commitment Program (CCP) and ITC Design Guidelines, with the exception of the partial alteration of current public views of the former Fox Theater building on Market Street in Downtown. With Alternative 1, the proposed Project would not be built and existing visual characteristics along Market Street, Prairie Avenue, and Manchester Boulevard would be maintained and the significant and unavoidable impact of the partial alteration of the visibility of the former Fox Theater building would be avoided.

2. Air Quality

During construction, the proposed Project would exceed the significance threshold for mass emissions of NOx after mitigation, which would be an unavoidable significant impact. Under Alternative 1, no emissions related to construction activities and associated vehicular travel from construction activities or construction-related vehicle trips would occur. For this reason, Alternative 1 would not conflict with implementation of the applicable air quality plan or exceed the thresholds established by the SCAQMD for criteria air pollutants.

Operation of the proposed Project would reduce VMTs throughout the City which would result in the beneficial effect of reducing air quality emissions from vehicle trips. Under this alternative, the proposed Project would not be built and VMTs throughout the City and region would not be reduced. As such, operational air quality emissions would be greater with the No Project Alternative.

3. Biological Resources

There are approximately 541 trees located along the proposed Project alignment. Removal and/or trimming of trees could result in significant impacts to protected migratory or nesting birds, or raptors. Measures are identified to mitigate these impacts to less than significant for the proposed Project. Alternative 1 would avoid these impacts. Thus, no impacts associated with biological resources would occur with Alternative 1, and impacts would be reduced in comparison to the proposed Project.

4. Cultural Resources

The proposed Project would require the demolition of the former People's Federal Building & Loan Association building on Market Street, identified as a historic resource. Further, with the proposed Project,

significant impacts to other historic resources on Market Street would be avoided, with the one exception of indirect impacts to the former Fox Theater building. The proposed guideway would partially limit current views of the Fox Theater building and this indirect impact is considered significant. Alternative 1 would maintain the existing views and structures of the historic buildings and would have no impacts on existing historical resources within the Project area and, therefore, impacts to cultural resources would be reduced.

5. Energy Resources

Under Alternative 1, no energy resources such as electricity, natural gas, or petroleum would be consumed for construction. Operation of the proposed Project would consume a maximum net increase of 23,488,223 kilowatt-hours (kWh) of electricity per year. As such, Alternative 1 would reduce operational electricity impacts. However, the proposed Project would result in a net decrease of 3,280,876 thousand British thermal units (kBTU) of natural gas per year because of the reduction in VMT that would result from the Project.

The proposed Project would be consistent with the Inglewood Energy and Climate Action Plan (ECAP) and General Plan which sets goals to reduce emissions through increased energy efficiency, renewable energy generation, improved transit options, and reduced consumption and waste. The proposed Project would reduce VMTs which would reduce annual petroleum-based fuel consumption by 324,557 to 1,122,058 gallons per year. As such, Alternative 1 would increase impacts related to natural gas and petroleum-based fuel consumption Compared in comparison to the proposed Project.

6. Geology and Soils

Alternative 1 would not involve the construction of any new transportation facilities. The Project is proposed in an area subject to groundshaking from earthquake events that may occur on faults in the region. Potentially active faults cross the proposed alignment for the Project. Measures are identified to mitigate potential impacts associated with these conditions to less than significant. Impacts related to construction of the Project, including the potential for construction activities to encounter and impact paleontological resources and an increase in the potential for erosion, would be avoided. Measures are identified to mitigate the potential impacts of the Project on paleontological resources to less than significant. In addition, no new transportation infrastructure would be built within the project study area, aside from related transportation projects that are currently under construction or funded for construction and operation by 2026. This alternative would avoid these potential impacts.

7. Greenhouse Gas Emissions

Alternative 1 would not involve any construction activity that would generate greenhouse gas (GHG) emissions. Operation of the proposed Project would reduce VMTs which would result in a beneficial effect on GHG emissions. Under this alternative, the proposed Project would not be built and VMTs would not be reduced. As such, operational GHG emissions would be greater with the No Project Alternative. The proposed Project would be consistent with the CARB 2017 Scoping Plan Update, SCAG's 2020-2045 RTP/SCS, the ECAP, and General Plan which sets goals to reduce GHG emissions by increasing energy efficiency and improving transit infrastructure. While Alternative 1 would not be inconsistent with these plans, it would not achieve the goals of these plans as well as the proposed Project.

8. Hazards and Hazardous Materials

With the No Project Alternative, no new construction would occur along the proposed Project alignment that could result in the potential for exposure to hazards or hazardous materials and all existing uses would continue to operate. Construction of the Project would include the demolition of existing buildings that may contain asbestos-containing materials (ACM) and lead based paint (LBP). Construction activities may also encounter underground storage tanks and soil that may be contaminated. The ITC Construction Commitment Program requires the preparation of plans defining protocols and actions to address this potential and avoid significant impacts. Under this alternative, no construction activities would occur that would have the potential to conflict with emergency response plans or evacuation routes due to street and/or lane closures. As such, Alternative 1 would reduce impacts associated with hazards and hazardous materials in comparison to the proposed Project.

9. Land Use and Planning

The No Project Alternative would not include the construction of the APM system and no changes to the land use pattern and character of the community would result from the construction or operation of additional transportation facilities. The proposed Project would remove traffic from existing roadways without diminishing the existing traffic capacity or the number of lanes that would exist with Alternative 1. Without the Project, congestion on roadways would increase more than with the Project, which would have an indirect effect on the character of the community.

Alternative 1 would be consistent with policies and goals in applicable plans as the existing character of the community would be maintained. The primary purpose of the Circulation Element of the City's General Plan is to ensure the provision of adequate street access and traffic capacity. The proposed Project would further this goal by reducing congestion on the City's street network. As street congestion will increase without the proposed Project, the No Project Alternative would not achieve policies and goals related to reducing congestion.

10. Noise and Vibration

No construction from the Project would occur along the proposed Project alignment with the No Project Alternative. No noise or groundborne vibration impacts from construction would occur and temporary noise and vibration impacts during construction impacts would be avoided. Therefore, Alternative 1 would avoid the noise and vibration impacts during Project construction. Operation of the proposed Project would reduce the amount of vehicle traffic on streets throughout the City, which would reduce roadway noise compared to this Alternative. Operation of the Project proposed trains would result in potential noise level increases from a low of 0.1 dBA to a high of 1.9 dBA, and operation of the proposed MSF would result in potential increases in noise levels around this facility ranging from no increase to a high of 4.4 dBA. Under Alternative 1, the Project would not be built or operate and these noise increases would not occur. As such, Alternative 1 would have a less than significant noise and vibration impact, and reduced construction and operational impacts in comparison to the proposed Project.

11. Population, Employment, and Housing

The proposed Project would have no direct impact on housing as the Project does not include the construction or demolition of any housing units. The proposed Project would impact existing employment opportunities in the City as commercial uses that would be displaced by the Project are estimated to be approximately 493 jobs. However, the proposed Project would result in a net increase of for approximately 11,173[5] Full Time Equivalent (FTE) jobs through the Greenhouse Gas Reduction Funds, as estimated by the Job Co-Benefits calculation (see **Section 4.11 Population, Employment, and Housing**). The number of jobs that will be supported by the proposed Project in the region is within the projected regional trends in the SCAG 2020-2045 RTP/SCS data and the jobs that will benefit from the proposed Project will not directly translate into additional population growth in the region. As such the proposed Project would have a less than significant impact on employment and population growth.

No changes to existing population, employment, and housing trends within the City and the region would occur with the No Project Alternative. As such, Alternative 1 would not directly or indirectly substantially induce population or employment growth in the City or the region. While the No Project Alternative would avoid the direct loss of local employment opportunities that would result from the Project, the additional jobs that would be supported by the construction and operation of the Project would not occur. Thus, more jobs would be created and supported under the proposed Project than under Alternative 1, and like Alternative 1, the proposed Project would not significantly impact population or housing.

5 11,516 minus 493 in numbers of jobs displaced.

12. Transportation

Under Alternative 1, the proposed Project would not be built and none of the transit infrastructure and street improvements and activities would occur. Existing public transit operators and private transportation would continue to provide service in the City, and these services would likely expand operations in response to the expected growth in visitors and residents within the major activity centers in the City of Inglewood. The less than significant construction transportation effects or disturbances from the proposed Project would not occur with Alternative 1.

The City would implement its Transportation Management and Operations Plan (TMOP) to provide future transit connectivity. The TMOP addresses traffic conditions and transportation needs before and after events at SoFi Stadium at Hollywood Park. While transit modes such as buses will be critical transportation options to access the City's event centers, these modes will still compete with existing roadway traffic and may not provide a convenient time-certain connectivity compared to an elevated rail connection such as the proposed Project. This alternative will not provide any operational benefits in comparison to those provided by the proposed Project. The congestion and delays on the roadway system areawide would remain under Alternative 1 compared to the improvement in congestion and roadway traffic flows anticipated as part of the proposed Project.

In addition, the substantial reductions in VMT and related reductions in GHG and AQ emissions that would be provided by the proposed Project would not be realized with the No Project Alternative. No operational benefits associated with reduction in VMT, reduced traffic flows or reduction in congestion would occur compared to the proposed Project, and a critical first/last mile gap between the City's housing, employment and activity centers and the regional Metro regional system would still exist

13. Tribal Cultural Resources

The proposed Project would have a less than significant impact on Tribal Cultural Resources (TCRs), No TCRs were identified in the records around the Project site and no sensitive resources were identified. Nonetheless, the Project as proposed would include construction which would have the potential to unearth subsurface resources not previously identified. Given the level of urban development in Inglewood, the likelihood of unearthing TCRs is low, but it is still a possibility. With the No Project Alternative, no construction would occur and this potential impact to TCRs would be avoided.

14. Utilities and Service Systems

With the No Project Alternative, no new construction would occur along the proposed Project alignment and all existing uses would continue to operate as they currently do. As such, no utility lines would need to be removed or relocated along Market Street, Manchester Boulevard, or Prairie Avenue. Alternative 1

would avoid construction impacts on utilities. Once operational, the proposed Project would not require further utility upgrades or relocation of utility infrastructure.

Operation of the proposed Project would consume a maximum of 23.49 million kWh of electricity per year. Operation of the proposed Project would also result in a net decrease of 3.28 million BTU of natural gas per year, and a net decrease of 8.5 acre-feet per year (afy) of water per year. With the No Project Alternative, this increase in electricity use would not occur, but the decrease in natural gas and water use that would result from the proposed Project would also not occur.

Relationship to Project Objectives

The No Project Alternative would not achieve any of the City's objectives for the proposed Project.

5.5.2 Alternative 2: Bus Rapid Transit (BRT) System

1. Aesthetics

The proposed Project would not result in significant impacts to the aesthetic character of the community during construction or operation with implementation of the project design features in the ITC Construction Commitment Program (CCP) and ITC Design Guidelines, with the exception of partially altering current public views of the former Fox Theater building on Market Street in Downtown.

With Alternative 2, the proposed APM guideway would not be built and existing visual characteristics along Market Street, Prairie Avenue, and Manchester Boulevard would generally be maintained. The significant and unavoidable impact of the alteration of the visibility of the former Fox Theater building would also be avoided.

2. Air Quality

During construction, the proposed Project would exceed the significance threshold for NOx after mitigation and would result in a significant and unavoidable impact. The BRT System would require some modifications to existing streets in order to create dedicated transit lanes and stops but this construction would be less than the demolition and construction activities associated with the proposed Project. This alternative would not conflict with implementation of the applicable air quality plans and construction emissions would be substantially reduced compared to the proposed Project. .

Though this Alternative would reduce VMTs, it would only be able to provide approximately 20 percent of the ridership capacity compared to the proposed Project. Moreover, Alternative 2 would reduce daily traffic volumes (ADTs) along key roadway corridors and VMTs on an average weekday basis to a lesser degree than the proposed Project. Specifically, typical weekday nonevent and daily VMT in the City would

be reduced by an amount equivalent to 20 percent to 25 percent of those of the proposed Project. Moreover, under Alternative 2 the existing uses proposed to be removed by the Project would remain operational and would not be replaced by the proposed Project components which generate less air quality emissions than the existing uses. As such, Alternative 2 would increase operational air quality impacts in comparison to the proposed Project.

3. Biological Resources

Approximately 541 trees are present along the proposed Project alignment which may require removal during construction of the proposed Project. The BRT System Alternative would only involve minor modifications to existing streets along the public right-of-way where BRT-only lanes along the route are implemented and BRT stops are constructed. Alternative 2 would not, therefore, require the same amount of potential tree removals as the proposed Project. Similar to the proposed Project, operation of Alternative 2 would not diminish the chances for long-term survival of bird species or their habitats and no additional tree and/or ornamental vegetation removals would occur. As such, Alternative 2 would result in similar operational impacts compared to the proposed Project.

4. Cultural Resources

The proposed Project would require the demolition of the former People's Federal Building & Loan Association building on Market Street, identified as a historic resource, and this impact is considered to be significant. Direct and indirect impacts to other historic resources on Market Street would be avoided, with the exception of indirect impacts to the former Fox Theater building. The proposed Project would partially limit existing views of the Fox Theater building and this indirect impact is considered significant.

Alternative 2, which would involve minor modifications of existing streets, construction of bus stops, and the operation of a Bus Rapid Transit system, would avoid these impacts.

5. Energy Resources

With Alternative 2, the proposed Project would not be built. No demolition or construction activities which would consume energy resources would occur, except along the public right-of-way where BRT-only lanes and bus stops along the route would be located. As such, Alternative 2 would reduce construction impacts to energy resources. Operation of the proposed Project would consume a maximum net increase of 23.48 million kWh of electricity per year. Alternative 2 would reduce operational electricity impacts. However, the proposed Project would result in a net decrease of 3.28 million kBTU of natural gas per year. Alternative 2 would reduce traffic along key roadway corridors and VMT on an average weekday basis to a lesser degree than the proposed Project. For this reason, Alternative 2 would increase impacts related to natural gas and petroleum-based fuel consumption. The proposed Project would be consistent with

the ECAP and General Plan which sets goals to reduce emissions through increased energy efficiency, renewable energy generation, improved transit options, and reduced consumption and waste. Alternative 2 would address the goals and policies within these plans by improving transit options but to a lesser degree than the proposed Project.

6. Geology and Soils

Under Alternative 2, impacts related to geology and soils conditions, including paleontological resources, would be less than with the proposed Project. The Project is proposed in an area subject to groundshaking from earthquake events that may occur on faults in the region. Potentially active faults cross the proposed alignment for the Project. Measures are identified to mitigate potential impacts associated with these conditions to less than significant. Because Alternative 2 would occur in the location as the proposed Project, the geological and soils conditions that would be encountered in construction of Alternative 2 would be the same as with the proposed Project. Potential risks from seismic events would be reduced with an at-grade system as no aerial structures would be built. Because there would be substantially less construction with an at-grade BRT system, the potential for accidental discovery of paleontological resources would decrease.

7. Greenhouse Gas Emissions

Under Alternative , the proposed Project would not be built. No demolition or construction activities which would produce GHG emissions would occur, except along the public right-of-way where BRT-only lanes and bus stops along the route would be located. As such, Alternative 2 would reduce construction GHG impacts compared to the proposed Project.

Though this alternative would reduce VMT, it would only be able to provide approximately 20 percent of the ridership capacity of the proposed Project. Alternative 2 would reduce traffic along key roadway corridors and VMT on an average weekday basis to a lesser degree than the proposed Project. Specifically, typical weekday nonevent and daily VMT in the City would be reduced by an amount equivalent to 20 percent to 25 percent of those of the proposed Project. Additionally, dedicated bus lanes would take away roadway carrying capacity for private vehicles and increase local traffic congestion. As such, Alternative 2 would not decrease operational GHG emissions to the same degree as the proposed Project.

Similar to the proposed Project, Alternative 2 would be consistent with the CARB 2017 Scoping Plan Update, SCAG 2020-2045 RTP/SCS, the ECAP, and General Plan which sets goals to reduce GHG emissions by improving transit infrastructure. However, Alternative 2 would improve transit infrastructure at a lesser degree compared to the proposed Project and would not result in more energy efficient uses being developed in place of the less energy efficient existing uses.

8. Hazards and Hazardous Materials

With the BRT Transit system alternative, the proposed Project would not be built. No construction of the guideway and stations in conjunction with the MSF and TPSSs would occur. Construction of the Project would include the demolition of existing buildings that may contain asbestos-containing materials (ACM) and lead based paint (LBP). Construction activities may also encounter underground storage tanks and soil that may be contaminated. The ITC Construction Commitment Program requires the preparation of plans defining protocols and actions to address this potential and avoid significant impacts. Alternative 2 would not involve the demolition of existing buildings, which may have the potential release hazardous materials, such as ACMs, LBP, and other potentially hazardous building materials. Transportation of hazardous materials during construction of the proposed Project would also not occur with this alternative. The potential for accidental release of hazardous materials in the environment would be significantly lessened when compared to the proposed Project.

Operation of the proposed Project would include the use and storage hazardous materials during operation typical of those used in an industrial setting. Under Alternative 2, operation of a BRT system would include the use and storage of similar materials. As such, operational impacts under Alternative 2 would be similar when compared to the proposed Project.

9. Land Use and Planning

Alternative 2 would not include the construction of the APM system or any substantial structures. The proposed Project would remove traffic from existing roadways without diminishing the existing traffic capacity or the number of lanes. With the BRT system alternative, an existing lane of travel would be dedicated for use by buses along the route, which would reduce the lane capacity for other vehicles and increase local traffic congestion for passenger vehicles in the community. This increase in congestion on roadways under Alternative 2 would have an indirect effect on the character of the community.

Alternative 2 would be generally consistent with all existing goals, plans, and policies as it would maintain the majority of the infrastructure in the surrounding communities, allowing the goals and objectives of the existing plans to be carried out generally. Notwithstanding, in certain locations there could be conflicts with the design of existing roadways, roadway capacity, and the City's circulation element and amendments to City documents may be needed to avoid these conflicts. Land use impacts would be similar with this alternative and the proposed Project.

10. Noise and Vibration

Under Alternative 2 the proposed Project would not be built. No demolition or construction activities which would produce noise or groundborne vibration impacts would occur, except along the public right-

of-way where BRT-only lanes and bus stops are located. As such, construction noise and vibration impacts would be reduced. Though this alternative would reduce VMT, it would only be able to provide approximately 20 percent of the ridership capacity compared to the proposed Project. Alternative 2 would reduce traffic volumes along key roadway corridors and VMT on an average weekday basis to a lesser degree than the proposed Project. Specifically, typical weekday nonevent and daily VMT in the City would be reduced by an amount equivalent to 20 percent to 25 percent of those of the proposed Project. With the proposed Project, operation of the APM trains would result in noise levels increases from a low of 0.1 dBA to a high of 1.9 dBA, and operation of the proposed MSF would result in noise increases ranging from no increase to a high of 4.4 dBA. Under Alternative 2, the APM system would not be built or operate and these noise increases would not occur. However, increased bus traffic on these roadways would increase the local noise levels and as such, noise and vibration impacts for Alternative 2 would be similar to the proposed Project during operational.

11. Population, Employment, and Housing

The proposed Project would have no direct impact on housing as the Project does not include the construction or demolition of any housing units. The proposed Project would impact existing employment opportunities in the City as commercial uses that would be displaced by the Project are estimated to be approximately 493 jobs. However, the proposed Project would result in a net increase of for approximately 11,173[6] Full Time Equivalent (FTE) jobs through the Greenhouse Gas Reduction Funds, as estimated by the Job Co-Benefits calculation (see **Section 4.11 Population, Employment, and Housing**). The number of jobs that will be supported by the proposed Project in the region is within the projected regional trends in by the SCAG 2020-2045 RTP/SCS data and the jobs that will benefit from the proposed Project will not directly translate into additional population growth in the region. As such the proposed Project would have a less than significant impact on inducing employment and population growth.

Alternative 2 would maintain the existing population and housing trends within the City and the region while having a minor impact on employment by hiring personnel for the BRT System construction and operation. As such, Alternative 2 would not significantly impact population or employment growth in the City or the region. As such, Alternative 2 would have similar impacts on population and housing conditions, the beneficial effects of this alternative would be greatly reduced as compared to the proposed Project.

12. Transportation

Under Alternative 2, the City would construct and operate a BRT system that would connect the LASED, including the Performance Arena, other mixed uses in the Hollywood Park Specific Plan area, SoFi Stadium,

6 11,516 minus 493 in numbers of jobs displaced.

the Forum, and the IBEC to the Crenshaw/LAX Line Downtown Inglewood station. Under this alternative, the proposed Project would not be built. No demolition or construction activities would occur, except along the public right-of-way where BRT-only lanes and bus stops along the route would be located. As such, Alternative 2 would reduce impacts associated with the construction of transportation facilities.

One to two roadway lanes would be lost to mixed traffic flow along the BRT alternative route depending upon location. With a maximum potential headway of approximately 3 minutes at peak times, Alternative 2 would only be able to provide approximately 20 percent of the capacity compared to the proposed Project. The proposed plan amendments included in the proposed Project would not occur. The area would continue to be used by the existing commercial, recreational, and other uses.

Alternative 2 would provide operational benefits by reducing traffic volumes along key roadway corridors and VMT on an average weekday basis to a lesser degree than the proposed Project. Specifically, typical weekday nonevent and daily VMT in the City would be reduced by an amount equivalent to 20 percent to 25 percent of those of the proposed Project. The estimated daily BRT ridership with Event Conditions would be approximately 20 percent of the projected proposed Project ridership. Sufficient transit connection capacity between the Metro's regional transit system and the City's new major activity centers and entertainment venues would not be provided by this alternative. Additionally, this alternative would reduce the roadway capacities along Florence Avenue, Prairie Avenue, Manchester Boulevard and Market Street, consequently, increasing traffic congestion areawide. In comparison, the proposed Project would not reduce roadway capacities compared to existing conditions and would improve congestion and traffic flows areawide. As such, Alternative 2 would obtain limited operational benefits while substantially worsening traffic flows and congestion Transportation impacts of Alternative 2 would be increased as compared to the proposed Project.

13. Tribal Cultural Resources

The proposed Project would have a less than significant impact on Tribal Cultural Resources (TCRs), No TCRS were identified in the records around the Project site and no sensitive resources were identified. Nonetheless, the proposed Project would include construction which would have the potential to unearth subsurface resources not previously identified. Given the level of urban development in Inglewood, the likelihood of unearthing TCRs is low but it is still a possibility. Alternative 2 would eliminate the need to construct the APM system and this potential impact to TCRs would be avoided. TCR impacts for Alternative 2 would be reduced as compared to the proposed Project.

14. Utilities and Service Systems

Under Alternative 2 the proposed Project would not be built. No demolition or construction activities would occur, except along the public right-of-way where BRT-only lanes and bus stops along the route are located. As such, no utility lines would need to be removed or relocated along Market Street, Manchester Boulevard, or Prairie Avenue, which would reduce construction impacts.

Once operational, the proposed Project and Alternative 2 would not require further utility upgrades or relocation of utility infrastructure, except for potential electric charging infrastructure. However, as discussed previously, operation of the proposed Project would consume a maximum net increase of 23.48 million kWh of electricity per year. Alternative 2 would reduce operational electricity demands in comparison to the proposed Project. However, operation of the proposed Project would result in a net decrease of 3.28 million kBTU of natural gas per year, and a net decrease of 8.5 afy of water per year. Alternative 2 would not result in similar reductions in utility demands.

Relationship to Project Objectives

The BRT System Alternative would meet some, but not all of the City's objectives for the proposed Project. The objectives to provide a direct and convenient connection to the Metro regional transit system, encourage intermodal transportation systems by providing convenient, safe, and reliable transit and convenient access to businesses in the City would be met by this alternative. However, the objective related to providing sufficient transit connection capacity between Metro's regional transit system and the City new major activity centers would, although not be met by this alternative, would still result in limited increased transit mode split, limited reduction in vehicle trips, and consequently, limited reduction in per-capita vehicle miles traveled to the City's major activity centers. The BRT System Alternative would also partially meet the City's objectives to support the ongoing economic revitalization within the Downtown TOD Plan area, and encourage redevelopment and investment within the City in areas served by the proposed Project, but not to the same degree as the proposed Project.

This alternative would partially meet the City's objective to support regional efforts to become more efficient, economically strong, equitable, and sustainable. Though the BRT System Alternative would provide limited operational benefits by reducing traffic volumes along key roadway corridors, it would also reduce the roadway capacities along Florence Avenue, Prairie Avenue, Manchester Boulevard and Market Street, consequently increasing traffic congestion throughout the City. As such, this alternative would not meet the City's objectives to maintain existing roadway capacity or reduce the City's traffic congestion and alleviate growing demand on the existing roadway network on both major arterials and residential streets for both nonevent and event days.

5.5.3 Alternative 3: Market Street Pedestrian Promenade

1. Aesthetics

With this alternative, the proposed Project and all of its components would be constructed and operate, but Market Street between Florence Avenue and Manchester Boulevard would be closed to vehicular traffic. Alternative 3 would require the placement of barricades vehicle access. These barricades would need to be designed in a manner which would not degrade the existing visual character of Downtown. As the APM system as proposed would be constructed with this alternative, the aesthetic impacts of the proposed Project would not be avoided or reduced by this alternative.

2. Air Quality

Construction under Alternative 3 would be similar to the proposed Project. During construction, the proposed Project would exceed the significance threshold for NOx after mitigation and would result in a significant and unavoidable impact. Therefore, similar to the proposed Project, Alternative 3 would conflict with implementation of the applicable air quality plans and exceed thresholds established by the SCAQMD for criteria air pollutants.

Operational impacts associated with Alternative 3 would be similar to the proposed Project as the Pedestrian Promenade would not generate additional air quality emissions. Moreover, reductions to daily traffic volumes along key roadway corridors and reductions to VMT on an average weekday basis with event would occur similar in magnitude to those associated with the proposed Project. As such, Alternative 3 would result in similar operational impacts compared to the proposed Project.

3. Biological Resources

Approximately 541 trees along the proposed Project alignment may require removal during construction of the proposed Project. The addition of a Pedestrian Promenade would not require tree removals and would likely include the planting of additional trees. As such, impacts to biological resources during construction would be reduced compared to the proposed Project. Alternative 3 would not diminish the chances for long-term survival of bird species or their habitats and no additional tree and/or ornamental vegetation removals would be required. As such, Alternative 3 would result in similar operational impacts compared to the proposed Project.

4. Cultural Resources

Closing Market Street to vehicular use, which would occur under Alternative 3, would not reduce the impacts of the proposed Project on historic resources as the APM system as proposed would be built. Conversion of this portion of Market Street to a pedestrian mall would not result in any additional direct

or indirect impacts to historic or other cultural resource impacts compared to the proposed Project, nor would it substantially reduce the cultural resources impacts of the proposed Project.

5. Energy Resources

Energy demand from construction activities under Alternative 3 would be similar to the proposed Project as the APM system as proposed would be built. The additional construction required to create the pedestrian mall would only increase these impacts incrementally. Reductions to daily traffic volumes along key roadway corridors and reductions to VMT on an average weekday basis would occur similar in magnitude to those associated with the proposed Project. As such, Alternative 3 would result in similar operational impacts compared to the proposed Project.

6. Geology and Soils

Under Alternative 3, the proposed Project would be built but would include a pedestrian promenade on Market Street between Florence Avenue and Manchester Boulevard. Impacts related to geology and soils conditions, including paleontological resources, would be similar to those identified for the proposed Project. Geology and soils conditions that would be encountered in construction of Alternative 3 would be the same as with the proposed Project. The Potrero Fault lies approximately one-quarter mile to the east of the project study area; however, compliance with the California Building Code would avoid the creation of seismic hazards. Ground-disturbing activity and the potential for accidental discovery of paleontological resources would continue to be potentially significant with Alternative 3.

7. Greenhouse Gas Emissions

Construction under Alternative 3 would be similar to the proposed Project and would result in a similar level of GHG emissions. Reductions to daily traffic volumes along key roadway corridors and reductions to VMT on an average weekday basis would occur similar in magnitude to those associated with the proposed Project. Therefore, similar to the proposed Project, Alternative 3 would be consistent with the CARB 2017 Scoping Plan Update, SCAG's 2020-2045 RTP/SCS, the ECAP, and General Plan which sets goals to reduce GHG emissions by increasing energy efficiency and improving transit infrastructure. Operational GHG impacts would be similar to the proposed Project.

8. Hazards and Hazardous Materials

Under Alternative 3, the proposed Project would be built but would include the pedestrian promenade. Construction under Alternative 3 would be similar to the proposed Project. Construction of the guideway and stations in conjunction with the MSF and TPSSs would involve the demolition of existing buildings, which may have the potential release hazardous materials, such as ACMs, LBP, and other potentially hazardous building materials. The additional construction activities required to create the pedestrian

promenade would be minor. Similar to the proposed Project, construction activities under Alternative 3 would likely cause the temporary closure of travel lanes, roadways segments, and sidewalks along the elevated guideway and stations within the street rights-of-way.

Under Alternative 3, operation of the APM system would include the use and storage of hazardous materials typical of those used in an industrial setting, similar to the proposed Project. Alternative 3 would not interfere or impair with the City's ability to increase public awareness or make any improvements to emergency services and warning systems during operation. Converting this portion of Market Street to a pedestrian promenade would not involve the use of handling of any hazardous materials. With adherence to the federal, State, and local safety requirements, Alternative 3 would not conflict with the requirements of an emergency response plan or emergency evacuation plan, similar to the proposed Project. As such, operational impacts under Alternative 3 would be similar to the proposed Project.

9. Land Use and Planning

Alternative 3 would modify existing traffic patterns and connections within the community. Vehicular connections would be reduced as Market Street between Florence Avenue and Manchester Boulevard would be closed. Vehicular traffic would need to be rerouted around the closed pedestrian promenade which may increase local traffic volume for adjacent streets. The connection between different parts of the community would not be diminished in a substantial manner as the street segment that would be closed only includes three blocks. Alternative 3 would not, therefore, divide the community physically but may contribute to additional ground level traffic surrounding the closure.

Alternative 3 would be generally consistent with all existing goals, plans, and policies as it would maintain the majority of the infrastructure in the surrounding community, allowing the goals and objectives of the existing plans to be carried out generally. Additionally, closure of Market Street would enable the activation and programming of Market Street, which could include open air markets, creative retail and concession spaces, recreational and open space areas, and locations for public art and locations for public gathering. This Alternative could achieve City's objective for economic development of Market Street. Conflicts with the design of existing roadways, roadway capacity, and the City's circulation element may exist and appropriate design and amendments proposed for City documents would be needed to avoid conflicts with existing plans and policies. The land use impacts of this alternative and the proposed Project would be similar

10. Noise and Vibration

Construction under Alternative 3 would be similar to the proposed Project. It is anticipated that the development of a Pedestrian Promenade along Market Street would not result in substantial noise or

vibration impacts as it would eliminate vehicle travel along Market Street between Florence Avenue and Manchester Boulevard which would reduce roadway noise. Moreover, reductions to daily traffic volumes along key roadway corridors and reductions to VMT on an average weekday basis with event would occur similar in magnitude to those associated with the proposed Project. As such, operational noise and vibration impacts would be reduced as compared to the proposed Project.

11. Population, Employment, and Housing

The proposed Project would have no direct impact on housing as the Project does not include the construction or demolition of housing units. The proposed Project would impact existing employment opportunities in the City as commercial uses that would be displaced by the Project are estimated to be approximately 493 jobs. However, the proposed Project would result in a net increase of approximately 11,173[7] Full Time Equivalent (FTE) jobs through the Greenhouse Gas Reduction Funds, as estimated by the Job Co-Benefits calculation (see **Section 4.11 Population, Employment, and Housing**). The number of jobs that will be supported by the proposed Project in the region is within the projected regional trends in the SCAG 2020-2045 RTP/SCS data and the jobs that will benefit from the proposed Project will not directly translate into additional population growth in the region. As such the proposed Project would have a less than significant impact on inducing employment and population growth.

Converting a portion of Market Street to a pedestrian mall would not result in any additional direct or indirect impacts to population, employment, and housing. Alternative 3 would maintain the existing population, employment, and housing trends within the City and the region. As such, Alternative 3 would not directly or indirectly substantially induce population in the City or the region. Employment support and would be similar to the proposed Project under Alternative 3.

12. Transportation

Construction under Alternative 3 would be similar to the proposed Project. The proposed Project and all of its components would be constructed and operational.. Market Street between Florence Avenue and Manchester Boulevard would be reconfigured to eliminate vehicular traffic north and south on Market Street. Cross traffic would be allowed on Regent Street and Queen Street without any turns to/from Market Street. The closure of Market Street would divert traffic to the surrounding streets including La Brea Avenue and Locust Street. Since the current traffic along Market Street is very low, this diversion of Market Street traffic can be accommodated along adjacent parallel streets. The operation of the APM system would be the same as planned for the proposed Project.

7 11,516 minus 493 in numbers of jobs displaced.

Similar to the proposed Project, Alternative 3 would result in operational benefits. Reductions to daily traffic volumes along key roadway corridors and reductions to VMTs on an average weekday basis would occur similar in magnitude to those associated with the proposed Project. Additionally, this alternative is estimated to result in transit ridership similar to the proposed Project. Finally, Alternative 3 would provide similar operational benefits as those of the proposed Project relative to reduction in traffic congestion and improvement of traffic flows along key roadway facilities areawide.

13. Tribal Cultural Resources

The proposed Project would have a less than significant impact on Tribal Cultural Resources (TCRs), No TCRs were identified in the records around the Project site and no sensitive resources were identified. Nonetheless, the Project as proposed would include construction which would have the potential to unearth subsurface resources not previously identified. Given the level of urban development in Inglewood, the likelihood of unearthing TCRs is low but it is still a possibility. Converting a portion of Market Street to a pedestrian promenade would not result in any additional impacts.

14. Utilities and Service Systems

Construction and operation under Alternative 3 would be similar to the proposed Project. Closing a portion of Market Street to vehicle traffic would only involve minor above ground street improvements. For this reason, impacts related to the construction or relocation of water, wastewater treatment, storm water drainage, electric power, natural gas, or telecommunications facilities would be similar compared to the proposed Project.

Relationship to Project Objectives

The Market Street Pedestrian Promenade Alternative would meet most of the City's objectives for the proposed Project since the proposed Project would still be built and reductions to daily traffic volumes along key roadway corridors and reductions to VMTs on an average weekday basis with event would occur similar in magnitude to those associated with the proposed Project. However, Alternative 3 would have not meet the City's objective to maintain existing roadway capacity along Market Street.

5.5.4 Alternative 4: 4th Station Alternative

1. Aesthetics

Under the 4th station alternative, impacts to visual character under aesthetics would be similar to the proposed Project. The proposed Project would not result in significant impacts to the aesthetic character of the community during construction or operation with implementation of the project design features in the ITC Construction Commitment Program (CCP) and ITC Design Guidelines, with the exception of the

alteration of currently available public views of the former Fox Theater building on Market Street in Downtown. The addition of a 4th station east of the intersection of Market Street and Manchester Boulevard would not result in any additional visual impacts as this station would be integrated into the design of the APM system consistent with the ITC Design Guidelines.

2. Air Quality

Under Alternative 4, the proposed Project would be built but would include an additional station along Manchester Boulevard. During construction, the proposed Project would exceed the significance threshold for NOx after mitigation and would result in a significant and unavoidable impact. The construction of a 4th station would require additional construction activities including operation of off-road heavy-duty equipment and on-road trucks for hauling which would increase air quality emissions. As such, similar to the proposed Project, Alternative 4 would conflict with implementation of the applicable air quality plans and exceed thresholds established by the SCAQMD for criteria air pollutants. Though Alternative 4 would implement similar mitigation measures as the proposed Project, it would increase construction impacts.

Operation of the APM system with a 4th station would not result in any additional operational air quality emissions. Operational air quality impacts would be similar with this alternative and the proposed Project.

3. Biological Resources

Approximately 541 trees are located along the proposed APM alignment that may require removal during construction of the proposed Project. The 4th station would be located along the guideway within the public right-of-way along Manchester Boulevard. With Alternative 4, no additional properties would need to be acquired and no additional demolition of buildings or site improvements would be required. Alternative 4 would not require an increase in tree removals or disturbance of nesting raptors or migratory birds. For this reason, impacts to biological resources during construction would be similar compared to the proposed Project. Moreover, operation of Alternative 4 would not diminish the chances for long-term survival of bird species or their habitats and no additional tree and/or ornamental vegetation removals would be planned. As such, Alternative 4 would result in similar operational impacts compared to the proposed Project.

4. Cultural Resources

Alternative 4 would have impacts on cultural resources similar to the proposed Project. Alternative 4 would construct the APM guideway on the same alignment with the same dimensions as the proposed Project which would result in indirect visual impacts to the former Fox Theater and the demolition of the former People's Federal Building & Loan Association building. The additional station would not result in

any additional impacts because the additional station and this segment of the guideway would be constructed above the nearby historic resource, the Bank of America building at 320 Manchester Boulevard. The Bank of America building would retain its ability to convey its historical significance without additional indirect impact to the view of its primary façade. As such impacts to cultural resources would be similar for Alternative 4 and the proposed Project.

5. Energy Resources

Under Alternative 4, the proposed Project would be built but would include an additional station along Manchester Boulevard. Construction of a 4th station would result in an incremental increase in energy resource consumption for electricity and petroleum-based fuels for construction of this station. However, this increase would be minimal and temporary, similar to the proposed Project. Nonetheless construction impacts to energy resources would increase incrementally compared to the proposed Project.

Operation of a 4th station would increase consumption of energy resources including electricity and natural gas. This alternative would result in reductions to daily traffic volumes along key roadway corridors and VMT on an average weekday basis would occur similar in magnitude to those estimated for the proposed Project. As such, this alternative would result in a reduction of petroleum-based fuel consumption from vehicle travel similar to the proposed Project. The addition of one station would not increase energy resource consumption to a level of significance. Nonetheless, impacts to energy resources during operation would incrementally increase with Alternative 4.

6. Geology and Soils

Under Alternative 4, the proposed Project would be built but would include an additional station along Manchester Boulevard. Impacts related to geology and soils conditions, including paleontological resources, and potential conflict with an emergency evacuation plan, would be similar to those described for the proposed Project. Geology and soils conditions that would be encountered in construction of Alternative 4 would be the same as with the proposed Project. The Potrero Fault lies approximately one-quarter mile to the east of the project study area; however, compliance with the California Building Code would avoid the creation of seismic hazards. Ground-disturbing activity and the potential for accidental discovery of paleontological resources would continue to be potentially significant under Alternative 4.

7. Greenhouse Gas Emissions

Under Alternative 4, the proposed Project would be built but would include an additional station along Manchester Boulevard. Construction of a 4th station would require additional construction activities including operation of off-road heavy-duty equipment and on-road trucks for hauling which would increase GHG emissions. However, similar to the proposed Project, these emissions would be temporary

in nature and cease once the Project is complete. Nonetheless, construction related GHG emissions would increase under Alternative 4.

Operation of a 4th station would incrementally increase operational GHG emissions. However, this alternative would result in reductions to daily traffic volumes along key roadway corridors and VMT on an average weekday basis would occur similar in magnitude to those estimated for the proposed Project. As such, this alternative would result in a net negative GHG emissions associated with vehicle travel. The addition of one station would not increase operational GHG emissions to a level of significance. Moreover, similar to the proposed Project, Alternative 4 would be consistent with the CARB 2017 Scoping Plan Update, SCAG 2020-2045 RTP/SCS, the ECAP, and General Plan which sets goals to reduce GHG emissions by increasing energy efficiency and improving transit infrastructure. Nonetheless, operational GHG emissions would increase incrementally with Alternative 4. Hazards and Hazardous Materials

Under Alternative 4, the proposed Project would be built but would include an additional station along Manchester Boulevard. Although construction of an additional station would increase construction activities compared to the proposed Project, construction impacts under Alternative 4 would be similar to those of proposed Project. Construction of the guideway and four stations in conjunction with the MSF and TPSSs would still involve the demolition of existing buildings, which may have the potential release hazardous materials, such as ACMs, LBP, and other potentially hazardous building materials. Furthermore, excavations of potentially contaminated soils may occur during construction of Alternative 4 as a result of prior uses on some of the sites, similar to the proposed Project.

Under Alternative 4, operation would include the use and storage of hazardous materials typical of those used in an industrial setting, similar to the proposed Project. Alternative 4 would not interfere with or impair the City's ability to increase public awareness or make any improvements to emergency services and warning systems during operation. With adherence to the federal, State, and local safety requirements, Alternative 4 would not conflict with the requirements of an emergency response plan or emergency evacuation plan, similar to the proposed Project. As such, operational impacts under Alternative 4 would be similar when compared to the proposed Project.

8. Land Use and Planning

Alternative 4 would build an APM system similar to the proposed Project with a 4th station located on Manchester Boulevard. The proposed Project would not physically divide the community with its elevated guideways and maintenance of existing roadway capacity and roadway connections. Alternative 4 would have an alignment and elevated guideways similar to the proposed Project. As such, Alternative 4 would also maintain the existing roadway capacity and roadway connections. Alternative 4 could activate foot traffic and interest on Market Street and help reinvigorate the Downtown business area. Alternative 4 will

have a similar impact on physically dividing the community as the proposed Project.

Alternative 4 would be generally consistent with the existing plans, policies and guidelines in the City and the greater region. Alternative 4 would require the same amendments to the Land Use Element, Circulation Element, Safety Element, and the Inglewood Municipal Code as the proposed Project to incorporate the APM system into the language of the existing plans, policies, and guidelines within the City. As such, land use impacts of Alternative 4 would be similar to the proposed Project

9. Noise and Vibration

Under Alternative 4, the proposed Project would be built but would include an additional station along Manchester Boulevard. Construction of a 4th station would require additional construction activities including operation of off-road heavy-duty equipment and on-road trucks for hauling which could increase construction noise and vibration levels. Though Alternative 4 would implement similar mitigation measures as the proposed Project, it would increase construction noise and vibration impacts.

Alternative 4 would result in reductions to daily traffic volumes along key roadway corridors and VMT on an average weekday basis would occur similar in magnitude to those estimated for the proposed Project. As such, this alternative would result in similar roadway noise levels as the proposed Project. The addition of one station would not increase operational noise or vibration levels to a level of significance.

10. Population, Employment, and Housing

The proposed Project would have no direct impact on housing as the Project does not include the construction or demolition of any housing units. The proposed Project would impact existing employment opportunities in the City as commercial uses that would be displaced by the Project are estimated to be approximately 493 jobs. However, the proposed Project would result in a net increase of for approximately 11,173[8] Full Time Equivalent (FTE) jobs through the Greenhouse Gas Reduction Funds, as estimated by the Job Co-Benefits calculation (see **Section 4.11 Population, Employment, and Housing**). The number of jobs that will be supported by the proposed Project in the region is within the projected regional trends in the SCAG 2020-2045 RTP/SCS data and the jobs that will benefit from the proposed Project will not directly translate into additional population growth in the region. As such the proposed Project would have a less than significant impact on inducing employment and population growth.

8 11,516 minus 493 in numbers of jobs displaced.

Alternative 4 would have a similar effect on the population and employment trend as the APM would be constructed and the same displacement of jobs and hiring of APM personnel would occur. As such, Alternative 4 would have similar impacts population, employment, and housing as the proposed Project.

11. Transportation

Under Alternative 4, the proposed Project would be built but would include an additional station along Manchester Boulevard. Construction of a 4th station would require additional construction activities including operation of off-road heavy-duty equipment and on-road trucks for hauling which could increase transportation effects and disruptions.

The weekday daily VMT would be reduced in the Future Opening Year (2026) with Event conditions similar to the VMT reductions estimated for the proposed Project. The estimated daily ITC ridership during Future Opening Year (2026) with NFL Event conditions are estimated to be approximately 25,100 passengers similar to the proposed Project. The weekday daily VMT would be reduced in the Future Horizon Year (2045) with Event conditions similar to the VMT reductions estimated for the proposed Project. The estimated daily ITC ridership during Future Horizon Year (2045) with an NFL Event conditions are estimated to be approximately 31,100 passengers, similar to the proposed Project. Additionally, daily traffic volumes would decrease along key travel corridors such as Prairie Avenue, Manchester Boulevard and Century Boulevard, thereby reducing congestion and improving travel conditions on a system-wide basis.

Similar to the proposed Project, Alternative 4 would result in operational benefits. Reductions to daily traffic volumes along key roadway corridors and VMTs on an average weekday basis would occur similar in magnitude to those estimated for the proposed Project. This alternative is estimated to result in ITC ridership similar to the proposed Project. Improved traffic flows and reduction in congestion along key travel corridors, similar to those associated with the proposed Project would occur with Alternative 4.

12. Tribal Cultural Resources

The proposed Project would have a less than significant impact on Tribal Cultural Resources (TCRs). No TCRs were identified in the records around the Project site and no sensitive resources were identified. Nonetheless, the Project as proposed would include construction which would have the potential to unearth subsurface resources not previously identified. Given the level of urban development in Inglewood, the likelihood of unearthing TCRs is low but it is still a possibility. The 4th station alternative would have a similar impact to TCRs as the proposed Project since extensive construction and excavation of soil would be required to construct the APM structure and the 4th station. Similar impacts to the TCRs would result from the proposed Project and Alternative 4.

13. Utilities and Service Systems

The 4th station would be located along the guideway within the public right-of-way along Manchester Boulevard. Under Alternative 4, no additional properties would need to be acquired and no additional demolition of buildings and site improvements would be required. As such impacts related to the construction or relocation of water, wastewater treatment, storm water drainage, electric power, natural gas, or telecommunications facilities would be similar to the proposed Project.

Relationship to Project Objectives

The 4th Station Alternative would meet all of the City's objectives for the proposed Project since the proposed Project would still be built and reductions to daily traffic volumes along key roadway corridors and reductions to VMTs on an average weekday basis with event would occur similar in magnitude to those associated with the proposed Project.

5.5.5 Alternative 5: Prairie Avenue Single Station Alternative

1. Aesthetics

The proposed Project would not result in significant impacts to the aesthetic character of the community during construction or operation with implementation of the project design features in the ITC Construction Commitment Program (CCP) and ITC Design Guidelines, with the exception of the alteration of currently available public views of the former Fox Theater building on Market Street in Downtown. Similarly, Alternative 5 would travel down the same alignment with the same proposed and elevated guideway across the frontage of the buildings on Market Street. No additional impacts on the visual character of downtown would result from the addition of this station.

2. Air Quality

Under Alternative 5, the proposed Project would be built but the two proposed stations along Prairie Avenue would be consolidated into a single station that would be located adjacent to the City's Civic Center site. During construction, the proposed Project would exceed the significance threshold for NOx after mitigation and would result in a significant and unavoidable impact. The construction of a single station along Prairie Avenue instead of two stations would result in less construction activities compared to the proposed Project. However, it is anticipated that construction emissions would still exceed the significance threshold for NOx during peak construction periods. Similar to the proposed Project, Alternative 5 would conflict with implementation of the applicable air quality plans and exceed thresholds established by the SCAQMD for criteria air pollutants. Nonetheless, Alternative 5 would implement similar mitigation measures as the proposed Project and would reduce construction air quality emissions.

Operation of a single station along Prairie Avenue instead of two stations would slightly decrease operational air quality emissions. However, under Alternative 5, mobile operational benefits would be

less than those associated with the proposed Project. Reductions to daily traffic volumes along key roadway corridors and VMTs on an average weekday basis would occur, but approximately 15 percent less in magnitude than those associated with the proposed Project. As such, operational air quality emissions associated mobile sources would increase compared to the proposed Project.

3. Biological Resources

Approximately 541 trees which may require removal during construction of the proposed Project exist along the proposed Project alignment. With Alternative 5, no additional properties would need to be acquired and no additional demolition of buildings or site improvements would be required. The guideway would still be constructed along the same segment of Prairie Avenue compared to the proposed Project. As such, Alternative 5 would not require an increase or decrease in tree removals or disturbance of nesting raptors or migratory birds. As such, impacts to biological resources during construction would be similar compared to the proposed Project. Similar to the proposed Project, operation of Alternative 5 would not diminish the chances for long-term survival of bird species or their habitats and no additional tree and/or ornamental vegetation removals would be planned. As such, Alternative 5 would result in similar operational impacts compared to the proposed Project.

4. Cultural Resources

Alternative 5 would have a similar impact on cultural resources as the proposed Project as these impacts occur on the Market Street segment of the system, which would not change with this alternative. The relocated and consolidated station on Prairie Avenue would have no impact and would not be located near any identified historical resources. As such impacts to cultural resources would be similar for Alternative 5 and the proposed Project.

5. Energy Resources

Under Alternative 5, the proposed Project would be built but the two proposed stations along Prairie Avenue would be consolidated into a single station that would be located adjacent to the City's Civic Center site. Construction of a single station in place of two stations would result in an incremental decrease of energy resource consumption for electricity and petroleum-based fuels associated with operation of the station.

Operation of a single station along Prairie Avenue instead of two stations would also slightly decrease operational energy resource consumption. However, under Alternative 5, mobile operational benefits would be less than those associated with the proposed Project. Reductions to daily traffic volumes along key roadway corridors and VMTs on an average weekday basis would occur, but approximately 15 percent less in magnitude than those associated with the proposed Project. As such, Alternative 5 would result in an increase in petroleum-based fuel consumption compared to the proposed Project.

6. Geology and Soils

Under Alternative 5, the proposed Project would be built but the two proposed stations along Prairie Avenue would be consolidated into a single station that would be located adjacent to the City's Civic Center site. Impacts related to geology and soils conditions, including paleontological resources, and potential to conflict with an emergency evacuation plan, would be similar to those described for the proposed Project. Geology and soils conditions that would be encountered in construction of Alternative 5 would be the same as with the proposed Project. The Potrero Fault lies approximately one-quarter mile to the east of the project study area; however, compliance with the California Building Code would avoid the creation of seismic hazards. Ground-disturbing activity and the potential for accidental discovery of paleontological resources would continue to be potentially significant under Alternative 5 and would require the same mitigation measures as identified for the proposed Project in order to reduce the impact to less than significant.

7. Greenhouse Gas Emissions

The construction of a single station along Prairie Avenue instead of two stations would result in a reduction in the level of construction activities compared to the proposed Project. As such Alternative 5 would reduce construction related GHG emissions.

Operation of a single station along Prairie Avenue instead of two stations would also slightly decrease GHG emissions resulting from operation of the stations. However, under Alternative 5, mobile operational benefits would be less than those associated with the proposed Project. Reductions to daily traffic volumes along key roadway corridors and VMTs on an average weekday basis would occur, but approximately 15 percent less in magnitude than those associated with the proposed Project. However, similar to the proposed Project, Alternative 5 would be consistent with the CARB 2017 Scoping Plan Update, SCAG 2020-2045 RTP/SCS, the ECAP, and General Plan which sets goals to reduce GHG emissions by increasing energy efficiency and improving transit infrastructure. Nonetheless, operational GHG emissions associated mobile sources would increase compared to the proposed Project.

8. Hazards and Hazardous Materials

While construction of a single station along Prairie Avenue instead of two stations would result in a reduction in the level of construction activities compared to the proposed Project, construction impacts under Alternative 5 would be similar to those of the proposed Project. Construction of the guideway and stations in conjunction with the MSF and TPSSs would still involve the demolition of existing buildings, which may have the potential release hazardous materials, such as ACMs, LBP, and other potentially hazardous building materials. Furthermore, excavations of potentially contaminated soils may occur during construction of Alternative 5 as a result of prior uses on some of the sites, similar to the proposed Project. Similar to the proposed Project, construction activities under Alternative 5 would likely cause the

temporary closure of travel lanes, roadways segments, and sidewalks along the elevated guideway and stations within the street rights-of-way.

Under Alternative 5, operation would include the use and storage of hazardous materials typical of those used in an industrial setting, similar to the proposed Project. Alternative 5 would not interfere or impair with the City's ability to increase public awareness or make any improvements to emergency services and warning systems during operation. With adherence to the federal, State, and local safety requirements, Alternative 5 would not conflict with the requirements of an emergency response plan or emergency evacuation plan, similar to the proposed Project. As such, operational impacts under Alternative 4 would be similar when compared to the proposed Project.

9. Land Use and Planning

Alternative 5 would build an APM system similar to the proposed Project while consolidating the two stations on Prairie Avenue to one single station adjacent to the Civic Center Site on Prairie Avenue. The proposed Project would not physically divide the community with its elevated guideways and maintenance of existing roadway capacity and roadway connections. Alternative 5 would have a similar alignment and elevated guideways similar to the proposed Project. As such, Alternative 5 would also maintain the existing roadway capacity and roadway connections. Alternative 5 would have a similar impact on physically dividing the community as the proposed Project.

Alternative 5 would be generally consistent with the existing plans, policies and guidelines in the City and the greater region. Alternative 5 would require the same amendments to the Land Use Element, Circulation Element, Safety Element, and the Inglewood Municipal Code as the proposed Project to incorporate the APM system into the language of the existing plans, policies, and guidelines within the City. As such, the policy consistency impacts of Alternative 5 would be similar to the proposed Project.

10. Noise and Vibration

The construction of a single station along Prairie Avenue instead of two stations would result in a reduction in the level of construction activities compared to the proposed Project. For this reason, Alternative 5 would reduce construction related noise and vibration levels.

Operation of a single station along Prairie Avenue instead of two stations would also slightly decrease operational noise and vibration levels. However, under Alternative 5, mobile operational benefits would be less than those associated with the proposed Project. Reductions to daily traffic volumes along key roadway corridors and VMTs on an average weekday basis would occur, but approximately 15 percent less in magnitude than those associated with the proposed Project. As such, operational noise and vibration impacts associated mobile sources would increase compared to the proposed Project.

11. Population, Employment, and Housing

The proposed Project would have no direct impact on housing as the Project does not include the construction or demolition of any housing units. The proposed Project would impact existing employment opportunities in the City as commercial uses that would be displaced by the Project are estimated to be approximately 493 jobs. However, the proposed Project would result in a net increase of for approximately 11,173[9] Full Time Equivalent (FTE) jobs through the Greenhouse Gas Reduction Funds, as estimated by the Job Co-Benefits calculation (see **Section 4.11 Population, Employment, and Housing**). The number of jobs that will be supported by the proposed Project in the region is within the projected regional trends in the SCAG 2020-2045 RTP/SCS data and the jobs that will benefit from the proposed Project will not directly translate into additional population growth in the region. As such the proposed Project would have a less than significant impact on inducing employment and population growth.

Alternative 5 would have a similar effect on the population and employment trend as the APM system would be constructed as planned. Alternative 5 would have a similar impact to the population, employment, and housing resource as compared to the proposed Project.

12. Transportation

Under Alternative 5, the proposed Project would be built but the two proposed stations along Prairie Avenue would be consolidated into a single station that would be located adjacent to the City's Civic Center site. The proposed Project modifies and relocates Prairie Avenue to the east to maintain the current roadway capacity. This relocation in conjunction with the need for a passenger station connection to the sidewalk/ground level affects properties located east of Prairie Avenue. Alternative 5 avoids affecting these properties by consolidating the two proposed stations along Prairie Avenue into a single station that would be located adjacent to the Intermodal Transit Facility at the City's Civic Center site. This alternative maintains Prairie Avenue within its existing right-of-way; however, one to two lanes would be lost reducing the capacity of the roadway. Specifically, one travel lane in each direction along the Prairie Avenue roadway between Arbor Vitae and La Palma, one lane in the southbound direction between La Palma and Pincay Drive, and one lane in each direction between Pincay Drive and Manchester Boulevard would be lost under Alternative 5.

Under Alternative 5, operational benefits would be less than those associated with the proposed Project. Reductions to daily traffic volumes along key roadway corridors and VMTs on an average weekday basis would occur, but approximately 15 percent less in magnitude than those associated with the proposed Project. Alternative 5 is estimated to result in transit ridership equivalent to approximately 75 percent of the transit ridership associated with the proposed Project. However, due to a reduction in capacities along

9 11,516 minus 493 in numbers of jobs displaced.

Prairie Avenue, traffic flow and congestion in the surrounding area would be worse under Alternative 5 compared to the proposed Project.

13. Tribal Cultural Resources

The proposed Project would have a less than significant impact on Tribal Cultural Resources (TCRs), No TCRS were identified in the records around the Project site and no sensitive resources were identified. Nonetheless, the Project as proposed would include construction which would have the potential to unearth subsurface resources not previously identified. Given the level of urban development in Inglewood, the likelihood of unearthing TCRs is low but it is still a possibility. Alternative 5 would have a similar impact to TCRs as the proposed Project since extensive construction and excavation of soil would be required to construct the APM structure. Similar impacts to the TCRs are anticipated for the proposed Project and Alternative 5.

14. Utilities and Service Systems

The proposed Prairie station under Alterative 5 would be located within the City's Civic Center site. The guideway would still be constructed along the same segment of Prairie Avenue compared to the proposed Project. As such, impacts related to the construction or relocation of water, wastewater treatment, storm water drainage, electric power, natural gas, or telecommunications facilities would be similar compared to the proposed Project.

Relationship to Project Objectives

The Prairie Avenue Single Station Alternative would partially meet the City's objective to reduce the City's traffic congestion and alleviate growing demand on the existing roadway network. Specifically, the Prairie Avenue Single Station Alternative would result in a reduction in capacities along Prairie Avenue, and traffic flow and congestion on a system-wide basis would be increased compared to those estimated for the proposed Project. However, the remaining City objectives would be met under the Prairie Avenue Single Station Alternative.

5.6 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

An EIR is required to identify the Environmentally Superior Alternative from among the range of reasonable alternatives that are evaluated. CEQA Guidelines section 15126.6(e)(2) requires that an environmentally superior alternative be designated and states that if the Environmentally Superior Alternative is the No Project alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.

Table 5.0-2: Alternatives Summary, identifies the ability of the Alternatives to meet the Project Objectives.

Table 5.0-2

Alternatives Summary

		Alternatives Considered Does the Alternative meet the Project Objectives?				
	Project Objectives	**Alternative 1 No Project**	**Alternative 2 Bus Rapid Transit (BRT) System**	**Alternative 3 Market Street Promenade**	**Alternative 4 4th Station Alternative**	**Alternative 5 Prairie Single Station Alternative**
1	Provide direct and convenient connection to the Metro regional transit system for local residents and the region to access the City's new major employment, commercial, and activity centers;	No	Yes	Yes	Yes	Yes
2	Provide sufficient transit connection capacity between the Metro regional transit system and the City's new major activity centers with enhanced travel time certainty and sufficient capacity to meet peak ridership demands to encourage transit as a travel mode choice;	No	Partial	Yes	Yes	Yes
3	Maintain existing roadway capacity	Yes	Partial	Yes, except on Market Street	Yes	Yes, except on Prairie Ave
4	Reduce the City's traffic congestion and alleviate growing demand on the existing roadway network on both major arterials and residential streets for both nonevent and event days	No	Partial	Yes	Yes	Partial
5	Encourage intermodal transportation systems by providing convenient, reliable certain transit	No	Yes	Yes	Yes	Yes
6	Increase transit mode split, reduce vehicle trips, and reduce per-capita vehicle miles traveled to the City's major activity centers, with corresponding improvement in air quality, public health, and reductions in greenhouse gas emissions from transportation sources in accordance with the City's goals under SB 375 and State policy with respect to climate change;	No	Yes	Yes	Yes	Yes
7	Support the ongoing economic revitalization, including through the creation of public parking facilities;	No	Partial	Yes	Yes	Yes
8	Encourage redevelopment and investment within the City in areas served by the proposed Project;	No	Yes	Yes	Yes	Yes
9	Provide safe, reliable, and convenient access to businesses in the City so that they are accessible to their workforce and customers;	No	Yes	Yes	Yes	Yes
10	Connect the Inglewood community and citizens to jobs, education, services, and destinations within the City and within the region by providing transit within safe and accessible walking distances; and	No	Yes	Yes	Yes	Yes
11	Support regional efforts to become more efficient, economically strong, equitable, and sustainable.	No	Yes	Yes	Yes	Yes

Of the alternatives evaluated in this EIR, the Environmentally Superior Alternative would be Alternative 2, Bus Rapid Transit (BRT) System Alternative. This alternative would avoid the unavoidable significant aesthetic and cultural resource impacts that would result from the Project on the Market Street segment. The BRT System Alternative would, however, not meet the City's basic objectives for the proposed Project.

With the BRT System Alternative, the proposed Project would not be constructed. No demolition or construction activities would occur, except along the public right-of-way where BRT-only lanes along the route are implemented. The BRT System Alternative would avoid all significant construction related effects and impacts identified for the proposed Project.

Unlike the No Project Alternative, the BRT System Alternative would meet some of the City's objectives including providing a direct and convenient connection to the Metro regional transit system, encouraging intermodal transportation systems by providing convenient transit, and providing safe, reliable, and convenient access to businesses in the City. The BRT System Alternative would also meet the City's objectives to support the ongoing economic revitalization, growth opportunities within the Downtown TOD Plan area, and encourage redevelopment and investment within the City in areas served by the proposed Project. The BRT System Alternative would not, however, create additional public parking to support ongoing economic revitalization efforts. The proposed Project would create additional public parking facilities in three locations along the proposed Alignment. In addition, the objective to provide sufficient transit connection capacity between Metro's regional transit system and the City's new major activity centers would not be met by this BRT alternative, resulting in limited increased transit mode split, limited reduction in vehicle trips, and consequently, limited reduction in per-capita vehicle miles traveled to the City's major activity centers. The estimated daily BRT ridership with Event Conditions would be approximately 20 percent of the projected ridership for the proposed APM system, providing transit options, increasing transit mode split, reducing vehicle trips, and reducing per capita vehicle miles traveled to the City's major activity centers. The BRT System Alternative would also not meet the City's objectives to maintain existing roadway capacity, reduce the City's traffic congestion and alleviate growing demand on the existing roadway network on both major arterials and residential streets for both nonevent and event days.

6.0 OTHER ENVIRONMENTAL CONSIDERATIONS

6.1 INTRODUCTION

California Environmental Quality Act (CEQA) Guidelines section 15126[1] requires that all phases of a project must be considered when evaluating its impact on the environment, including planning, acquisition, development, and operation. Further, CEQA Guidelines section 15126.2(a) requires that the evaluation of significant impacts consider direct and reasonably foreseeable indirect effects of the proposed Project over the short-term and long-term. The Environmental Impact Report (EIR) must identify (1) significant environmental effects that cannot be avoided if the proposed Project is implemented, (2) significant irreversible environmental changes that would result from implementation of the proposed Project, (3) effect found not to be significant, and (4) growth-inducing effects of the proposed Project.

6.2 SIGNIFICANT UNAVOIDABLE IMPACTS

CEQA Guidelines section 15126.2(c) requires that an EIR describe any significant impacts that cannot be avoided, even with the implementation of feasible mitigation measures. The significant environmental impacts of the proposed Project are identified below.

Aesthetics

Impact AES-1a: The proposed Project would substantially degrade the existing visual character or quality of public views of the site and its surroundings. This also applies under cumulative conditions.

While the Project would not result in significant impacts to the overall visual character of Downtown Inglewood along Market Street, the guideway would obstruct views of the former Fox Theater building, identified as a historic resource due the architectural design of the building. Mitigation measures and project design features included in the ITC Design Guidelines would reduce this impact to the extent feasible, however, this indirect impact on the visual character of this building would be a significant and unavoidable impact of the Project.

Air Quality

Impact AQ-1: Conflict with or obstruct implementation of the applicable air quality plan.

Even with the implementation of all feasible mitigation measures, including requiring use of off-road diesel-powered construction equipment that meets or exceeds Tier 4 Final off-road emissions standards

1 CEQA Guidelines sections 15126.2(a), (c-e).

or equivalent for all equipment rated at 50 horsepower or greater, dust control measures, and maximizing the use of electric-powered construction equipment, construction-related daily emissions would exceed the SCAQMD significance threshold for NOx.

Impact AQ-2: Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or State ambient air quality standard.

Cultural

Impact CUL-1: The proposed Project would cause substantial adverse changes in the significance of historical resources as defined in Section 15064.5.

The proposed APM guideway would be located directly in front of the former Fox Theater building on Market Street and visually obscure a portion of the sign pylon, creating a visual separation between the uppermost portion of the pylon and the lower portion of the building containing the theater marquee and public entrance. The APM guideway would also block views of the primary façade of the building, making it difficult to appreciate the overall design of the building. Because the ability of the former Fox Theater to convey its historic significance would be impaired following the implementation of the proposed Project, the indirect impact on the former Fox Theater is identified as a significant impact of the Project that cannot be avoided.

As the guideway turns east on Manchester Boulevard, it would partially intrude into the former People's Federal Building & Loan Association building located at 150 S. Market Street. The intrusion is necessary to accommodate for the turning radius of the guideway at this location. Acquisition and demolition of this building is proposed to accommodate the guideway. Demolition of this building is identified as a significant impact of the Project that cannot be avoided.

6.3 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

Under CEQA, an EIR must evaluate the extent to which the Proposed Project primary and secondary effects would generally commit future generations to the allocation of nonrenewable resources and to irreversible environmental damage. Specifically, CEQA Guidelines section 15126.2(d)[2] states:

> *Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible, since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit*

2 EQA Guidelines sections 15126.2(d).

> *future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.*

The evaluation below addresses whether the Proposed Project would result in significant irreversible environmental changes if they would:

- Involve a large commitment of nonrenewable resources;
- Result in primary or secondary impacts that would generally commit future generations to similar uses;
- Involve uses in which irreversible damage could result from any potential environmental accidents associated with the project; or
- Result in consumption of resources that is not justified (e.g., the project involves the wasteful use of energy).

Each of these issues is discussed below for the proposed Project.

Commitment of the Project for Future Generations

Development of the proposed Project would result in the commitment of the Project area to a transit use along with accompanying support facilities uses, thereby precluding other uses for the lifespan of the proposed Project, a period of time anticipated to be at least 50 years.

Irreversible Environmental Damage

The CEQA Guidelines also require a discussion of the potential for irreversible environmental damage that could be caused by an environmental accident associated with the proposed Project. While the proposed Project could result in the use, transport, storage, and disposal of limited amounts of hazardous wastes during construction and operation, all activities would comply with applicable State and federal laws related to hazardous materials, which significantly reduce the likelihood and severity of the occurrence of accidents that could result in irreversible environmental damage.

Over the past decade, the understanding of global climate change and the role that communities can play in mitigating and/or adapting to it has grown tremendously. There is broad scientific consensus that recent changes in climatic conditions, including increases in global temperatures, are associated with corresponding increases of greenhouse gases (GHGs). Temperature increases are beginning to affect regional climates and continued increases are expected result in impacts to the southern California region and the world. Climate change is anticipated to have profound implications for the availability of the natural resources on which economic prosperity and human development depend.

Greenhouse Gas Emissions, the emission of GHGs is known to have long-term effects on atmospheric conditions that affect the global climate, with resultant changes in sea level, hydrological conditions in rivers, heat island effects, and a range of other conditions. While these changes are not considered irreversible, they could last for generations. The proposed Project could result in short-term increases in GHG emissions during construction, but through the implementation of mitigation measures identified in this Draft EIR, the construction-related GHG emissions would be reduced. Operation of the proposed Project would result in a decrease in GHG emissions as it would provide for the conversion of vehicles trips in the area to ridership on the APM trains. As such, the proposed Project would not contribute to global climate changes and related irreversible environmental damage.

Unjustified Consumption of Resources

Resources that would be permanently and continually consumed by implementation of the proposed Project include water, electricity, natural gas, and fossil fuels; however, the amount and rate of consumption of these resources would not result in the unnecessary, inefficient, or wasteful use of resources.

Project Construction

As shown in **Table 4.5-2** and **Table 4.5-3** in **Section 4.5: Energy Resources**, a total of approximately 172,177 kWh of electricity and 4,102,730 gallons of petroleum is estimated to be consumed during construction of the proposed Project. Construction activities do not typically involve the consumption of natural gas, as construction equipment and staging rely heavily on electricity and transportation fuels. Accordingly, natural gas would likely not be needed to support construction activities; thus, there would be little to no demand generated by construction.

Construction of the proposed Project would result in the irretrievable commitment of construction materials (e.g., steel products, cement, glass). While construction of the proposed Project would result in the irretrievable commitment of nonrenewable energy resources, primarily in the form of fossil fuels (including fuel oil), natural gas, and gasoline for automobiles and construction equipment, the consumption of fossil fuels would occur on a temporary basis during the construction period.

Construction of the proposed Project would employ fuel-efficient equipment consistent with State and federal regulations, such as fuel efficiency regulations in accordance with the California Air Resources Board (CARB) Pavley Phase II standards, the anti-idling regulation in accordance with section 2485 in Title 13 of the (CCR), and fuel requirements for stationary equipment in accordance with section 93115 (concerning Airborne Toxic Control Measures) in Title 17 of the CCR. Use of construction equipment that

is compliant with these regulations would result the use of more fuel-efficient engines and associated fuel savings.

The proposed Project would divert mixed construction and demolition debris to City-certified construction and demolition waste processors using City-certified waste haulers, which would reduce truck trips to landfills, and increase the amount of waste recovered (e.g., recycled, reused, etc.) at material recovery facilities, thereby further reducing transportation fuel consumption. As such, the consumption of energy during project construction would not be wasteful, inefficient, or unnecessary.

Project Operation

Operation of the Proposed Project would result in the demand for electricity and natural gas for project operations, and gasoline and diesel fuel for transportation and backup generation functions.

As shown in **Table 4.5-5** in **Section 4.5**, the electricity demand for the proposed Project during normal operation would result in a net increase of 22,651,384 kWh (22.7 GWh) per year. In the event the MSF TPSS is unable to operate, the electricity demand for the proposed Project results in a net increase of 22,164,841 kWh (22.1 GWh) per year. In the event the Civic Center Site TPSS is unable to operate, the electricity demand for the proposed Project results in a net increase of 23,485,411 kWh (23.5 GWh) per year.

As shown in **Table 4.5-6** in **Section 4.5**, the proposed Project would result in a net decrease of 3,467,250 kBTU of natural gas per year.

As shown in **Table 4.5-8** in **Section 4.5**, implementation of the proposed Project would reduce annual petroleum-based fuel under all scenarios. Specifically, under the Adjusted Baseline (2016) scenario, the proposed Project would reduce annual fuel consumption from 48,954,790 gallons to 48,633,366 gallons, a decrease of 321,424 gallons. Under the Future (2026) Non-Event scenario, the proposed Project would reduce annual fuel consumption from 46,722,216 gallons to 46,341,084 gallons, a decrease of 381,133 gallons. Under the Future (2026) All Event scenario, the proposed Project would reduce annual fuel consumption from 50,499,092 gallons to 49,377,161 gallons, a decrease of 1,121,931. Under the Future (2045) Non-Event scenario, the proposed Project would reduce annual fuel consumption from 41,714,897 gallons to 41,353,725 gallons, a decrease of 361,172 gallons. Under the Future (2045) All Event scenario, the proposed Project would reduce annual fuel consumption from 44,782,905 gallons to 43,660,847 gallons, a decrease of 1,122,058 gallons.

Additionally, the proposed Project would include up to two stationary standby generators with an estimated total capacity rated at approximately 4,000 kilowatts (kW) to provide emergency power

primarily for lighting and other emergency building systems. The estimated annual fuel usage assuming each generator operates of 50 hours per year (2 hours per day) is 27,440 gallons of diesel fuel.[3]

Operation of the proposed Project would comply with all applicable building codes, including the 2019 Title 24 building energy efficiency standards, CAFE fuel economy standards, consistency with the SCAG 2020-45 RTP/SCS, compliance with the County's Low Impact Development (LID) Development Standards Manual, compliance with the City's Low Impact Development Requirements for New Development and Redevelopment, the City's Green Street Policy, the City's Water Conservation and Water Supply Shortage Program, as well as mitigation measures included in this Draft EIR, would ensure that natural resources are used efficiently and conserved to the maximum extent possible. Further, it is expected that, over time, new technologies or systems will emerge, or will become more cost-effective or user-friendly, to further reduce the reliance upon nonrenewable natural resources. For example, future implementation of the Clean Fuel Standard and the Renewable Portfolio Standard are expected to decrease the use of nonrenewable fossil fuels.

Collectively, the incorporation of the above described conservation measures and features, operation of the proposed Project would minimize the consumption of electricity, natural gas, and transportation fuels. Therefore, as proposed operation of the proposed Project would not result in the wasteful, inefficient, or unnecessary consumption of electricity, natural gas, and transportation fuels, and thus would not result in the unjustified consumption of natural resources.

6.4 EFFECTS FOUND NOT TO BE SIGNIFICANT

Section 15128 of the CEQA Guidelines[4] requires that an EIR "contain a statement briefly indicating the reasons that various possible significant effects of a project were determined not to be significant and therefore were not discussed in detail in the EIR."

The Original Initial Study (Original IS) (see **Appendix 2.0.2b**) was published in July 2018 and determined that an EIR would be prepared in compliance with CEQA to analyze potentially significant impacts that may result from the Project. As such, an Original Notice of Preparation (Original NOP) (see **Appendix 2.0.1b**) was circulated and comments were received from the public and agencies following a 30-day comment period that ended on August 15, 2018.

As a result of the comments received and refinements and modifications to proposed Project identified in the Original NOP and Original IS, a Revised NOP and IS were circulated. Subsequent to the circulation of

3 Vender Specifications for Standby Generator, Accessed August 25, 2020 at: https://www.cat.com/en_US/products/new/power-systems/electric-power.html

4 California Environmental Quality Act (CEQA) Guidelines, Section 15128.

the Original IS, the State of California Office of Planning and Research (OPR) updated and revised the thresholds contained in the State CEQA Guidelines Appendix G.[5] The Revised IS was updated to address the updated Appendix G checklist that became effective on December 28, 2018. The following analysis is based on the Revised Initial Study (Revised IS) recirculated on September 10th, 2020 (see **Appendix 2.0.2a**).

Impacts determined by the Initial Study to be potentially significant, as well as included in this Draft EIR are addressed in detail in **Section 4.0: Environmental Impact Analysis**. The discussion below presents the analysis of the effects related to specific thresholds for the impacts identified in the Revised Initial Study that were not found to be significant. All impacts for the issues discussed in this section would be less than significant or have no impact.

6.4.1 Aesthetics

Except as provided in Public Resources Code Section 21099, would the Project:

Threshold: Have a substantial adverse effect on a scenic vista?

A significant impact regarding a scenic vista could occur if the proposed Project were to introduce incompatible visual elements within a field of view containing a scenic vista or substantially blocked views of a scenic vista. Scenic vistas are generally described in two ways: panoramic views (visual access to a large geographic area, for which the field of view can be wide and extend into the distance) and focal views (visual access to a particular object, scene, or feature of interest). Scenic resources typically include natural open spaces, topographic formations, and landscapes that contribute to a high level of visual quality. They also can include ridgelines, parks, trails, nature preserves, sculpture gardens, and similar features.

The proposed Project consists of an elevated guideway that would be located in the center of the public rights-of-way. The proposed Project's alignment would extend from a point near the under-construction Metro Crenshaw/LAX Line, which will run south along North and South Market Street, east along East Manchester Avenue, and south along South Prairie Avenue before terminating near the intersection of South Prairie Avenue and Hardy Street.

The proposed Project is located entirely within the City in a highly developed urban area characterized by commercial, residential, and industrial uses. The existing level of development on the site and in the surrounding area limits views across and beyond the site from surrounding roadways. The City's General Plan states that no forest resources, wildlife, fisheries, shorelines, or agricultural land are present in the City,[6] nor does the General Plan designate any scenic vistas within the City or its vicinity. Additionally, the

5 California Environmental Quality Act (CEQA) Guidelines, Appendix G.
6 City of Inglewood, General Plan, "Conservation Element" (1997), 1.

proposed Project is not near any designated wild or scenic rivers pursuant to the National Wild and Scenic Rivers System.[7] The nearest surrounding mountains, the Santa Monica Mountains, are more than 10 miles to the north.[8] No views of these mountains or of any other focal points or broad panoramic view corridors are available from public rights-of-way along the proposed Project.

Based on the above, the proposed Project would not have a substantial adverse effect on a scenic vista. Impacts would be less than significant.

Threshold: **Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway?**

A significant impact would occur if the proposed Project were to substantially damage identified scenic resources bordered by or within the viewshed of a State-designated scenic highway.

There are no designated scenic highways near the proposed Project. In addition, although the City Municipal Code (IMC) has a tree protection ordinance that requires any street trees affected by project implementation be replaced at a 1:1 ratio, the appended tree inventory does not identify any federally or State-listed trees that would be affected by proposed Project's implementation. None of the trees inventoried is located within a State scenic highway. Historic buildings located in the vicinity of the proposed Project also do not fall within a State scenic highway, and no rock outcroppings are present on or near the proposed Project. As such, impacts would be less than significant.

6.4.2 Agricultural and Forestry Resources

Would the proposed Project:

Threshold: **Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to nonagricultural use?**

Significant impacts would occur if the proposed Project were to adversely impact Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. The location of the proposed Project is surrounded by commercial, commercial recreation, single- and multifamily residential, and entertainment uses (within the Hollywood Park Specific Plan).

7 National Wild and Scenic Rivers System, accessed July 2020, https://www.rivers.gov.
8 Google Maps accessed July 2020, https://www.google.com/maps.

According to the California Department of Conservation's Farmland Mapping and Monitoring Program, the location of the proposed Project has not been previously mapped.7 However, the City is highly developed and entirely urbanized; no portion of the City, including the proposed Project location and surrounding development, is currently in agricultural use. As such, no portion of the proposed Project's location would qualify for designation as Prime Farmland, Farmland of Statewide Importance, Unique Farmland, or Farmland of Local Importance. No impacts would occur.

Threshold: Conflict with existing zoning for agricultural use, or Williamson Act contract?

Significant impacts would occur if the proposed Project were to conflict with existing agricultural zoning or a Williamson Act contract.

As previously noted, the proposed Project's location and surrounding development are not used for agricultural, nor can they support agricultural use. The area is not subject to a Williamson Act contract. No impacts would occur.

Threshold: Conflict with existing zoning for, or cause rezoning of, forestland (as defined in PRC section 12220(g)), timberland (as defined by PRC section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?

The proposed Project's location is not designated or zoned for forest or timberland. No timber operations exist in the area. Additionally, the area is highly urbanized area and is not within any forestland area. No impacts would occur.

Threshold: Would the Project result in the loss of forest land or conversion of forest land to non-forest use?

As previously noted, the proposed Project's location does not contain any farmland or forestland. Development of the proposed Project would occur in an existing highly urbanized and developed area. No impacts would occur.

Threshold: Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland to nonagricultural use, or conversion of forestland to nonforest use?

The proposed Project's location is not designated or zoned for forest or timberland. No timber operations exist in the area. Additionally, the area is highly urbanized area and is not within any forestland area. No impacts would occur.

6.4.3 Air Quality

Would the proposed Project:

Threshold: **Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?**

Impacts would be considered potentially significant if the proposed Project were to result in the creation of objectionable odors with the potential to affect substantial numbers of people, or if construction or operation of the proposed Project would result in the creation of nuisance odors that would be noxious to a substantial number of people as codified in South Coast Air Quality Management District (SCAQMD) Rule 402 (Nuisance).[9]

Odors are typically associated with industrial projects involving the use of chemicals, solvents, petroleum products, and other strong-smelling elements used in manufacturing processes, as well as sewage treatment facilities and landfills.

During construction, activities associated with the operation of equipment, the application of asphalt, and the application of architectural coatings and other interior and exterior finishes may produce discernible odors typical of most construction sites. As construction-related emissions dissipate from the area, odors associated with these emissions would also decrease, dilute, and become unnoticeable.

According to the SCAQMD CEQA Air Quality Handbook, land uses that are associated with odor complaints include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting refineries, landfills, dairies, and fiberglass molding.[10] The proposed Project would not include any of these odor-producing uses. Odors associated with the proposed Project's operation would be limited to on-site waste generation and disposal, as well as cleaning operations at the MSF. All trash receptacles would be covered and properly maintained in a manner as to minimize odors, as required by City and Los Angeles County Health Department regulations and be emptied on a regular basis.[11]

Implementation of the proposed Project would not generate objectionable odors affecting a substantial number of people. Impacts related to odors would be less than significant.

---

9 SCAQMD, "Rule 402: Nuisance" (adopted May 7, 1976), http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule402.pdf.

10 SCAQMD, Air Quality Handbook, accessed July 2020, http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysishandbook.

11 County of Los Angeles Department of Public Health, "Solid Waste Management Program," accessed July 2020, http://publichealth.lacounty.gov/eh/EP/solid_waste/solid_waste_main.htm.

6.4.4 Biological Resources

Would the project:

Threshold: **Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or US Fish and Wildlife Service?**

A significant impact would occur if the proposed Project were to lead to adverse effects on any species identified as a candidate, sensitive, or special status species according to any adopted plan, policy, or regulation. This includes effects caused by habitat modification.

The proposed Project is located entirely within a highly developed urban area characterized by commercial and residential uses. The proposed Project's location consists of paved and active streets with various landscaping, as well as developed or previously developed parcels where the MSF and TPSS facilities may be located. The existing level of development in the area and in the surrounding area is not compatible with supporting wildlife and natural plant communities.

A biological assessment for the proposed Project's location was completed to determine the presence or absence of any sensitive biological resources. As part of the biological assessment, the California Department of Fish and Wildlife (CDFW) California Natural Diversity Database (CNDDB)[12] was used to conduct a 9-quadrant survey. In the Inglewood quadrant, 29 species were previously identified as seen in **Table 6.0-1: CNDDB Inglewood Quadrant Species List**.

There were no species listed on the CNNDB that have been observed within the area of proposed Project. Fourteen of the species listed in **Table 6.0-1** were no closer than 1.89 miles from the proposed Project. The only plant species on site were landscaping as well as weeds and ruderal vegetation. Of these species, none listed is a candidate, sensitive, or special-status species. None of the species listed in the CNDDB was found to be present within or surrounding the proposed Project during the field survey on May 23, 2018.

12 California Department of Fish and Wildlife (CDFW), California Natural Diversity Database (CNDDB), "Maps and Data," accessed July 2020, https://www.wildlife.ca.gov/Data/CNDDB.

Table 6.0-1
CNDDB Inglewood Quadrant Species List

Scientific Name	Common Name	Distance to Proposed Project (miles)
Spea hammondii	Western spadefoot	Unprocessed
Nycticorax	Black-crowned night heron	Unprocessed
Ammodramus savannarum	Grasshopper sparrow	Unprocessed
Spizella breweri	Brewer's sparrow	Unprocessed
Agelaius tricolor	Tricolored blackbird	3.06 SE
Setophaga petechia	Yellow warbler	Unprocessed
Athene cunicularia	Burrowing owl	4.19 NE
Polioptila californica	Coastal California gnatcatcher	2.01 NW
Empidonax traillii extimus	Southwestern willow flycatcher	4.19 NE
Vireo bellii pusillus	Least Bell's vireo	4.59 NE
Bombus crotchii	Crotch bumble bee	Not Present on-site
Eumops perotis californicus	Western mastiff bat	1.89 SE
Nyctinomops femorosaccus	Pocketed free-tailed bat	Unprocessed
Microtus californicus stephensi	South coast marsh vole	2.01 NW
Taxidea taxus	American badger	4.19 NE
Lasionycteris noctivagans	Silver-haired bat	Unprocessed
Anniella stebbinsi	Southern California legless lizard	Unprocessed
Phrynosoma blainvillii	Coast horned lizard	5.70 S
Eryngium aristulatum var. parishii	San Diego button-celery	2.12 SW
Centromadia parryi ssp. australis	Southern tarplant	Not Present on-site
Lasthenia glabrata ssp. coulteri	Coulter's goldfields	0.77 NE
Atriplex coulteri	Coulter's saltbush	4.44 SE
Astragalus tener var. titi	Coastal dunes milk-vetch	0.77 NE
Sidalcea neomexicana	Salt spring checkerbloom	3.07 NW
Camissoniopsis lewisii	Lewis' evening-primrose	Unprocessed
Hordeum intercedens	Vernal barley	Unprocessed
Orcuttia californica	California Orcutt grass	3.69 SW
Navarretia fossalis	Spreading navarretia	On site
Navarretia prostrata	Prostrate vernal pool navarretia	Not Present on-site

Source: CNDDB
Notes: NE = Northeast; S = South; SE = Southeast; SW = Southwest; Unprocessed = Data for species has not been uploaded to CNDDB for mapping—cannot determine distance.

The sensitive species listed in quadrants are not within the proposed Project's footprint. The species listed tend to only occur in specific habitats that do not present within the City; suitable habitats for these species tend to occur in area beyond the City, such as the Santa Monica Mountains to the northwest and

the coastal regions to the west. The proposed Project area is completely urbanized and has no natural open space natural plant communities.

The proposed Project is not located in a significant ecological area defined in the County of Los Angeles (the County) General Plan.[13] Moreover, the City's General Plan states that no forest resources, wildlife, fisheries, shorelines, or agricultural land are present in the City.[14]

Impacts would be less than significant.

Threshold: **Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or US Fish and Wildlife Service?**

Significant impacts would occur if the proposed Project were to cause adverse effects on any riparian habitat or other sensitive natural community identified in an adopted plans, policies or regulations.

The proposed Project is located in an area that consists of paved rights-of-way, as well as developed or previously developed urban parcels adjacent to the proposed Project. As such, no riparian habitat or sensitive natural community is located in the area.[15] In addition, the proposed Project is not located in a significant ecological area defined in the County's General Plan[16] or the City's General Plan.[17]

No impacts would occur.

Threshold: **Have a substantial adverse effect on State or federally protected wetlands (including but not limited to marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?**

A significant impact would occur if the proposed Project were to adversely affect federally protected wetlands under Section 404 of the Clean Water Act.

The proposed Project is not in proximity to, nor does it contain, wetland habitat or a blue-line stream that is subject to the jurisdiction of the US Army Corps of Engineers or the CDFW. The National Wetlands

13 Los Angeles County, Department of Regional Planning (LA County DRP), General Plan 2035, "General Plan Update Program— Interactive Map (GP-NET)," accessed July 2020, http://planning.lacounty.gov/gpnet.
14 City of Inglewood, General Plan, "Conservation Element" (1997).
15 CDFW, CNDDB, "Maps and Data."
16 LA County DRP, General Plan 2035, "General Plan Update Program—Interactive Map (GP-NET)."
17 City of Inglewood, General Plan, "Conservation Element."

Mapper does not show any federally protected streams, wetlands, or other water bodies, or any riparian habitat on site or adjacent to the proposed Project.[18]

Because the proposed Project would not have any effect on federally protected wetlands, and would not result in any removal, filling, hydrological interruption, or other means of disruption to a watercourse, no impact would occur.

Threshold: **Conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or State habitat conservation plan?**

Significant impacts would occur if the proposed Project were to conflict with a Habitat Conservation Plan (HCP), Natural Community Conservation Plan (NCCP), or another approved plan designed to conserve habitat.

No adopted HCP, NCCP, or similar plan applies to the proposed Project's area.[19] Consequently, implementation of the proposed Project would not conflict with the provisions of any adopted conservation plan and therefore no impacts would occur.

6.4.5 Geology and Soils

Would the proposed Project:

Threshold: **Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction?**

Significant impacts would occur if the proposed Project were to expose people or structure to the effects of liquefaction.

Liquefaction is a seismic phenomenon in which loose, saturated, granular soils behave similarly to a fluid when subjected to high-intensity ground shaking. Liquefaction occurs when three general conditions exist: shallow groundwater; low-density, fine, clean sandy soils; and strong ground motion. The effects of liquefaction can include sand boils, settlement, and bearing-capacity failures below structural foundations.

18 US Fish and Wildlife Service (USFWS), National Wetlands Inventory, "National Wetlands Mapper," accessed July 2020, https://www.fws.gov/wetlands/data/mapper.html.

19 CDFW, "NCCP Plan Summaries," accessed July 2020, https://www.wildlife.ca.gov/conservation/planning/nccp/plans.

According to the CGS, the location of the proposed Project is not within an area susceptible to liquefaction.[20] Based on previous investigations and available geologic data, liquefaction zones are not mapped or known to exist beneath the proposed Project.

The following materials were consulted regarding potential liquefaction for the proposed Project:[21]

- Mapped liquefaction areas on the Inglewood Quadrangle,
- The City of Los Angeles Safety Element, and
- The County of Los Angeles Seismic Safety Element.

Based on are review of the above, it was determined that the proposed Project is not located within areas identified as having a potential for liquefaction according to these source materials. Furthermore, the regional geologic map and subsurface conditions reported in previous geotechnical investigations, and the absence of shallow groundwater, the Pleistocene age sediments underlying the proposed Project (generally dense silty sand and firm silty clay silts) are not considered prone to liquefaction. Therefore, the potential for liquefaction and its secondary effects are considered low and a Project area-specific study in accordance with the Seismic Hazards Mapping Act[22] will not be required. The design and construction of the proposed Project would conform to California Building Code requirements related to seismic standards, as approved by the City Building Safety Division.

Impacts related to seismic related liquefaction would be less than significant.

Threshold: **Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides?**

Significant impacts would occur if the proposed Project were to expose people or structures to adverse impacts associated with landslides.

The proposed Project is located on level terrain. Based on the topographic setting and a review of previous geotechnical evaluations in the proposed Project's vicinity, no historical landslides are known to have occurred that could potentially impact the proposed Project. According to the CGS,[23] the proposed Project is not located within an Earthquake-Induced Landslide Zone as shown on the Earthquake Zones of Required Investigation, Inglewood Quadrangle map. The probability of seismically induced landslides

20 CDC, CGS, Earthquake Zones of Required Investigation, interactive map, accessed July 2020, https://maps.conservation.ca.gov/cgs/EQZApp/app/.

21 Inglewood Transit Connector, Technical Memorandum (DRAFT), Geology and Soils, Geosyntec Consultants, June 25, 2018.

22 2018 California Code, Public Resources Code – PRC, Division 2 – Geology, Mines and Mining, Chapter 7.8, Seismic Hazards Mapping, Section 2690, Seismic Hazards Mapping Act.

23 California Department of Conservation, California Geological Survey, DC, CGS, Earthquake Zones of Required Investigation.

occurring within the area of the proposed Project is not significant due to the general lack of elevation difference in slope geometry across or adjacent to the site. In addition, development of the proposed Project would not substantially alter the existing topography of the area.

As such, no impacts related to slope instability or landslides would occur.

Threshold: Result in substantial soil erosion or the loss of topsoil?

Significant impacts would occur if the proposed Project were to result in substantial soil erosion or the loss of topsoil.

The location of the proposed Project has been substantially developed with impermeable surfaces with only small areas of vegetative planters, and no areas of the site are susceptible to erosion under existing conditions. The area is highly urbanized and developed; the land is relatively flat and contains minimal rises or changes in elevation. No major slopes or bluffs are on or adjacent to the site. Although development of the proposed Project has the potential to result in the erosion of soils during construction activities, erosion would be reduced through implementation of SCAQMD Rule 403—Fugitive Dust to minimize wind- and waterborne erosion.

The proposed Project's construction would temporarily expose on-site soils to surface water runoff. Compliance with construction-related best management practices (BMPs), as detailed in a Storm Water Pollution Prevention Plan (SWPPP), would control and minimize erosion and siltation. Appropriate erosion control BMPs may include but are not limited to silt fencing, fiber rolls, sand bag barriers, gravel bag berms, stabilized construction site entrances/exits, and any other practices laid out in the City's Low-Impact Development (LID) Standards Manual.[24] Following construction activities, treated runoff would be directed into existing storm drains that receive surface water runoff under existing conditions, and runoff would not encounter unprotected soils.

Because the proposed Project is greater than 1 acre in size, the proposed Project will implement a SWPPP in accordance with the National Pollutant Discharge Elimination System (NPDES) General Permit for Discharges of Storm Water Associated with Construction Activity and Land Disturbance Activities. The site specific SWPPP would be prepared prior to earthwork activities and would be implemented during the proposed Project's construction. The SWPPP would include BMPs and erosion control measures to prevent pollution in stormwater discharge. Typical BMPs that could be used during construction include good housekeeping practices (e.g., street sweeping; proper waste disposal; vehicle and equipment maintenance; concrete washout area; materials storage; minimization of hazardous materials; proper

24 IMC, ch. 10, Public Works, art. 16, LID Standards Manual, incorporated by reference.

handling and storage of hazardous materials; etc.) and erosion- and sediment-control measures (e.g., silt fences, fiber rolls, gravel bags, stormwater inlet protection, soil stabilization measures, etc.). The SWPPP would be subject to review and approval by the City.

The proposed Project's construction activities would comply with the City's grading permit regulations, which require the implementation of grading and dust control measures, including a wet-weather erosion control plan if construction occurs during the rainy season. Through compliance with these existing regulations, the proposed Project would not result in any significant impacts related to soil erosion during the construction phase.

During the proposed Project's operational phase, the proposed Project's surface areas would be developed with impervious surfaces, and all stormwater flows would be directed to storm drainage features and would not come into contact with bare soil surfaces. In addition, no native topsoil is present on the site because it has been previously disturbed and developed. Therefore, soil erosion impacts associated with construction and operation of the proposed Project would not occur, and soil erosion impacts would be less than significant.

Threshold: **Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?**

Significant impacts would occur if the proposed Project were based on unstable soils that could result in landslides, lateral spreading, subsidence, liquefaction, or soil collapse.

Subsidence and ground collapse generally occur in areas with active groundwater withdrawal or petroleum production. The extraction of groundwater or petroleum from sedimentary source rocks can cause the permanent collapse of the pore space previously occupied by the removed fluid. The proposed Project does not involve the creation of new groundwater wells, nor are there active groundwater activities in the vicinity of the proposed Project.[25]

According to the California Energy Management Division (CalGEM) (formerly the Division of Gas and Geothermal Resources (DOGGR)), the area of the proposed Project is not located within the limits of any existing or former oil fields.[26] The area does not contain existing oil production wells, and no plugged or abandoned oil exploration wells are known to be located within the proposed Project area. The closest

25 Los Angeles County Public Works. Groundwater Wells. https://dpw.lacounty.gov/general/wells/. September 1, 2020.
26 California Division of Gas and Geothermal Resources (DOGGR), Well Finder, https://maps.conservation.ca.gov/doggr/wellfinder/#openModal/-118.32073/33.94064/15. Accessed August 31, 2020.

known oil production well is located approximately 1,00 feet east of Prairie Avenue and is categorized as "idle."[27] Therefore, while there is some history of oil extraction in the area, no oil extraction occurs or is known to have historically occurred within the area of the proposed Project.

Subsidence and ground collapse can also occur during dewatering activities. However, dewatering is not necessary for the proposed Project. US Geological Survey groundwater measurements indicate that nearby groundwater is at least 85 feet below grade. Given that the proposed Project does not include substantial excavation or subterranean structures, groundwater would not be encountered during construction. The proposed Project's design features and construction would comply with all applicable building codes and standards.

A site-specific geotechnical study would be performed by a licensed engineer that would outline structural design elements to ensure structural integrity is maintained and account for site specific soil conditions. In addition, the design and construction of the proposed Project would conform to California Building Code requirements related to site specific soil conditions, as approved by the City Building Safety Division.

With adherence to existing regulations, impacts related to geological failure—including lateral spreading, off-site landslides, liquefaction, or collapse—would be less than significant.

Threshold: **Be located on expansive soil, as defined in Table 18 1-B of the Uniform Building Code (1994), creating substantial risks to life or property?**

Significant impacts could occur if the proposed Project were located on expansive soil that could create substantial risks to life or property.

Expansive soils include clay minerals characterized by their ability to undergo significant volume change (shrink or swell) due to variation in moisture content. Sandy soils are generally not expansive, while clayey soils generally are expansive. Changes in soil moisture content can result from rainfall, irrigation, pipeline leakage, perched groundwater, drought, or other factors. Volumetric change of expansive soil may cause excessive cracking and heaving of structures with shallow foundations, concrete slabs-on-grade, or pavements supported on these materials.

Soil materials in the area tend to include: (1) artificial fill, consisting primarily of silty sand and sand with silt and gravel; (2) alluvial deposits consisting of sand, gravel, and cobles; and (3) alluvial deposits consisting of silty sand, sand, silty clay, and sandy clay. Typically, sandy soils have a low expansion potential

27 California Division of Gas and Geothermal Resources (DOGGR), Well Finder, https://maps.conservation.ca.gov/doggr/wellfinder/#openModal/-118.32073/33.94064/15. Accessed August 31, 2020.

while clayey soils can have a high expansion potential. The predominance of granular content in the soils in the area including gravels, sands, and cobbles indicate a generally low potential for expansive soils.

A site-specific geotechnical study would be performed by a licensed engineer that would outline structural design elements to ensure structural integrity is maintained and account for site specific soil conditions. In addition, the design and construction of the proposed Project would conform to California Building Code requirements related to site specific soil conditions, as approved by the City Building Safety Division.

The proposed Project would incorporate standard construction practices to maintain the integrity of the proposed Project's structures. Additionally, the proposed Project's design features and construction would comply with all applicable building codes and standards. With adherence to existing regulations, impacts related to expansive soils would be less than significant.

Threshold: **Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?**

The proposed Project would result in significant impacts if it were located on soils incapable of supporting septic tanks or other alternative systems in the event that the proposed Project were not connected to existing sewer systems.

The proposed Project is located in a highly urbanized area where wastewater infrastructure is currently in place. The proposed Project would connect to the City's existing sewer system and would not require the use of septic tanks or alternative wastewater disposal systems. Thus, the proposed Project would not result in any impacts related to soils that are incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems.

No impacts would occur.

6.4.6 Hazards and Hazardous Materials

Would the proposed Project:

Threshold: **Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?**

Construction

During construction activities, excavation of soil impacted with petroleum hydrocarbons or dry-cleaning solvents or other contaminants may be encountered. In addition, common construction materials, such

as fuels, paints, oils, transmission fluids, solvents, and other acidic and alkaline solutions, would be utilized. The potential encounter and usage of contaminants and hazardous materials would require special handling, transport, and disposal. Hazardous materials used during construction would typically be packaged in consumer quantities with handling instructions from the manufacturers. Manufacturer instructions will be followed during required usage of hazardous materials to minimize the risk of exposure to workers and the environment.

In addition, the construction of the MSF and TPSSs will necessitate the demolition of existing structures. Demolition activities have the potential to release hazardous materials, such as asbestos containing materials (ACM), lead-based paint (LBP), and other potentially hazardous building materials in some form such as polychlorinated biphenyl, mercury, or chlorofluorocarbons found in fluorescent lighting and electrical switches. Potential exposure to hazardous materials during demolition will be limited only to the duration of demolition activities. Prior to demolition, existing buildings are required to be inspected for the presence of hazardous materials, including asbestos containing materials, lead based paint, polychlorinated biphenyl (PCB) materials and mercury.

The identification, removal, and disposal of ACM is regulated under 8 CCR 1529 and 5208. The identification, removal, and disposal of LBP is regulated under 8 CCR 1532.1. A State-certified professional would be required to conduct all work related to the identification, removal, and disposal of both ACM and LBP. If either ACM or LBP are found, a site-specific hazard control plan must be prepared and submitted to the appropriate agency detailing removal methods and specific instructions for protective clothing and equipment for abatement personnel. A State-certified LBP and an asbestos removal contractor would be retained to conduct the appropriate abatement measures and be retained for the removal of the hazardous material in compliance with all federal, State, and local laws and regulations. Once all abatement measures have been implemented and the hazardous material has been removed, a written documentation will be submitted to the City.

The identification, removal, and disposal of PCBs is regulated by the EPA under the Toxic Substances Control Act[28] and 22 CCR 66263.44. Electrical transformers and older fluorescent light ballasts, along with other suspect material will need to be tested and verified for PCB content prior to demolition. If PCBs are detected above action levels, a material must be disposed of at a licensed facility permitted to accept the materials. The identification, removal, and disposal of PCBs must follow all federal, State, and local laws and regulations. Upon completion of abatement measures, the contractor will submit written documentation to the City.

28 Title 40, Chapter 1, Subchapter R, Part 761

All hazardous material identification, removal, and disposal activities will be carried out in accordance with all federal, State, and local laws and regulations in combination with enforcement mechanisms by agencies including SCAQMD and Cal/OSHA. Compliance with applicable laws and regulations will minimize the potential for exposure of individuals and the environment to hazards during the construction, demolition, and disposal process.

The transport of hazardous material is regulated by US Department of Transportation, Caltrans and the California Highway Patrol. The enforcement agencies have established driver-training requirements, load labeling requirements, and container specifications designed to minimize the exposure of hazardous materials. Manchester Boulevard and Prairie Avenue are major roadways along the elevated guideway that are designated truck routes.[29] These routes are permitted for use by any vehicle exceeding a maximum gross weight of 3 tons and includes the routine transport of hazardous materials by such trucks. While hazardous materials, with some exceptions, can be transported on all City roadways, Section 31303 of the California Vehicle Code and US Department of Transportation regulations require that hazardous materials be transported by routes with the least overall travel time, ensuring that freeways and major boulevards are primarily used for the transport of hazardous materials. Prior to the commencement of construction, haul routes will be reviewed and approved of by the City.

Additionally, the NPDES General Construction Permit described above in **Section 4.6: Geology and Soils**, would include the submittal of a SWPPP, identifying various BMPs and other measures, including proper material storage, prevention, and containment of accidental spills of hazardous materials and wastes, to ensure hazardous materials are contained. All materials will also be stored, handled, transported, and disposed of in accordance with all applicable local, State, and federal regulations. Therefore, the proposed Project would not create a significant impact related to routine transport, use, or disposal of hazardous materials during construction. Impacts would be less than significant.

Operation

The types and amounts of hazardous materials that would be used in connection with operation of the proposed Project, including along the elevated guideway and at the stations, but particularly at the MSF, would be typical of those used in an industrial setting (e.g., cleaning solutions, solvents, pesticides for landscaping, painting supplies, and petroleum products used in normal vehicle fleet operations, coolants, absorbents, oil and fuel products, and machining wastes). All potentially hazardous materials would be used and stored in accordance with applicable federal, State, and local regulations, and the proposed Project would comply with planning and emergency response regulations pertaining to the presence of

29 IMC, ch. 3, Motor Vehicles and Traffic, art. 3, Truck Route Regulations, sec. 3-85, Truck Routes Established (1985).

such materials. The potential for a significant hazardous impact to occur during operation of the proposed Project is considered low. Impacts would be less than significant.

Threshold: **Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?**

Significant impacts would occur if the proposed Project were located on a site that is included on a list of hazardous materials sites.

California Government Code Section 65962.5 requires various State agencies, including but not limited to the Department of Toxic Substances Control (DTSC) and the State Water Resources Control Board (SWRCB), to compile lists of hazardous waste disposal facilities, unauthorized releases from underground storage tanks, contaminated drinking water wells and solid waste facilities where there is known migration of hazardous waste and submit such information to the Secretary for Environmental Protection on at least an annual basis.50 The State of California maintains the Hazardous Waste and Substances Site List, also known as the Cortese List, as a planning document that assists Lead Agencies with CEQA compliance as it relates to hazardous materials and sites.

Section 65962.5(a)(1)requires that DTSC "shall compile and update as appropriate, but at least annually, and shall submit to the Secretary for Environmental Protection, a list of all the following: (1) [a]ll hazardous waste facilities subject to corrective action pursuant to Section 25187.5 of the Health and Safety Code (HSC)."The hazardous waste facilities, identified in HSC Section 25187.5, are those where DTSC has taken or contracted for corrective action because a facility owner/operator has failed to comply with a date for taking corrective action in an order issued under HSC Section 25187, or because DTSC determined that immediate corrective action was necessary to abate an imminent or substantial endangerment.

No portions of the of the proposed Project are currently on the active Cortese list of sites compiled pursuant to Government Code Section 65962.5. Any site that was within the area of the proposed Project areas that were previously on the Cortese list has been sufficiently remediated to meet DTSC, SWRCB, and other agency requirements, and no longer pose a significant hazard to the public and the environment. Therefore, impacts would be less than significant.

Threshold: **For a project located within an airport land use plan or, where such plan has not been adopted, within two miles of a public airport or public use airport, would the Project result in a safety hazard for people residing or working in the Project area?**

A significant impact would occur if the proposed Project were located in an airport land use plan or within 2 miles of a public airport and would result in a safety hazard as a result of that location.

The proposed Project is not subject to the Los Angeles County Airport Land Use Plan, which was adopted in December 1991 and revised in December 2004. Los Angeles International Airport (LAX) is located more than 2 miles southwest of the proposed Project, and the Hawthorne Municipal Airport is located approximately 1.5 miles south of the proposed Project. The proposed Project is not located near a private airstrip.

Airport operation hazards include incompatible land uses or features such as power transmission lines, wildlife hazards, and tall structures that can interfere with aircraft operations. The proposed Project would not construct any buildings or structures to a height that would interfere with or obstruct any local airport operations. Therefore, impacts would be less than significant.

Threshold: **Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?**

Significant impacts would occur if the proposed Project were to expose people or structures to significant risks associated with wildland fires.

The City is highly developed and entirely urbanized and is without an urban/wildland interface. The proposed Project is not within a Moderate, High, or Very High Fire Hazard Severity Zone as designated by CAL FIRE. As such, the proposed Project would not increase or create the potential for wildland fires to occur near the proposed Project. No impacts would occur.

6.4.7 Hydrology and Water Quality

Would the proposed Project:

Threshold: **Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?**

A significant impact would occur if project discharges (either urban or stormwater runoff) to surface water or groundwater were to violate the conditions of any of the guiding federal, State, regional, or local requirements.

Construction

During construction, the proposed Project could disturb areas that require development outside of the transportation rights-of-way, including excavation, site preparation, and infrastructure improvements. Removing existing pavement, importing/exporting soil, grading, and stockpiling could potentially result in soils being exposed, loosened, and transported by stormwater to downstream receiving waters. Additional pollutants, including oil and grease, metals, and pH-altering materials, may also be introduced to the receiving water(s) during the construction phase. However, to reduce the potential for the above impacts during the construction phase, the proposed Project will comply with the SWRCB Construction General Permit (CGP). Under the CGP, the proposed Project will prepare an approved SWPPP and implement construction BMPs. The CGP will be enforced through the City's construction, grading, and excavation permitting process.

Therefore, impacts related to water quality standards and waste discharge requirements during the construction phase would be less than significant.

Operation

The proposed Project's elevated guideway is located within existing transportation rights-of-way. The proposed Project component would be constructed on impervious surfaces. The proposed Project structures would also be constructed in compliance with the applicable City's and County's Municipal Separate Storm Sewer System (MS4) Permits and LID Ordinance requirements to address any potential pollutant or pollutant loading impacts.

The proposed MSF site has nearly fully impervious surfaces with the exception of a few landscape areas. The MSF site would be constructed in full compliance with the City's and County's MS4 Permits and LID Ordinance requirements to address any potential pollutant or pollutant loading impacts.

The proposed Project in located over the West Coast Basin, which is a confined aquifer, and is located approximately 220 ft below the ground surface. Urban and stormwater runoff infiltrated on site is unlikely to reach this groundwater aquifer. As a result, even if infiltration BMPs are incorporated into the proposed Project as required LID measures, such BMPs would extend to such a depth as to enter the basin. Therefore, infiltrated runoff would be unlikely to cause adverse impact to the local groundwater quality. Any potential impacts would be reduced to acceptable levels with implementation of infiltration BMPs.

Therefore, impacts related to surface water and groundwater quality standards and waste discharge requirements during both the construction and operations phases would be less than significant.

Threshold: **Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin?**

A significant impact would occur if the proposed Project were to substantially deplete groundwater or interfere with groundwater recharge.

Construction

The proposed Project's water supply needs during the construction phase will be provided by the City's municipal system (MS4). There would be no impact on groundwater supplies during the construction phase of the proposed Project. Because the underlying water basin is a confined aquifer, and the water table is located approximately 50 to 200 feet below ground surface, dewatering is not anticipated during the construction phase.

Therefore, impacts related to groundwater supply depletion during the construction phase would be less than significant.

Operation

The proposed Project could result in increased demand of potable and nonpotable water from proposed Project operation and addition of commercial sites. The proposed Project's water supply during the operation phase will be provided by the City, which depends on a combination of extracted groundwater from City-owned wells and potable and nonpotable water purchased from WBMWD.

However, according to the City's 2015 Urban Water Management Plan Update (UWMP), the City cannot meet increased water demand through an increase in groundwater extraction due to limitations in water rights. Therefore, projected demands are anticipated to be met through a combination of conservation of

local surface water, imported water, graywater, stormwater capture, ocean desalination, and/or other nongroundwater sources.

Impacts related to groundwater supply depletion during the operation phase would be less than significant.

Threshold: **Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on or off site?**

- **i. Result in substantial erosion or siltation on or off site;**
- **ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;**
- **iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or**
- **iv. Impede or redirect flood flows?**

A significant impact could occur if the proposed Project were to substantially alter the drainage pattern of an existing stream or river such that substantial erosion or siltation would result.

Construction

No existing surface streams or rivers pass within the proposed Project's extent. The nearest open channel is Centinela Creek, approximately 1.3 miles downstream of the proposed Project. In the existing condition, stormwater runoff is collected in curbs, gutters, and inlets, and conveyed through the storm drain network. No topographic changes are proposed as part of the proposed Project. If the construction phase of the proposed Project results in increased runoff or any modifications to existing drainage patterns, the existing stormwater facilities will be analyzed in the context of the proposed additional flow and upgraded if needed.

Activities during construction may expose and/or loosen soils, potentially resulting in erosion and topsoil loss. The average slopes of the proposed Project extents within the Ballona Creek and Dominguez Channel Watersheds were 0.5 and 0.9 percent, respectively. Because the slopes in the proposed Project extents are relatively flat, the majority of soil disturbance is expected to be related to importing and exporting of soil, grading, and stockpiling. All potential impacts related to these activities are expected to be reduced

to acceptable levels under the CGP-required SWPPP. The SWPPP will identify any potential sources of sedimentation during construction and detail required BMPs to reduce or eliminate erosion and/or any potential alterations to drainage patterns. BMPs may include silt fencing, fiber rolls, sand bag barriers, gravel bag berms, and/or stabilized construction site entrances/exits. A Qualified SWPPP Practitioner will ensure compliance with the SWPPP by conducting regular monitoring and inspections of construction activities.

Any storm drain upgrades required to address increases in peak flow or runoff volumes would be made as part of the proposed Project's drainage design. BMPs as required by the SWPPP and the MS4 Permit would preclude any additional sources of polluted runoff during both construction and operations.

Therefore, impacts related to the creation or contribution of runoff water exceeding the capacity of existing or planned stormwater drainage systems, or providing substantial additional sources of polluted runoff, during both the construction and operation phases would be less than significant.

No streams or rivers run within the proposed Project's location. The proposed Project does not propose any changes to existing drainage patterns. During construction, BMPs (required and monitored under the SWPPP) would be used to reduce the volume and velocity of stormwater runoff, thereby mitigating the potential for flooding due to construction. Any accumulated sediment observed during inspection of temporary BMPs or permanent stormwater network devices would be removed to prevent flooding. The proposed Project is located outside the 100-year Federal Emergency Management Agency (FEMA) flood hazard area.[30]

Impacts related to altering the existing drainage pattern of the proposed Project's structural and support facilities that would result in erosion or siltation during the construction phase would be less than significant.

Operation

No topographic changes or altered drainage patterns are currently proposed as part of the proposed Project, and any increases in runoff would be handled through compliance with MS4 Permit requirements.

Surface drainage will continue to be collected via the storm drain network to be ultimately conveyed to Ballona Creek and Dominguez Channel. Should the proposed Project result in increased runoff or peak flows, the existing stormwater facilities will be analyzed in the context of the proposed additional flow and

30 County of Los Angeles, Department of Public Works, Flood Zone Determination Website, http://dpw.lacounty.gov/floodzone/.

upgraded if needed. In the proposed condition, stormwater runoff would not encounter unprotected soils within landscaped areas.

The proposed Project will not modify the existing drainage patterns and would address any increases in runoff through compliance with the MS4 Permits and upgrades to existing stormwater infrastructure, if needed.

Impacts related to altering the existing drainage pattern of the area of the proposed Project that would result in erosion or siltation during the operation phase would be less than significant.

Threshold: **In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?**

A significant impact would occur if the proposed Project were located within an area susceptible to flooding because of the failure of a levee or dam. A significant impact could occur if the proposed Project were located in an area subject to inundation by seiche, tsunami, or mudflow. A seiche is an oscillation of a body of water in an enclosed or semi-enclosed basin, such as a reservoir, harbor, or lake. A tsunami is a sea wave produced by a significant undersea disturbance. Mudflows result from the down-slope movement of soil and/or rock under the influence of gravity.

Construction and Operation

The proposed Project is located within FEMA unshaded Zone X, which is defined as an area outside the 0.2 percent annual chance floodplain. Further, the proposed Project is outside of the floodplain of any nearby flood control channel (Centinela Creek and Dominguez Channel). Any increase in peak flow or runoff volumes in the proposed condition would be addressed through compliance with the MS4 Permit and drainage system upgrade as part of the proposed Project.

The proposed Project is not located in any established tsunami inundation area, liquefaction zone, or landslide zone. The proposed Project is at least 1.3 miles away from any open water feature and, therefore, would not be subjected to seiche events. As stated above, the proposed Project proposed is relatively flat within both the Ballona Creek and Dominguez Channel Watersheds, and it is not adjacent to any exposed or steep grades.

Therefore, the proposed Project would have no impact related to exposing people or structures to loss, injury, or death involving flooding during either the construction or operational phases.

Threshold: **Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?**

Construction

Regular construction activities have the ability to result in the degradation of water quality, most noticeably from erosion and sedimentation. Loose sediment itself may degrade water quality and has the capacity to carry such pollutants as heavy metals, nutrients, pathogens oil and grease, and fuels. Additionally, construction may expose the proposed Project's location and stormwater to trash, solvents, paint, etc. The CGP requires the implementation of BMPs to eliminate or reduce the discharge of pollutants in stormwater discharges and prohibits the discharge of nonstormwater from construction sites because these nonstormwater discharges are likely to carry pollutants to receiving waters. The BMPs detailed in the SWPPP will minimize potential for impacts from erosion and sedimentation during construction. The SWPPP will also detail use of BMPs to minimize the potential for spills of toxic or hazardous chemicals or substances into surface or ground waters.

Impacts related to otherwise substantially degrading water quality during the construction phase would be less than significant.

Operation

The Project will address proposed changes in land use, which often results in changes in pollutant contributions, through an analysis of the anticipated pollutant concentrations and loads under both the existing and proposed condition. Any projected increase in pollutant concentrations or loads will be addressed through compliance with the MS4 Permit, as well as site-specific BMPs to address any increases in pollutant concentrations or loads.

Impacts related to substantially degrading water quality during the operation phase would be less than significant.

6.4.8 Mineral Resources

Would the project:

Threshold: **Result in the loss of availability of a known mineral resource that would be of future value to the region and the residents of the State?**

Significant impacts would occur if the proposed Project's implementation would result in the loss of availability of a known mineral resource.

The proposed Project is located within a Mineral Resources Zone 3 (MRZ-3), which is an area where significant mineral deposits cannot be evaluated based on current and available data.[31] The State of California has not classified or designated mineral resource zones within the area, and the Bureau of Land Management mineral potential maps also indicate no prospective valuable deposits.[32]

In addition, the proposed Project is located entirely within a highly developed urban area characterized by commercial, industrial, and residential land uses. No records exist with respect to the presence of valuable mineral resources within the proposed Project's area or the immediate surrounding area, and no mining is currently taking place in the City.[33]

No impacts would occur.

Threshold: **Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?**

Significant impacts would occur if the proposed Project were to result in the loss of availability of a locally important mineral resource recovery site.

The proposed Project is located within MRZ-3 and, as such, information is not available to determine whether valuable mineral resources are deposited on site.

As mentioned above, the proposed Project is located entirely within a highly developed urban area characterized by commercial and residential uses and no mining operations are currently being conducted

---

31 CDC, Division of Mines and Geology, Update of Mineral Land Classification of Portland Cement Concrete Aggregate in Ventura, Los Angeles, and Orange Counties, California: Part II—Los Angeles County (1994), Plate 1B, available at ftp://ftp.consrv.ca.gov/pub/dmg/pubs/ofr/OFR_94-14/OFR_94-14_Text.pdf.

32 CDC, CGS, Mineral Lands Classification, data portal, accessed July 2020, https://maps.conservation.ca.gov/cgs/informationwarehouse/index.html?map=mlc.

33 CDC, Division of Mines and Geology, Update of Mineral Land Classification of Portland Cement Concrete Aggregate, Plate 1B.

in the City. There are no records of valuable mineral resources within the proposed Project's footprint or the immediate surrounding area.[34]

No impacts would occur.

6.4.9 Noise

Would the proposed Project:

Threshold: **For a project within an airport land use plan or, where such a plan has not been adopted within 2 miles of a public airport or public use airport, would the Project expose people residing or working the Project area to excessive noise levels?**

A significant impact would occur if the proposed Project were to expose people residing or working in the proposed Project area to excessive noise levels from a public airport or public use airport.

The Federal Aviation Administration (FAA) requires airports to prepare noise contour maps to assess the effects of aircraft noise to surrounding land uses. These maps can be used as an indicator of potential impacts. The closest airports to the proposed Project are the Hawthorne Municipal Airport (HHR), approximately 1.5 miles to the south, and Los Angeles International Airport (LAX), approximately 2 miles to the west of the proposed Project. Noise contours for the Hawthorne Municipal Airport remain confined within the runway of the airports and not within the proposed Project immediate area.[35]

The proposed Project is partially located within the Planning Boundary/Airport Influence Area for the LAX Airport, as designated within the Los Angeles County ALUP.[36] The proposed Project falls within the Airport Influence Area and Airport Compatibility Zone for LAX for the southern LAX runway. Portions of the proposed Project are within the 65 dBA CNEL noise contour. This includes a portion of the proposed Project located within street rights-of-way on E. Manchester Boulevard and Prairie Avenue. The proposed Project is not considered a noise sensitive use in and of itself; therefore, noise associated with LAX would not create any impacts. Further, according to the Los Angeles World Airports' Noise Contour Map for the first

34 LA County DRP, General Plan 2035, "General Plan Update Program—Interactive Map (GP-NET)."
35 LA County DRP, Hawthorne Airport: Airport Influence Area (May 13, 2003), http://planning.lacounty.gov/assets/upl/project/aluc_airport-hawthorne.pdf.
36 Los Angeles County Airport Land Use Commission, Los Angeles County Airport Land Use Plan, adopted December 1991, http://planning.lacounty.gov/view/alup/

quarter of 2018, the proposed Project is not located within noise contours associated with LAX as determined by studies by Los Angeles World Airports.[37]

Therefore, the proposed Project would not expose people to excessive noise levels associated with airport uses. As such, impacts would be less than significant, and

6.4.10 Population, Employment, and Housing

Would the proposed Project:

Threshold: **Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?**

A significant impact would occur if the proposed Project were to displace substantial numbers of existing housing. The proposed Project would be constructed entirely within the existing public rights-of-way along City streets except for the MSF and the TPSSs. These features would be built on sites that are either currently vacant or being used for commercial or industrial purposes. As such, no housing would be displaced because of the proposed Project's implementation, and no impacts would occur. As noted above, portions of the proposed Project would be constructed and operated in areas that are proximate to residential uses. The proposed Project's elevated guideway and stations would be constructed almost entirely within existing public rights-of-way along existing City streets. The potential sites for the MSF and TPSS facilities are either vacant or are currently occupied by nonresidential uses. The EIR will address whether the proposed Project may have an indirect effect on these uses as a result of noise or vibration.

In addition, the proposed Project is consistent with the City's General Plan and Downtown TOD Plan and will assist the City is achieving the goals of these plans by supporting economic development in areas located along the proposed alignment by providing an additional transit option and reducing congestion on streets throughout the City. The existing number of travel lanes and traffic capacity of these streets will be maintained. Access and circulation to existing businesses and residences located along the proposed alignment will be maintained at all times during construction and the ITC Construction Commitment Program includes program to support local businesses during construction including the provision of funding for temporary signage and advertising during construction to help businesses affected by construction.

37 Los Angeles World Airports, "Quarterly Noise Reports and Contour Maps," https://www.lawa.org/en/lawaenvironment/noise-management/lawa-noise-management-lax/quarterly-noise-reports-and-contour-maps.

The APM guideway and stations will be located within the public right of way and designed in accordance with the ITC Design Guidelines to ensure the Project is integrated into the streets it is located on in a complementary manner. For these reasons, it is not expected that the project will result in business closures or vacancies. If any commercial property vacancies occur along the proposed alignment, these vacancies are expected to be short term and would not result in changes to the character of the community that would result in physical impacts to the environment that would be significant.

6.4.11 Public Services

Threshold: **Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:**

i) Fire protection?

The proposed Project would have a significant impact on fire protection if it were to require the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility to maintain service. Services include fire suppression; hazardous materials protection; emergency medical treatment, including basic and advanced life support transportation; earthquake and fire safety planning; fire inspections; and building plan reviews.

The City is served by Battalion 20 within Division 6 of LACFD. Battalion 20 operates six stations in total; four of these serve the City (Fire Stations 170, 171, 172, and 173). Fire Station 171 is located approximately 0.25 miles west of the proposed Project at 141 W. Regent Street; Station 172 is approximately 0.7 miles north at 810 Centinela Avenue; Station 173 is approximately 1 mile east at 9001 S. Crenshaw Boulevard; and Station 170 is approximately 1.1 miles southeast at 10701 S. Crenshaw Boulevard. The stations are staffed in three rotating shifts (A, B, and C). A three-platoon schedule is based on 24-hour shifts that start at 8 AM. Standard company staffing is generally a minimum of 25 personnel per shift. An assistant deputy chief oversees each of the three divisions.

Although the proposed Project would help accommodate large numbers of persons attending events at adjacent sports and entertainment venues, these people would likely be in the proposed Project's vicinity due to events at LASED or proposed IBEC. The reduction in vehicle traffic that would directly result from the proposed Project's implementation could potentially reduce the amount of fire services required in

the area. Therefore, implementation of the proposed Project would not represent an increase in the need for these services.

Impacts would be less than significant.

ii) Police protection?

The proposed Project would have a significant impact on police protection services if it were to require expanded police services in the area as a result of the proposed Project's implementation.

Law enforcement services in the City are provided by the Inglewood Police Department (IPD). IPD operates one police station that houses most of the department's offices, located adjacent to Inglewood City Hall at One Manchester Boulevard. The Office of the Chief of Police, the Patrol Bureau, the Detective Bureau, the Records Division, the Custody Division, and the pistol range are all located at the police station. The Communications Division is located in the basement of the station, known as the Emergency Operations Center. The offices for the Traffic Division, the Training Section, and the Personnel Section are located on the second floor of the City Hall Building. IPD has 186 sworn officers and approximately 92 civilian personnel. The department comprises three major offices: Administrative Services, Criminal Investigative Services, and Patrol Services.

Although the proposed Project would help accommodate large numbers of persons attending events at adjacent sports and entertainment venues associated with LASED and proposed IBEC, these people would likely be in the proposed Project's vicinity regardless of the proposed Project's implementation. The proposed Project would provide an alternative mode of transit for persons attending such events but would not result in greater attendance than would otherwise be expected to occur. Because the proposed Project would divert some attendees who would otherwise travel by private vehicle, the proposed Project will reduce vehicle traffic. The reduction in surface vehicle traffic could potentially reduce the amount of police services required in the area. Therefore, the implementation of the proposed Project would not increase the need for police services.

Impacts would be less than significant, and

iii) Schools?

Significant impacts would occur if the Project were to necessitate the construction or expansion of schools in the proposed Project's area.

The proposed Project would not result in an increase in the number of residents; thus, there would be no increase in demand for school facilities. Because the proposed Project will primarily serve to accommodate

persons attending one-day events at adjacent sports and entertainment venues, the construction or expansion of schools would not be required because of the proposed Project's implementation.

No impacts would occur.

iv) Parks?

Significant impacts would occur if the proposed Project were to result in a need for new or expanded parks facilities.

The proposed Project would not result in an increase in the number of residents; thus, there would be no increase in demand for parks and recreational facilities. Because the proposed Project will primarily serve to accommodate persons attending one-day events at adjacent sports and entertainment venues, the construction or expansion of parks or recreational facilities would not be required because of the proposed Project's implementation.

No impacts would occur.

v) Other public services?

Significant impacts would occur if the proposed Project were to result in an increased need in public services other than those described above.

The proposed Project would not result in an increase in the number of residents; thus, there would be no increase in demand for other public services such as libraries. Because the Project will primarily serve to accommodate persons attending one-day events at adjacent sports and entertainment venues, the construction or expansion of library facilities would not be required because of the proposed Project's implementation.

No impacts would occur.

6.4.12 Recreation

Would the project:

Threshold: **Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?**

Significant impacts would occur if the proposed Project were to result in an increased use of existing recreational facilities such that these facilities would need to be expanded or new ones constructed.

The proposed Project would primarily serve special events at the existing, under-construction, and proposed sports and entertainment venues associated with LASED. As such, most of ridership would use the proposed Project for events at those facilities and would not visit existing neighborhood or regional parks. In addition, weekday commuter ridership on nonevent days would not increase the use of neighborhood and regional parks.

No impacts would occur.

Threshold: **Include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?**

Significant impacts would occur if the proposed Project were to include recreational facilities or required the expansion or construction of existing residential facilities.

The proposed Project does not include recreational facilities. Because it will primarily serve to accommodate persons attending one-day events at adjacent sports and entertainment venues, the construction or expansion of recreational facilities would not be required because of the proposed Project's implementation.

6.4.13 Utilities and Service Systems

Would the proposed Project:

Threshold: **Have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry and multiple dry years?**

A significant impact could occur if a project were to increase water consumption to such a degree that new water sources would need to be identified.

Water supply to the City is provided through WBMWD and the West Coast Groundwater Basin via City wells.[38] The City's UWMP concludes that Inglewood has sufficient existing water supplies so that a nonwater-intensive project, such as the one proposed, would not result in a strain on existing water supplies. Because water supplies in the proposed Project area are more than sufficient, impacts would be less than significant, and

38 City of Inglewood, Final Draft 2015 Urban Water Management Plan, https://www.cityofinglewood.org/DocumentCenter/View/1061/2015-Urban-Water-Mangement-Plan-PDF?bidId=.

Threshold: **Result in a determination by the wastewater treatment provider which serves or may serve the Project that it has adequate capacity to serve the Project's projected demand in addition to the provider's existing commitments?**

A significant impact would occur if a project were to increase water consumption or wastewater generation to such a degree that the capacity of the existing facilities would be exceeded.

Water is provided to the proposed Project via WBMWD as well as City-owned wells. Wastewater generated by the proposed Project would be treated at the JWPCP.

Development of the proposed Project would not significantly increase the demand for water and wastewater treatment services within the City. The APM trains are electrified systems; the operation of the trains would not require significant water resources because none of its constituent components is water dependent. In addition, activities at the MSF and TPSS sites would not require additional water demands such that existing facilities would need expansion or new facilities constructed. The routine maintenance and storage of parts of the APM trains at the MSF would not require significant amounts of water except for train washing. Activities that would take place at the MSF includes service activities to the APM train cars, vehicle storage, loading platforms, and a paint booth. Although water and wastewater lines may need to be relocated, no aspect of the construction or operation of the proposed Project would require new or expanded water or wastewater treatment facilities.

Impacts would be less than significant

Threshold: **Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?**

A significant impact would occur if a project were to increase solid waste generation to a degree such that the existing and projected landfill capacity would be insufficient to accommodate the additional solid waste.

Solid waste services in the City are provided by Consolidated Disposal Service (CDS); trash collected in the City is taken to CDS's American Waste Transfer Station in the City of Gardena, where it is sorted; residual garbage is taken to the Consolidated Volume Transport Disposal and Recycling Center (CVT) in the City of Anaheim, and recycling and green waste is taken to CDS's Compton Transfer Station in the City of Compton.66 Solid waste generated in the City is ultimately disposed of at various landfill facilities located throughout Los Angeles County.

The proposed Project would generate additional solid waste from construction debris, activities, and site preparation, as well as during operation of the proposed Project. Solid waste generated during construction and operation of the proposed Project would have to be separated and recycled. As described in Los Angeles County's most recent landfill disposal capacity report, a shortfall in permitted solid waste disposal capacity within the County is not anticipated to occur under forecasted growth and ongoing municipal efforts at waste reduction and diversion. The proposed Project would not drastically change the amount of solid waste disposal projected by the County due to the fact that the operations phase would generate minimal waste. Impacts would be less than significant, and

Threshold: **Comply with federal, State, and local management and reduction statutes and regulations related to solid waste?**

A significant impact would occur if a project were to generate solid waste that was not disposed of in accordance with applicable regulations.

Assembly Bill (AB) 939 requires every city and county to divert 50 percent of its waste from landfills by the year 2000 through such means as recycling, source reduction, and composting.[39] In addition, AB 939 requires each county to prepare a countywide siting element for a 15-year period, specifying areas for transformation or disposal sites to provide capacity for solid waste generated in the county that cannot be reduced or recycled. Further, AB 1327, the California Solid Waste Reuse and Recycling Access Act of 1991, requires local agencies to adopt ordinances mandating the use of recyclable materials in development projects.[40]

The proposed Project would generate solid waste during both construction and operation that is typical of the development of a mechanical transportation system and industrial uses. This includes typical construction waste such as wood, concrete, and asphalt, as well as operational waste such as that collected from pedestrians and employees.

The proposed Project would fully comply with all federal, State, and local statutes and regulations regarding proper disposal. Impacts would therefore be less than significant.

39 CalRecycle, "Assembly Bill 939," accessed July 2020, http://www.calrecycle.ca.gov/laws/legislation/calhist/1985to1989.htm.

40 CalRecycle, "Ordinances, Resolutions, and Policies," accessed July 2020, http://www.calrecycle.ca.gov/LGCentral/Library/LocalDocs/Policy.htm.

6.4.14 Wildfire

If located in or near State responsibility areas or lands classified as very high fire hazard severity zones, would the project:

Threshold: **Substantially impair an adopted emergency response plan or emergency evacuation plan?**

Significant impacts would occur if the proposed Project were to impair the implementation of an adopted emergency response or emergency evacuation plan.

The City is located in a fully developed urban area that is not associated with wildland fires. According to the Fire Hazard Severity Zone mapping done by the California Department of Forestry and Fire Protection, the proposed Project is located in an incorporated city that is considered to be in the Non Very High Fire Hazard Safety Zone (non-VHFHSZ).[41] The City is responsible for fire protection in the area, which is implemented in part by enforcement of the Fire Code requirements contained within the Building Code, as well as fire protection services provided by the City Fire Department.

As described in **Section 4.8: Hazards and Hazardous Materials**, the proposed Project is located largely within public rights-of-way. For this reason, construction activities associated with the proposed Project would likely cause the closure of travel lanes in streets along the elevated guideway. The City has planned evacuation routes that assume worst-case displacement and surface rupture from a seismic event in the region along the Newport-Inglewood Fault or Potrero Fault, as described in the Safety Element of the City's General Plan.[42]

However, the closure of lanes would be temporary and such closures would only be associated with the construction phase of the proposed Project. A Traffic Management Plan will be prepared to ensure that interference with area traffic is minimized. This would include ensuring that routes to the emergency room at the adjacent Centinela Hospital Medical Center would be maintained. The plan will require that emergency access be maintained throughout the proposed Project's construction. Therefore, the proposed Project's impacts on emergency response or evacuation plans would be less than significant.

41 California Department of Forestry and Fire Protection, 2011. Fire and Resource Assessment Program. Very High Fire Hazard Severity Zones in LRA as Recommended by CAL FIRE. Los Angeles County.

42 City of Inglewood, General Plan (adopted July 1995).

Threshold: **Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?**

Significant impacts would occur if the proposed Project were to exacerbate wildfire risks, and thereby expose Project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire due to slope, prevailing winds, and other factors.

The City is a fully developed urban area that is not associated with wildland fires. As mentioned previously, the proposed Project is located in an area considered to be non-VHFHSZ.[43] The City is responsible for fire protection in the area, which is implemented in part by enforcement of Fire Code requirements contained within the Building Code, as well as fire protection services provided by the City Fire Department.

As described in **Section 4.7**, the proposed Project is located on level terrain. Based on the topographic setting and a review of previous geotechnical evaluations in the proposed Project's vicinity, no historical landslides are known to have occurred that could potentially impact the proposed Project. The nearest surrounding mountains, the Santa Monica Mountains, are more than 10 miles to the north.[44]

According to the CGS,[45] the proposed Project is not located within an Earthquake-Induced Landslide Zone as shown on the Earthquake Zones of Required Investigation, Inglewood Quadrangle map. The probability of seismically induced landslides occurring within the area of the proposed Project is not significant due to the general lack of elevation difference in slope geometry across or adjacent to the site. In addition, development of the proposed Project would not substantially alter the existing topography of the area.

Therefore, the proposed Project's impacts on exacerbation of wildfire risks, and thereby exposure of Project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire would be less than significant due to slope, prevailing winds, and other factors.

43 California Department of Forestry and Fire Protection, 2011. Fire and Resource Assessment Program. Very High Fire Hazard Severity Zones in LRA as Recommended by CAL FIRE. Los Angeles County.

44 Google Maps accessed July 2020, https://www.google.com/maps.

45 CDC, CGS, Earthquake Zones of Required Investigation.

Threshold: **Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?**

Significant impacts would occur if the proposed Project were to require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment.

As discussed above in **Section 4.14: Utilities and Service Systems**, the proposed Project will require utility systems improvements, upgrades and possible relocations to accommodate and serve the various project related components. The design and construction of the proposed Project's elevated guideway structures, stations and support facilities will avoid existing utility and other infrastructure to the degree possible. In addition to surface improvements, some utility infrastructure that cannot be avoided may need to be relocated to accommodate the guideway columns and foundations. As mentioned above, the City is a fully developed urban area that is not associated with wildland fires. According to the Fire Hazard Severity Zone mapping done by the California Department of Forestry and Fire Protection, the proposed Project is located in an incorporated city that is considered to be non-VHFHSZ.[46] The City is responsible for fire protection in the area, which is implemented in part by enforcement of Fire Code requirements contained within the Building Code, as well as fire protection services provided by the City Fire Department. With adherence to Fire Code requirements contained within the Building Code and implementation of fire protection services provided by the City Fire Department, any potential infrastructure-induced fire risk or ongoing environmental impacts would be less than significant.

Threshold: **Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?**

Significant impacts would occur if the proposed Project were to expose people or structures to impacts associated with downstream flooding or landslides as a result of runoff, post-fire slope instability, or drainage changes. The City is a fully developed urban area that is not associated with wildland fires. According to the Fire Hazard Severity Zone mapping done by the California Department of Forestry and Fire Protection, the proposed Project is located in an incorporated city that is considered to be non-

46 California Department of Forestry and Fire Protection, 2011. Fire and Resource Assessment Program. Very High Fire Hazard Severity Zones in LRA as Recommended by CAL FIRE. Los Angeles County.

VHFHSZ.[47] The City is responsible for fire protection in the area, which is implemented in part by enforcement of Fire Code requirements contained within the Building Code, as well as fire protection services provided by the City Fire Department.

As discussed in **Section 4.7**, the proposed Project is located on level terrain. Based on the topographic setting and a review of previous geotechnical evaluations in the proposed Project's vicinity, no historical landslides are known to have occurred that could potentially impact the proposed Project.

According to the CGS,[48] the proposed Project is not located within an Earthquake-Induced Landslide Zone as shown on the Earthquake Zones of Required Investigation, Inglewood Quadrangle map. The probability of seismically induced landslides occurring within the area of the proposed Project is not significant due to the general lack of elevation difference in slope geometry across or adjacent to the site. In addition, development of the Project would not substantially alter the existing topography of the area.

No streams or rivers run within the proposed Project's location., nor does it propose any changes to existing drainage patterns. During construction, BMPs (required and monitored under the SWPPP) would be used to reduce the volume and velocity of stormwater runoff, thereby mitigating the potential for flooding due to construction. Any accumulated sediment observed during inspection of temporary BMPs or permanent stormwater network devices would be removed to prevent flooding. The proposed Project is located outside the 100-year Federal Emergency Management Agency (FEMA) flood hazard area.[49] No topographic changes or altered drainage patterns are currently proposed as part of the proposed Project, and any increases in runoff would be handled through compliance with MS4 Permit requirements during operation.

As such, no impacts associated with downstream flooding or landslides as a result of runoff, post-fire slope instability, or drainage changes would occur.

6.5 GROWTH INDUCING EFFECTS

As required CEQA Guidelines section 15126.2(e),[50] an EIR must discuss ways in which a project could foster economic or population growth or the construction of additional housing, either directly or indirectly, in the surrounding environment. Also, an EIR must discuss the characteristics of a project that could

47 California Department of Forestry and Fire Protection, 2011. Fire and Resource Assessment Program. Very High Fire Hazard Severity Zones in LRA as Recommended by CAL FIRE. Los Angeles County.

48 California Department of Forestry and Fire Protection, 2011. Fire and Resource Assessment Program. Very High Fire Hazard Severity Zones in LRA as Recommended by CAL FIRE. Los Angeles County.

49 County of Los Angeles, Department of Public Works, Flood Zone Determination Website, http://dpw.lacounty.gov/floodzone/.

50 CEQA Guidelines sections 15126.2(e).

encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. Growth can be induced in a number of ways, such as through the elimination of obstacles to growth, through the stimulation of economic activity within the region, or through the establishment of policies or other precedents that directly or indirectly encourage additional growth. The purpose of this section is to evaluate the potential growth-inducing effects resulting from the implementation of the proposed Project in the greater Los Angeles area. Additional analysis of the effects of the proposed Project on population and employment growth is provided in **Section 4.11: Population, Employment, and Housing**.

In general, a project may foster spatial, economic, or population growth in a geographic area if the project removes an impediment to growth (e.g., the establishment of an essential public service, the provision of the new access to or infrastructure capacity that serves an area; a change in zoning or general plan designations that increase density for areas outside the boundaries of a project site); or indirectly stimulates economic expansion or growth that occurs in an area in response to the project (e.g., changes in revenue base, employment expansion, etc.). These circumstances are further described below:

- Elimination of Obstacles to Growth: This refers to the potential for a project to remove infrastructure limitations or provide infrastructure capacity, or remove regulatory constraints that could result in growth unforeseen at the time of project approval; and
- Economic Effects: This refers to the potential for a project to cause increased activity in the local or regional economy. Economic effects can include such effects as the Multiplier Effect. A “multiplier” is an economic term used to describe inter-relationships among various sectors of the economy. The Multiplier Effect provides a quantitative description of the direct employment effect of a project, as well as indirect and induced employment growth. The multiplier effect recognizes that the on-site employment and population growth of each project may not be the complete picture of growth caused by the project.

Elimination of Obstacles to Growth

The elimination of physical obstacles to growth is considered a growth-inducing effect. The proposed Project is located in a highly urbanized area in the vicinity of other facilities designed to accommodate large sporting and entertainment events. Common factors that limit growth include limited capacities of local or regional utility infrastructure, such as storm drainage systems, or wastewater conveyance and treatment systems. Transportation infrastructure can also be a factor that limits growth.

The proposed Project is located within a fully urbanized landscape, with extensive transportation and utility infrastructure designed to accommodate urban development in the City and the larger South Bay region.

Economic Effects

Section 4.11, Population, Employment, and Housing describes potential employment of the proposed Project. The proposed Project is anticipated to have a total direct employment of up to 150 full-time equivalent people. This would include workforce requirements for the operation and maintenance necessary for the proposed Project, including system engineers, operators, maintenance personnel, janitorial crews, security, and other jobs. These jobs would extend beyond construction and into oversight of long-term operations.

Additionally, the proposed Project will provide funding for the support and transition of jobs through the California Climate Investments which facilitate GHG emission reductions and deliver a suite of economic, environmental, and public health co-benefits, including job co-benefits. Approximately 11,516 jobs will be benefitted through these funds and programs. Estimated jobs supported by the California Climate Investments through the proposed Project can be found in the **Table 4.11-8.**

The proposed Project would replace certain existing uses in order to accommodate for various project components (guideway, stations, and MSF). Existing sites to be replaced include the commercial/retail center (CVS plaza) at the northeast corner of Regent Street and Market Street that would be removed for the Market Street/Florence Avenue station, the commercial uses at 500 and 510 Manchester Boulevard (retail plaza) that would be removed for the proposed MSF, and the commercial building (Hat Store) that would be removed to allow for the encroachment of the guideway at 150 S. Market Street. The existing work force for these uses include:

- The CVS plaza at Market Street and Florence Avenue with an estimated 284 workers employed at the various commercial and retail uses.
- The commercial use at 150 S. Market Street (Hat Store) with an estimated 37 workers; and
- Existing businesses at the commercial center at 500 and 510 Manchester Boulevard (grocery store, café, gym, bank, and a gas station) which have a combined estimated workforce of 172 workers.[51]

In total, the existing businesses within the footprint of the proposed Project employ approximately 493 workers (for existing employment details refer to **Table 4.11-6**).

The proposed Project would generate approximately 150 full-time jobs for the operation and maintenance of the APM trains and will either directly or indirectly benefit 11,516 jobs. This results in a net support for

51 Number of employees generated by each commercial plaza area are calculated using the square footage of the facilities multiplied by a set factor. The factor used is 2.2371 employees per 1,000 SF, which is found in Inglewood Unified School District's Commercial Fee Justification Study 2018. The report can be located at: https://www.lbschools.net/Asset/Files/Business_Services/Developer_Fees/2018/2018-Commercial-Fee-Justification-Study.pdf. Accessed July 22, 2020. It is important to note that land areas and number of employees are rounded numbers used for estimates for analysis purposes only.

approximately 11,173[52] jobs with the implementation of the proposed Project. Furthermore, ongoing and proposed developments along the elevated guideway would also benefit from the implementation of the proposed Project. Nearby projects such as the Hollywood Park Specific Plan (HPSP) and the Los Angeles Sports and Entertainment District (LASED) would also provide additional jobs and employment opportunities. The HPSP is projected to generate approximately 517 net new jobs[53] while the IBEC is projected to generate 833 net new jobs,[54] resulting in a combined 1,350 net new jobs from adjacent projects. Since jobs supported by the implementation of the proposed Project does not directly correlate to the number of new jobs created, the number of jobs created does not directly correlate to population growth within the area.

As previously discussed, approximately 92 percent of the residents in the City currently commutes to work outside of the City, with the remaining 8 percent of residents working within the City (**Table 4.11-5**). This pattern points to a regional spread in work locations for the City residents. Because of this, local fluctuations in job generation is unlikely to directly impact population growth within the City. Even though the proposed Project will either directly or indirectly support 11,173 jobs, the implementation of the proposed Project will only directly create 150 full-time equivalent jobs. Therefore, not all jobs supported by the proposed Project will translate into an increase in population growth for the local area or the region.

Additionally, according to SCAG 2020-2045 RTP/SCS, approximately 8,389,000 jobs were available in 2016 across industries in the region and the number of jobs available will increase to 10,050,000 by 2045, an increase of approximately 0.62 percent or approximately 52,700 annually in jobs.[55] Similarly, SCAG projects the population in the region will increase from approximately 18,832,418 in 2016 to 22,507,188 in 2045, resulting in an increase of approximately 0.61 percent or approximately 115,290 population annually. The proposed Project will provide benefits to approximately 0.14 percent of the jobs in the region based on the 2016 jobs number or approximately 23 percent of new jobs added to the region annually. The jobs that will be supported by the proposed Project in the region is within the regional trends provided by the SCAG 2020-2045 RTP/SCS data and the jobs that will benefit from the proposed Project does not directly translate into population growth.

52 11,516 minus 493 in numbers of jobs displaced.

53 Hollywood Park Specific Plan. “Introduction Executive Summary.” https://www.cityofinglewood.org/DocumentCenter/View/125/I-Introduction-Execitive-Summary-PDF. Accessed July 27, 2020.

54 City of Inglewood. Summary. https://www.cityofinglewood.org/DocumentCenter/View/13888/03-Summary. Accessed July 27, 2020.

55 SCAG. 2020-2045 ConnectSoCal Demographics and Growth Forecast. https://www.connectsocal.org/Documents/Draft/dConnectSoCal_Demographics-And-Growth-Forecast.pdf. Accessed July 27, 2020.

As a result of this analysis, the proposed Project will not substantially induce population growth beyond the regionally projected value. Therefore, there is a less than significant impact on employment and population growth from the operation of the proposed Project.

Environmental Effects of Induced Growth

The proposed Project's is a transit system that spans the length of approximately 1.6 miles and would be located near existing residential, office, retail, and commercial land uses which generate vehicle trips on local roadways within the City. The proposed Project would provide direct connections between regional transit provided by Metro, specifically at the Crenshaw/LAX line, and other transit providers as well as the City's major activity centers, such as The Forum, the LASED and HPSP. Implementation of the proposed Project would provide an alternate mode of transportation within the City and decrease vehicle ridership and thereby resulting in a corresponding decrease in VMTs.

The proposed Project would be designed to accommodate a projected demand of approximately 9,600 travelers during the peak hour in each direction for special-events service, which occurs during a three event night.[56] In addition, the operations to serve the normal weekday peak-hour ridership outlined in the Lea+Elliott Report would be approximately 441 pedestrians per hour per direction (pphpd). At 2.1 minutes headway, the system capacity is approximately 11,500 pphpd. **Table 4.2-8** shows the projected ridership numbers for the proposed Project.

VMT estimates are derived from the Traffic Study (see **Appendix 4.12.1**) and are shown in **Table 4.2-9** for the six operational scenarios with and without the proposed Project. As shown, the proposed Project daily and annual VMT are less than the daily and annual VMT without the proposed Project. Implementation of the proposed Project would increase transit mode split, reduce vehicle trips, and reduce VMT accordingly.

The proposed Project will help manage and support the City's projected growth by providing transit within a safe and accessible walking distance to thousands of new residents, housing units and jobs. The proposed Project's connection from the City's new housing and employment centers, and sports and entertainment venues, to the Metro Crenshaw Line and larger regional and State rail system will result in significant benefits for both the City and southern California region. As shown in **Table 4.2-10**, the housing and employment growth projected in the City, together with the proposed Project, are generating approximately 6.9 million annual boardings on the regional transportation system in 2026 and increase to approximately 13.9 million annual boardings in 2076;[57] the resulting reduction in VMT in 2026 is

56 Lea+Elliott, Inc. Inglewood Transit Connector EIR Operating Systems Conceptual Planning EIR Project Definition, December 2020. (Appendix 3.0-1)

57 City if Inglewood, Transit and Intercity Rail Program (TIRCP) Application for the City of Inglewood Transit Connector Project, January 16, 2020. Table 6.

approximately 30 million, and in 2076 will reach 67.4 million. These reductions will improve air quality through reduced emissions and generate a significant reduction in the generation of GHG emissions throughout the region.

The incremental changes in economic activity created by the indirect and induced employment associated with the proposed Project would be a small part of the overall future growth in economic activity in the City or the greater Los Angeles metropolitan region. The City is approving additional employment-generating land uses such as the LASED and HPSP, which would benefit from the proposed Project. Through their planning and entitlement actions, the future actions of the City and other surrounding local agencies would be subject to environmental review under CEQA and would be required to be consistent with regional and State plans and regulations. To the extent that future development that accommodates indirect and induced growth from the proposed Project is undertaken in a manner consistent with the multitude of planning and regulatory documents referred to throughout the technical sections of this EIR, many of the potential adverse environmental consequences would be reduced in magnitude or avoided altogether.

Although the economic effect of indirect and induced employment can be predicted because the adverse physical environmental impacts of these economic effects could occur at locations throughout the City and the Los Angeles metropolitan region, the environmental consequences of this type of economic growth are too speculative to evaluate or predict. Pursuant to CEQA Guidelines section 15145, no further analysis of the environmental consequences of indirect or induced growth associated with the proposed Project is required under CEQA.

7.0 ORGANIZATIONS AND PERSONS CONSULTED

This Draft Environmental Impact Report (Draft EIR) was prepared by the City of Inglewood with the assistance of Meridian Consultants LLC, and the report preparers and consultants are identified as follows, along with agencies, organizations, and individuals that provided information used to prepare this Draft EIR.

7.1 LEAD AGENCY

The City of Inglewood is the Lead Agency for the preparation of this Draft EIR.

City of Inglewood
One West Manchester Boulevard
Inglewood, CA 90301

7.1.1 City of Inglewood

Administrative Office

Artie Fields: City Manager
Louis A. Atwell, P.E.: Assistant City Manager/Public Works Department Director

Economic and Community Development Department

Christopher E. Jackson, Sr.: Director
Peter Puglese, P.E. T.E.: Principal City Traffic Engineer
Mindy Wilcox, AICP: Planning Division, Planning Manager
Fred Jackson: Planning Division, Senior Planner
Taylor Kay: Planning Division, Assistant Planner

7.2 EIR PREPARERS

The following participated in the preparation of this document:

7.2.1 Meridian Consultants LLC

920 Hampshire Road, Suite A5
Westlake Village, California 91361

The following Meridian Consultants LLC staff contributed to the preparation of this Draft EIR.

Joe Gibson, Partner, Principal-in-Charge
Tony Locacciato, AICP, Partner
Christ Kirikian, Principal/Director, Air Quality and Acoustics
Christine Lan, AICP, Senior Project Manager
Leanna Williams, Senior Project Manager
Holly Galbreath, Project Planner
Evan Sensibile, Staff Planner
Jesse McCandless, Field Environmental Supervisor
Dillan Murray, Staff Planner
Marina Barton, Staff Planner/Biologist
Lisa Maturkanic, Administrative Services Manager
Matt Lechuga, Marketing Manager
Tom Brauer, Graphics Specialist
Rachel Bastian, Publication Specialist

7.3 ORGANIZATIONS CONSULTED

The following organizations provided information used in the preparation of this Draft EIR:

7.3.1 Pacifica Services, Inc.

106 S. Mentor Drive, Suite 200
Pasadena, CA 91106

Ernest Camacho, President/Chief Executive Officer
Desiree Gonzales,
Robin Rickman, Project Manager
Sal Torres

7.3.2 Trifiletti Consulting, Inc.

1541 Wilshire Boulevard, Suite 560
Los Angeles, CA 90017

Lisa Trifiletti, Principal
Desiree De La O, Director of Operations
Omar Pulido, Senior Project Director
Julie Soic, Senior Project Director
Perla Solis, Planning Associate

7.3.3 Lee+Elliott, Inc.

101 Montgomery Street, Suite 1750
San Francisco, CA 94104

Sambit Bhattacharjee, Professional Engineer (P.E.), LEED® AP, Associate Principal & Vice President

Iris Yuan, Senior Associate
Eduardo Cuadra, Project Engineer

7.3.4 Sanjeev Shah, Inc.

1172 South Dixie Highway #527
Coral Gables, FL 33146

Sanjeev Shah, Esq., P.E., Principal and CEO

7.3.5 Skidmore, Owings & Merrill LLP

333 S. Grand Avenue, Suite 3600
Los Angeles, CA 90071

Jed Zimmerman, AIA, LEED® AP, DBIA, Managing Director
Hansol Park, AIA, LEED® AP, Architect/Senior Designer
Lani Lee, Associate, Project Manager

7.3.6 RCH Group

11060 White Rock Road, Suite 150-A
Rancho Cordova, CA 95670

Mike Ratte, Senior Air Quality Scientist

7.3.7 Pax Environmental, Inc.

530 West Ojai Avenue, Suite 202 and 207
Ojai, CA 93023

Brian Holly, Principal, Senior Ecologist
Iggy Sharp, Project Manager/Senior Biologist

7.3.8 PaleoWest Archaeology

517 S. Ivy Avenue
Monrovia, CA 91016

Roberta Thomas, M.A., RPA, Senior Archaeologist
Gena Granger, M.A., RPA
W. Geoffrey Spaulding, Lead, Ph.D., Lead Paleontologist
Jorge Mendieta, Staff Paleontologist

7.3.9 Historic Resources Group

12 S. Fair Oaks Avenue
Pasadena, CA 91105

Paul Travis, AICP, Managing Principal
Kari Fowler, Senior Preservation Planner

7.3.10 Geosyntec Consultants

64 N. Raymond Avenue, Suite 200
Pasadena, CA 91103

Mital Desai, Senior Professional
Jane Besch, Principal
Jared J. Warner, Project Geologist
Alexander J. Greene, Senior Principal Engineering Geologist
Megan Otto, Senior Engineer
Curtis Fang, P.E.

7.3.11 Raju Associates, Inc.

505 E. Colorado Boulevard, #200
Pasadena, CA 91101

Srinath Raju, P.E., President/CEO

7.3.12 Kosmont Companies

1230 Rosecrans Avenue, Suite 630

Manhattan Beach, CA 90266

Felicia Williams, Senior Vice President

7.3.13 The Robert Group

111 N La Brea Avenue, Suite 409
Inglewood, CA 90301

Christine M. Robert, President

7.3.14 Remy Moose Manley, LLP

555 Capitol Mall
Sacramento, CA 95814

Tiffany Wright, J.D., Managing Partner
Laura Harris, J.D., Senior Counsel

7.3.15 Park & Velayos, LLP

801 South Figueroa Street, Suite 450
Los Angeles, CA 90017

Francis Park, J.D., Partner

7.3.16 DKA Associates

1513 W. Sepulveda Boulevard, Suite D
Torrance, CA 90501

Doug Kim, Principal

7.3.17 CAJA Environmental Services, LLC

15350 Sherman Way, Suite 315
Van Nuys, CA 91406

Christopher Joseph, Director

Stacie Henderson, Senior Project Manager

7.3.18 Wood Environment & Infrastructure Solutions, Inc

6001 Rickenbacker Road
Los Angeles, CA 90040

Rosalind Munro, Principal Geologist

8.0 TERMS, DEFINITIONS, AND ACRONYMS

AAQS	ambient air quality standards
AB	Assembly Bill
ACC	Advanced Clean Cards
ACM	asbestos-containing materials
ACWM	asbestos-containing waste materials
ADA	Americans with Disabilities Act
ADT	Average daily traffic
AERMOD	American Meteorological Society/USEPA Regulatory Model
SFY	Acre-feet per year
AIA	Airport Influence Area
ALRT	Automated light rail transit
ALUC	Airport land use commission
ALUP	Los Angeles County Airport Land Use Plan
AM	Morning Peak Hour
ANSI	American National Standard Institute
APM	Automated people mover
APEFZ	Akquist-Priolo earthquake fault zones
AQMP	SCAQMD *2016 Air Quality Management Plan*
ATCM	Airborne Toxic Control Measure
BACT	Best Available Control Technology
Basin	South Coast Air Basin
BAU	Business-as-usual
BMP	best management practice
BRT	Bus rapid transit
CAA	Clean Air Act
CAAQS	California Ambient Air Quality Standards
CAFE	Corporate Average Fuel Economy
CAL FIRE	California Department of Forestry and Fire Protection
CALGreen	California Green Building Standards Code
California Register/CR	California Register of Historical Resources
CalRecycle	California Department of Resources Recycling and Recovery
CALSTA	California State Transportation Agency

Caltrans	California Department of Transportation
CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resources Board
CBC	California Building Code
CBSC	California Building Code Commission
CCC	Command, control, and communications
CCP	Construction Commitment Program
CCR	California Code of Regulations
CCTV	Closed-circuit television
CDC	California Department of Conservation
CDFW	California Department of Fish and Wildlife
CDRP	Construction and Demolition Recycling Program
CDS	Consolidated Disposal Service
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CESA	California Endangered Species Act
CEUS	California Commercial End Use Survey
CFR	Code of Federal Regulations
CGP	Construction General Permit
CGS	California Geological Survey
CHHSL	California Human Health Screening Levels
CHMIRS	California Hazardous Material Incident Report System
CHRIS	California Historic Resources Information System
CI	Compression ignition
City	City of Inglewood
CIWMB	California Integrated Waste Management Board
CLEO	Commercial Lighting Efficiency Offer
CMP	Congestion Management Plan
CNDDB	California Natural Diversity Database
CNEL	Community noise exposure level
CO	Carbon monoxide
CO2	Carbon dioxide
Col WMP	County of Los Angeles Integrated Waste Management Plan
COPCs	Chemicals of potential concern

COPD	Chronic obstructive pulmonary disease
CPUC	California Public Utility Commission
CNDDB	California Natural Diversity Database
CNPS	California Native Plant Society
CNRA	California Natural Resources Agency
County	County of Los Angeles
CPUC	California Public Utilities Commission
CTA	Central Terminal Area
CVT	Consolidated Volume Transport Disposal and Recycling Center
CWC	California Water Code
CY	Cubic yards
DB	decibel
dBA	A-weighted sound pressure level
DBFOAM	design/build/finance/operate/maintain
DBH	Diameter at breast heigh
DDW	Division of Drinking Water
DES	Division of Engineering Services
DHS	Department of Health Services
DMV	Department of Motor Vehicles
DNEL	Day-Night Average Sound Level
DOE	Department of Energy
DOGGR	Department of Conservation
DOSH	Division of Occupational Safety and Health
DPM	Diesel Particulate Matter
DPF	Diesel Particulate Filters
DTSC	California Department of Toxic Substances Control
DWP	Drinking Water Program
ECAP	Energy and Climate Action Plan
EIFD	Enhanced Infrastructure Financing District
EIR	Environmental Impact Report
EISA	Energy Independence and Security Act
ELM	Energy Loading Monitoring
EPCRA	Emergency Planning and Community Right-to Know Act
EWMP	Enhanced Watershed Management Programs

FAA	Federal Aviation Administration
FEMA	Federal Emergency Management Agency
FESA	Federal Endangered Species Act
FTA	Federal Transit Administration
Geosyntec	Geosyntec Consultants
GPS	Geographic positioning system
GHG	greenhouse gas
GPS	Geographic positioning system
GSA	Groundwater Sustainability Agencies
GSP	Groundwater Sustainability Plans
GSWC	Golden State Water Company
GWP	Global warming potential
HABS	Historic American Buildings Survey
HAZNET	California Department of Toxic Substances Control database
HCP	Habitat Conservation Plan
HEPA	High-efficiency particulate air filters
HHM	Hazards and Hazardous materials
HHMD	Hazards and Hazardous Materials Division
HHR	Jack Northrop Field/Hawthorne Municipal Airport (HHR)
HI	Hazard Index
HMBP	Hazardous materials business plan
HOT	High occupancy Toll
HPSP	Hollywood Park Specific Plan
HRA	Health Risk Assessment
HRG	Historic Resources Group
HSWA	Hazardous and Solid Waste Amendments
Hz	Hertz
IBEC	Inglewood Basketball and Entertainment Center
ICT	Innovative Clean Transit Program
IEC	International Electrotechnical Commission
IHPA	Inglewood Historic Preservation Alliance
IIPP	Injury and Illness Prevention Program
IMC	City of Inglewood Municipal Code
IPCC	Intergovernmental Panel on Climate Change

IPD	Inglewood Police Department
ips	Inches per second
IRP	Integrated Water Resources Plan
ITC	Inglewood Transit Connector
ITDF	Inglewood Travel Demand Forecasting Model
ITF	intermodal transit facility
JWPCP	Joint Water Pollution Control Plant
LACDRP	Los Angeles County Department of Regional Planning
LACFD	Los Angeles County Fire Department
LACM	Natural History Museum of Los Angeles County
LACSD	Los Angeles County Sanitation District
LADOT	Los Angeles Department of Transportation
LADWP	City of Los Angeles Department of Water and Power
LAMP	Landside Access Modernization Program
LARWQCB	Los Angeles Regional Water Quality Control Board
LASED	Los Angeles Sports and Entertainment District
LAWA	Los Angeles World Airports
LAX	Los Angeles International Airport
LAX ALUP	LAX Airport Land Use Plan
LCFS	Low Carbon Fuel Standard
LDP	Lead-based paints
LED	Light-emitting diode
LEPC	Local emergency planning center
LPA	Locally Preferred Alternative
LID	low-impact development
Lmax	Maximum noise level
LRT	Light Rail Transit
Lv	velocity level in decibels as measured in 1/3 octave bands of frequency over the frequency ranges of 8 to 80
MATES IV	Multiple Air Toxics Exposure Study
MBTA	Migratory Bird Treaty Act
MD	Midday
MDAB	Mojave Desert Air Basins

MDE	Maximum design element
MDR LCP	Marina Del Rey Local Coastal Program
Metro	Los Angeles County Metropolitan Transportation Authority
MEI	Maximally exposed individual
MHMP	Multi-Hazard Mitigation Plan
MM	Mitigation measure
MMRP	Mitigation monitoring program
MPO	Metropolitan planning organization
MRZ-3	Mineral Resources Zone 3
MS4	Municipal Separate Storm Sewer System
MSF	maintenance and storage facility
MTA	Metropolitan Transportation Authority
MTD	Memo to designers
MTBE	methyl tertiary-butyl ether
NAAQS	National Ambient Air Quality Standards
NAHC	California Native American Heritage Commission
National Register/NR	National Register of Historic Places
NBA	National Basketball Association
NCCP	Natural Community Conservation Plan
NEHRPA	National Earthquake Hazards Reduction Program
NFL	National Football League
NFRAP	No Further Remedical Action Planned
NHPA	National Historic Preservation Act
NHTSA	National Highway Traffic Safety Administration
NIFZ	Newport-Inglewood Fault Zone
NIST	National Institute of Standards and Technology
NPPA	California Naive Plant protect act
NPS	National Park Service
NO	Nitric oxide
NOx	Nitrogen Oxide
NPDES	National Pollutant Discharge Elimination System
NPPA	California Naive Plant Protection Act
NSF	National Science Foundation
NSR	New Source Review

OEHHA	Office of Environmental Health Hazard Assessment
OES	Office of Emergency Services
OHP	Office of Historic Preservation
OPR	Office of Planning and Research
OSHA	Occupational Safety and Health Act
PCB	polychlorinated biphenyl
PCE	tetrachloroethylene
PEM	Premium Efficiency Motors
PFA	Public Financing Authority
PHBT	Puente Hills Blind Thrust fault
PM	Evening Peak Hour
PM	Particulate Matter
PPV	Peak particle velocity
PRC	Public Resources Code
PSC	Property-specific Soil Criteria
PVC	Polyvinyl chloride
RCRA	Resource Conservation and Recovery Act
RFS	Renewable Fuel Standard
RHNA	Regional Housing Needs Allocation
RMS	Root mean square
ROGs	Reactive organic gases
RPS	Renewable Portfolio Standards
RPZ	Reduced pressure zone
RTP/SCS	Regional Transportation Plan/Sustainable Communities Strategy
RWQCB	Regional Water Quality Control Board
SAFE Vehicles Rule	*Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule for Model Years 2021-2026 Passenger Cars and Light Trucks*
SAR	Second Assessment Report
SB	Senate Bill
SBCCOG	South Bay Cities Council of Governments
SCAB	South Coast Air Basin
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCCIC	South Central Coastal Information Center

SCE	Southern California Edison
SCP	Site Cleanup Program
SCS	Sustainable Communities Strategy
SEL	Sound exposure level
SERC	State Emergency Response Center
SGMA	Sustainable Groundwater Management Act
SHRC	State Historical Resources Commission
SLF	Sacred Lands File
SLMs	Sound level meters
SMFZ	Santa Monica Fault Zone
SMP	Soils Management Plan
SOx	Sulfur oxide
SP	Service population
SRTS	Safe Routes to Schools
SSMP	Sewer System Management Plan
SUSMP	Standard Urban Storm Water Mitigation Plan
SVP	Society of Vertebrate Paleontology
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TAC	Toxic air contaminants
TBA	tert-Butyl alcohol
TCR	tribal cultural resource
TIRCP	Transit and Intercity Rail Capital Program
TNC	transportation network company
TOD	Transit Oriented Development
TOD Plan	City of Inglewood 2016 *New Downtown and Fairview Heights Transit Oriented Development Plan and Design Guidelines*
TPSS	Traction Power Substation
TPZ	Tree Protective Zone
TSA	Thomas Safran & Associates
TSCA	Toxic Substances Control Act
UPS	Uninterruptible power supplies
USDOE	US Department of Energy
USDOT	US Department of Transportation

USEPA	United States Environmental Protection Agency
USFWS	United States Fish and Wildlife Service
USGS	US Geological Survey
UWMP	City of Inglewood *2015 Urban Water Management Plan Update*
UST	Underground storage tank
VdB	Vibration decibels
VDC	Volt direct current
VMT	vehicle miles traveled
VOC	Volatile organic compound
WBMWD	West Basin Municipal Water District
WMPs	Watershed Management Programs
YOLA	Youth Orchestra Los Angeles
ZE	Zero emissions

9.0 REFERENCES

"$11 Million Center Assured in Inglewood," Los Angeles Times, March 31, 1968.

"Downtown Center of Many Activities," Los Angeles Times, March 18, 1962.

"Forum," National Register of Historic Places Form. Prepared by Historic Resources Group, April 29, 2014.

"Holy Faith Episcopal Church: One Hundred Years of Ministry," Holy Faith Episcopal Church, https://www.holyfaithla.org/ (accessed February 2019).

"Inglewood Fox Theatre," Los Angeles Historic Theatre Foundation, http://www.lahtf.org/inglewoodfox/ (accessed February 2019); "Fox Theater," Inglewood Public Art, http://www.inglewoodpublicart.org /Fox_Theater.html (accessed February 2019). The former Fox Theater is located at 115 N. Market Street.

"Inglewood Glows Under New Lights," Los Angeles Times, May 20, 1927.

"Merchants Protest Proposal to Build on Parking Lot," Los Angeles Times, October 16, 1986.

"The Changing Face of South Bay: Downtowns," Los Angeles Times, January 4, 1987.

"Two-Story Business Structure: Work for Inglewood Bank Let," Los Angeles Times, May 15, 1927. The former Bank of Inglewood building is located at 100 N. Market Street/307 E. Queen Street.

15 USC Section 2601 et seq. (1976), 40 CFR Section 700 et seq. (2012).

2009 California Vehicle Code - Section 27200-27207: Article 2.5. Noise Limits

2018 California Code, Public Resources Code – PRC, Division 2 – Geology, Mines and Mining, Chapter 7.8, Seismic Hazards Mapping, Section 2690, Seismic Hazards Mapping Act.

2019 California Building Standards Code (Cal. Code Regs., Title 24, Part 2, Volumes I and II) published July 1, 2019.

22 CCR Division 4.5, "Environmental Health Standards for the Management of Hazardous Waste," 2020, https://govt.westlaw.com/calregs/Index?transitionType=Default&contextData=(sc.Default).

29 CFR Section 1926.65 Appendix C – Compliance Guidelines (1993).

29 USC Section 651 et seq. (1970), 29 CFR Section 1910 et seq. (1999).

40 CFR Section 370.20 et seq. (2002).

42 United States Code (USC), Section 12101.

42 USC §13201 et seq. (2005).

42 USC Section 116 et seq. (2010), 40 CFR Section 350 et seq. (2011).

42 USC Section 6991 et seq., (1976), 40 CFR Section 280 et seq., (2014).

49 CFR Section 100 et seq., (2016).

49 USC Section 1801 et seq., (1975).

AB 1007, Pavley, Chapter 37I, Statutes of 2005.

AB 1493, Clean Car Standards – Pavley, California Air Resources Board, Low-Emissions Vehicle Greenhouse Gas Program, Accessed July 30, 2020, https://ww2.arb.ca.gov/our-work/programs/advanced-clean-cars-program/lev-program/low-emission-vehicle-greenhouse-gas.

AB 52 Consultation Summary, Meridian Consultants LLC, February 6, 2019.

AB-52 Native Americans: California Environmental Quality Act., An act to amend Section 5097.94 of, and to add Sections 21073, 21074, 21080.3.1, 21080.3.2, 21082.3, 21083.09, 21084.2, and 21084.3 to, the Public Resources Code, relating to Native Americans.

Acoustical Society of America, 2018. Rationale for Withdrawing ANSI/ASA S12.9-2008/Part 6. Annex 3. July 22, 2018.

Airborne Toxic Control Measures, Title 17 CCR, Section 93115, Accessed July 30, 2020, https://ww2.arb.ca.gov/sites/default/files/classic//diesel/documents/finalreg2011.pdf?_ga=2.201342804.479047022.1596146954-1722362475.1583193018.

American Institute of Physics for the Acoustical Society of America, American National Standard Specification for Sound Level Meters (1992).

American Society of Civil Engineers (ASCE). Standard 21 - Automated People Mover Standards. Part 1, Section 3 (ASCE 21-05). https://ascelibrary.org/doi/book/10.1061/9780784408735

American Society of Civil Engineers (ASCE). Standard 21 , Part 4 (ASCE 21.4-08) - Automated People Mover Standards—Part 4: Security Emergency Preparedness System Verification and Demonstration Operations, Maintenance, and Training Operational Monitoring. https://standards.globalspec.com/std/1147223/ASCE%2021.4-08

American Society of Civil Engineers, Automated People Mover Standards – Part 2 Section 2.2.1, Exterior Airborne Noise, ASCE 21-05.

Analysis of Transit Connection (August 2017).

Analytical Consulting Group, Inc., Memorandum of Completion, Arsenic-contaminated Soil Removal, May 5, 2020.

Analytical Consulting Group, Inc., Post-Removal Soil Sampling Report, Removal of Arsenic-Contaminated Soil, May 21, 2020.

Anderegg, William R. L., J.W. Prall, J. Harold, S.H., Schneider, 2010. Expert Credibility in Climate Change, Proceedings of the National Academy of Sciences of the United States of America. 2010; 107:12107-12109.

Anne Cheeck La Rose, "Inglewood Fox Theatre: Bringing Back the Inglewood Fox Theatre," Los Angeles Historic Theatre Foundation, http://www.lahtf.org/inglewoodfox/ (accessed February 2019).

Arthur C. Nelson et al., The Best Stimulus for the Money: Briefing Papers on the Economics of Transportation Spending, University of Utah's Metropolitan Research Center and Smart Growth America, April 2009. http://stimulus.smartgrowthamerica.org/484.

Assembly Bill (AB) 32, the California Global Warming Solutions Act of 2006 (codified in the California Health and Safety Code (HSC), Division 25.5.

Automated People Mover Standards Committee of the Standards Council of the Transportation and Development Institute of ASCE, https://www.asce.org/templates/membership-communities-committee-detail.aspx?committeeid=000000885461.

Automated People Mover Standards Committee of the Standards Council of the Transportation and Development Institute of ASCE, Automated People Mover Standards, ANSI/ASCE/T&DI 21-13. https://ascelibrary.org/doi/book/10.1061/asce21#:~:text=Automated%20People%20Mover%20Standards%2C%20Part%201%20(ASCE%2021%2D96)&text=Automated%20People%20Mover%20Standards%20establishes%20the%20minimum%20set%20of%20requirements,people%20mover%20(APM)%20system.

Bean, L.J., and C.R. Smith, Gabrielino, in California, edited by R.F. Heizer, pp. 538-549 Handbook of North American Indians, Vol. 8, W. C. Sturtevant, general editor, Smithsonian Institution, Washington, D.C., 1978.

Bricker, 8 (Database Master Report, appendix to the Inglewood Downtown District/Main Street Project Area Historic Design Guidelines)

Bricker, Lauren Weiss, Marion Mitchell-Wilson, and Janet L. Tearnen. Inglewood Downtown District Main Street Project Area, Historic Design Guidelines, report. Inglewood, CA: Main Street Inglewood, 2000.

Byrd, Brian F., and L. Mark Raab, Prehistory of the Southern Bight: Models for a New Millennium, in California Prehistory: Colonization, Culture, and Complexity, edited by Terry L. Jones and Kathryn A. Klar, pp. 215-227, 2007.

Cal-Adapt, "Climate Tools," Maps of Projected Changes, Available: https://cal-adapt.org/tools/. Accessed October 19, 2020.

Cal-Adapt. Available: http://cal-adapt.org.

California / Health and Safety Code - HSC / CHAPTER 2. General Provisions [7050.5. - 7055.] / Section 7050.5.

California Administrative Code, State Historical Building Code per Part 8, Title 4.

California Air Pollution Control Officers Association, California Emissions Estimator Model User's Guide, 2017. http://www.aqmd.gov/docs/default-source/caleemod/01_user-39-s-guide2016-3-2_15november2017.pdf?sfvrsn=4,

California Air Pollution Control Officers Association, CEQA & Climate Change: Evaluating and Addressing Greenhouse Gas Emissions from Projects Subject to the California Environmental Quality Act, January 2008, p. 35, Accessed August 2020 at: http://www.capcoa.org/wp-content/uploads/2012/03/CAPCOA-White-Paper.pdf.

California Air Resources Board (CARB), California Clean Air Act (1988), https://arb.ca.gov/bluebook/bb05/HEA[14]16/HEA_[14]_16.htm.

California Air Resources Board, 2010. In-Use Off-Road Diesel-Fueled Fleets Regulation. December 2010, revised October 2016.

California Air Resources Board, 2016. CalEEMod® Users Guide, Appendix E, Section 5. September 2016. Factors for the prior Title 24 standard are extrapolated based on the technical source documentation.

California Air Resources Board, 2017. California's 2017 Climate Change Scoping Plan: The strategy for achieving California's 2030 greenhouse gas target. Available: www.arb.ca.gov/cc/scopingplan/scoping_plan_2017.pdf. Accessed August 4, 2020.

California Air Resources Board, 2017. Off-Road Diesel Emission Factor Update for NOx and PM. 2017.

California Air Resources Board, California Ambient Air Quality Standards, https://ww2.arb.ca.gov/resources/california-ambient-air-quality-standards.

California Air Resources Board, Carbon Monoxide & Health, https://ww2.arb.ca.gov/resources/carbon-monoxide-and-health.

California Air Resources Board, EMFAC2017 User's Guide, March 1, 2018, Accessed July 6, 2020 at: https://ww3.arb.ca.gov/msei/downloads/emfac2017-volume-i-users-guide.pdf and https://www.arb.ca.gov/emfac/2017/.

California Air Resources Board, EMFAC2017 Web Database, www.arb.ca.gov/emfac/2017/.

California Air Resources Board, General Information About "Hot Spots." https://www.arb.ca.gov/ab2588/general.htm.

California Air Resources Board, Inhalable Particulate Matter and Health (PM2.5 and PM10), https://www.arb.ca.gov/research/aaqs/common-pollutants/pm/pm.htm, last reviewed August 10, 2017.

California Air Resources Board, Lead & Health, https://ww2.arb.ca.gov/resources/lead-and-health.

California Air Resources Board, Low-Emissions Vehicle Program, Accessed July 30, 2020, https://ww2.arb.ca.gov/node/2930/about.

California Air Resources Board, Nitrogen Dioxide & Health, https://ww2.arb.ca.gov/resources/nitrogen-dioxide-and-health.

California Air Resources Board, OFFROAD Instructions, Accessed July 6, 2020 at: http://www.arb.ca.gov/msprog/ordiesel/info_1085/oei_write_up.pdf and https://www.arb.ca.gov/orion/.

California Air Resources Board, Overview: Diesel Exhaust & Health, https://ww2.arb.ca.gov/resources/overview-diesel-exhaust-and-health.

California Air Resources Board, Ozone & Health, Health Effects of Ozone, https://ww2.arb.ca.gov/resources/ozone-and-health.

California Air Resources Board, Sulfur Dioxide & Health, https://ww2.arb.ca.gov/resources/sulfur-dioxide-and-health.

California Air Resources Board, Truck and Bus Regulation. https://ww2.arb.ca.gov/our-work/programs/truck-and-bus-regulation/about

California Air Resources Board, Vinyl Chloride & Health, https://ww2.arb.ca.gov/resources/vinyl-chloride-and-health.

California Air Resources Board, Visibility Reducing Particles and Health, https://ww2.arb.ca.gov/resources/vinyl-chloride-and-health.

California Air Resources Board. AB 25188 Air Toxics "Hot Spots" Program. https://www.arb.ca.gov/ab2588/ab2588.htm.

California Air Resources Board. CCI Co-benefit Assessment Methodologies. Job Co-Benefit Assessment Methodology. https://ww2.arb.ca.gov/resources/documents/cci-methodologies. Accessed 11/2/2020.

California Air Resources Board. Priority Population Investments. https://ww3.arb.ca.gov/cc/capandtrade/auctionproceeds/communityinvestments.htm. Accessed September 15, 2020.

California Air Toxics Board, Toxic Air Contaminant Board, Toxic Air Contaminant Identification List, https://www.arb.ca.gov/toxics/id/taclist.htm, last reviewed July 18, 2011.

California Buildings Standards Commission, California Green Building Standards Code (Cal. Code Regs., Title 24, Part 11), Accessed April 2020, http://www.bsc.ca.gov/Home/CALGreen.aspx.

California Climate Change Investments, About Climate Change Investments. http://www.caclimateinvestments.ca.gov/about-cci accessed August 17, 2020.

California Code of Regulations (CCR), Title 24, Part 11 - CALGreen, 2019 California Green Building Standards Code, Effective January 1, 2020

California Code of Regulations Title 14, Section15064.4. Determining the Significance of Impacts from Greenhouse Gas Emissions.

California Code of Regulations, Division 43. The Safe Drinking Water, Water Quality and Supply, Flood Control, River and Coastal Protection Bond Act of 2006.

California Code of Regulations, tit. 14, div. 6, ch. 3, California Environmental Quality Act Guidelines, sec. 15126.2(b).

California Code of Regulations, tit. 14, div. 6, ch. 3, State CEQA Guidelines, sec. 15121.

California Code of Regulations, Title 14, “Natural Resources.”

California Code of Regulations, Title 14, Division 6, Chapter 3, Article 20, § 15380.

California Code of Regulations, Title 22, “Social Security.”

California Code of Regulations, Title 23, “Waters.”

California Code of Regulations, Title 23. Waters Division 3. State Water Resources Control Board and Regional Water Quality Control Boards Chapter 16. Underground Tank Regulations Article 7. Underground Storage Tank Closure Requirements.

California Code of Regulations, Title 27, “Environmental Protection.”

California Code of Regulations, Title 8 Section 3203, “Injury and Illness Prevention Program,” 2020, https://www.dir.ca.gov/title8/3203.html.

California Department of Conservation, “Los Angeles County Tsunami Inundation Maps,” https://www.conservation.ca.gov/cgs/tsunami/maps/los-angeles accessed June 12, 2020.

California Department of Conservation, California Geological Survey, DC, CGS, Earthquake Zones of Required Investigation.

California Department of Conservation, Division of Mines and Geology, Seismic Hazard Zone Report for the Inglewood 7.5-Minute Quadrangle, Los Angeles County, California, 1998.

California Department of Conservation, Division of Mines and Geology (now California Geological Survey), Seismic Hazard Zone Report for the Inglewood 7.5-Minute Quadrangle, Los Angeles County, California, 1998.

California Department of Conservation, Division of Oil, Gas, and Geothermal Resources (DOGGR), Well Statewide Tracking and Reporting System (WellSTAR) database, interactive map, accessed March 2019, available at https://maps.conservation.ca.gov/doggr/wellfinder/#openModal/-118.94276/37.10257/6.

California Department of Conservation, DOGGR, WellSTAR, Well Details for API # 03705654, accessed March 2019, available at https://secure.conservation.ca.gov/WellSearch/Details?api=03705654.

California Department of Fish and Wildlife (CDFW), California Natural Diversity Database (CNDDB), "Maps and Data," accessed July 2020, https://www.wildlife.ca.gov/Data/CNDDB.

California Department of Fish and Wildlife, Fish and Game Code (FGC), Division 4. Birds and Mammals, [3000 - 4904](Division 4 enacted by Stats. 1957, Ch. 456), Part 2. Birds [3500 - 3864] (Part 2 enacted by Stats. 1957, Ch. 456)

California Department of Fish and Wildlife, Native Plant Protection Act (NPPA), accessed June 2020, https://www.wildlife.ca.gov/Conservation/Plants/Laws.

California Department of Forestry and Fire Protection, 2011. Fire and Resource Assessment Program. Very High Fire Hazard Severity Zones in LRA as Recommended by CAL FIRE. Los Angeles County.

California Department of General Services, CalGreen, accessed June 2020, https://www.dgs.ca.gov/BSC/Resources/Page-Content/Building-Standards-Commission-Resources-List-Folder/CALGreen.

California Department of Health Care Services, Systems of Care Division, Child Health and Disability Prevention Program, Health Assessment Guidelines (July 2016).

California Department of Natural Resources, Division of Oil and Gas (now DOGGR), WellSTAR, Well Record for API #03713694, accessed March 2019, available at https://secure.conservation.ca.gov/WellRecord/037/03713694/03713694_2018-02-27_DATA.pdf.

California Department of Substances Control, Official California Code of Regulations (CCR), Title 22, Division 4.5, accessed June 2020, https://dtsc.ca.gov/title22/.

California Department of Toxic Substances Control, EnviroStor, accessed March 2019, available at https://www.envirostor.dtsc.ca.gov/public/.

California Department of Transportation, California Scenic Highway Mapping System, Los Angeles County, http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/, accessed August 2018.

California Department of Transportation, Technical Nosie Supplement, September 2013, accessed December 2020, https://dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/env/tens-sep2013-a11y.pdf

California Department of Water Resources, "SGMA Groundwater Management," accessed June 2020, https://water.ca.gov/Programs/Groundwater-Management/SGMA-Groundwater-Management.

California Division of Gas and Geothermal Resources (DOGGR), Well Finder, https://maps.conservation.ca.gov/doggr/wellfinder/#openModal/-118.32073/33.94064/15. Accessed August 31, 2020.

California Division of Mines and Geology Special Publication 117, 1997; revised and readopted in 2008 by the California Geologic Survey.

California Emissions Model (CalEEMod®), http://www.aqmd.gov/caleemod/home. Accessed August 4, 2020

California Energy Commission, "2019 Weekly Fuels Watch Report," accessed July 1, 2020.

California Energy Commission, 2016 Appliance Efficiency Regulations, Accessed April 2020. http://www.energy.ca.gov/2017publications/CEC-400-2017-002/CEC-400-2017-002.pdf.

California Energy Commission, 2017. 2017 Power Content Label. Available: https://www.energy.ca.gov/pcl/.

California Energy Commission, 2019 Building Energy Efficiency Standards, https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2019-building-energy-efficiency.

California Energy Commission, California Commercial End Use Survey,

California Energy Commission, California Commercial End-Use Survey, http://capabilities.itron.com/CeusWeb/ChartsSF/Default2.aspx.

California Energy Commission, Enforcement Procedures for the Renewables Portfolio Standards for Local Publicly Owned Electric Utilities: Amended Regulations, Accessed April 2020, http://www.energy.ca.gov/2016publications/CEC-300-2016-002/CEC-300-2016-002-CMF.pdf.

California Energy Commission, Inventory of California Greenhouse Gas Emissions and Sinks: 1990 to 2004, Staff Final Report, CEC-600-2006-013-SF (December 2006).

California Energy Commission, Renewable Portfolio, Accessed April 2020, http://www.energy.ca.gov/portfolio.

California Environmental Protection Agency, 2013. Preparing California for Extreme Heat: Guidance and Recommendations. Available: https://toolkit.climate.gov/reports/preparing-california-extreme-heat-guidance-and-recommendations.

California Environmental Protection Agency, 2013. Preparing California for Extreme Heat: Guidance and Recommendations. Available: https://toolkit.climate.gov/reports/preparing-california-extreme-heat-guidance-and-recommendations.

California Environmental Protection Agency, Climate Action Team Report to Governor Schwarzenegger and the Legislature (March 2006), 58, http://s3-us-west-2.amazonaws.com/ucldc-nuxeo-ref-media/0bdec21c-ca2b-4f4d-9e11-35935ac4cf5f, accessed August 2018.

California Environmental Protection Agency, Cortese List: Section 65962.5(c), accessed March 2019, available at https://calepa.ca.gov/sitecleanup/corteselist/section-65962-5c/.

California Environmental Quality Act (CEQA) Guidelines, Appendix G.

California Environmental Quality Act (CEQA) Guidelines, Section 15128.

California Executive Order S-01-07, January 2007.

California Executive Order S-03-05, June 2005.

California Executive Order S-14-08, November 2008.

California Executive Order S-21-09, September 2009.

California Fire Code 2019.

California Fish and Game Code, Fish and Game Code (FGC), Division 2, Department of Fish and Wildlife, (700-1940), Chapter 10, Sections 1900-1913, Native Plant protection.

California Gas and Electric Utilities, 2018 California Gas Report, Accessed May 2020, https://www.sdge.com/sites/default/files/regulatory/2018%20California%20Gas%20Report.pdf.

California Geological Survey, “Earthquake Zones of Required Investigation: Inglewood Quadrangle,” March 25, 1999, http://gmw.conservation.ca.gov/SHP/EZRIM/Maps/INGLEWOOD_EZRIM.pdf, accessed August 2018.

California Geological Survey, Note 49: Guidelines for Evaluating the Hazard of Surface Fault Rupture, https://www.conservation.ca.gov/cgs/Documents/Publications/CGS-Notes/CGS-Note-49.pdf.

California Government Code §65040.12.e.

California Government Code Section 65583 (c)(1)(A).

California Government Code Section 7260-7277

California Governor's Office of Planning and Research, Scripps Institution of Oceanography, CEC, California Public Utilities Commission. 2018. Statewide Summary Report. California's Fourth Climate Change Assessment. Publication number: SUMCCCA4-2018-013. Available: http://www.climateassessment.ca.gov/state/docs/20190116-StatewideSummary.pdf. Accessed August 6, 2020.

California Green Building Standards Code (CCR, Title 24, Part 11 - CALGreen)

California Green Building Standards Code (CCR, Title 24, Part 6, Section 100.1(b) - CALGreen)

California Health and Safety Code Division 20, Chapter 6.7, Section 25298, Underground Storage of Hazardous Substances

California Health and Safety Code Section 13000 et seq.

California Health and Safety Code section 25100 et seq., Hazardous Waste Control Act.

California Health and Safety Code Sections 25500–25520.

California Health and Safety Code Sections 25531–25543.3.

California Health and Safety Code, Chapter 6.95.

California Health and Safety Code, Division 26. Air Resources, PART 3. Air Pollution Control Districts, Chapter 5.5. South Coast Air Quality Management District, ARTICLE 5. Plan, Section 40460(b).

California Health and Safety Code, Division 7, Dead Bodies, Section 7050.5

California Legislative Information, California Solid Waste Reuse and Recycling Access Act of 1991 [42900 - 42912] , accessed June 2020, https://leginfo.legislature.ca.gov/faces/codes_displayText.xhtml?lawCode=PRC&division=30.&title=&part=3.&chapter=18.&article=1.

California Legislative Information, SB-1 Public resources, accessed June 2020, https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=200920107SB1.

California Legislative Information, Senate Bill No. 32, Accessed April 2020, https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201520160SB32.

California Legislative Information, Senate Bill No. 350, Accessed April 2020, https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201520160SB350.

California Legislative Information, Senate Bill No. 375, Accessed April 2020, https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=200720080SB375.

California Legislative Information, Water Code, accessed June 2020, https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=WAT&sectionNum=13050#:~:text=(d)%20%E2%80%9CWaste%E2%80%9D%20includes,nature%20prior%20to%2C%20and%20for.

California Legislative Information. Senate Bill No. 375. https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=200720080SB375. Accessed May 22nd, 2020.

California Legislature, Urban Water Management Planning Act (Division 6 Part 2.6 of the Water Code §§10610 – 10656).

California Native Plant Society (CNPS), Inventory of Rare and Endangered Plants (V. 6) 2001, Note - the Inventory switched to being online (V. 7, developed and maintained by Larry Levine), and is currently in its 8th edition. https://www.cnps.org/rare-plants/cnps-inventory-of-rare-plants

California Natural Resources Agency, 2009 California Climate Adaptation Strategy, A Report to the Governor of the State of California in Response to Executive Order S-13-2008. https://resources.ca.gov/CNRALegacyFiles/docs/climate/Statewide_Adaptation_Strategy.pdf

California Natural Resources Agency, 2014. Safeguarding California: Reducing Climate Risk, an Update to the 2009 California Climate Adaptation Strategy. Available: http://resources.ca.gov/climate/safeguarding/.

California Natural Resources Agency, 2018. Safeguarding California Plan: 2018 Update. Available: http://resources.ca.gov/climate/safeguarding/

California Natural Resources Agency, CEQA Guidelines Amendments, Sections 15064.4, 15183.5, 15364.5. Available: http://resources.ca.gov/ceqa/docs/2018_CEQA_FINAL_TEXT_122818.pdf.

California Natural Resources Agency, Final Statement of Reasons for Regulatory Action, December 2009, pp. 20-26. Available: http://resources.ca.gov/ceqa/docs/Final_Statement_of_Reasons.pdf.

California Natural Resources Agency, Safeguarding California: Implementation Action Plans, Available: https://resources.ca.gov/CNRALegacyFiles/docs/climate/safeguarding/Safeguarding%20California-Implementation%20Action%20Plans.pdf.

California Office of Environmental Health and Hazard Assessment (OEHHA), CalEnviroScreen. https://oehha.ca.gov/calenviroscreen.

California Office of Environmental Health Hazard Assessment (OEHHA), Air Toxics Hot Spots Program (February 2015), Accessed June 2020, https://oehha.ca.gov/media/downloads/crnr/2015guidancemanual.pdf.

California Office of the Governor, California EO B-30-15: Establishing 2030 CA emissions target, Adaptation initiatives. April 29, 2015.

California Office of the Governor, California Executive Order S-13-08 Requiring State Adaptation Strategy, November 14, 2008.

California Office of the Governor, Executive Order N-79-20, Available: https://www.gov.ca.gov/wp-content/uploads/2020/09/9.23.20-EO-N-79-20-text.pdf.

California Office of the Governor, Governor Brown Established Most Ambitious Greenhouse Gas Reduction Target in North America, (April 29, 2015), https://www.gov.ca.gov/2015/04/29/news18938/

California PRC, Division 13. Environmental Quality, Section 21083.2.

California PRC, Sections 21083.2, Archeological Resources.

California PRC, Sections 5020-5029.5, Historic Resources. https://leginfo.legislature.ca.gov/faces/codes_displayText.xhtml?lawCode=PRC&division=5.&title=&part=&chapter=1.&article=2.

California PRC, Sections 5097.9-5097.998, Native American Historical, Cultural, and Sacred Sites.

California PRC, Sections, 5079-5079.65. Parks and Monuments.

California Public Resources Code (PRC), sec. 21000 et seq., California Environmental Quality Act (CEQA).

California Public Resources Code (PRC), Sections 5020-5029.5, Historic Resources.

California Public Resources Code Section 21092.6.

California Public Resources Code Section 65962.5

California Public Resources Code Section 8550 – 8669.7.

California Public Resources Code Sections 5020-5029.5, 5079-5079.65, and 5097.9-5097.998

California Public Resources Code, sec. 2690–2699.6 Seismic Hazards Mapping Act.

California Public Resources Code, tit. 14, Div. 6, ch. 3, State CEQA Guidelines, sec. 15123.

California Public Utilities Code, Division 9, Part 1, Chapter 4, Article 3.5, Sections 21670– 21679.5.

California Senate Bill 1082.

California State Alquist-Priolo Earthquake Fault Zoning Act of 1972. California Public Resources Code, sec. 2621.5.

California State Water Resources Control Board, Division of Water Quality, "Underground Storage Tank Program," accessed March 2019, available at https://www.waterboards.ca.gov/ust/.

California State Water Resources Control Board, GeoTracker, accessed March 2019, available at https://geotracker.waterboards.ca.gov/.

California Vehicle Code Division 13, Chapter 5, Article 1, Section 31303–31309.

California, Fish and Game Code, Section 2050 et. seq. California Endangered Species Act.

California, Health and Safety Code sec. 7050.5, "Dead Bodies."

California's Greenhouse Gas Vehicle Emission Standards under Assembly Bill 1493 of 2002 (Pavley).

CalRecycle, "Assembly Bill 939," accessed July 2020, http://www.calrecycle.ca.gov/laws/legislation/calhist/1985to1989.htm.

CalRecycle, "Ordinances, Resolutions, and Policies," accessed July 2020, http://www.calrecycle.ca.gov/LGCentral/Library/LocalDocs/Policy.htm.

CalRecycle, "Ordinances, Resolutions, and Policies," accessed July 2020, http://www.calrecycle.ca.gov/LGCentral/Library/LocalDocs/Policy.htm.

CalRecycle, Construction and Demolition (C&D) Diversion Informational Guide, accessed June 2020, https://www.calrecycle.ca.gov/lgcentral/library/canddmodel.

CalRecycle, Enforcement, accessed June 2020, https://www.calrecycle.ca.gov/lgcentral/enforcement.

CalRecycle, Mandatory Commercial Recycling, accessed June 2020, https://www.calrecycle.ca.gov/recycle/commercial.

CALSTA, 2020 Transit and Intercity Rail Capital Program Formal Draft Guidelines, TIRCP Quantification Methodology and Calculator Tool, https://calsta.ca.gov/subject-areas/transit-intercity-rail-capital-prog

Caltrans LRFD, Memo to Designers 20-10, Fault rupture, January 2013.

Caltrans LRFD, Memo to Designers 20-8, Analysis of Ordinary Bridges that Cross Faults, January 2018.

Caltrans SDC, Version 1.7, April 2013

Caltrans, Scenic Highways, https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways, accessed July 30, 2020.

CARB, "CAAQS" (August 10, 2017), https://www.arb.ca.gov/research/aaqs/caaqs/caaqs.htm.

CARB, Air Quality and Land Use Handbook: A Community Health Perspective (April 2005), https://www.arb.ca.gov/ch/handbook.pdf.

CARB, Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling, Title 13 CCR section 2485. 2004.

CARB, California's 2017 Climate Change Scoping Plan, Accessed April 2020, https://www.arb.ca.gov/cc/scopingplan/scoping_plan_2017.pdf.

CARB, California's Greenhouse Gas Vehicle Emission Standards under Assembly Bill 1493 of 2002 (Pavley) https://ww2.arb.ca.gov/californias-greenhouse-gas-vehicle-emission-standards-under-assembly-bill-1493-2002-pavley

CARB, Climate Change Scoping Plan, p. ES-7.

CARB, Climate Change Scoping Plan: A Framework for Change, Accessed April 2020, https://www.arb.ca.gov/cc/scopingplan/document/adopted_scoping_plan.pdf.

CARB, Final Regulation Order: Regulation for In-Use Off-Road Diesel-Fueled Facts, accessed May 2020, https://ww3.arb.ca.gov/msprog/ordiesel/documents/finalregorder-dec2011.pdf

CARB, First Update to the Climate Change Scoping Plan: Building on the Framework (May 2014).

CARB, Section 2480 in Title 13 of the CCR, California Administrative Code (December 24, 2010), https://www.arb.ca.gov/toxics/sbidling/SBVIdling.pdf.

CARB, The Advanced Clean Cars Program, (January 18, 2017), https://www.arb.ca.gov/msprog/acc/acc.htm

CARB. Airborne Toxic Control, Title 17 CCR section 93115, 2004.

CDC, CGS, Earthquake Zones of Required Investigation, interactive map, accessed July 2020, https://maps.conservation.ca.gov/cgs/EQZApp/app/.

CDC, CGS, Earthquake Zones of Required Investigation.

CDC, CGS, Mineral Lands Classification, data portal, accessed July 2020, https://maps.conservation.ca.gov/cgs/informationwarehouse/index.html?map=mlc.

CDC, Division of Mines and Geology, Update of Mineral Land Classification of Portland Cement Concrete Aggregate in Ventura, Los Angeles, and Orange Counties, California: Part II—Los Angeles County (1994), Plate 1B, available at ftp://ftp.consrv.ca.gov/pub/dmg/pubs/ofr/OFR_94-14/OFR_94-14_Text.pdf.

CDC, Division of Mines and Geology, Update of Mineral Land Classification of Portland Cement Concrete Aggregate, Plate 1B.

CDC, Division of Mines and Geology, Update of Mineral Land Classification of Portland Cement Concrete Aggregate in Ventura, Los Angeles, and Orange Counties, California: Part II—Los Angeles County (1994), Plate 1B, available at ftp://ftp.consrv.ca.gov/pub/dmg/pubs/ofr/OFR_94-14/OFR_94-14_Text.pdf.

CDC, Division of Mines and Geology, Update of Mineral Land Classification of Portland Cement Concrete Aggregate, Plate 1B.

CDFW, “NCCP Plan Summaries,” accessed July 2020, https://www.wildlife.ca.gov/conservation/planning/nccp/plans.

CDFW, California Interagency Wildlife Task Group, California Wildlife Habitat Relationships System, "Pocketed Free-Tailed Bat,” accessed June 2020, https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=2353.

CDFW, California Natural Diversity Database, “Maps and Data,” accessed June 2020, https://www.wildlife.ca.gov/Data/CNDDB.

CEC, Demand Analysis Office, California Energy Demand 2018-2030 Revised Forecast, Accessed May 2020, https://efiling.energy.ca.gov/getdocument.aspx?tn=223244.

CEC, Final 2019 Integrated Energy Policy Report, Accessed May 2020, https://www.energy.ca.gov/data-reports/reports/integrated-energy-policy-report/2019-integrated-energy-policy-report.

CEQA Guideline, Section 15064.3(b), Determining Significant Impacts of Transportation Projects.

CEQA Guideline, Section 15064.3(b), Determining Significant Impacts of Transportation Projects.

CEQA Guidelines Section 15002; PRC, sec. 21002.1.; 15121(a); 15161.

CEQA Guidelines section 15126.2(b).

CEQA Guidelines section 15131(a).

CEQA Guidelines section 15382.

CEQA Guidelines sections 15126.2(a), (c-e).

CEQA Guidelines, Appendix F: Energy Conservation.

CEQA Guidelines, Section 15064.5(b).

CEQA Section 21080.3.1.

CEQA, PRC section 21100(b)(3).

City if Inglewood, Transit and Intercity Rail Program (TIRCP) Application for the City of Inglewood Transit Connector Project, January 16, 2020. Table 6.

City Municipal Code, Section 3-85. Truck Routes Established.

City of IMC, Chapter 12.

City of Inglewood General Plan, (1980).

City of Inglewood General Plan, "Conservation Element" (1997).

City of Inglewood General Plan, "Environmental Justice Element" (April 2020).

City of Inglewood General Plan, "Housing Element" (2014).

City of Inglewood General Plan, "Land Use Element" (1980).

City of Inglewood General Plan, "Noise Element" (1987).

City of Inglewood General Plan, "Open Space Element" (adopted 1973, last amended 1995), https://www.cityofinglewood.org/DocumentCenter/View/132/Land-Use-Element-1980-Amended-1986-2009-2016-PDF, accessed July 30, 2020.

City of Inglewood General Plan, "Safety Element" (1995).

City of Inglewood Municipal Code, Section 3-95, Truck Routes Established. https://www.qcode.us/codes/inglewood/view.php?topic=3-3-3_85&frames=on

City of Inglewood Public. Public Works. Urban Water Management Plan 2015. https://www.cityofinglewood.org/DocumentCenter/View/14954/ING-2015-UWMP-Report-Final. Accessed November 4, 2020.

City of Inglewood Technical Background Report, August 2006.

City of Inglewood Tree Preservation Ordinance (IMC Section Chapter 12, Article 32).

City of Inglewood, "About the City," Accessed July 2020. https://www.cityofinglewood.org/493/About-the-City.

City of Inglewood, "Master Fee Schedule", September 2016.

City of Inglewood, "Telecommunications," accessed September 2020, https://www.cityofinglewood.org/327/Telecommunications.

City of Inglewood, "Waste Collection FAQs," accessed June 2020, https://www.cityofinglewood.org/FAQ.aspx?TID=30.

City of Inglewood, "Water Works," accessed June 2020, https://www.cityofinglewood.org/463/Water-Works.

City of Inglewood, 2010 Urban Water Management Plan, June 2011.

City of Inglewood, 2010. Multi-Hazard Mitigation Plan, March 23, 2010

City of Inglewood, 2013, Inglewood Energy and Climate Action Plan. Available: https://www.cityofinglewood.org/225/Sustainability

City of Inglewood, 2015 Urban Water Management Plan, August 2016.

City of Inglewood, City of Inglewood General Plan, Land Use Element, Land Use Comparison table, Inglewood

City of Inglewood, Department of Community Development and Housing, General Plan. January 1980

City of Inglewood, Energy Efficiency Climate Action Plan, December 2015, https://www.southbaycities.org/sites/default/files/EECAP_Inglewood_Final_20151218.pdf.

City of Inglewood, Envision Inglewood, 2018, http://envisioninglewood.org/wp-content/uploads/2018/07/Envision-.

City of Inglewood, Envision Inglewood: Connecting People, Places, and the Future (May 2018), accessed March 2019, http://envisioninglewood.org/.

City of Inglewood, Final Draft 2015 Urban Water Management Plan, https://www.cityofinglewood.org/DocumentCenter/View/1061/2015-Urban-Water-Mangement-Plan-PDF?bidId=.

City of Inglewood, Final Environmental Impact Report for the Hollywood Park Redevelopment Project, June 3, 2009.

City of Inglewood, Final Environmental Impact Report for the Transit Oriented Development Plan for

City of Inglewood, General Plan (adopted July 1995).

City of Inglewood, General Plan- Related Documents, https://www.cityofinglewood.org/209/General-Plan. Accessed June 12, 2020

City of Inglewood, General Plan Update Technical Background Report, August 2006.

City of Inglewood, General Plan, "Circulation Element" (1992), accessed March 2019, https://www.cityofinglewood.org/DocumentCenter/View/128/Circulation-Element-1992-PDF.

City of Inglewood, General Plan, "Conservation Element."

City of Inglewood, General Plan, "Land Use Element" (adopted 1980, amended 1986, 2009, and 2016), accessed March 2019, https://www.cityofinglewood.org/DocumentCenter/View/132/Land-Use-Element-1980-Amended-1986-2009-2016-PDF

City of Inglewood, General Plan, Environmental Justice Element, Adopted June 2020.

City of Inglewood, General Plan, Safety Element, July 1995.

City of Inglewood, Hollywood Park Specific Plan, "Exhibit 6-5- Minimum Building Setbacks," 6-30, adopted July 8, 2009, amended September 23, 2014, and further amended February 24, 2015.

City of Inglewood, Hollywood Park Specific Plan, adopted July 8, 2009, amended September 23, 2014, and further amended February 24, 2015. https://www.cityofinglewood.org/DocumentCenter/View/1347/Hollywood-Park-Specific-Plan. Accessed November 1, 2020.

City of Inglewood, Housing Element 2013-2021, https://www.cityofinglewood.org/DocumentCenter/View/127/2013-2021-Housing-Element-Adopted-January-28-2014-PDF. Accessed July 22, 2020.

City of Inglewood, IMC Section 12-113, Protected Trees.

City of Inglewood, IMC, Chapter 5 Offenses, Miscellaneous, "Article 2. Noise Regulations," Section 5-26. Noise Level Measurement Criteria.

City of Inglewood, IMC, Ordinance No. 15-14 revised Article 16 of "Chapter 10, Stormwater Management and Discharge Control," Section 10-208, Low Impact Development Requirements for New Development and Redevelopment.

City of Inglewood, Inglewood Energy and Climate Action Plan, March 2013, https://www.cityofinglewood.org/DocumentCenter/View/148/Inglewood-Energy-and-Climate-Action-Plan-ECAP-Adopted-2013-PDF, accessed July 30, 2020.

City of Inglewood, Inglewood General Plan: Noise Element, September 1987, https://www.cityofinglewood.org/DocumentCenter/View/130/Noise-Element-1987-PDF. Accessed December 2018.

City of Inglewood, Master Fee Schedule, September 2016.

City of Inglewood, Multi-Hazard Mitigation Plan, March 23, 2010.

City of Inglewood, Municipal Code, "Chapter 11, Article 2 Building Code, Sections 11-2 through 11-5. California Building Code. Established and Additions, Deletions and Amendments."

City of Inglewood, Municipal Code, Article 2, Noise Regulations. Section 5-41, Construction of Building and Projects, Noise Regulated 41http://www.qcode.us/codes/inglewood/?view=desktop&topic=5-2

City of Inglewood, Municipal Code, Section 12-31.46 (Ord. 17-01 11-01-16).

City of Inglewood, Municipal Code, Section 3-95, Truck Routes Established. https://www.qcode.us/codes/inglewood/view.php?topic=3-3-3_85&frames=on

City of Inglewood, Municipal Code, Section 5-41, Construction of Building and Projects Noise Regulated.

City of Inglewood, New Downtown and Fairview Heights Transit Oriented Development Plan and Design Guidelines, November 1, 2016

City of Inglewood, New Downtown and Fairview Heights Transit Oriented Development Plan and Design

City of Inglewood, Ordinance 12-06 5-8-12 and Ordinance 13-04 11-5-13.

City of Inglewood, Ordinance No. 15-02, Accessed July 30, 2020, https://www.cityofinglewood.org/DocumentCenter/View/1011/Ordinance-Number-15-02-PDF.

City of Inglewood, Sewer System Management Plan, August 31, 2015,accessed June 2020, https://www.cityofinglewood.org/DocumentCenter/View/986/Sewer-System-Management-Plan-PDF.

City of Inglewood, Technical Background Report (2006), Design and Development Standards, adopted January 30, 1979.

City of Inglewood, Transit and Intercity Rail Program (TIRCP) Application for the City of Inglewood Transit Connector Project, January 16, 2020.

City of Inglewood. City History. https://www.cityofinglewood.org/512/City-History. Accessed July 21, 2020.

City of Inglewood. Environmental Justice Element. April 2020. https://www.cityofinglewood.org/DocumentCenter/View/14211/Environmental-Justice-Element. Accessed August 11, 2020.

City of Inglewood. Final Environmental Impact Report. I. Introduction Executive Summary. https://www.cityofinglewood.org/DocumentCenter/View/125/I-Introduction-Execitive-Summary-PDF. Accessed November 30, 2020.

City of Inglewood. General Plan. https://www.cityofinglewood.org/209/General-Plan. Accessed May 18th, 2020.

City of Inglewood. Hollywood Park Specific Plan (2009, amended 2014, amended 2015). https://www.cityofinglewood.org/DocumentCenter/View/1347/Hollywood-Park-Specific-Plan. Accessed August 17, 2020.

City of Inglewood. Housing Element 2013-2021. https://www.cityofinglewood.org/DocumentCenter/View/127/2013-2021-Housing-Element-Adopted-January-28-2014-PDF. Accessed July 22, 2020.

City of Inglewood. Inglewood Municipal Code. Section 12-38.50. T-C Zone. Permitted Uses. https://qcode.us/codes/inglewood/view.php?topic=12-17_2-12_38_50&frames=on.

City of Inglewood. Inglewood Transit Connector TIRCP Grant Application. January 16, 2020.

City of Inglewood. Land Use Element. https://www.cityofinglewood.org/DocumentCenter/View/132/Land-Use-Element-1980-Amended-1986-2009-2016-PDF. Accessed July 22, 2020.

City of Inglewood. New Downtown and Fairview Heights Transit Oriented Development Plan and Design Guidelines. Adopted November 1st, 2016. http://inglewood.arroyogroup.com/wp-content/uploads/2017/01/The-New-Downtown-Fairview-Heights-TOD-Plan-Design-Guidelines-lo-res.pdf. Accessed November 30, 2020.

City of Inglewood. Summary. https://www.cityofinglewood.org/DocumentCenter/View/13888/03-Summary. Accessed July 27, 2020.

City of Inglewood. The New Downtown Inglewood & Inglewood TOD Plans. http://inglewood.arroyogroup.com/wp-content/uploads/2017/01/The-New-Downtown-Fairview-Heights-TOD-Plan-Design-Guidelines-lo-res.pdf, accessed July 2020.

City of Inglewood. Transit and Intercity Rail Program Application for the Inglewood Transit Connector Project. January 2020.

City of Inglewood. Water Works. https://www.cityofinglewood.org/463/Water-Works.

City, General Plan, “Noise Element” (September 1, 1987).

City, Municipal Code, Article 2, Noise Regulations. Section 5-41, Construction of Building and Projects, Noise Regulated 41http://www.qcode.us/codes/inglewood/?view=desktop&topic=5-2

City, Municipal Code, Section 5-41, Construction of Building and Projects Noise Regulated.

City, New Downtown and Fairview Heights Transit Oriented Development Plan and Design Guidelines, (adopted November 1, 2016), accessed March 2019, http://inglewood.arroyogroup.com/wp-content/uploads/2017/01/The-New-Downtown-Fairview-Heights-TOD-Plan-Design-Guidelines-lo-res.pdf.

Clean Air Act Title I, Section 112, USC 7412 “Hazardous Air Pollutants.”

Clean Water Act, 33 Code of Federal Regulations, sec. 402(p) (2008).

Climate Central, 2019. Available: https://www.climatecentral.org/gallery/maps/2018-global-temp-review-land-ocean. Accessed April 25, 2019. Published February 6, 2019.

Code of Federal Regulations (CFR) at 28 CFR parts 35 (title II) and 36 (title III), American with Disabilities Act.

Code of Federal Regulations (CFR), Title 40. Protection of Environment, Environmental Protection Agency, Subchapter G. Noise Abatement Programs, Part 205. Transportation Equipment Noise Emission Controls.

Code of Federal Regulations (CFR), Title 49. Transportation. Subtitle B. Other Regulations Relating to Transportation, Chapter VI. Federal Transit Administration, Part 659, Rail Fixed Guideway Systems; State Safety Oversight.

Conceptual Design Utility Impacts, Pacifica Services, Incorporated, December 2019.

Cornell Lab of Ornithology, eBird, “Hotspot Map,” accessed June 2020, https://ebird.org/home.

County of Los Angeles Department of Public Health, “Solid Waste Management Program,” accessed July 2020, http://publichealth.lacounty.gov/eh/EP/solid_waste/solid_waste_main.htm.

County of Los Angeles, Standard Urban Storm Water Mitigation Plan For Los Angeles County and Cities In Los Angeles County, March 8, 2000.

CPUC, Long Term Energy Efficiency Strategic Plan. 2008

Critelli, S. P. Rumelhart, and R. Ingersoll, Petrofacies and provenance of the Puente Formation (middle to upper Miocene), Los Angeles Basin, Southern California: implications for rapid uplift and accumulation rates, Journal of Sedimentary Research A65: 656-667, 1995.

Cultural Resource Investigation, Roberta Thomas, M.A., RPA, and Gena Granger, M.A., RPA, PaleoWest Archaeology (PaleoWest), December 12, 2018.

Dean Murphy and Michele L. Norris, "Government Money Becomes Urban Lifeblood: Innovation and Optimism Thrive on Public Funds in Inglewood, San Pedro," Los Angeles Times, January 4, 1987.

Dinkelspiel, Frances, Towers of Gold, St. Martin's Press, New York, 2008.

Documents/MS_052_California_Aggregates_Report_201807.pdf) Aggregate production areas in the Los Angeles

Downtown Inglewood and Fairview Heights, September 2016. Prepared by Metis Environmental Group.

Earthquake Hazards Reduction Act of 1977, As Amended by Section 5. Earthquake Hazards Reduction Program [New Section 103 in Public Law 108-360]

EDD. California Profile. https://www.labormarketinfo.edd.ca.gov/cgi/databrowsing/localAreaProfileQSResults.asp?selectedarea=California&selectedindex=0&menuChoice=localAreaPro&state=true&geogArea=0601000000&countyName=. Accessed August 24, 2020.

EDD. Labor Force and Unemployment Rate for Cities and Census Designated Places. Cities and Census Designated Places by Individual County. https://www.labormarketinfo.edd.ca.gov/data/labor-force-and-unemployment-for-cities-and-census-areas.html. Accessed August 24, 2020.

EDD. Los Angeles County Profile. https://www.labormarketinfo.edd.ca.gov/cgi/databrowsing/localAreaProfileQSResults.asp?selectedarea=Los+Angeles+County&selectedindex=19&menuChoice=localAreaPro&state=true&geogArea=0604000037&countyName=. Accessed August 24, 2020.

EDD. Unemployment Rates (Labor Force) https://www.labormarketinfo.edd.ca.gov/cgi/dataanalysis/labForceReport.asp?menuchoice=LABFORCE. Accessed August 24, 2020.

Element-1980-Amended-1986-2009-2016-pdf.

Email correspondence with Iris Yuan, Lea+Elliott, June 29, 2020.

Energy + Environmental Economics (E3), 2015. Summary of the California State Agencies' PATHWAYS Project: Long-term Greenhouse Gas Reduction Scenarios. Available: https://www.ethree.com/public_proceedings/summary-california-state-agencies-pathways-project-long-term-greenhouse-gas-reduction-scenarios/.

Energy and Policy Conservation Act (EPCA) (Pub. Law 94–163, 89 Stat. 871, enacted December 22, 1975).

Envision Inglewood. http://envisioninglewood.org/

EPA, "The Clean Air Act – Highlights of the 1990 Amendments," United States Environmental Protection Agency, accessed June 22, 2020, https://www.epa.gov/clean-air-act-overview/clean-air-act-highlights-1990-amendments.

EQA Guidelines sections 15126.2(d).

Erlandson, Jon M., Early Hunter-Gatherers of the California Coast, Plenum Press, New York, 1994.

Erler & Kalinowski, Inc., Soil Management Plan, July 3, 2007.

Fault Rupture Hazard Evaluation in Support of Draft EIR (Fault Rupture Hazard Evaluation), Geosyntec Consultants, September 27, 2019

Federal Aviation Administration, Land Use Compatibility and Airports. p.V-10.

Federal Highway Administration (FHWA). Manual on Uniform Traffic Control Devices (MUTCD) for Streets and Highways. https://mutcd.fhwa.dot.gov/

Federal Highway Administration, FHWA Highway Traffic Noise Prediction Model, December 1978, https://ia801807.us.archive.org/3/items/fhwahighwaytraff00barr/fhwahighwaytraff00barr.pdf.

Federal Highway Administration, Traffic Noise Model Version 2.5, https://www.fhwa.dot.gov/environment/noise/traffic_noise_model/tnm_v25/.

Federal Railroad Administration, High-Speed Ground Transportation Noise and Vibration Impact Assessment, September 2012.

Federal Register, Endangerment and Cause or Contribute Findings for Greenhouse Gases Under Section 202(a) of the Clean Air Act, Accessed April 2020, https://www.federalregister.gov/documents/2009/12/15/E9-29537/endangerment-and-cause-or-contribute-findings-for-greenhouse-gases-under-section-202a-of-the-clean.

Federal Register, Mandatory Reporting of Greenhouse Gases, Accessed April 2020, https://www.gpo.gov/fdsys/pkg/FR-2009-10-30/pdf/E9-23315.pdf.

Federal Transit Administration (FTA), Transit Noise and Vibration Impact Assessment Manual, FTA Report No. 0123, September 2018.

Final 2017 Integrated Energy Policy Report, Adopted February 21, 2018, Accessed July 13, 2020 https://efiling.energy.ca.gov/getdocument.aspx?tn=223205.

Florence Avenue, Prairie Avenue and Manchester Boulevard are City-designated evacuation routes.

Geosyntec. Fault Rupture Hazard Evaluation in Support of Draft EIR. September 2019.

Gladys Waddingham, The History of Inglewood (Inglewood, CA: Historical Society of Centinela Valley, 1994), 8.

Google Earth, 2020.

Google Maps accessed July 2020, https://www.google.com/maps.

Government Code Section 65580, et seq.

Governor's Office of Planning and Research, State of California General Plan Guidelines (2017), http://www.opr.ca.gov/docs/OPR_COMPLETE_7.31.17.pdf.

Governor's Office of Planning and Research*. Technical Advisory on Evaluating Transportation Impacts in CEQA.* December 2018.

Gumprecht, Blake, Los Angeles River: Its Life, and Possible Rebirth, The Johns Hopkins University Press, Baltimore, 1999, reprinted 2001.

H.R. 2576 — 116th Congress, "Federal Government Advertising Equity Accountability Act," (2016).

Hazardous Material Assessment Technical Memorandum, Geosyntec Consultants, July 3, 2018.

Hazardous Waste Control Law, California Health and Safety Code sections 25100 et seq

Health and Safety Code Sections 25531 – 25534.3.

Historical Resources Technical Report. Inglewood Transit Connector. November 19, 2020.

Hollywood Park Lan Company, LLC. Hollywood Park Specific Plan. https://www.cityofinglewood.org/DocumentCenter/View/1347/Hollywood-Park-Specific-Plan. Adopted July 8, 2009, Amended September 23, 2014, Amended February 24, 2015.

Hollywood Park Specific Plan. "Introduction Executive Summary." https://www.cityofinglewood.org/DocumentCenter/View/125/I-Introduction-Execitive-Summary-PDF. Accessed July 27, 2020.

Homburg, Jeffrey A., John G. Douglass, and Seeths N. Reddy (editors), "Paleoenvironment and Culture History," In People in a Changing Land: The Archaeology and History of the Ballona in Los Angeles, California, Volume 1, series edited by D.R. Grenda, R. Ciolek-Torello and J.H. Altschul. Statistical Research, Redlands, California, 2014.

IMC, ch. 10, Public Works, art. 16, LID Standards Manual, incorporated by reference.

IMC, ch. 3, Motor Vehicles and Traffic, art. 3, Truck Route Regulations, sec. 3-85, Truck Routes Established (1985).

Ingersoll, R. V., and P. E. Rumelhart, Three-stage basin evolution of the Los Angeles basin, Southern California, Geology 27: 593-596, 1999.

Inglewood Municipal Code 12-16.8.

Inglewood Municipal Code Chapter 12, Article 32, Tree Preservation.

Inglewood Municipal Code, "Chapter 6, Article 1: Fire Code and Amendments," https://www.qcode.us/codes/inglewood/view.php?topic=6-1&frames=off

Inglewood Municipal Code, Chapter 10 Section 208, Accessed July 2020, http://www.qcode.us/codes/inglewood/view.php?topic=10-16-10_208&frames=off.

Inglewood Municipal Code. Chapter 3 – Motor vehicles and traffic, Article 3 – Truck Route regulations.

Inglewood Park Cemetery, http://www.inglewoodparkcemetery.com/heritage.html (accessed February 2019).

Inglewood Transit Connector, Technical Memorandum (DRAFT), Geology and Soils, Geosyntec Consultants, June 25, 2018.

Inglewood, California, Municipal Code, "Chapter 10, Article 16, Stormwater Management and Discharge Control," Section 10-208, Low Impact Development Requirements for New Development and Redevelopment.

Inglewood, California, Municipal Code, Article 32, Section 12-110 (2012), Tree Preservation.

Inglewood, California, Municipal Code, Chapter 12, Article 23, Section 12-116 (2012).

Inglewood, California, Municipal Code, Section 12-113, Protected Trees.

Intergovernmental Panel on Climate Change (IPCC), Climate Change 2014 Mitigation of Climate Change, Working Group III Contribution to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change, 2014, p. 439.

Intergovernmental Panel on Climate Change, 2007. Synthesis Report. Contribution of Working Groups I, II and III to the Fourth Assessment Report of the Intergovernmental Panel on Climate Change. Available: https://www.ipcc.ch/assessment-report/ar4/. Accessed August 11, 2020.

Intergovernmental Panel on Climate Change, 2014. Synthesis Report. Contribution of Working Groups I, II and III to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change. Available: www.ipcc.ch/report/ar5/syrhttps:/. Accessed August 11, 2020.

International Electrotechnical Commission (IEC), IEC 61672-1 Ed. 1.0, IEC 60651. Ed 1.2.

International Society of Arboriculture, Guide for Plan Appraisal, 10th Edition, 2018.

International Union for Conservation of Nature, "Crotch bumble bee," accessed June 2020, https://www.iucnredlist.org/species/44937582/46440211.

ITC Construction Commitment Program.

ITC Design Guidelines.

John M. Cruikshank Consultants, Inglewood Planning Services for Transit Oriented Development, Existing Infrastructure Baseline Data, June 30, 2015.

Johnson, J. R., and D. D. Earle, Tataviam Geography and Ethnohistory, Journal of California and Great Basin Anthropology, Vol. 12, No. 2, pp. 191-214, 1990.

Kenward, A, et al. (2013). Wildfires and Air Pollution: The Hidden Health Hazards of Climate Change. Climate Central. Available: http://assets.climatecentral.org/pdfs/WildfiresAndAirPollution.pdf.

Kielbasa, John, 1998. Historic Adobes of Los Angeles County. Dorrance Publishing Co. Pittsburg, Pennsylvania.

Kroeber, A. L., Handbook of the Indians of California, Dover Publications, Inc., New York, 1925, reprinted 1976.

LA County DRP, General Plan 2035, "General Plan Update Program—Interactive Map (GP-NET)."

LA County DRP, Hawthorne Airport: Airport Influence Area (May 13, 2003), http://planning.lacounty.gov/assets/upl/project/aluc_airport-hawthorne.pdf.

Land Use, p. 54, updated 2016, https://www.cityofinglewood.org/DocumentCenter/View/132/Land-Use-

Larson Davis Model 831 SLM, http://www.larsondavis.com/support/slmsupport/model831.

Larson Davis, 831 Advanced Sound Level Meter for Architectural, Environmental, & Product Noise Analysis, http://www.larsondavis.com/contentstore/mktg/LD_Downloads/831_Lowres.pdf.

LARWQCB Basin Plan, March 13, 2020, https://www.waterboards.ca.gov/losangeles/water_issues/programs/basin_plan/.

Lauren Weiss Bricker, Marion Mitchell-Wilson, and Janet L. Tearnen, Inglewood Downtown District Main Street Project Area, Historic Design Guidelines, report (Inglewood, CA: Main Street Inglewood, 2000), 9.

Lea+Elliott, Inc. Inglewood Transit Connector EIR Operating Systems Conceptual Planning EIR Project Definition, December 2020. (Appendix 3.0-1)

League for the Protection of Oakland's Architectural and Historic Resources vs. City of Oakland, 52 Cal. App. 4th 896, 906-7 (1997).

Los Angeles County Airport Land Use Commission, Los Angeles County Airport Land Use Plan, adopted December 1991, http://planning.lacounty.gov/view/alup/

Los Angeles County Airport Land Use Plan, 1991, Contour Map, http://planning.lacounty.gov/view/alup/

Los Angeles County Department of Public Works, Environmental Programs Division, Underground Storage Tank Program: Closure, accessed June 30, 2020, https://pw.lacounty.gov/epd/UST/closure.cfm.

Los Angeles County Department of Public Works, Los Angeles County Integrated Waste Management Plan, 2018 Annual Report, December 2019.

Los Angeles County Department of Public Works, Los Angeles County Storm Drain System, interactive map, accessed June 2020, https://pw.lacounty.gov/fcd/StormDrain/index.cfm.

Los Angeles County Department of Regional Planning, Significant Ecological Areas Program, GIS Web Application, accessed June 2020, http://rpgis.isd.lacounty.gov/Html5Viewer/index.html?viewer=GISNET_Public.GIS-NET_Public.

Los Angeles County Metropolitan Transportation Authority, City of Champions/Inglewood (NFL) Focused

Los Angeles County Public Works, "Countywide Siting Element," accessed June 2020, https://dpw.lacounty.gov/epd/cse/AboutUs/.

Los Angeles County Public Works. Groundwater Wells. https://dpw.lacounty.gov/general/wells/. September 1, 2020.

Los Angeles County, Airport Land Use Commission, Department of Regional Planning, Los Angeles County Airport Land Use Plan, adopted December 19, 1991, revised December 1, 2004, available at http://planning.lacounty.gov/view/alup/, accessed February 15, 2019.

Los Angeles County, Department of Regional Planning (LA County DRP), General Plan 2035, "General Plan Update Program— Interactive Map (GP-NET)," accessed July 2020, http://planning.lacounty.gov/gpnet.

Los Angeles International Airport. LAX Specific Plan. 2017. file:///C:/Users/clan/Downloads/17-0276-s2_ord_185164_10-28-17.pdf.file:///C:/Users/clan/Downloads/17-0276-s2_ord_185164_10-28-17.pdf. Accessed August 16, 2020.

Los Angeles Times, How will the L.A. Phil carry on amid COVID-19? Dudamel and Smith lay out a plan, July 16, 2020.

Los Angeles World Airports, "Quarterly Noise Reports and Contour Maps," https://www.lawa.org/en/lawaenvironment/noise-management/lawa-noise-management-lax/quarterly-noise-reports-and-contour-maps.

Los Angeles World Airports. Los Angeles Plan Amendment Study Report. March 2012.

Massachusetts v. Environmental Protection Agency, 127 S.Ct. 1438 (2007).

McCawley, William, The First Angelinos: The Gabrielino Indians of Los Angeles, Malki Museum Press, Banning, California, 1996.

McWilliams, Carey, Southern California: An Island on the Land, Gibbs Smith, Layton, Utah, 1946.

Metis Environmental Group, Downtown Inglewood and Fairview Heights, Transit Oriented Development Plan Draft Program EIR, "4.L.3 Environmental Setting" (July 2016).

Metropolitan Water District of Southern California, "Overview," accessed June 2020, http://www.mwdh2o.com/WhoWeAre/Mission/Pages/default.aspx.

Metropolitan, "Planning Documents," accessed June 2020, http://www.mwdh2o.com/AboutYourWater/Planning/Planning-Documents/Pages/default.aspx.

Mike Sonksen, "On Location: Inglewood," KCET: History and Society, https://www.kcet.org/history-society/on-location-inglewood (accessed February 2019).

Milliken, Randall, Laurence H. Shoup, and Beverly R. Ortiz, Ohlone/Costanoan Indians of the San Francisco Peninsula, and their Neighbors, Yesterday and Today, prepared by Archaeological and Historical Consultants, Oakland, California, prepared for National Park Service Golden Gate National Recreation Area, San Francisco, California, June 2009.

NAGPRA, Title 43. Public Lands: Interior, Subtitle A. Office of the Secretary of the Interior, Part 10. Native American Graves Protection and Reparation Regulations, § 5097.98 – Notification of discovery of Native A

National Aeronautics and Space Administration, Building Vibrations Induced by Noise from Rotorcraft and Propeller Aircraft Flyovers, p. 10, June 1992.

National Earthquake Hazards Reduction Program Reauthorization Act of 2004, Public Law 95-124, 42 U.S.C. 7701 et. seq.), as amended by Public Laws 101-614, 105-47, 106-503, and 108-360.

National Fire Protection Association (NFPA), Standard 130 - Standard for Fixed Guideway Transit and Passenger Rail Systems. 2020. https://www.nfpa.org/codes-and-standards/all-codes-and-standards/list-of-codes-and-standards/detail?code=130

National Highway Traffic Safety Administration, "The Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule for Model Years 2021–2026 Passenger Cars and Light Trucks," August 24, 2018, accessed June 2020, https://www.nhtsa.gov/corporate-average-, accessed November 11, 2018.

National Historic Preservation Act of 1966 amend thru 1992, Public Law. Approved October 15, 1966 (Public Law 89-665; 80 STAT.915; 16 U.S.C. 470) as amended by Public Law 91-243, Public Law

93-54, Public Law 94-422, Public Law 94-458, Public Law 96-199, Public Law 96-244, Public Law 96-515, Public Law 98-483, Public Law 99-514, Public Law 100-127, and Public Law 102-575)

National Oceanic and Atmospheric Association, Assessing the US Climate in 2018. https://www.ncei.noaa.gov/news/national-climate-201812. Accessed April 25, 2019. Published February 6, 2019

National Research Council, 2010. Advancing the Science of Climate Change. Available: http://dels.nas.edu/resources/static-assets/materials-based-on-reports/reports-in-brief/Science-Report-Brief-final.pdf.

National Wild and Scenic Rivers System, accessed July 2020, https://www.rivers.gov.

NHTSA, Corporate Average Fuel Economy, Accessed July 30, 2020, https://www.nhtsa.gov/laws-regulations/corporate-average-fuel-economy.

NIST Handbook, State Weights and Measures Laboratories Program Handbook, March 2003, accessed August 2020, https://www.nist.gov/system/files/documents/2017/04/28/hb143-03-final.pdf

Noise Control Act (42 United States Code section 4901 et seq.)

OEHHA. SB 535 Disadvantaged Communities. https://oehha.ca.gov/calenviroscreen/sb535. Accessed September 15, 2020.

Office of Environmental Health Assessment, Air Toxic Hotspots Program, Risk Assessment Guidelines – Guidance Manual for Preparation of Health Risk Assessment, February 2015. https://oehha.ca.gov/media/downloads/crnr/2015guidancemanual.pdf

Office of Environmental Health Hazard Assessment. Determination of Noncancer Chronic Reference Exposure Levels. February 2000.

Office of Historic Preservation, 2019. http://ohp.parks.ca.gov/ListedResources/Detail/363. Accessed January 9, 2019.

Office of the Governor, Executive Order S-01-07, (January 18, 2007), https://www.arb.ca.gov/fuels/lcfs/eos0107.pdf.

OSHA, “Occupational Noise Exposure,” https://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=STANDARDS&p_id=10625.

Paleontological Resources Assessment Report, Inglewood Basketball and Entertainment Center, City of Inglewood, California, ESA, May 2019

Paul R. Spitzzeri, "Shake, Rattle and Roll: The Inglewood Earthquake of 21 June 1920," Homestead Museum, https://homesteadmuseum.wordpress.com/2018/06/21/shake-rattle-and-roll-the-inglewood-earthquake-of-21-june-1920/ (accessed February 2019).

Perry W. Payne and Sara Rosenbaum, "Massachusetts et al. v Environmental Protection Agency: Implications for Public Health Policy and Practice," Public Health Reports 122 No. 6 (2007): 817–819, Accessed April 2020, https://doi.org/10.1177/003335490712200614.

Pitt, Leonard, The Decline of the Californios: A Social History of the Spanish-speaking Californians, 1846-1890, University of California Press, Berkeley, 1994.

PRC Section 21083.2(a)

PRC, Division 13. Environmental Quality Section 21080.3.1, "Chapter 2.6. General, Tribal Consultation."

PRC, Division 13. Environmental Quality Section 21080.3.2, "Chapter 2.4. Definitions."

PRC, Division 13. Environmental Quality Section 21080.3.2, "Chapter 2.6."

PRC, sec/ 21002.1[a].; sec. 21067 as amended, CEQA.; tit. 14, div. 6, ch. 3, State CEQA Guidelines, sec. 15123.

Public Law 110-140 (2007).

Public Resources Code (PRC), Division 5. Parks and Monuments[5001 - 5873], "CHAPTER 1. State Parks and Monuments," Article 2. Historical Resources (5024.1).

Raab, L. Mark, Judith F. Porcasi, Katherine Bradford, and Andrew Yatsko, Debating Cultural Evolution: Regional Implications of Fishing Intensification at Eel Point, San Clemente Island, Pacific Coast Archaeological Society Quarterly 31(3):3–27, 1995.

Roberts, Cedric, Construction Noise and Vibration Impact on Sensitive Premises, p. 6, November 23 – 25, 2009, accessed October 2020, https://www.acoustics.asn.au/conference_proceedings/AAS2009/papers/p11.pdf

Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil, AQMD, 2001, http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1166.pdf.

Rule 1403 – Asbestos Emissions from Demolition/Renovations Activities, AQMD, 2007, http://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1403.pdf.

Sam Gnerre, "The Suangna Native American Village in Carson," South Bay Daily Breeze, January 17, 2015.

Sanborn Fire Insurance Maps, Inglewood CA, 1892. The Inglewood Hotel is labeled on this map as "not open" and occupied by four families as a dwelling.

Sanborn Fire Insurance Maps, Inglewood CA, 1907.

SB 107, Chapter 325, Statues of 2015.

SB 1078, Chapter 516, Statues of 2002.

SB 1078, Renewable Energy: California Renewables Portfolio Standard Program.

SB 1368 - Emission Performance Standards, Perata, Chapter 598, Statutes of 2006.

SB 1389, (PRC sections 25300–25323)

SB 350, Clean Energy and Pollution Reduction Act.

SB X1-2, Statutes of 2011.

SCAG. 2019 Local Profiles. https://www.scag.ca.gov/Documents/Inglewood.pdf. Accessed July 21, 2020.

SCAG. 2020-2045 ConnectSoCal Demographics and Growth Forecast. https://www.connectsocal.org/Documents/Draft/dConnectSoCal_Demographics-And-Growth-Forecast.pdf. Accessed July 27, 2020.

SCAG. Adopted Final Connect SoCal. https://connectsocal.org/Pages/Connect-SoCal-Final-Plan.aspx. Accessed July 22, 2020.

SCAG. Certified Final Connect SoCal PEIR. https://www.connectsocal.org/Documents/PEIR/draft/dPEIR_ConnectSoCal_3_14_PopulationHousing.pdf. Accessed September 21, 2020.

SCAG. Connect SoCal, 2020-2045 RTP/SCS. Chapter 2 SoCal Today. https://www.connectsocal.org/Documents/Adopted/fConnectSoCal-02-Plan.pdf. Accessed September 18, 2020.

SCAG. Draft 2020-2045 Connect SoCal Demographics And Growth Forecast. https://www.connectsocal.org/Documents/Draft/dConnectSoCal_Demographics-And-Growth-Forecast.pdf. Accessed July 27, 2020.

SCAG. Final 2016 RTP/SCS. http://scagrtpscs.net/Pages/FINAL2016RTPSCS.aspx. Accessed July 22, 2020.

SCAG. Regional Housing Needs Assessment (RHNA) & Housing. http://www.scag.ca.gov/programs/Pages/Housing.aspx. Accessed October 28th, 2020.

SCAQMD, “Final 2016 Air Quality Management Plan” (2017), accessed January 2019, http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2016-air-quality-management-plan/final-2016-aqmp/final2016aqmp.pdf?sfvrsn=15.

SCAQMD, "Frequently Asked CEQA Questions," Accessed June 2020, http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/frequently-asked-questions.

SCAQMD, "Rule 1113: Architectural Coatings", http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-1113.pdf.

SCAQMD, "Rule 1146.2: Emissions of Oxides of Nitrogen from Large Water Heaters and Small Boilers and Process Heaters," http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-1146.2.pdf.

SCAQMD, "Rule 1186: PM10 Emissions From Paved and Unpaved Roads, and Livestock Operations" (amended July 11, 2008), http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1186.pdf.

SCAQMD, "Rule 201: Permit to Construct" (amended December 3, 2004), http://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-201.pdf.

SCAQMD, "Rule 401: Visible Emissions, http://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book

SCAQMD, "Rule 402: Nuisance" (adopted May 7, 1976), http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule402.pdf.

SCAQMD, "Rule 403: Fugitive Dust", http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403.pdf.

SCAQMD, Air Quality Analysis Guidance Handbook, Accessed June 2020, http://www.aqmd.gov/CEQA/hdbk.html. 2010.

SCAQMD, Appendix A: Calculation Details for CalEEMod (October 2017), Accessed June 2020, http://www.aqmd.gov/docs/default-source/caleemod/02_appendix-a2016-3-2.pdf?sfvrsn=6.

SCAQMD, Final 2016 Air Quality Management Plan (2016), Accessed June 2020, http://www.aqmd.gov/home/library/clean-air-plans/air-quality-mgt-plan/final-2016-aqmp.

SCAQMD, Greenhouse Gases: CEQA Significance Thresholds, Accessed April 2020, http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/ghg-significance-thresholds.

SCAQMD, MATES V Multiple Air Toxics Exposure Study, Accessed June 2020, http://www.aqmd.gov/home/air-quality/air-quality-studies/health-studies/mates-v.

SCAQMD, Multiple Air Toxics Exposure Study (MATES-IV) in the South Coast Air Basin, May 1, 2015, Accessed June 2020, http://www.aqmd.gov/home/air-quality/air-quality-studies/health-studies/mates-iv.

SCAQMD, Permit Application Package "N", for Use in Conjunction with the Risk Assessment Procedures for Rules 1401, 1401.1, and 212, Draft Version 8.1.

SCAQMD, Permits, Emergency Generators. http://www.aqmd.gov/home/permits/emergency-generators.

SCAQMD, Regulation XIII – New Source Review. October 2016. http://www.aqmd.gov/home/permits/new-source-review,

SCAQMD, Regulation XIV – Toxics and Other Noncompliance Air Pollution. http://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book/regulation-xiv

SCAQMD, Rule 1113 Architectural Coating (amended September 6, 2013).

SCAQMD, Rule 1470 - Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines.

SCAQMD, SCAQMD's Historical Activity on Climate Change, Accessed April 2020, http://www.aqmd.gov/nav/about/initiatives/climate-change.

SCAQMD, White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution, August 2003. http://www.aqmd.gov/docs/default-source/Agendas/Environmental-Justice/cumulative-impacts-working-group/cumulative-impacts-white-paper.pdf

SCG, "Company Profile," Accessed May 2020, https://www.socalgas.com/about-us/company-profile.

See California Energy Commission, 2019 Building Energy Efficiency Standards for additional information.

Senate Bill 350 (2015–2016 Reg, Session) Stats 2015, ch. 547.

Senate Bill No. 18 (Burton), An act to amend Section 815.3 of the Civil Code, to amend Sections 65040.2, 65092, 65351, 65352, and 65560 of, and to add Sections 65352.3, 65352.4, and 65562.5 to the Government Code, relating to traditional tribal cultural places.

SoundPLAN https://www.soundplan.eu/en/

South Bay Cities Council of Governments, 2011. City of Inglewood Community Greenhouse Gas Emissions Inventory Report. http://www.southbaycities.org/sites/default/files/documents/inventories/Inglewood_Community_Inventory.pdf.

South Bay Cities Council of Governments, Supplemental Energy Climate Action Plan: City of Inglewood, 2018, accessed June 23, 2020, https://www.southbaycities.org/sites/default/files/Inglewood%20CAP.pdf.

South Coast Air Quality Management District (SCAQMD), 2016 Air Quality Management Plan, Appendix I: Health Effects (March 2017), Accessed June 2020, https://www.aqmd.gov/docs/default-

source/clean-air-plans/air-quality-management-plans/2016-air-quality-management-plan/final-2016-aqmp/appendix-i.pdf?sfvrsn=14.

South Coast Air Quality Management District, 1993. CEQA Air Quality Handbook, p. 12-1. November 1993

South Coast Air Quality Management District, 2017. CalEEMod® Users Guide Appendix D: Default Data Tables. October 2017.

South Coast Air Quality Management District, 2017. Final 2016 Air Quality Management Plan. March 2017.

South Coast Air Quality Management District, 2017. Risk Assessment Procedures for Rule 1401, 1401.1, and 212, Version 8.1, September 1, 2017.

South Coast Air Quality Management District, Air Quality Analysis Handbook, pp. 12-2, 12-3, http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook. Accessed April 16, 2019.

South Coast Air Quality Management District, CEQA Air Quality Handbook, Accessed July 6 ,2020 at: http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook

South Coast Air Quality Management District, Final 2016 Air Quality Management Plan, March 2017.

South Coast Air Quality Management District, Risk Assessment Procedures for Rule 1401, 1401.1 and 212, September 1, 2017, Accessed April 2, 2019 at: http://www.aqmd.gov/docs/default-source/permitting/rule-1401-risk-assessment/riskassessproc-v8-1.pdf?sfvrsn=12.

South Coast Air Quality Management District, SCAQMD Air Quality Significance Thresholds, March 2015, Accessed April 2, 2019 at: http://www.aqmd.gov/ceqa/hdbk.html.

Southern California Association of Governments (SCAG), Connect SoCal: 2020-2045 Regional Transportation Plan/Sustainable Communities Strategies Draft, “Chapter 1,” https://www.connectsocal.org/Pages/Connect-SoCal-Draft-Plan.aspx, Accessed on July 10, 2020.

Southern California Association of Governments, Final 2016 RTP/SCS, Accessed July 30, 2020, http://scagrtpscs.net/Pages/FINAL2016RTPSCS.aspx.

Southern California Edison, “Electric Company ESG/Sustainability Quantitative Information,” November 4, 2019, accessed July 2020, https://www.edison.com/content/dam/eix/documents/sustainability/2019-eix-esg-pilot-quantitative-section-sce.pdf.

Southern California Edison, "Newsroom Fact Sheet," April 29, 2019, accessed July 2020, https://newsroom.edison.com/internal_redirect/cms.ipressroom.com.s3.amazonaws.com/166/files/20193/SCE%20Service%20Area%20Fact%20Sheet_Ver2_04252019.pdf

Southern California Edison, 2012. 2012 Corporate Responsibility and Sustainability Report. Available: https://www1.sce.com/wps/wcm/connect/68145014-2eba-40c2-8587-6482ce056977/CRR_08202013.pdf?MOD=AJPERES&ContentCache=NONE.

Southern California Edison, 2018. ESG/Sustainability Template. Report date: September 27, 2018. Available: https://www.edison.com/content/dam/eix/documents/sustainability/eix-esg-pilot-quantitative-section-sce.pdf.

Southern California Edison, Circuit Reliability Review-Inglewood (2020), accessed July 16, 2020, https://library.sce.com/content/dam/sce-doclib/public/reliability/Inglewood.pdf

Southern California Edison, Tehachapi Renewable Transmission Project, accessed August 2020, https://www1.sce.com/nrc/trtp/PEA/4.12_Noise.htm

Southern California Edison's (SCE) 2013-2014 Local Government Partnership Strategic Plan Pilots Program https://www.sce.com/partners/partnerships

Southern California Gas Company, "Company Profile," Accessed May 2020, https://www.socalgas.com/about-us/company-profile.

Southern California Gas Company, "Los Angeles County: Gas Transmission and High Pressure Distribution Pipeline Interactive Map," accessed July 2020, https://socalgas.maps.arcgis.com/apps/webappviewer/index.html?id=c85ced1227af4c8aae9b19d677969335.

Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring & Reconstructing Historic Buildings, 2017, accessed June 2018 at https://www.nps.gov/tps/standards/treatment-guidelines-2017.pdf.

Starr, Kevin, California: A History, Modern Library, New York, 2007.

State CEQA Guidelines, sec. 15000 et seq.; sec. 15002; PRC, sec. 21002.1.

State CEQA Guidelines, Section 15064.5. Determining the Significance of Impacts to Archaeological and Historical Resources.

State CEQA Guidelines, Section 15125.

State of California, Office of Historic Preservation, California Register of Historic Places, https://ohp.parks.ca.gov/?page_id=21238.

State of California, Office of Planning and Research, Tribal Consultation Guidelines, Supplement to General Plan Guidelines, November 2005.

State Water Resources Control Board (SWRCB), Storm Water, accessed June 2020, https://www.waterboards.ca.gov/water_issues/programs/stormwater/constpermits.shtml.

Supreme Court of California, Sierra Club et al., Plaintiffs and Appellants, v. County of Fresno et al., Defendants and Respondents; FRIANT RANCH, L.P., Real Party in Interest and Respondent. S219783 Fifth Appellate District F066798 Fresno County Superior Court 11CECG00726, 11CECG00706, 11CECG00709, December 24, 20128.

SWRCB, "Drinking Water Programs," accessed June 2020, https://www.waterboards.ca.gov/drinking_water/programs/.

SWRCB, California Drinking Water-Related Laws, accessed June 2020, https://www.waterboards.ca.gov/drinking_water/certlic/drinkingwater/Lawbook.html.

SWRCB, California Statutes Making Conservation a California Way of Life, accessed June 2020, https://www.waterboards.ca.gov/water_issues/programs/conservation_portal/california_statutes.html.

SWRCB, Governor's Conservation Executive Orders and Proclamations, accessed June 2020, https://www.waterboards.ca.gov/water_issues/programs/conservation_portal/executive_orders.html.

SWRCB, Low Impact Development – Sustainable Storm Water Management, accessed June 2020, https://www.waterboards.ca.gov/water_issues/programs/low_impact_development/.

SWRCB, Recycled Water Policy, accessed June 2020, https://www.waterboards.ca.gov/water_issues/programs/water_recycling_policy/.

SWRCB, SB X7-7, accessed June 2020, https://water.ca.gov/Programs/Water-Use-And-Efficiency/SB-X7-7.

SWRCB, Standard Urban Storm Water Mitigation Plan (SUSMP), accessed June 2020, https://www.waterboards.ca.gov/losangeles/water_issues/programs/stormwater/susmp/susmp_details.shtml.

SWRCB, Storm Water, accessed June 2020, https://www.waterboards.ca.gov/water_issues/programs/stormwater/constpermits.shtml.

SWRCB, Storm Water-Municipal Permits, accessed June 2020, https://www.waterboards.ca.gov/losangeles/water_issues/programs/stormwater/municipal/.

SWRCB, Waste Discharge Requirements Program, accessed June 2020, https://www.waterboards.ca.gov/water_issues/programs/waste_discharge_requirements/.

The California Gas and Electric Utilities, 2018 California Gas Report, "Gas Demand," 36.

Title 13 CCR, Section 2485, accessed July 30, 2020, https://ww2.arb.ca.gov/sites/default/files/classic//msprog/truck-idling/13ccr2485_09022016.pdf.

Title 40 CFR Part 51, Revision to the Guideline on Air Quality Models: Adoption of a Preferred General Purpose (Flat and Complex Terrain) Dispersion Model and Other Revisions; Final Rule, Accessed July 6, 2020 at: http://www.epa.gov/ttn/scram/guidance/guide/appw_05.pdf.

Title 40, Chapter 1, Subchapter R, Part 761

TreePeople, Inglewood and Lennox Greening Plan, December 2016.

U.S. Census, QuickFacts, Inglewood City, California, https://www.census.gov/quickfacts/fact/table/inglewoodcitycalifornia/RHI125219. Accessed September 24, 2020.

U.S. Department of the Interior, National Park Service (NPS), Nation Register of Historic Places. https://www.nps.gov/subjects/nationalregister/what-is-the-national-register.htm

U.S. Department of Transportation, "EPA, DOT and California Align Timeframe for Next Generation of Clean Cars," April 18, 2012, available at https://www.transportation.gov/briefing-room/epa-dot-and-california-align-timeframe-proposing-standards-next-generation-clean-cars, accessed August 7, 2018.

U.S. Department of Transportation, Office of Planning and Environment, Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, September 2018, accessed July 2020, https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf

U.S. EIA, Annual Energy Outlook 2020, "Table 11. Petroleum and Other Liquids Supply and Disposition," Accessed May 2020, https://www.eia.gov/outlooks/aeo/data/browser/#/?id=11-AEO2020&cases=ref2020&sourcekey=0.

U.S. EIA, Frequently Asked Questions, "How much electricity does an American home use?" Accessed September 2020, https://www.eia.gov/tools/faqs/faq.php?id=97&t=3.

U.S. EIA, Independent Statistics & Analysis, "Table F16: Total Petroleum Consumption Estimates," 2018, Accessed May 2020, https://www.eia.gov/state/seds/data.php?incfile=/state/seds/sep_fuel/html/fuel_use_pa.html&sid=US.

U.S. Energy Information Administration (EIA), "Frequently Asked Questions," Accessed May 2020, https://www.eia.gov/tools/faqs/faq.php?id=40&t=6.

U.S. Energy Information Administration, Annual Energy Outlook 2020: Table 11. Petroleum and Other Liquids Supply and Disposition, Accessed July 2020, https://www.eia.gov/outlooks/aeo/data/browser/#/?id=11-AEO2020&cases=ref2020&sourcekey=0.

U.S. Environmental Protection Agency (USEPA), Regulations for Emissions from Vehicles and Engines, "Final Rule for Model Year 2017 and Later Light-Duty Vehicle Greenhouse Gas Emissions and Corporate Average Fuel Economy Standards," October 15, 2012, https://www.gpo.gov/fdsys/pkg/FR-2012-10-15/pdf/2012-21972.pdf, accessed July 25, 2018.

U.S. Fish and Wildlife Service (USFWS), Migratory Bird Treaty Act of 1918 (16 U.S.C. 703-712; Ch. 128; July 3, 1918; 40 Stat. 755) as amended by: Chapter 634; June 20, 1936; 49 Stat. 1556; P.L. 86-732; September 8, 1960; 74 Stat. 866; P.L. 90-578; October 17, 1968; 82 Stat. 1118; P.L. 91-135; December 5, 1969; 83 Stat. 282; P.L. 93-300; June 1, 1974; 88 Stat. 190; P.L. 95-616; November 8, 1978; 92 Stat. 3111; P.L. 99-645; November 10, 1986; 100 Stat. 3590 and P.L. 105-312; October 30, 1998; 112 Stat. 2956

U.S. General Services Administration, "NHPA Section 106 Tribal Consultation," accessed March 2019, https://www.gsa.gov/resources-for/native-american-tribes/nhpa-section-106-tribal-consultation

U.S. General Services Administration, Section 106, 16 U.S.C. 470f) accessed June 2020, https://www.nps.gov/history/local-law/nhpa1966.htm.

U.S. Green Building Council, LEED Rating System, Accessed July 30, 2020, https://www.usgbc.org/leed.

United Sate Code (USC), Title 16, Sections 1531-1544, Endangered Species Act.

United States Environmental Protection Agency (USEPA), Endangerment and Cause or Contribute Findings for Greenhouse Gases under the Section 202(a) of the Clean Air Act, Accessed April 2020, https://www.epa.gov/ghgemissions/endangerment-and-cause-or-contribute-findings-greenhouse-gases-under-section-202a-clean/.

United States Environmental Protection Agency Preferred/Recommended Models, AERMOD Modeling System, Accessed July 6, 2020 at: https://www.epa.gov/scram/air-quality-dispersion-modeling-preferred-and-recommended-models#aermod.

United States Environmental Protection Agency, Endangerment and Cause or Contribute Findings for Greenhouse Gases under the Section 202(a) of the Clean Air Act, accessed June 2020, https://www.epa.gov/ghgemissions/endangerment-and-cause-or-contribute-findings-greenhouse-gases-under-section-202a-clean.

United States Environmental Protection Agency, Greenhouse Gas Reporting Program (GHGRP), accessed June 2020, https://www.epa.gov/ghgreporting/additional-information-2009-proposed-rule.

United States Environmental Protection Agency, Inventory of U.S. Greenhouse Gas Emissions and Sinks, Accessed July 6, 2020 at https://www.epa.gov/ghgemissions/inventory-us-greenhouse-gas-emissions-and-sinks.

United States Environmental Protection Agency, Protective Noise Levels, 1978, p.11

Urban Water Management Planning Act, Water Code Section 10610-10610.4.

US Code, Title 54, Section 300101 et seq., National Historic Preservation Act of 1966, Sections 106 and 110.

US Department of Energy, "Laying the Foundation for Solar America: The Million Solar Roofs Initiative" (October 2016), https://www.nrel.gov/docs/fy07osti/40483.pdf

US Department of Transportation Federal Highway Administration, 2016. Updated Interim Guidance on Mobile Source Air Toxic Analysis in NEPA Documents. October 18, 2016.

US Department of Transportation, Federal Transit Administration (USDOT, FTA), Transit Noise and Vibration Impact Assessment, FTA report no. 0123 (September 2018), accessed December 2018, https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf.

US Environmental Protection Agency, 1974. Information on Levels of Environmental Noise Requisite to Protect Public Health and Welfare with an Adequate Margin of Safety. March 1974. p. 34.

US Environmental Protection Agency, 2016. Federal Register/Vol. 81, No. 206/Tuesday, Greenhouse Gas Emissions and Fuel Efficiency Standards for Medium- and Heavy-Duty Engines and Vehicles—Phase 2. October 25, 2016.

US Environmental Protection Agency, Air Toxics Risk Assessment Reference Library, Volume 1 Technical Resource Manual. April 2004.

US Environmental Protection Agency, Carbon Monoxide (CO) Pollution in Outdoor Air, https://www.epa.gov/co-pollution/basic-information-about-carbon-monoxide-co-outdoor-air-pollution, last updated September 8, 2016.

US Environmental Protection Agency, Hazardous Air Pollutants, https://www.epa.gov/haps

US Environmental Protection Agency, Health Effects of Ozone Pollution, https://www.epa.gov/ground-level-ozone-pollution/health-effects-ozone-pollution, last updated October 10, 2018.

US Environmental Protection Agency, Sulfur Dioxide (SO2) Pollution, https://www.epa.gov/so2-pollution/sulfur-dioxide-basics, last updated June 28, 2018.

US Fish and Wildlife Service (USFWS), National Wetlands Inventory, "National Wetlands Mapper," accessed July 2020, https://www.fws.gov/wetlands/data/mapper.html.

US Fish and Wildlife Service, National Wild and Scenic Rivers System, available at https://www.rivers.gov/, accessed August 31, 2018.

USC Title 16, Section 1533. [ESA Section 4] Determination of endangered species and threatened species.

USC Title 16, Section 1538. [ESA Section 9] Prohibited acts.

USC Title 16, Section 1539. [ESA Section 10] Exceptions.

USDOT, FTA, Transit Noise and Vibration Impact Assessment.

USEPA, Clean Air Act Title I - Air Pollution Prevention and Control, Parts A through D.

USEPA, National Pollutant Discharge Elimination System (NPDES), accessed June 2020, https://www.epa.gov/npdes.

USEPA, Regulations for Emissions from Vehicles and Engines, "Final Rule for Greenhouse Gas Emissions and Fuel Efficiency Standards for Medium- and Heavy-Duty Engines and Vehicles - Phase 2," October 25, 2016, https://www.gpo.gov/fdsys/pkg/FR-2016-10-25/pdf/2016-21203.pdf, accessed July 25, 2018.

USEPA, Resource Conservation and Recovery Act (RCRA) Laws and Regulations, accessed June 2020, https://www.epa.gov/rcra.

USEPA, Safe Drinking Water Act (SDWA), accessed June 2020, https://www.epa.gov/sdwa.

USEPA, Summary of the Clean Water Act, accessed June 2020, https://www.epa.gov/laws-regulations/summary-clean-water-act.

Vender Specifications for Standby Generator, Accessed August 25, 2020 at: https://www.cat.com/en_US/products/new/power-systems/electric-power.html

Wallace, W. J., A Suggested Chronology for Southern California Coastal Archaeology, Southwestern Journal of Anthropology 11(3):214-230, 1955.

Warren, C. N., Cultural Traditions and Ecological Adaptation on the Southern California Coast, Archaic Prehistory in the Western United States, edited by Cynthia Irwin-Williams, Eastern New Mexico University Contributions in Anthropology 1(3):1-14, 1968.

WBMWD, "About Us," accessed June 2020, http://www.westbasin.org/about-us.

WBMWD, "Reports & Plans," accessed June 2020, http://www.westbasin.org/policy-planning/reports-plans.

WBMWD, 2015 Urban Water Management Plan, June 2016.

WBMWD, Water Use Report: Fiscal Year 2016–2017, November 9, 2017.

West Basin Municipal Water District (WBMWD), 2015 Urban Water Management Plan, June 2016.

Westerling, Anthony LeRoy. (2018). Wildfire Simulations for the Fourth California Climate Assessment: Projecting Changes in Extreme Wildfire Events with a Warming Climate. California's Fourth Climate Change Assessment, California Energy Commission. Publication number: CCCA4-CEC-2018-014.

Western Regional Climate Center, "Cooperative Climatological Data Summaries," https://wrcc.dri.edu/cgi-bin/cliMAIN.pl?ca8973. Accessed July 2020.

White Paper on Regulatory Options for Addressing Cumulative Impacts from Air Pollution Emissions, SCAQMD Board Meeting, September 5, 2003, Agenda No. 29, Appendix D, p. D-3.

Yerkes, R. F., T. H. McCulloh, J. E. Schollhamer, and J. G. Vedder, Geology of the Los Angeles Basin – an introduction, Geological Survey Professional Paper 420-A, 1965.