4200 CENTURY PROJECT

INITIAL STUDY/ MITIGATED NEGATIVE DECLARATION

Prepared for

CITY OF INGLEWOOD
Development Services Department
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Inglewood, CA 90301

Prepared by

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October 2024

INITIAL STUDY

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INITIAL STUDY

1 INTRODUCTION

This Initial Study (IS) document evaluates potential environmental effects resulting from the construction and operation of the proposed 4200 Century project (Project) pursuant to the requirements of the California Environmental Quality Act (CEQA). Therefore, this document has been prepared in compliance with the relevant provisions of CEQA and the State CEQA Guidelines as implemented by the City of Inglewood (City). Based on the analysis provided within this IS, the City has concluded that the Project would not result in significant impacts on the environment. This Initial Study and Mitigated Negative Declaration (IS/MND) is intended as an informational document and is ultimately required to be adopted by the decision maker prior to Project approval by the City.

1.1 PURPOSE OF AN INITIAL STUDY

CEQA was enacted in 1970 with several basic purposes: (1) to inform government decision-makers and the public about the potentially significant environmental effects of proposed projects; (2) to identify ways that environmental damage can be avoided or significantly reduced; (3) to prevent significant, avoidable damage to the environment by requiring changes in projects through the use of mitigation measures or feasible alternatives[1]; and (4) to disclose to the public the reasons behind a project's approval even if significant environmental effects are anticipated.

An application for the Project has been submitted to the City's Planning Division for discretionary review. The City, as the Lead Agency, has determined that the Project is subject to CEQA, and the preparation of an IS/MND is required.

An Initial Study is a preliminary analysis conducted by the Lead Agency, in consultation with other agencies (responsible or trustee agencies, as applicable), to determine whether there is substantial evidence that a project may have a significant effect on the environment. If the Initial Study concludes that the Project, with mitigation, may have a potentially significant effect on the environment, an Environmental Impact Report (EIR) should be prepared; otherwise, the Lead Agency may adopt a Negative Declaration or a Mitigated Negative Declaration.

This IS/MND has been prepared in accordance with CEQA (Public Resources Code §21000 et seq.) and the State CEQA Guidelines (Title 14, California Code of Regulations, §15000 et seq.).

1 *Project Alternatives are only required in an EIR.*

1.2 ORGANIZATION OF THE IS/MND

This IS/MND is organized into five sections as follows:

1 INTRODUCTION

Describes the purpose and content of the Initial Study and provides an overview of the CEQA process.

2 EXECUTIVE SUMMARY

Provides Project information, identifies environmental issues addressed in the Initial Study, and includes a determination of whether the Project may have a significant effect on the environment.

3 PROJECT DESCRIPTION

Provides a description of the environmental setting and the Project, including Project characteristics and a list of discretionary actions.

4 EVALUATION OF ENVIRONMENTAL IMPACTS

Contains the completed IS Checklist and a discussion of the environmental issues that would be potentially affected by the Project and related projects (i.e., cumulative development). The cumulative impact analysis conducted for the Transportation environmental topic uses the full related projects list included in the Inglewood Basketball and Entertainment Center (IBEC) EIR certified July 2020 (State Clearinghouse Number 018021056) (see Table 3.0-2 from the IBEC Draft EIR), as well as a supplemental list of 37 additional development projects proposed after the preparation of the IBEC Draft EIR, for purposes of a conservative transportation analysis, notwithstanding the fact that many of the related projects have already been constructed and are operational, as well as the fact that many projects are located a significant distance from the Project. The cumulative analysis conducted for the remaining environmental topics is based on proposed or pending development in the City identified by both the IBEC EIR related projects list and supplemental related projects list that have not yet been constructed and that are located within a one-half-mile radius of the Project Site. These 6 related projects are outlined in Table 1-1. The location of the 6 related projects is shown on Figure 1-1.

5 PREPARERS AND PERSONS CONSULTED

Identifies the Lead Agency, Project Applicant, and others involved in the preparation of the IS/MND.

Table 1-1
List of Related Projects

No.	Address	Land Use	Size
1	1050 S. Prairie Avenue	Apartments Retail Office Hotel	2,186 units 371,923 sf 3,567,314 sf 300 rooms
2	316 Hardy Street	Condominiums	5 units
3	616-620 E. 99th Street	Affordable Housing	20 units
4	4049-4055 W. Century Boulevard	Hotel	142 rooms
5	3846 W. Century Boulevard	Self-Storage	335,246 sf
6	3820 W. 102nd Street	Hotel	300 rooms

sf = square feet

Source: City of Inglewood, 2024.

Legend

Related Projects*

City of Inglewood

1) 1050 S. Prairie Avenue
2) 316 Hardy Street
3) 616-620 E. 99th Street
4) 4049-4055 W. Century Boulevard
5) 3846 W. Century Boulevard
6) 3820 W. 102nd Street

Project Site

*Details regarding the related projects are included in Table 1-1 in Section 1 (Introduction).

Figure 1-1
Related Projects Radius Map

Source: Google Maps 2024.

INITIAL STUDY

2 EXECUTIVE SUMMARY

PROJECT TITLE	4200 CENTURY

PROJECT LOCATION	4200 W. CENTURY BOULEVARD & 4229-4233 W. 101ST STREET INGLEWOOD, CA 90304
GENERAL PLAN DESIGNATION	INDUSTRIAL
ZONING	C-2A (AIRPORT COMMERCIAL)

LEAD AGENCY	CITY OF INGLEWOOD
STAFF CONTACT	CHRISTINE RIVERA, PLANNER
ADDRESS	1 WEST MANCHESTER BOULEVARD, 4TH FLOOR INGLEWOOD, CA 90301
PHONE NUMBER	310-412-5230
EMAIL	CRIVERA@CITYOFINGLEWOOD.ORG

APPLICANT	4200 QOF LLC
ADDRESS	4200 WEST CENTURY BOULEVARD INGLEWOOD, CA 90304
PHONE NUMBER	(212) 444-2654

PROJECT DESCRIPTION SUMMARY

The Project includes the demolition and removal of all existing uses from the Project Site and the development of the site with a 333,500-square-foot mixed-use building. The building would be 13 stories over one level of subterranean parking, reaching a maximum height of 150 feet. The building would include 11 residential condominium units on levels 9-12; 118 "serviced apartment" extended stay hotel rooms located on levels 7-12; 175 hotel rooms on levels 3-6; and event space and hotel lobby and hotel-associated bar and restaurant on levels 1-2. The Project would incorporate on-site open space and recreational amenities for Project guests and occupants, including courtyards, sky decks, and swimming and exercise facilities. The Project includes the removal of the 59 existing trees located on or near the Project Site and replacing these trees in accordance with the City's tree replacement requirements outlined in Section 12-116 of the Inglewood Municipal Code (IMC). The Project would include a total of 915 vehicle parking spaces in one subterranean level, one at-grade level, and six above-ground levels, in conformance with the Project's proposed Planned Assembly Development (PAD) zoning regulations. Bicycle parking would be included as part of the Project in accordance with IMC Section 12-42.1 and the standards of the Project's proposed PAD zoning regulations. The Project proposes to include digital displays that would be located on 4200 W. Century Boulevard. The displays would include three primary components: the east façade with a curved 3,548-square-foot digital display; the north façade with 16 double-sided (fins) (243 square feet of digital display at each face of the fins); and the west façade with a 3,848-square-foot digital display. The Project's construction phase would occur over an estimated 26-month period. The Project would require the export of approximately 112,813 cubic yards of soil. The Project will require City approval of the following discretionary entitlements: 1) General Plan Amendment to change Project Site's land use designation from Industrial to Commercial Residential; 2) Zoning Code Amendment regarding extended-stay hotel use; 3) Approval of a Planned Assembly Development and a Special Use Permit for the Project Site; 4) Tract Map and Condominium Plan; 5) Site Plan Review; 6) Sign Agreement to allow Project's proposed digital signage; and 7) Tree Removal Permit.

(For additional detail, see "Section 3 PROJECT DESCRIPTION.")

ENVIRONMENTAL SETTING

The 1.98-acre (86,429 square feet) Project Site is located at 4200 W. Century Boulevard and 4229-4233 W. 101st Street in the City of Inglewood (City). The Project Site comprises Assessor Parcel Numbers 4034-002-001, -002, and -004. The Project Site is bounded by W. Century Boulevard on the north, W. 101st Street on the south, a motel on the west, and S. Freeman Avenue on the east. Regional access to the Project Site is provided via Interstate 405 located approximately 1.0 miles to the west and Interstate 105 located approximately 0.75 miles to the south. The Project Site is located within the boundaries of a High Quality Transit Area (HQTA), which is defined by the Southern California Association of Governments (SCAG) as an area within one-half-mile of a well-serviced transit stop or a high-quality transit corridor (HQTC) with 15-minute or less service frequency during peak commute hours. Hawthorne Boulevard, located less than 0.25 miles to the west of the Project Site, meets the definition of an HQTC. The Project Site is currently developed with a 137-room hotel and associated surface vehicle parking. A total of 59 trees are located on or near the Project Site and could be affected by the Project. Due to size, all of these trees are considered "protected trees" as defined by the City.

The General Plan land use designation for the Project Site is Industrial. The existing zoning for the site is C-2A, Airport Commercial. The Project Site is located along the Century Boulevard corridor, which is developed with various retail/commercial, hotel/motel, residential, and entertainment uses (i.e., the SoFi Stadium and the Intuit Dome [formerly the IBEC project]), and is approximately 1.75 miles from the Los Angeles International Airport (LAX) and 1.5 miles from Hawthorne Municipal Airport (HHR). Land uses to the north and south of Century Boulevard are largely multi- and single-family residential.

(For additional detail, see “Section 3 PROJECT DESCRIPTION.”)

OTHER PUBLIC AGENCIES WHOSE APPROVAL IS REQUIRED
(e.g. permits, financing approval, or participation agreement)

- Los Angeles County Airport Land Use Commission due to the Project’s proximity to the Airport Influence Area of LAX

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

- ☐ Aesthetics
- ☐ Agriculture & Forestry Resources
- ☐ Air Quality
- ☐ Biological Resources
- ☐ Cultural Resources
- ☐ Energy
- ☐ Geology / Soils
- ☐ Greenhouse Gas Emissions
- ☐ Hazards & Hazardous Materials
- ☐ Hydrology / Water Quality
- ☐ Land Use / Planning
- ☐ Mineral Resources
- ☐ Noise
- ☐ Population / Housing
- ☐ Public Services
- ☐ Recreation
- ☐ Transportation
- ☐ Tribal Cultural Resources
- ☐ Utilities / Service Systems
- ☐ Wildfire
- ☐ Mandatory Findings of Significance

DETERMINATION

(To be completed by the Lead Agency)

On the basis of this initial evaluation:

☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☒ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions on the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

PRINTED NAME	**TITLE**
SIGNATURE	**DATE**

EVALUATION OF ENVIRONMENTAL IMPACTS

1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of a mitigation measure has reduced an effect from "Potentially Significant Impact" to "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analysis," as described in (5) below, may be cross-referenced).

5) Earlier analysis must be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR, or negative declaration. Section 15063 (c)(3)(D). In this case, a brief discussion should identify the following:

    a) Earlier Analysis Used. Identify and state where they are available for review.

    b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.

    c) Mitigation Measures. For effects that are "Less Than Significant With Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

7) Supporting Information Sources: A sources list should be attached, and other sources used or individuals contacted should be cited in the discussion.

8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whichever format is selected.

9) The explanation of each issue should identify:

    a) The significance criteria or threshold, if any, used to evaluate each question; and

    b) The mitigation measure identified, if any, to reduce the impact to less than significance.

INITIAL STUDY

3 PROJECT DESCRIPTION

3.1 ENVIRONMENTAL SETTING

3.1.1 Project Location

The 1.98-acre (86,429 square feet) Project Site is located at 4200 W. Century Boulevard and 4229-4233 W. 101st Street in the City of Inglewood (City). The Project Site comprises Assessor Parcel Numbers 4034-002-001, -002, and -004. The Project Site is bounded by W. Century Boulevard on the north, W. 101st Street on the south, a motel on the west, and S. Freeman Avenue on the east. Regional access to the Project Site is provided via Interstate 405 located approximately 1.0 miles to the west and Interstate 105 located approximately 0.75 miles to the south. The Project Site location is shown in Figures 3-1 and 3-2.

The Project Site is located within the boundaries of a High Quality Transit Area (HQTA), which is defined by the Southern California Association of Governments (SCAG) as an area within one-half-mile of a well-serviced transit stop or a high-quality transit corridor (HQTC) with 15-minute or less service frequency during peak commute hours. Hawthorne Boulevard, located less than 0.25 miles to the west of the Project Site, meets the definition of an HQTC.

3.1.2 Existing Conditions

The Project Site is currently developed with a 137-room hotel and associated surface vehicle parking. As listed below, a total of 59 trees are located on or near the Project Site and could be affected by the Project.[1] Due to size, all of these trees are considered "protected trees" as defined by the City.[2]

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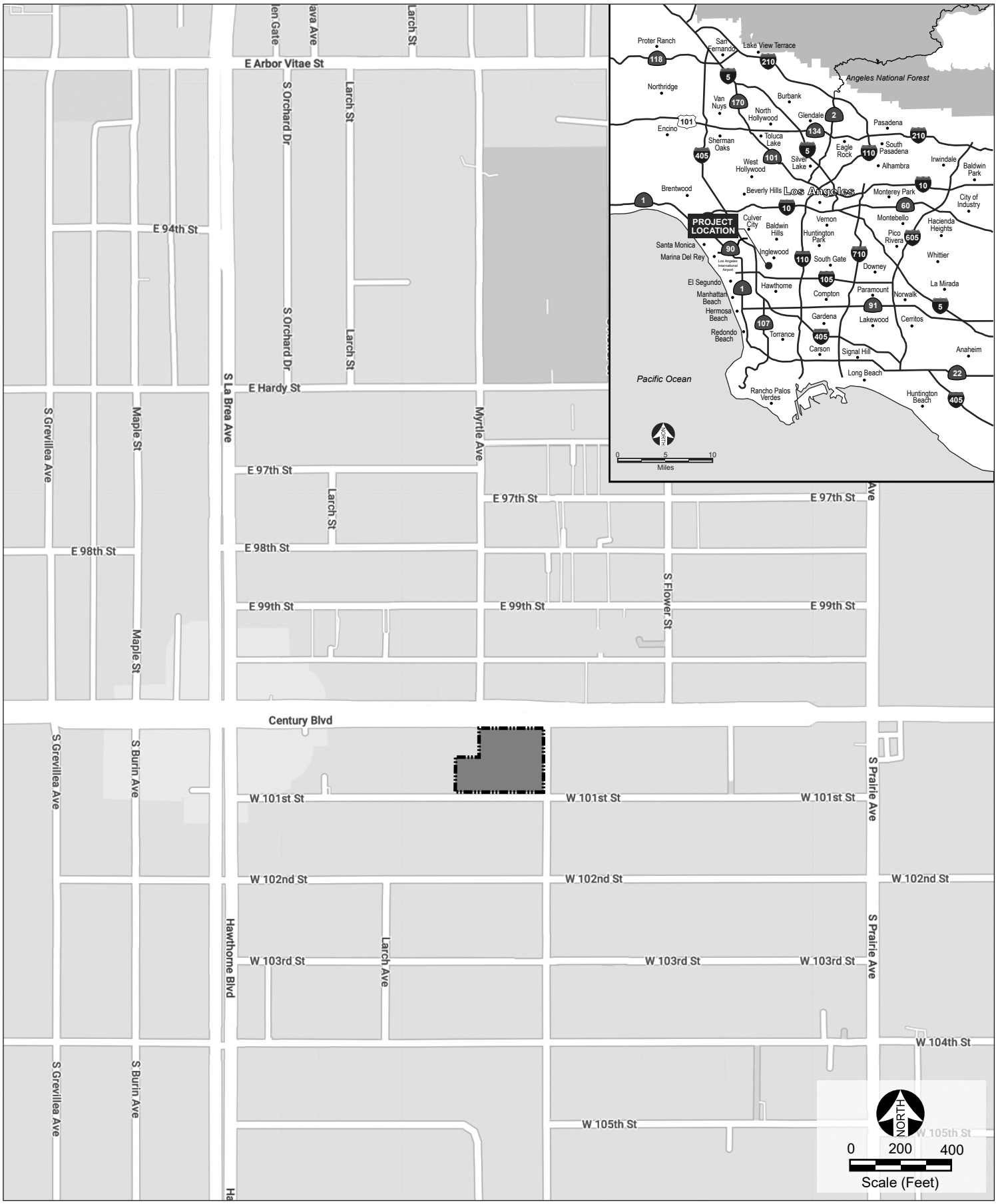
1 *City of Inglewood Tree Inventory Report, Carlberg Associates, February 13, 2022. Refer to Appendix A.*

2 *The Inglewood Municipal Code (IMC) defines a "protected tree" as follows: (A) Trees having a minimum trunk diameter of eight inches measured 54inches above the ground. When measuring a multi-trunk 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: 1. Big Leaf Maple (Acer macrophyllum); 2. California Buckeye (Aesculus californica); 3. Madrone (Arbutus menziesii); 4. Western Dogwood (Cornus nuttallii); 5. California Sycamore (Platanus racemosa); 6. Coast Live Oak (Quercus agrifolia); 7. Canyon Live Oak (Quercus chrysolepis); 8. Blue Oak (Quercus douglassii); 9. Oregon White Oak (Quercus garryana); 10. California Black Oak (Quercus kelloggii); 11. Valley Oak (Quercus lobate); 12. Interior Live Oak (Quercus wislizenii); 13. California Bay(Umbellularia californica); and (E) A tree or trees of any size planted as a replacement for a protected tree. (IMC Section 12-113.)*



Legend

Project Site

Source: Google Maps 2022.

Figure 3-1
Regional Location Map

Legend

Project Site

Source: Google Maps 2022.

Figure 3-2
Aerial of the Project Site

On-site Trees

- Mexican fan palm (19 trees)
- Spanish dagger (2 trees)
- Fern pine (1 tree)
- Indian laurel fig (1 tree)
- King palm (9 trees)
- Weeping fig (2 trees)
- Umbrella tree (2 trees)
- Corkscrew willow (1 tree)
- Paper mulberry (2 trees)
- Mimosa (1 tree)
- Jacaranda (4 trees)
- Canary Island pine (2 trees)
- Pygmy date palm (1 tree)
- White mulberry (2 trees)
- Common guava (1 tree)
- Brush cherry (2 trees)

Right-of-Way Trees

- Mexican fan palm (7 trees)

3.2.3 Land Use and Zoning Designation

The General Plan land use designation for the Project Site is Industrial. The existing zoning for the site is C-2A, Airport Commercial.

3.2.4 Surrounding Land Uses

The Project Site is located along the Century Boulevard corridor, which is developed with various retail/commercial, hotel/motel, residential, and entertainment uses (i.e., SoFi Stadium and Intuit Dome (formerly known as IBEC), and is located approximately 1.75 miles east of the Los Angeles International Airport (LAX) and 1.5 miles northwest of the Hawthorne Municipal Airport (HHR). Land uses to the north and south of Century Boulevard are largely multi- and single-family residential.

3.2 DESCRIPTION OF PROJECT

3.2.1 Project Overview

The Project includes the demolition and removal of all existing uses from the Project Site and the development of the site with a 333,500-square-foot mixed-use building. The building would be 13 stories over one level of subterranean parking, reaching a maximum height of 150 feet, and would reflect a contemporary architectural style. The building would include 11 residential condominium units on levels 9-12; 118 “serviced apartment”

extended stay hotel rooms located on levels 7-12[3]; 175 hotel rooms on levels 3-6; and approximately 54,700 square feet of event/entertainment space, hotel lobby/lounge, and hotel-associated bar and restaurant on levels 1-2. A breakdown of the uses is included in Table 3-1.

Table 3-1
Proposed Uses

Use	Size
Apartments	118 units
Condominiums	11 units
Hotel	175 rooms
Lobby/Lounge[a]	3,600 sf
Main Event Space[a]	7,730 sf
Food Hall[b]	9,000 sf
Café[b]	1,330 sf
Bowling[a]	9,300 sf
Retail	800 sf
2nd Floor Lounge/Bar[c]	6,220 sf
Virtual Sports Suites[c]	4,370 sf
Back of House/Service Areas	12,350 sf

sf = square feet

[a] *The Project's lobby/lounge, event space, and bowling uses are analyzed as 20,360 sf of event/entertainment uses for trip generation and utility demand purposes in this document.*

[b] *The Project's food hall and café uses are analyzed as 10,330 sf of restaurant uses for trip generation and utility demand purposes in this document.*

[c] *The Project's lounge/bar and sports suites uses are analyzed as 10,590 sf of bar uses for trip generation and utility demand purposes in this document.*

Project plans are shown in Figures 3-3 through 3-21. As depicted by the plans, the Project's design reflects contrasting vertical and horizontal elements, articulated façades, and integrated signage components resulting in a visually diverse but cohesive architectural presentation. Active ground-level uses would include a food hall and hotel lobby and amenity areas that would enliven the adjacent streetscape and surrounding area. Assembly and recreational uses, including an event hall, bowling alley, and virtual sports suites would be located internal to the building at its lower levels.

[3] *The Project's proposed "serviced apartment"/extended stay hotel guest room units would be leased on a long-term basis by tenants, but would not be their primary place of residence. Instead, these units would be occupied intermittently by tenants in connection with their attendance of various regional sports and entertainment events for which the City has become well known. Accordingly, these units would result in fewer impacts compared to traditional apartment units (e.g., utility demands would be reduced due to intermittent occupancy, VMT and daily trips would be reduced due to the short and intermittent travel distances incurred by tenants between LAX, the Project, and various sports and entertainment venues in the City, etc.). Notwithstanding, this MND analyzes the proposed serviced apartment/extended stay hotel guest room units as traditional apartment units for conservative analysis purposes.*

PROGRAM & MASSING

CONDO
23,200 sqft GFA (6.96%)
3 TYPICAL FLOORS
11 UNITS

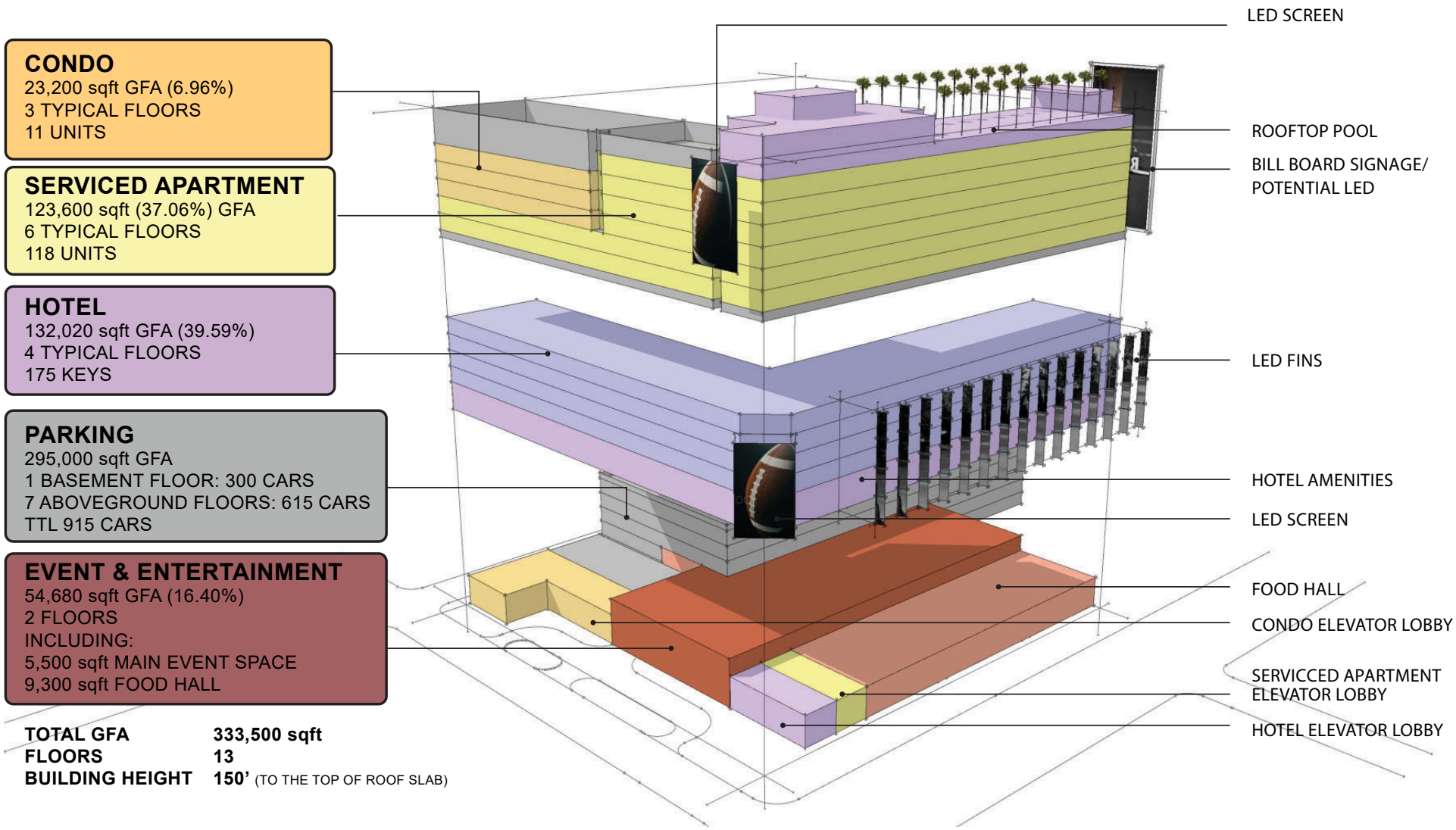
SERVICED APARTMENT
123,600 sqft (37.06%) GFA
6 TYPICAL FLOORS
118 UNITS

HOTEL
132,020 sqft GFA (39.59%)
4 TYPICAL FLOORS
175 KEYS

PARKING
295,000 sqft GFA
1 BASEMENT FLOOR: 300 CARS
7 ABOVEGROUND FLOORS: 615 CARS
TTL 915 CARS

EVENT & ENTERTAINMENT
54,680 sqft GFA (16.40%)
2 FLOORS
INCLUDING:
5,500 sqft MAIN EVENT SPACE
9,300 sqft FOOD HALL

TOTAL GFA	**333,500 sqft**
FLOORS	**13**
BUILDING HEIGHT	**150'** (TO THE TOP OF ROOF SLAB)



Source: CRTKL, 2022.

Figure 3-3
Project Program and Massing

Source: CRTKL, 2022.

Figure 3-4
View from Sidewalk

Source: CRTKL, 2022.

Figure 3-5
East View

Source: CRTKL, 2022.

Figure 3-6
Northeast View

Source: CRTKL, 2022.

Figure 3-7
North View

Source: CRTKL, 2022.

Figure 3-8
West View

Source: CRTKL, 2022.

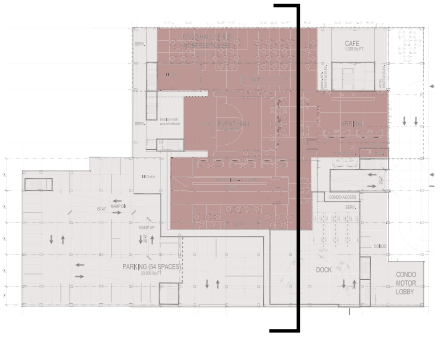
Figure 3-9
Southeast Corner on Freeman Avenue

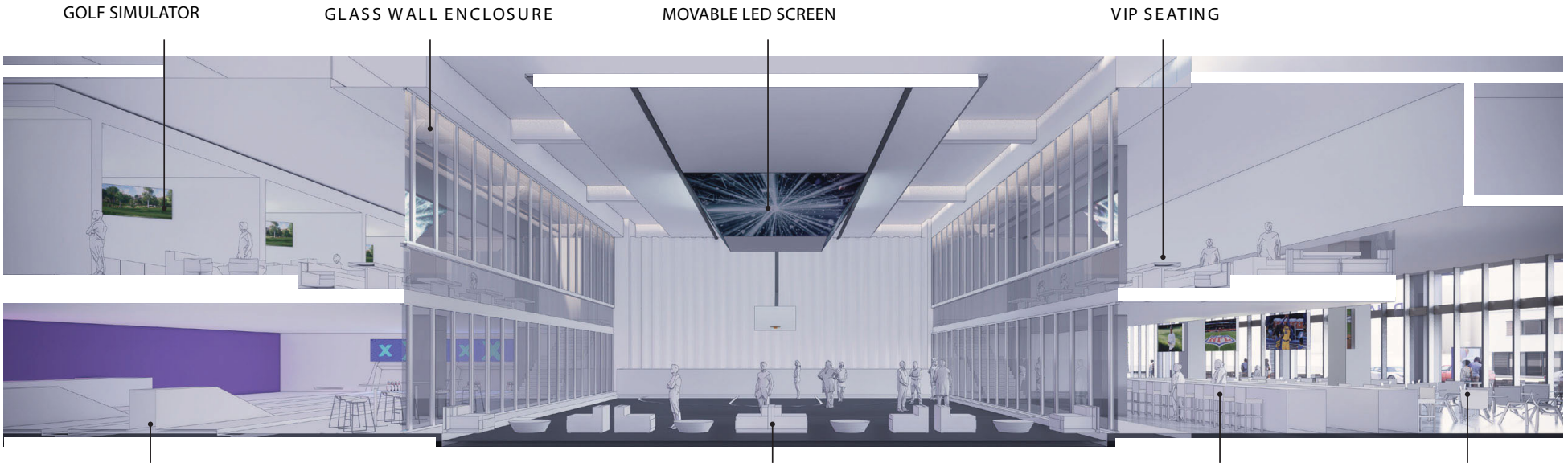
Source: CRTKL, 2022.

Figure 3-10
Rooftop Aerial View

Source: CRTKL, 2022.

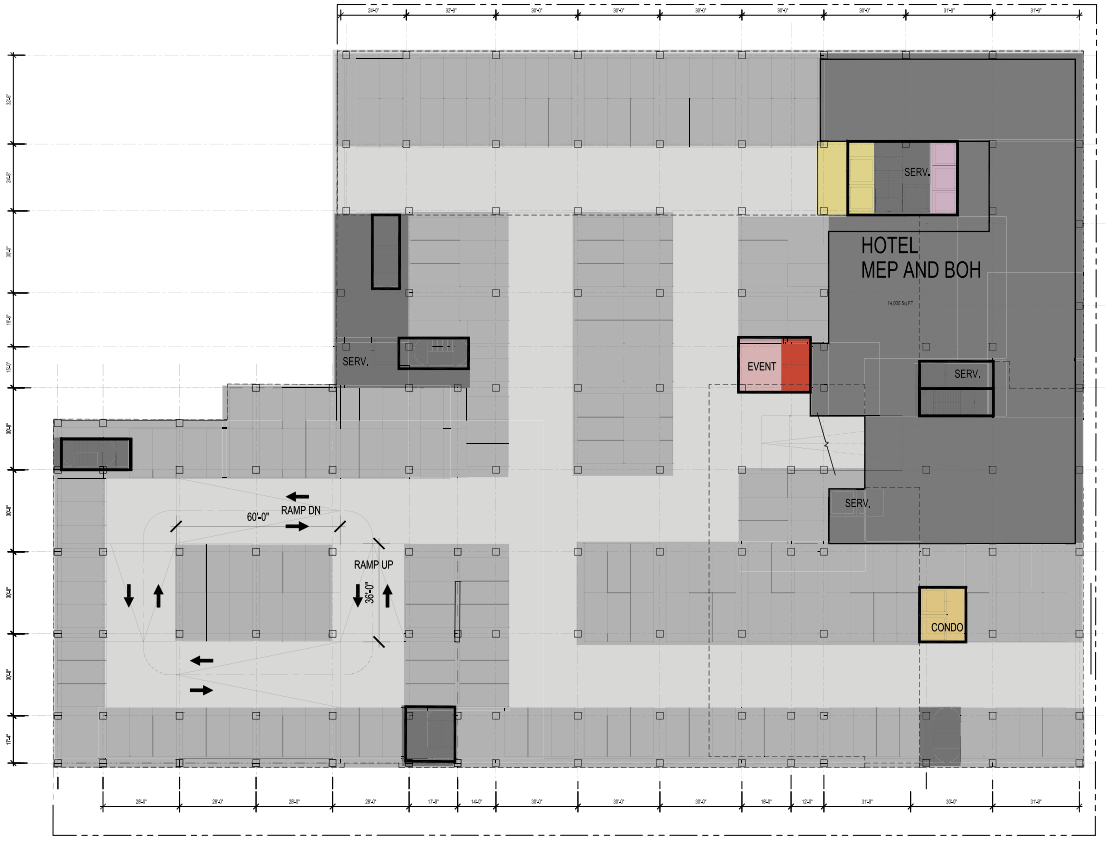
Figure 3-11
Rooftop Pool View





Source: CRTKL, 2022.

Figure 3-12
Podium Section



BASEMENT LEVEL B1 (300 SPACES)
PARKING, MEP AND BOH

RETAIL/ENTERTAINMENT F&B EVENT/MULTI-FUNCTIONAL APARTMENT CONDO HOTEL SERVICE/BOH/MEP PARKING OUTDOOR/GREEN

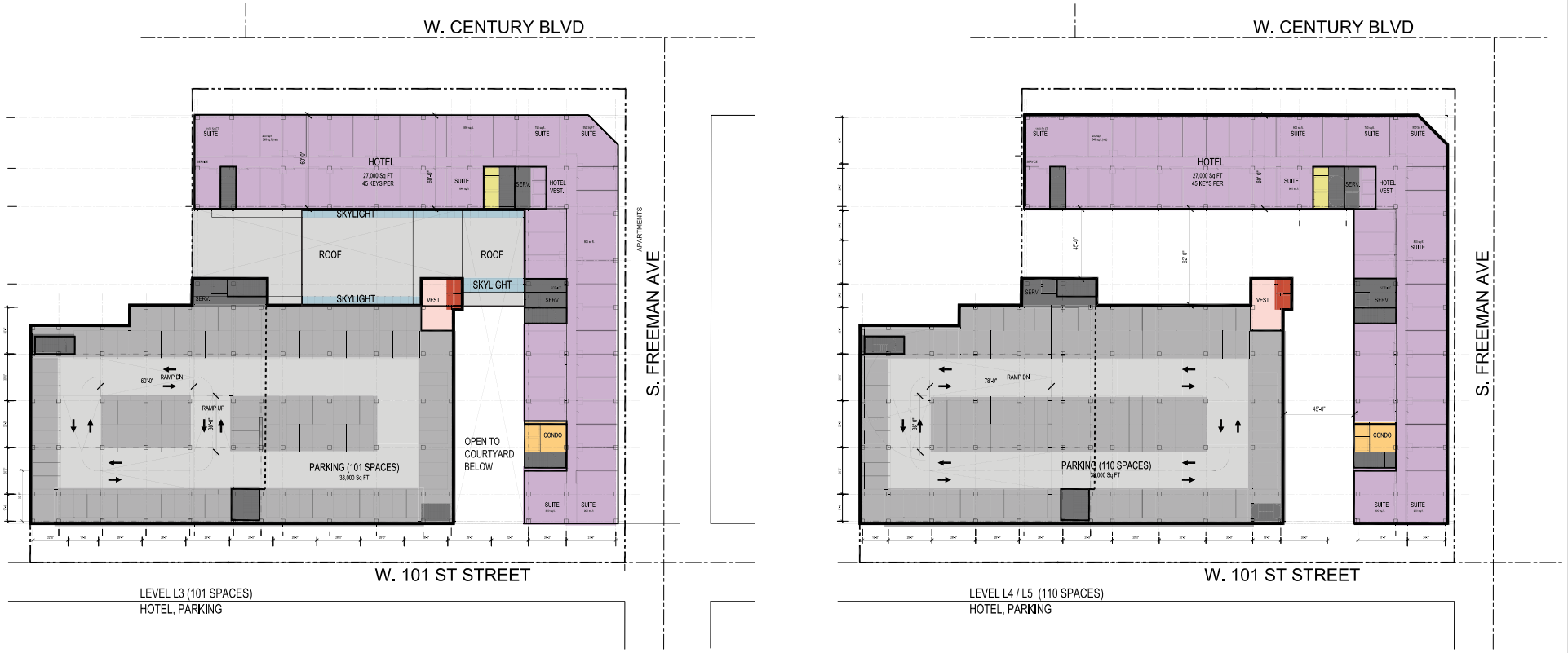
NORTH

Source: CRTKL, 2022.

Figure 3-13
Basement Level B1

Source: CRTKL, 2022.

Figure 3-14
Ground Level L1/L1M

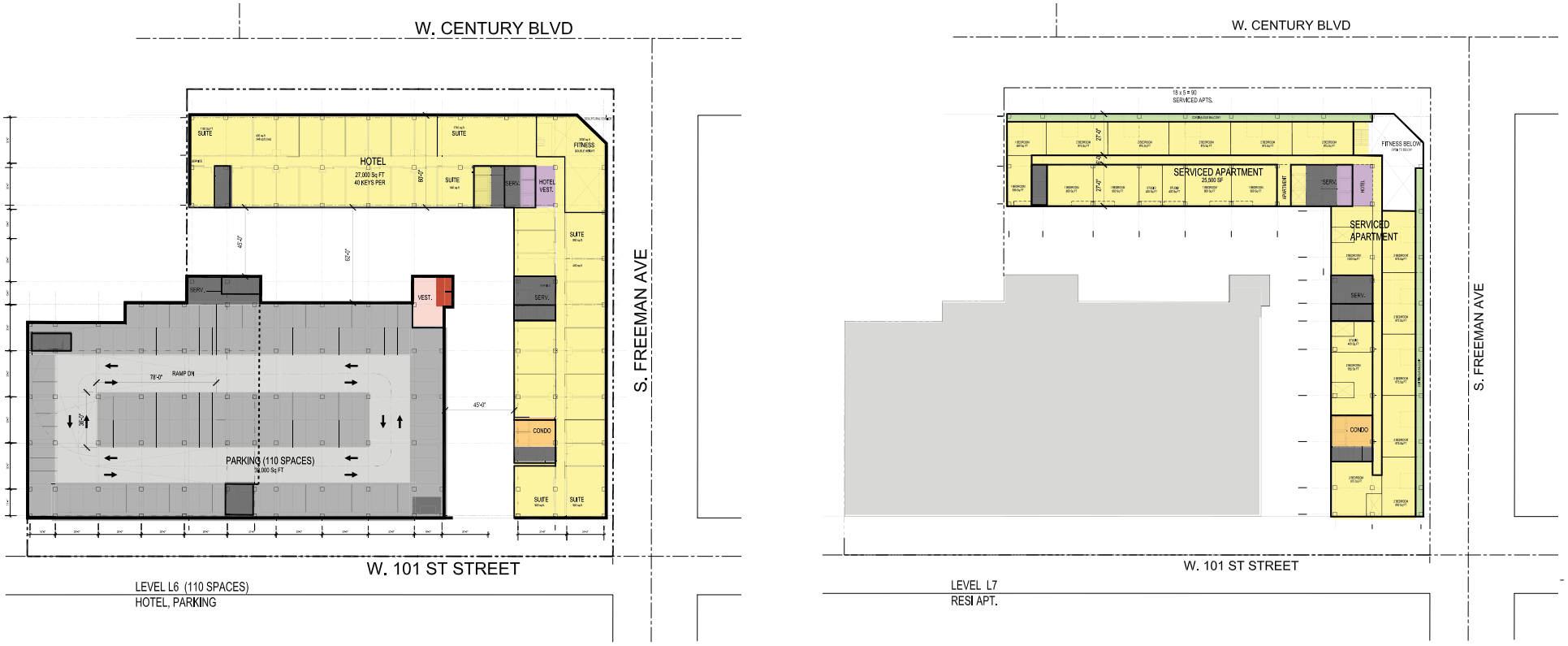


RETAIL/ENTERTAINMENT F&B EVENT/MULTI-FUNCTIONAL APARTMENT CONDO HOTEL SERVICE/BOH/MEP PARKING OUTDOOR/GREEN

NORTH

Source: CRTKL, 2022.

Figure 3-15
Levels L3 – L5



RETAIL/ENTERTAINMENT F&B EVENT/MULTI-FUNCTIONAL APARTMENT CONDO HOTEL SERVICE/BOH/MEP PARKING OUTDOOR/GREEN

NORTH

Source: CRTKL, 2022.

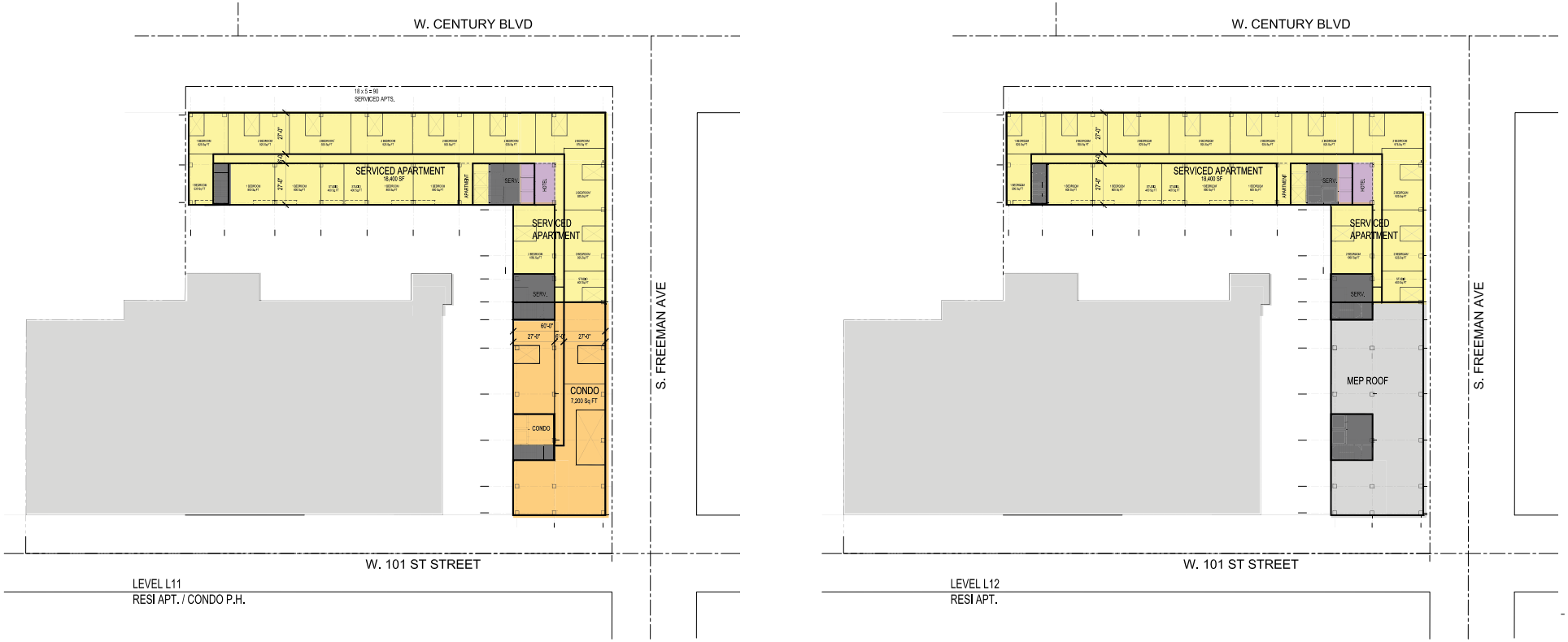
Figure 3-16
Levels L6 and L7

RETAIL/ENTERTAINMENT F&B EVENT/MULTI-FUNCTIONAL APARTMENT CONDO HOTEL SERVICE/BOH/MEP PARKING OUTDOOR/GREEN

NORTH

Source: CRTKL, 2022.

Figure 3-17
Levels L8 – L10

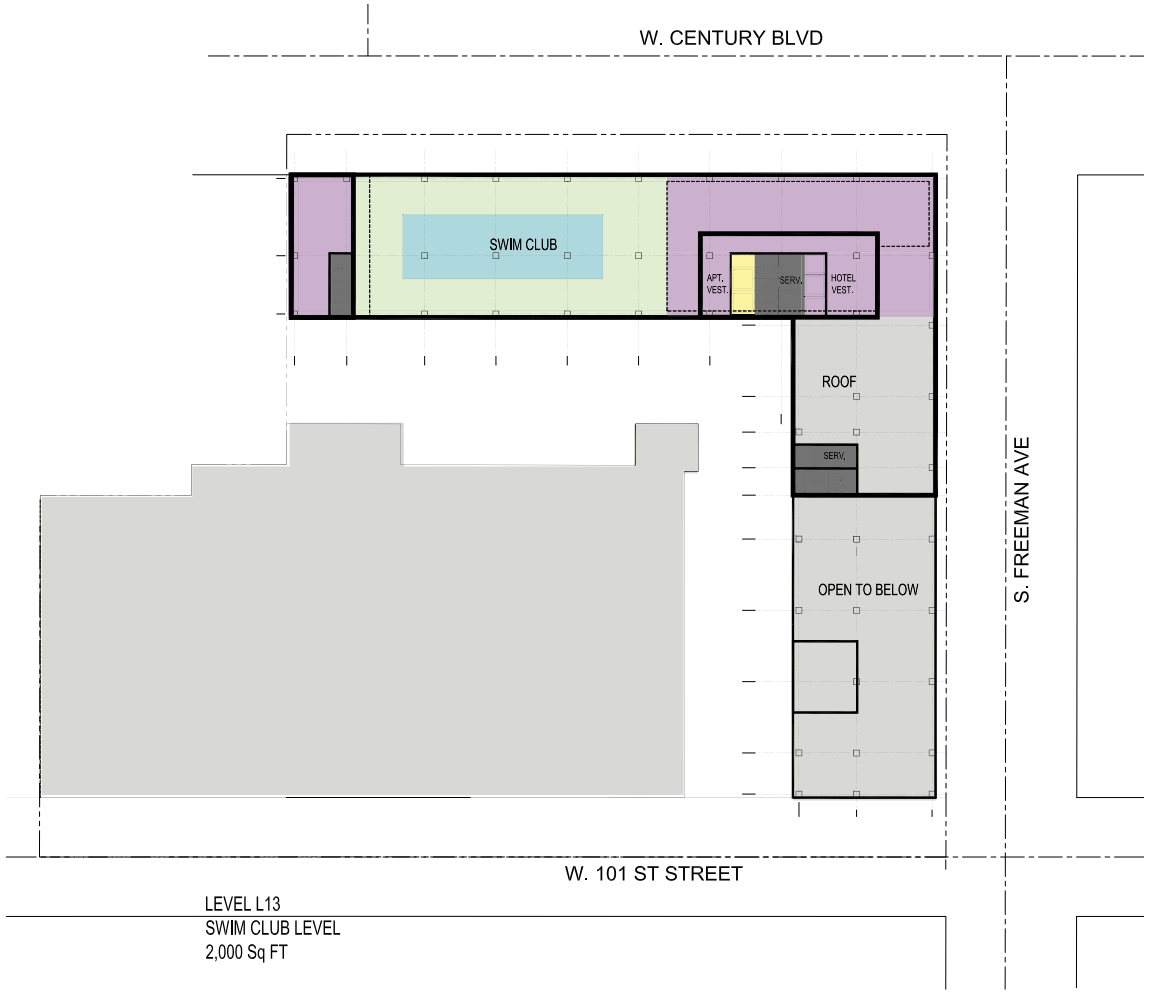


RETAIL/ENTERTAINMENT F&B EVENT/MULTI-FUNCTIONAL APARTMENT CONDO HOTEL SERVICE/BOH/MEP PARKING OUTDOOR/GREEN

NORTH

Source: CRTKL, 2022.

Figure 3-18
Levels L11 and L12

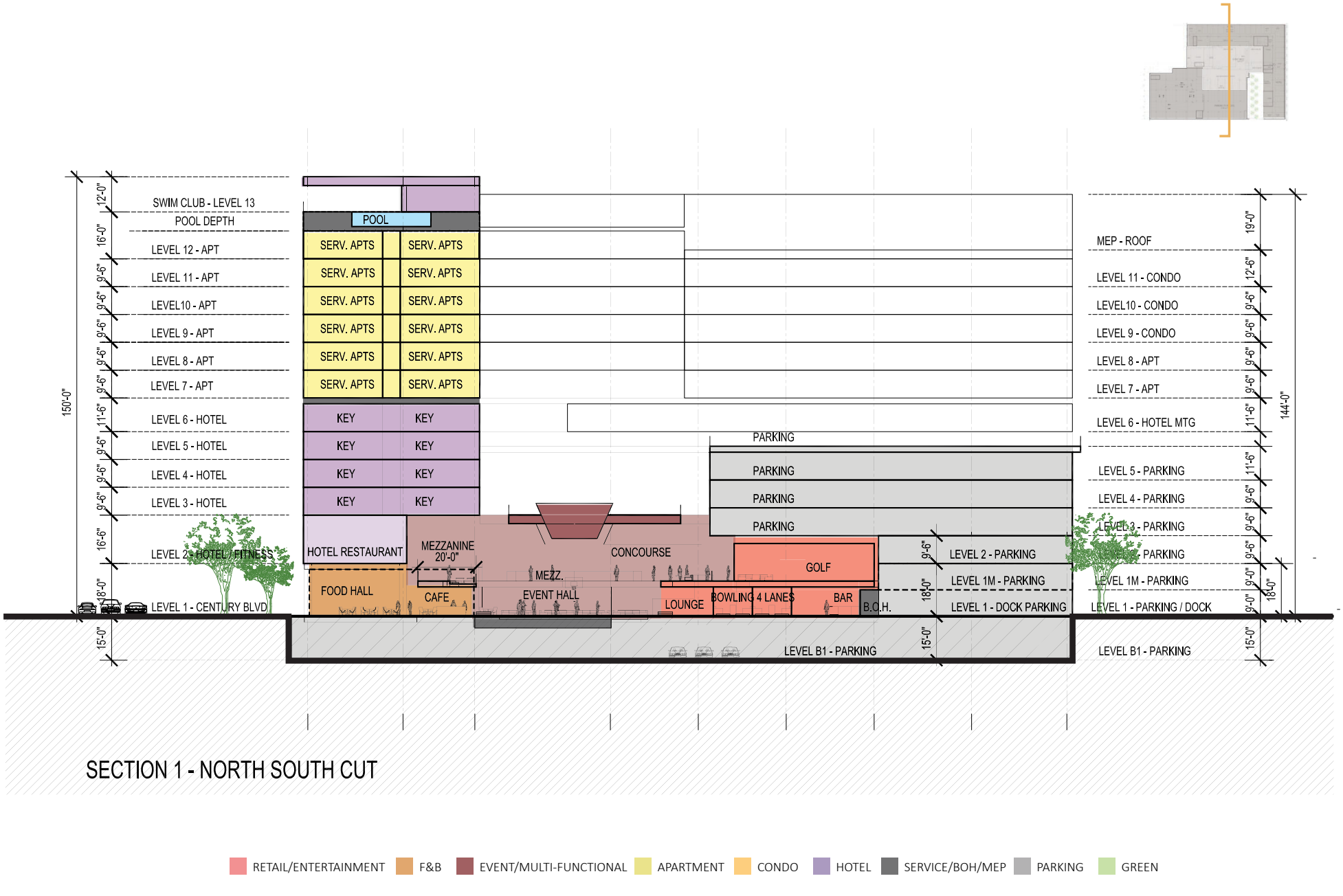


RETAIL/ENTERTAINMENT F&B EVENT/MULTI-FUNCTIONAL APARTMENT CONDO HOTEL SERVICE/BOH/MEP PARKING OUTDOOR/GREEN

NORTH

Figure 3-19
Level L13

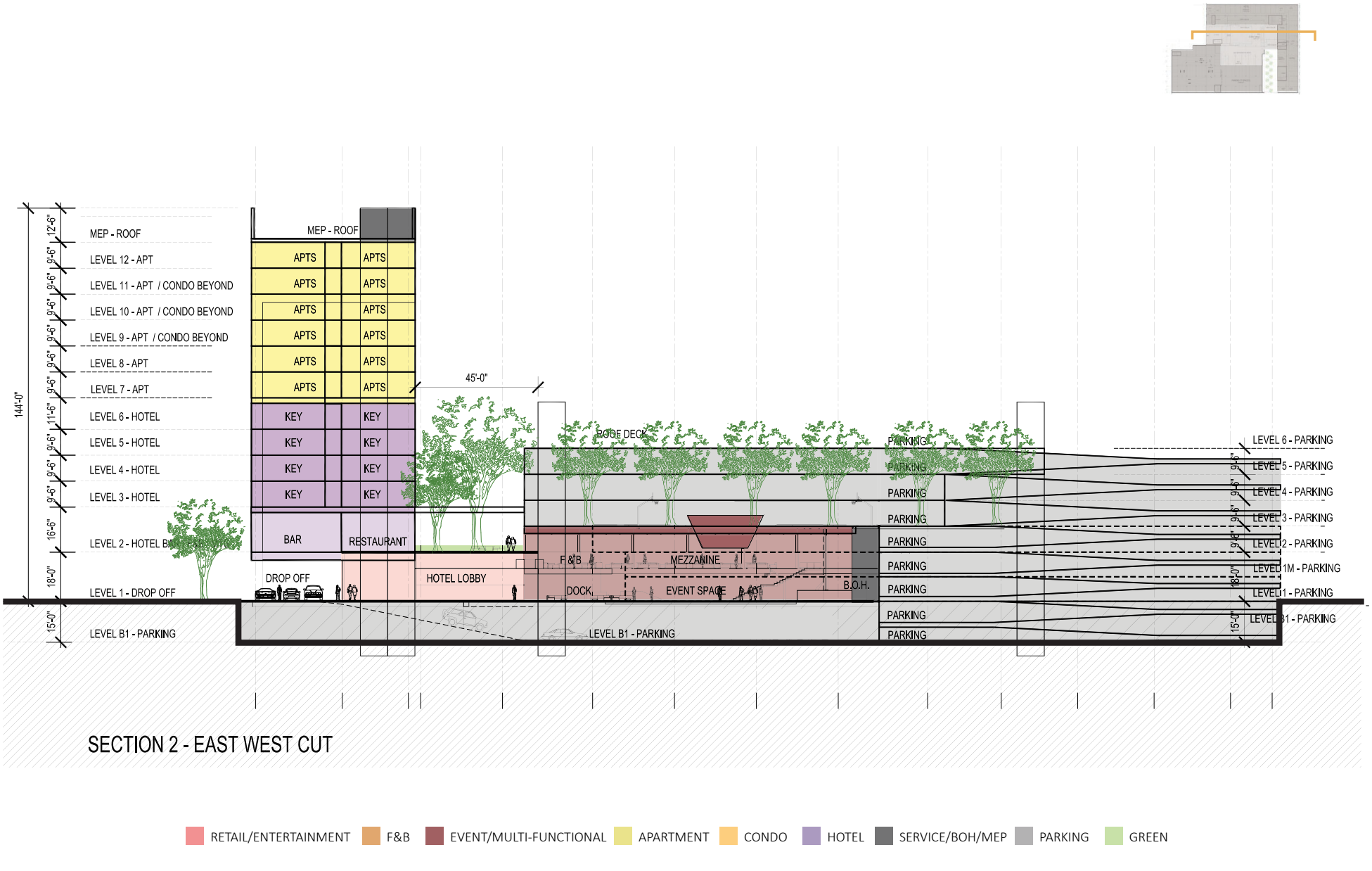
Source: CRTKL, 2022.



SECTION 1 - NORTH SOUTH CUT

Source: CRTKL, 2022.

Figure 3-20
Section North/South



Source: CRTKL, 2022.

Figure 3-21
Section East/West

The building's upper levels would contain the proposed lodging and limited number of residential units, and the landscaped rooftop would provide resident and guest amenity areas, including a pool, spa, and clubhouse area. Additional interior residential amenity areas include a fitness center on the building's sixth level. The Project would be constructed in full accordance with Title 24 building and energy conservation standards.

A breakdown of the bedroom count for the serviced apartment and residential condominium units is included in Table 3-2.

Table 3-2
Breakdown of Bedroom Count

Bedroom Type	Unit Count
Bachelor Unit	18 units
1-Bedroom Unit	36 units
2-Bedroom Unit	75 units
Total	**129 units**
Source: CRTKL, 2022.	

3.2.2 Open Space

The Project would incorporate on-site open space and recreational amenities, including courtyards, sky decks, and swimming and exercise facilities, for Project occupants and guests. In addition, the Project would comply with City parkland dedication or in-lieu fee requirements, including IMC Sections 12-105.7 and 12-105.9, as may be applicable.

3.2.3 Tree Removal and Replacement

The Project includes removing the 59 existing trees located on or near the Project Site and replacing these trees in accordance with the City's tree replacement requirements set forth by IMC Section 12-116.

3.2.4 Parking and Access

The Project would include a total of 915 vehicle parking spaces in one subterranean level, one at-grade level, and six above-ground levels, in conformance with the Project's proposed Planned Assembly Development (PAD) zoning regulations. Bicycle parking would be included as part of the Project in accordance with IMC Section 12-42.1 and the standards of the Project's proposed PAD regulations.

The Project's vehicular access is shown in Figure 3-14. Vehicular access to the Project's on-site residential parking would be provided via one driveway along the north side of 101st Street. This driveway is proposed to accommodate full vehicular access (left-turn and right-turn ingress and egress movements). In addition, the Project would provide an on-site valet, with the valet drop-off/pick-up area located along the west side of Freeman Avenue. Vehicles accessing the Project's valet area would access the valet drop-off/pick-up area by making a southbound right-turn from Freeman Avenue into the northerly Freeman Avenue Driveway. Vehicles would continue southbound in the valet drop-off/pick-up area and leave their vehicle with a valet attendant. The attendant would then park the vehicle in the on-site parking garage. Vehicles leaving the Project Site from the

valet drop-off/pick-up area would exit via the outbound-only southerly Freeman Avenue Driveway via a left- or right-turn onto Freeman Avenue. Valet attendants would be able to access the parking garage internally from the valet drop-off/pick-up area and would not need to utilize local streets (i.e., Freeman Avenue and 101st Street) to park vehicles.

3.2.5 Signage

The Project proposes to include static digital displays that would be located on 4200 W. Century Boulevard. As shown in Figures 3-4 through 3-8, the displays would include three primary components: the east façade with a curved 3,548-square-foot digital display; the north façade with 16 double-sided projecting signs arranged in a linear sequence along the building's northern façade(or "fins") (243 square feet of digital display at each face of the fins); and the west façade with a 3,848-square-foot digital display.

The Project would incorporate the following Project Design Features in relation to the proposed digital displays:

Maximum Brightness: 150-600 nits (nighttime) and 6,500 nits (daytime). The digital displays shall be fully dimmable from 100 percent to 0 percent, with a target brightness of 600 nits at nighttime, which may be further reduced to a level of 150 nits. These target values are for the brightest color setting – white light – and would be reduced for any dark background or colored settings.

Transition and Refresh Rates: The digital displays shall provide a smooth transition between day/night settings in relation to sunset time (i.e., begin dimming the system 45 minutes prior to sunset each day, to gradually transition the system into its darker nighttime setting.). Static images shall not be refreshed at a rate of any less than once every 8 seconds.

Viewing Angle: The LEDs are to have a 140-degree viewing angle – defined by 50 percent intensity at 70 degrees off of center in both horizontal and vertical angles.

Hours of Operation: The digital displays shall operate under the following schedule:

- Nighttime Setting = 1 hour prior to sunrise, until 45 minutes after sunrise
    - (Recommended 150-600 nits)
- Daytime Setting = 45 minutes after sunrise until 45 minutes before sunset
    - (Recommended 6500 nits)
- Nighttime Setting = 45 minutes before sunset until 2:00 A.M.
    - (Recommended 150-600 nits)

3.2.6 Project Design Features

The Project shall incorporate the following project design feature (PDF):

PDF-1: Promotions and Marketing TDM Strategy 4-N

The Applicant shall utilize promotional and marketing tools to educate and inform employees and residents about alternative transportation options and the effects of their travel choices. Rather than two-way communication tools or tools that would encourage an individual to consider a different mode of travel at the time the trip is taken (i.e., smartphone application, daily email, etc.), the Applicant shall make available passive educational and promotional materials, such as posters, information boards, or a website with information that employees and residents can choose to read at their leisure. Materials would be placed in an area with the greatest amount of visibility for Project employees and residents.

3.2.7 Estimated Construction Schedule and Approximate Haul Route

The Project's estimated construction schedule is shown in Table 3-3. The Project's construction phase would occur over an estimated 26-month period. The Project would require the export of approximately 112,813 cubic yards of soil.

Table 3-3
Estimated Construction Schedule

Phase	Duration	Notes
Demolition	Months 1-3	Removal of approximately 61,000 square feet of building floor area and 40,502 square feet of asphalt/concrete parking lot hauled 30 miles to landfill in 10-cubic-yard capacity trucks
Site Preparation	Month 3	Removal of trees, plants, landscaping, weeds, grubbing
Grading/Shoring	Months 3-7	Approximately 112,813 cubic yards of soil (including swell factors for topsoil and dry clay) hauled 30 miles to landfill in 10-cubic yard capacity trucks
Below Grade Parking Construction	Months 6-9	Pour-in-place construction
Above Grading Parking Construction	Months 9-18	Pour-in-place construction
Building Construction	Months 9-26	Includes framing, concrete pouring, welding; installing electrical, plumbing, and HVAC, installing insulation, interior drywall, flooring
Architectural Coatings	Months 19-26	Application of interior and exterior coatings and sealants.

The potential approximate haul routes include the following:

- Eastbound on Century Boulevard to northbound/southbound Interstate 110;
- Westbound on Century Boulevard to northbound/southbound Interstate 405;
- Eastbound on Century Boulevard to southbound Hawthorne Boulevard to Interstate 105 to a regional receptor site; and/or
- Westbound on Century Boulevard to southbound South Prairie Boulevard to Interstate 105 to a regional receptor site.

3.3 REQUESTED PERMITS AND APPROVALS

The Project will require City approval of the following discretionary entitlements:

- General Plan Amendment to change Project Site's land use designation from Industrial to Commercial/Residential;
- Zoning Code Amendment regarding extended-stay hotel use;
- Approval of a Planned Assembly Development and Special Use Permit for the Project Site to allow certain deviations from various IMC provisions;
- Tract Map and Condominium Plan;
- Site Plan Review;
- Sign Agreement to allow Project's proposed digital signage; and
- Tree Removal Permit

Other approvals and permits from the City's Building Safety Division and other municipal agencies would be required for Project construction actions including, but not limited to demolition, building, and tenant improvements.

The Project would require approval by the Los Angeles County Airport Land Use Commission (ALUC) due to its proximity to the Airport Influence Area of LAX.

INITIAL STUDY

4 ENVIRONMENTAL IMPACT ANALYSIS

I. AESTHETICS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Except as provided in Public Resources Code Section 21099 would the project:				
a. Have a substantial adverse effect on a scenic vista?	☐	☐	☐	☒
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views 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 conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

a) Have a substantial adverse effect on a scenic vista?

No Impact. The Project Site is located in a highly urbanized area of the City of Inglewood (City). Views from within the Project Site area are largely limited to typical urban development (e.g., buildings/structures, signage, lighting, roadway infrastructure, etc.). No scenic views are available from within the Project Site area. Additionally, the Project Site is not in or near a designated scenic vista. The Project would not have a substantial adverse effect on a scenic vista. Therefore, no impacts related to scenic vistas would occur as a result of the Project.

b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings, or other locally recognized desirable aesthetic natural feature within a state scenic highway?

No Impact. The Project Site is not visible from a state scenic highway. The closest state-designated scenic highway to the Project Site is a segment of State Route 110 located approximately 10 miles to the northeast of the site that starts near Downtown Los Angeles and

travels north to the City of Pasadena.[1] No rock outcroppings or historic buildings are located on the Project Site. All protected trees that would be removed as part of the Project would be replaced in accordance with the City's tree replacement requirements outlined in Section 12-116 of the City's Municipal Code. Thus, the Project would not substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings, or other locally recognized desirable aesthetic natural feature within a state scenic highway. Therefore, no impacts related to scenic resources would occur as a result of the Project.

c) In non-urbanized areas, 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 conflict with applicable zoning and other regulations governing scenic quality?

Less Than Significant Impact. The Project Site is located in a highly urbanized area of the City on the Century Boulevard corridor, approximately 1.75 miles to the east of LAX, that includes a variety of lodging and commercial uses similar to those proposed as part of the Project, including hotels, restaurants, airport parking, retail, and entertainment venues. Development along the Century Boulevard corridor reflects a variety of architectural styles, sizes, and construction eras. Renderings of the Project are included in Figures 3-4 through 3-9 in Section 3 (Project Description). The proposed mixed-use building would include residential, hotel, and event space uses within 13 stories, reaching a maximum height of 150 feet, reflecting contemporary architecture and consistent with the use and development standards established by the Project's proposed Commercial Residential land use designation and Planned Assembly Development (PAD) zoning regulations.

Applicable regulations governing the scenic quality of the Project are outlined in the City's *Design and Development Standards and Guidelines*, adopted in 1979. The Project's consistency with the *Design and Development Standards and Guidelines* is discussed in Table I-1. As demonstrated there, the Project would be substantially consistent with the applicable standards and guidelines.

[1] *Caltrans, California State Scenic Highway System Map, https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aacaa, accessed January 24, 2023.*

Table I-1
Project Consistency with the Design and Development Standards and Guidelines

Guidelines and Standards	Project Consistency
Drainage and Grading	
Guidelines 1. The visual result should be pleasing; indeed the purpose may be purely aesthetic, to screen views or create new land form. Building up earth forms may create interest and variation on level sites. 2. General considerations for slopes include the following: a. Slopes under 1% (rising one foot in 100 feet of horizontal distance) do not drain well unless they are paved and carefully finished. b. Slopes under 4% seem flat and are usable for all kinds of intense activity. c. Slopes between 4 and 10% appear as easy grades and are suitable for practically any use. However, slopes over 8% are not suitable for handicapped access (see Chapter on Pedestrian Access). d. Slopes over 10% seem steep and require notice- able effort to climb or to descend and are a desirable maximum for service driveways and parking areas. e. Slopes over 25% are too steep for lawns and power mowing. f. Slopes over 50% cannot be protected from erosion from heavy rains except by terracing or cribbing (reinforcement by embedded wooden or concrete beams). Standards 1. The resulting ground surface after grading must have positive drainage throughout without any isolated depressions. 2. All property should be graded to prevent surface water from draining onto neighboring properties. 3. Paved areas shall not drain across public sidewalks. Plans for paved areas shall show direction of surface flow to catch basins. 4. No driveway shall have a grade greater than 30%, and any portion having a grade greater than 20% must have a length greater than 25 feet. Any grade change in a driveway in excess of 15% shall have a minimum 10 feet transition section which divides the grade change into equal parts. (See Parking Lot Standards). 5. Building foundation grading or excavation is generally included with the building permit. Otherwise, grading permits are required for the following: a. Excavation not for a building foundation in excess of 2 feet in depth.	**Consistent:** While the Project Site is flat, given the size constraints of the site, the Project would not include development of any berms or drastic changes in topography at the site. The proposed building would be designed and constructed in accordance with applicable design standards would not require screening from view. Additionally, the Project's drainage, handicap access, driveways, and parking would be designed and constructed to meet existing regulatory requirements and would not require arbitrary changes in topography.

Table I-1
Project Consistency with the Design and Development Standards and Guidelines

Guidelines and Standards	Project Consistency
b. Fill in excess of three feet in depth, no for building foundation c. Fill in excess of 50 cubic yards.	
Building Orientation	
Guidelines 1. Public entrances and primary elevations should be oriented toward public streets or toward the most dominant street. 2. Building and parking lot locations should complement the topography, shape of the lot, and the abutting land uses whenever possible. 3. Buildings should be set back from public streets a distance adequate to provide landscaping. The depth and variation of this landscaped space will be dependent upon the site location, development use, and building design. 4. Consideration should be given to the scale and bulk of a building in its relationship to the scale of the street and neighboring properties. 5. Loading areas, storage areas, and mechanical equipment should not be readily visible from public streets or any neighboring residential property. (see also Walls and Landscaping)	**Consistent:** All public entrances and primary elevations would be oriented toward Century Boulevard and Freeman Avenue. The proposed building would span the flat Project Site, and vehicle parking would be located within one subterranean level and five parking levels at the back of the building and acting as a step back from adjacent buildings of lower heights. All loading areas and mechanical equipment would be located inside the building and not visible from neighboring residential properties.
Building Design and Materials	
Guidelines 1. Elevations/Detailing a. All building elevations shall be considered in the evaluation of any new construction, additions or alterations. The importance of the side and rear views of a building should not be minimized because of their impact on adjoining properties. b. The same or compatible design features should be continued or repeated upon the various elevations of a building. c. Doors, windows, or other openings should be uniform in design and located to present a symmetrical appearance to the elevation except where any variations are an integral and necessary part of the exterior design. d. In buildings intended for retail sales or comparable uses, lack of or unusual design of doors, windows and display areas is generally undesirable. The developer must demonstrate that such a treatment will not be detrimental to the future viability of the building for retail use. 2. Roofs/Roof Lines a. Roofs should be given design consideration and treatment equal to that of the rest of the building exteriors. Roofs and roof lines should	**Consistent:** The architecture and design of the proposed building would carry through all elevations of the building. Doors, window, and other openings would be sized appropriately for use and recognition purposes and compatible with the design and architecture of the building. The roofline of the proposed building would be unique to the building and compatible with the contemporary style of the building and would incorporate parapet walls. All mechanical equipment, ducting, and appurtenances would be screened from view.

Table I-1
Project Consistency with the Design and Development Standards and Guidelines

Guidelines and Standards	Project Consistency
be continuous in design except where there is a major change in an element on a building elevation. Such elements include wing walls, fin walls, and interior building corners. An exterior building corner is not such an element. b. Roof line elements including parapet walls should be developed along all elevations, regardless of orientation away from street or towards a neighboring structure. 3. Materials/Colors a. All exterior materials, textures and colors shall be appropriate for any architectural style or theme of the building and should contribute towards the quality of the streetscape. b. All colors and materials shall be durable and shall not readily deteriorate with exposure to the elements. c. Colors and materials, excepting glass, utilized for paving and exterior building surfaces should be subdued or flat-toned so as not to produce excessive reflected glare from the sun. 4. Equipment/Screening a. No mechanical equipment, ducting, meters or other appurtenances should be left exposed at the ground level or on roofs. b. Screening or higher parapet walls may be used to integrate such installations with the total development.	
Parking	
Guidelines 1. Outdoor parking lots may be a cheaper method of providing required parking spaces; however, they consume valuable site area and there must be landscaped to be visually attractive. Parking structures may be a greater initial expense but generally provide a more efficient use or the land. 2. Generally, the most economical parking patterns are achieved with spaces located off both sides of each aisle and with the spaces aligned at 90 degrees. Deviation from the 90 degree parking angle may add to the ease of entering and backing out of parking spaces, but the additional area required for the same number of parking spaces may restrict the use of parking patterns that are less than 90 degrees. 3. Entrances and exits to parking facilities should be limited in number and should be designed and located to minimize any interference with the flow of street traffic.	**Consistent:** Vehicle parking would be provided in one subterranean level and a five-story parking garage at the back of the proposed building. Entrances/exits to the parking would be limited to one access point on 101st Street for residential traffic and two access points on Freeman Avenue for hotel/entertainment traffic. All parking spaces would be constructed and located in accordance with the City's requirements and as set forth in the proposed PAD regulations.

Table I-1
Project Consistency with the Design and Development Standards and Guidelines

Guidelines and Standards	Project Consistency
4. To reduce intrusion into residential neighborhoods, parking lots should take access from other than residential streets except when a lot is serving a residential use. 5. Barren parking lots are considered to be unsightly and distracting. Parking areas should be located and designed to minimize direct exposure to public view. These areas should be buffered with landscaping to reduce the visual impact and may be located at the rear of buildings, or by taking advantage of natural topography or planned grading, created in areas which are above or below adjacent street and property grades. <u>Residential Standards</u> 1. Parking spaces shall be located on the same lot as the use and be within 200 feet of the entrance to the residence. They shall not be located in the required side yards and shall be farther than 40 feet from the front line except for two spaces which are permitted within 40 feet of the front line. 2. A minimum of two enclosed parking spaces shall be provided for each residential unit. The spaces required for one or two unit developments shall be fully enclose and include garage doors. Carports do not satisfy the requirements for residential parking spaces. 3. All parking spaces located within a building shall have the following minimum inside dimensions. • Each space adjacent to another with no intervening obstructions (8 feet wide x 19 feet long) • Any single space separated by walls or other obstructions (9 feet and 6 inches wide x 19 feet long) 4. Garage door clearances shall be a minimum of 8 feet wide per space and 6 feet and 8 inches high. 5. Garage entrances facing the front street shall be 22 feet or more from the front lot line. 6. Garage entrances facing the side street of a corner lot shall not be located within the strip which is defined by drawing lines 10 feet and 22 feet from the exterior side lot line and parallel to it. 7. Required driveways for residential developments shall provide the unobstructed minimum widths of 10 feet for one to 9 living units, and 16 feet for 10 to 20 living units. Refer to the Municipal Code when residential driveways serve more than 20 living units. No driveway shall exceed 28 feet in width at the front or exterior side lot line.	

Table I-1
Project Consistency with the Design and Development Standards and Guidelines

Guidelines and Standards	Project Consistency
8. Residential driveways shall be paved with not less than 3 1/2 inches of Portland cement concrete. 9. When access to any parking space requires a 90 degree or right angle turn, an unobstructed area with a depth of 25 feet shall be provided for maneuvering into the space. 10. When access to any parking space involves a reverse turn or "S" turn, an unobstructed area shall be provided for maneuvering into the space. The required minimum depth of unobstructed area is dependent upon the encroachment into the line of direct access to the parking space, and is shown in the following diagram and table [refer to page 20 in the Design and Development Standards and Guidelines]. 11. Residential parking facilities, including the driveway, for 3 or more living units shall be separated from any abutting residential property by a masonry wall not less than 5 feet high. All portions of this required wall which are adjacent to the required front yard of the residential property shall be 3 feet 6 inches high. (See Walls and Fences.) 12. All required parking spaces shall be maintained for parking purposes only. <u>Commercial and Industrial Standards</u> 1. Parking facilities shall be located within 300 feet of the use for which they are provided. 2. Every development shall provide the minimum number of standard size off-street parking spaces as specified by the Inglewood Municipal Code. The following is provided only to indicate that the required number of spaces varies with the use and gross floor area. • Theaters and recreational uses = 1 space/35 sf • Restaurants and grocery stores = 1 space/150 sf • Offices and general commercial = 1 space/300 sf • Manufacturing and general industrial = 1 space/500 sf • Warehouse = 1 space/1,500 sf 3. All parking spaces located outside of a building shall have the following minimum dimensions. • Spaces not alongside a wall or obstruction = 8 feet and 6 inches wide x 20 feet long • Spaces alongside a wall or obstruction = 9 feet and 6 inches wide x 20 feet long	

Table I-1
Project Consistency with the Design and Development Standards and Guidelines

Guidelines and Standards	Project Consistency
4. All parking spaces located within a building shall have the following minimum inside dimensions. • Each space adjacent to another with no intervening obstruction = 8 feet wide x 19 feet long • Any single space separated by walls or other obstructions 9 feet and 6 inches x 19 feet long 5. Each parking lot shall provide a minimum of one parking space, 12 feet wide, specifically for the use of the handicapped. This space shall be in close proximity to the main entrance of the building and shall be clearly designated, "RESERVED FOR THE HANDICAPPED."	
Loading	
Guidelines 1. Entrances and exits to loading facilities should be limited in number and should be designed and located to minimize any interference with the flow of traffic along the street. 2. To reduce the intrusion into residential neighborhoods, loading areas should have access from other than residential streets. 3. Loading areas are considered to be unsightly and should be located and designed to minimize direct exposure to public view. These areas should be buffered with landscaping to reduce the visual impact. 4. The design of loading facilities must take into consideration the specific dimensions required for maneuvering the combinations of trucks and tractor-trailers into and out of loading position at docks or in stalls and driveways. The maneuvering space required is largely dependent on three factors: (1) overall length of the tractor-trailer unit; (2) the width-of the space in which the vehicle must be placed; and (3) the turning radius of the tractor-truck which pulls the unit. Inasmuch as the tractor-trailer uses slightly more space to pull out than to back in, all reference to maneuvering space is based on the requirements for pulling out. Standards 1. Every commercial development shall provide a loading stall for service vehicles. Industrial developments shall be designed to provide loading stalls in accordance with the expected use of the property. 2. Loading areas shall be visibly separated from public entrances and parking areas.	**Consistent:** The Project would include one loading entrance/exit, which would occur from 101st Street, and would be constructed in accordance with applicable standards.

Table I-1
Project Consistency with the Design and Development Standards and Guidelines

Guidelines and Standards	Project Consistency
3. Loading stalls shall be designed to not interfere with circulation or parking, and to permit trucks to fully maneuver on the property without backing from or onto a public street. 4. The minimum loading stall width shall be 12 feet. The recommended width of 15 feet is required for loading stalls alongside a wall or other obstruction. 5. For general commercial developments the minimum loading stall length shall be 20 feet. For other developments in which trucking is an activity the minimum stall length shall be 30 feet or equal to the length of the longest trucks and tractor-trailers expected at the facility, whichever is greater. 6. The depth of the loading apron shall be sufficient to permit trucks to maneuver into and out of the loading stalls. The minimum loading apron depth shall be 25 feet or equal to the length of the loading stall, whichever is greater. 7. Loading areas shall be graded to drain surface water to an alley, street or public storm drain. Surface water shall be conducted under any intervening public sidewalk by a drain approved by the Public Works Department. 8. The surface area used for any loading activity shall be paved with not less than 2 inches of asphaltic concrete on 4 inches of crushed rock base, or with 3 1/2 inches of Portland cement concrete. Soil conditions or the nature of the trucking activity may necessitate greater requirements as determined by the Division of Building and Safety. 9. Each loading space aligned with and directly adjacent to a parking space shall be clearly designated “LOADING ONLY.” 10. Poured concreate curbs shall be provided at the perimeter of the planter areas that abut paved vehicle areas. 11. A combination of masonry walls and landscaping shall be provided to buffer or screen loading areas from direct public view and from abutting residential properties. (See Landscaping.) 12. All artificial illumination shall be installed, directed, and shielded to confine all direct rays within the property. 13. All loading facility improvements, including the pavement, striping, curbs, and landscaping shall be continuously maintained, which includes repairs, repainting, replacement, and regular cleaning.	
Pedestrian Circulation	
<u>Guidelines</u>	**Consistent:** The Project would provide pedestrian circulation amenities in compliance

Table I-1
Project Consistency with the Design and Development Standards and Guidelines

Guidelines and Standards	Project Consistency
1. Where grades become excessive, ramps or stairs must be used. It is best to have a set of stairs no higher than eye level so that a pedestrian may judge the distance to the top of the landing safely. 2. The width of walks or plazas in a pedestrian circulation system depends on capacity requirements, scale, and their relation to other elements. 3. A clearly defined and delineated access from the public sidewalk to the primary building entrance should be provided. 4. Special attention should be given to the provision of convenient access to the pedestrian circulation system for handicapped persons. This will require extra consideration in designing the placement of building entrances in relation to parking lots and/or public sidewalks. <u>Standards</u> 1. Width: Minimum acceptable sidewalk width is 4 feet without obstructions. In appropriate locations, methods other than paved walkways may be utilized to delineate pedestrian ways. 2. Ramps: Grades in excess of 6.67% (1 vertical to 15 horizontal) shall be considered a ramp and shall meet building code requirements for ramps. The maximum acceptable ramp grade is 12.5% (1 vertical to 8 horizontal). 3. Handrails: Any ramp or set of steps shall be provided with handrails for pedestrian safety. 4. Handicapped Access: All new construction is required to have an entrance accessible to handicapped persons. To qualify as a handicapped entrance there must be access from a parking lot with designated handicapped spaces or access from a public sidewalk that meets the following: a. no steps or curbs b. no sidewalk grade greater than 5% c. no ramp grade greater than 8.33% (1 vertical to 12 horizontal) d. adequate platform space at the building entrance to provide a wheelchair while opening the door. (See Building Code.) 5. Handicapped Access – Public Right-of-Way: If a curb or sidewalk is reconstructed within a pedestrian crosswalk area, or is located before a site that is being developed, the developer shall construct a sidewalk access ramp (wheelchair ramp) for the handicapped as part of the improvements required by the Department of Public Works, unless directed otherwise by the Engineer.	with all City size and location standards. Additionally, the Project would be required to comply with Americans with Disabilities Act (ADA) requirements.

Table I-1
Project Consistency with the Design and Development Standards and Guidelines

Guidelines and Standards	Project Consistency
Landscaping	
Guidelines 1. Landscaped areas should be planned and designed as an integral part of the project. The type; quantity and placement of plant material should be selected for its structure, texture, color, and compatibility with the building design and materials. 2. Exterior lighting, signs, walls and walkways should also be incorporated as an integral part of the landscape design. 3. Soil, water, sun conditions and other factors should be considered in the choice of specific plant materials Standards 1. Plant Materials a. Minimum size street trees shall be 24-inch box. With the exception of specimens, minimum size trees for parking lot and site landscaping shall be 15 gallon. All newly planted trees shall be supported with stakes or guy wires. b. Shrubs shall be minimum 5 gallon size. When planted to serve as a hedge or screen, shrubs shall be planted with 2 to 4 feet spacing, depending on the plant species. c. Depending on the plant material, groundcover shall be generally spaced at a maximum of 6 to 8 inches on-center. When used as groundcover, minimum one gallon size shrubs may be planted at 18 to 24 inches on-center. d. All plant material shall be installed in a healthy, vigorous condition typical to the species. 2. Site Landscaping a. All areas not covered by buildings or structures, enclosed for storage or used for paved walks, driveways or parking shall be landscaped. Trees (exclusive of street trees) should be planted at a quantity approximate to one tree for each 200 square feet of landscaped area when the site can accommodate such. Trees may be planted in groupings. b. Landscaping including trees, shall be provided adjacent to structures and along interior property lines when the site can accommodate such; trees may be planted in groupings. c. Along fences or walls that are visible from the street, a combination of trees, hedges, shrubs, and vines, shall be planted on the street-facing side.	**Consistent**. The Project would include landscaped areas and replacement trees in accordance with City requirements and the provisions of the proposed PAD regulations.

Table I-1
Project Consistency with the Design and Development Standards and Guidelines

Guidelines and Standards	Project Consistency
d. Areas used for loading, refuse, storage and equipment shall be screened with a combination of walls and landscaping. 5. Irrigation All permanent sprinkler irrigation system sufficient to cover all planted areas including parkways shall be provided and shall be specified on all submitted plans. Automatic controls are required on all irrigation systems except on single-family residential developments 6. Maintenance Landscaping shall be maintained in a neat and healthy condition. This shall include proper trimming, mowing of lawns, weeding, removal of litter, fertilizing, and regular watering and replacement of diseased or dead plants.	
Refuse Enclosures	
Standards 1. Refuse areas constructed entirely within a building shall meet the minimum requirements·contained in Chapter 12 Article 1 of the Inglewood Fire Code. 2. Refuse area constructed in areas zoned for multiple family residences, and commercial or industrial uses shall conform to the following standards: a. The enclosure shall be constructed of masonry block or decorative block. Texture and color shall blend with the architecture of the building. b. Height of the enclosure shall be sufficient to conceal the contents of the enclosure, including containers, but in no case, less than five feet nor more than six feet. c. The gate shall be an opaque panel, the color, type, and design of which will blend with the enclosure. A double swing gate with a clear opening of six feet shall be provided for access to the enclosure. The gate height shall be equal to the enclosure height and be equipped with a latch or other device to insure the gate remains closed when not in use. d. The refuse enclosure shall be so located on the site as to be readily accessible to the collection vehicle at all times. e. The enclosure shall be constructed with a concrete floor sloped to drain and designed so that it can be washed out and kept in a sanitary condition. MINIMUM REFUSE STORAGE AREAS 1. Residential Use	**Consistent:** The Project would meet all of the applicable standards for refuse enclosures in accordance with applicable City requirements and the provisions of the proposed PAD regulations.

Table I-1
Project Consistency with the Design and Development Standards and Guidelines

Guidelines and Standards	Project Consistency
a. For sites having 3 or less residential units, no enclosure is required. b. For sites having 4 to 20 units, an enclosure having at least 64 square feet of area with a minimum dimension of 8 feet shall be provided. c. For sites having 21 to 40 units, an enclosure or enclosures having a minimum total area of 96 square feet and having a minimum dimension of 8 feet shall be required. d. For each additional 20 units, an additional 48 square feet of enclosure area having a minimum dimension of 8 feet shall be provided. 2. Commercial and Industrial Use There shall be 10 square feet of refuse enclosure per 1,000 square feet of net floor area of building or structure, except that no enclosure shall have dimensions less than 8 feet by 8 feet.	
Lighting	
Guidelines 1. Luminaires and lighting fixtures should be coordinated on a basis of function and appearance. 2. Energy conservation should be considered in determining a desirable lighting system. 3. Decorative lighting can attract attention to a site and should be treated as a subtle, dignified, and effective method of enhancing a development. 4. Vehicle entrances and driveways, parking and service areas, and pedestrian entrances, walkways, and activity areas should be lighted to provide security and safety. Standards 1. Luminaires and lighting fixtures shall be selected on the basis of appropriate appearance and performance. 2. Steps and other potentially hazardous grade breaks along circulation paths shall be lighted for safety. 3. Lighting shall not appear to be animated. 4. Exterior lighting shall be installed, directed and shielded to confine all direct rays of artificial light within the boundaries of the development. 5. Electrical service for lighting shall be placed underground or within buildings unless determined to be physically unfeasible by the Superintendent of Building and Safety.	**Consistent**: The Project's lighting would comply with these guidelines and standards, as applicable.
Source: Design and Development Standards and Guidelines, 1979.	

Additionally, the Project would be required to undergo Site Plan Review by the City to ensure the Project complies with the City's design standards and achieves compatibility with the existing built environment. Thus, the Project would not conflict with applicable zoning or other regulations governing scenic quality. Therefore, Project impacts related to scenic quality would be less than significant.

d) Create a new source of substantial light or glare which would adversely affect daytime or nighttime views in the area?

Less Than Significant Impact. The information and analysis provided below are based primarily on the following document, which is included in Appendix B:

- *4200 Century Blvd. Digital Signage Impact Analysis, The Lighting Design Alliance, May 10, 2024.*

Proposed Signage and Existing Setting

A *Digital Signage Impact Analysis* was prepared for the Project to assess the potential light and glare impacts of the Project's proposed digital displays, which include the following three primary components:

- Digital Display A, located on the east façade of the proposed building, with a curved 3,548-square-foot digital display.

- Digital Display B, located on the west façade of the proposed building, with a 3,848-square-foot digital display.

- Digital Display C, located on the north façade of the proposed building, with 16 double-sided projecting signs arranged in a linear sequence along the building's northern façade (or "fins") (243 square feet of digital display on each face of the fins.

These digital displays are shown in Figure I-1.

Because the Project Site is located in a relatively dense and increasingly active area of the City, there are existing brightness and glare contributors that currently exist both on the Project Site as well as throughout the area surrounding it. Multiple surveys of the Project Site area were performed to:

1. Identify potential commercial and residential receptors near the Project Site that could have direct views of the proposed digital displays and/or experience the potential for either unwanted light trespass or glare from the displays.

2. Document existing vertical and horizontal illuminance levels within the Project Site area to use as an overall baseline for the Project's ambient light levels.

Digital Display A

The image above depicts the large curved display spanning the east façade of the building, with an overall profile of 28’-6” x 124’-6” (3,548 square feet).

Digital Display B

The image above depicts the large flat display spanning the west façade of the building, with an overall profile of 45’-0” x 85’-6” (3,848 square feet).

Digital Display C

The image above depicts the series of 16 double-sided “fin” displays along the north façade of the building. Each face of the fins has an overall profile of 4’-6” x 54’-0” (243 square feet per face of display).

Figure I-1
Proposed Digital Displays

3. Document existing luminance levels and glare contributors within the Project Site area to assess the relationship between the identified commercial and residential receptors and any potential sources of glare (e.g., headlights, streetlights, pedestrian light poles, building-mounted floodlights, digital signage, backlit signage, flood-lit signage, etc.).

Receptors

Figure I-2 shows the potential commercial and residential receptors near the Project Site. The distance from the Project to each receptor location is noted in Figure I-3, with distances ranging between 130 feet to 550 feet from the Project Site.

Residential properties are of special concern for the purpose of this analysis, due to the consideration that they are often occupied during evening, nighttime, and early morning hours. Commercial properties were also considered to ensure that the proposed digital displays would not present a significant risk for disability of discomfort glare or any other potential visual distraction.

Existing Illuminance and Luminance Levels

Measuring the existing vertical and horizontal illuminance levels at various locations in proximity to the Project Site is an essential step in establishing existing ambient light levels. As mentioned previously, the Project Site and the surrounding area are currently affected by a complex assortment of site conditions that contribute to the overall ambient light levels, including but not limited to existing street lighting poles, pedestrian lighting poles, building-mounted floodlights, building storefront and interior lighting, illuminated signage (including digital displays, backlit signage, and flood-lit signage), as well as the constant and dynamic contribution from vehicular headlights from traffic in all directions.

The survey was conducted using an illuminance/light meter, and all horizontal illuminance recordings were measured at approximately 36 inches above the ground level, with the meter in a horizontal orientation. All vertical illuminance recordings in were measured at approximately 5 feet and 6 inches above the ground level, with the meter facing directly toward the locations of the Project's proposed digital displays. The unit of measurement used is foot-candles.

In addition to the illuminance study, another critical component to the existing ambient lighting evaluation is the measurement of existing brightness and glare contributors from existing buildings and signage in close proximity to the Project Site. This step involved taking luminance measurements (measured in "nits") of the various brightness contributors for both the brightest of light sources (i.e., streetlights), as well as the darkest of ambient light sources (the natural nighttime sky). Luminance is a photometric measurement of the luminous intensity of a surface and is determined by measuring the amount of light coming off a surface within a given area.

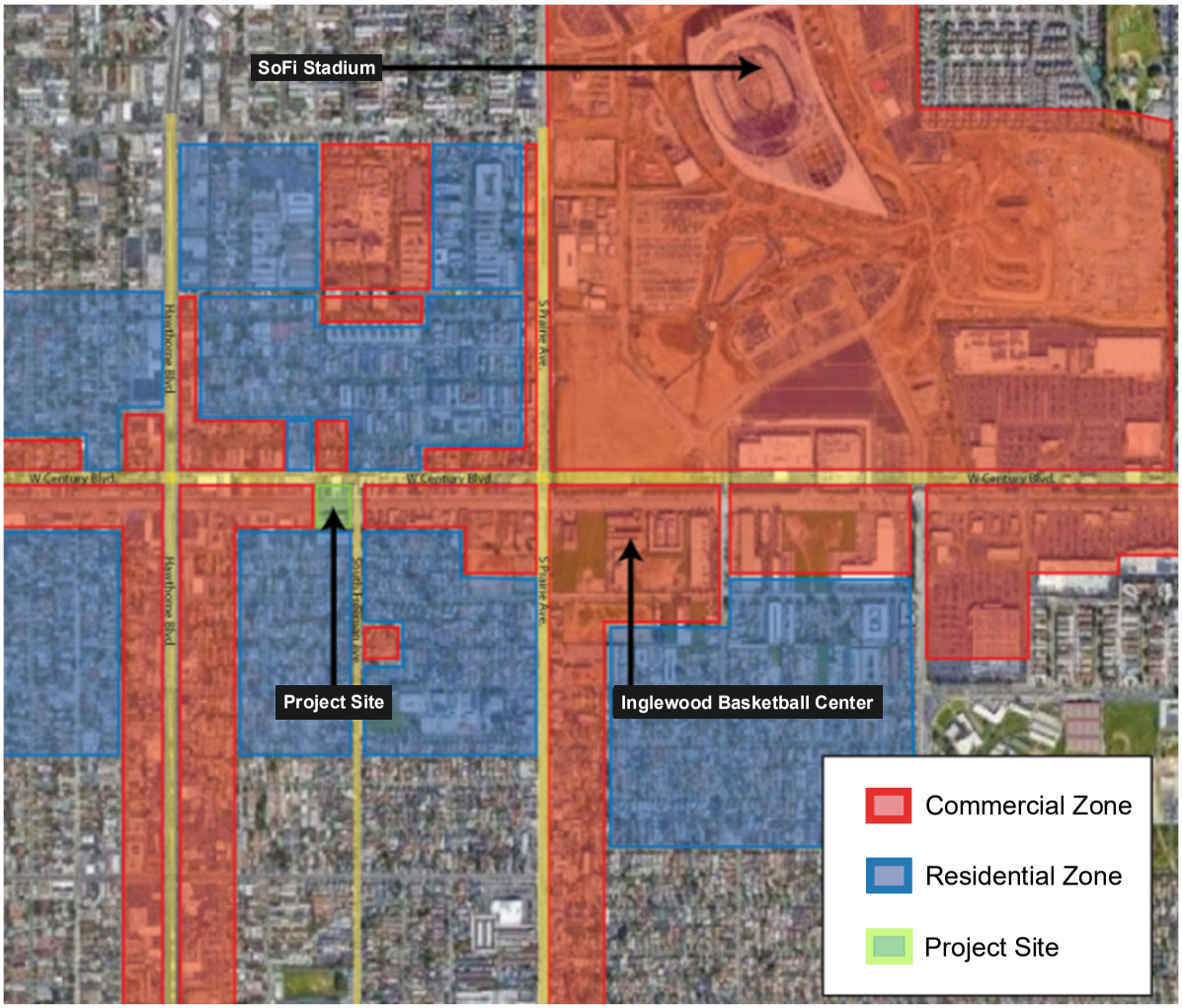
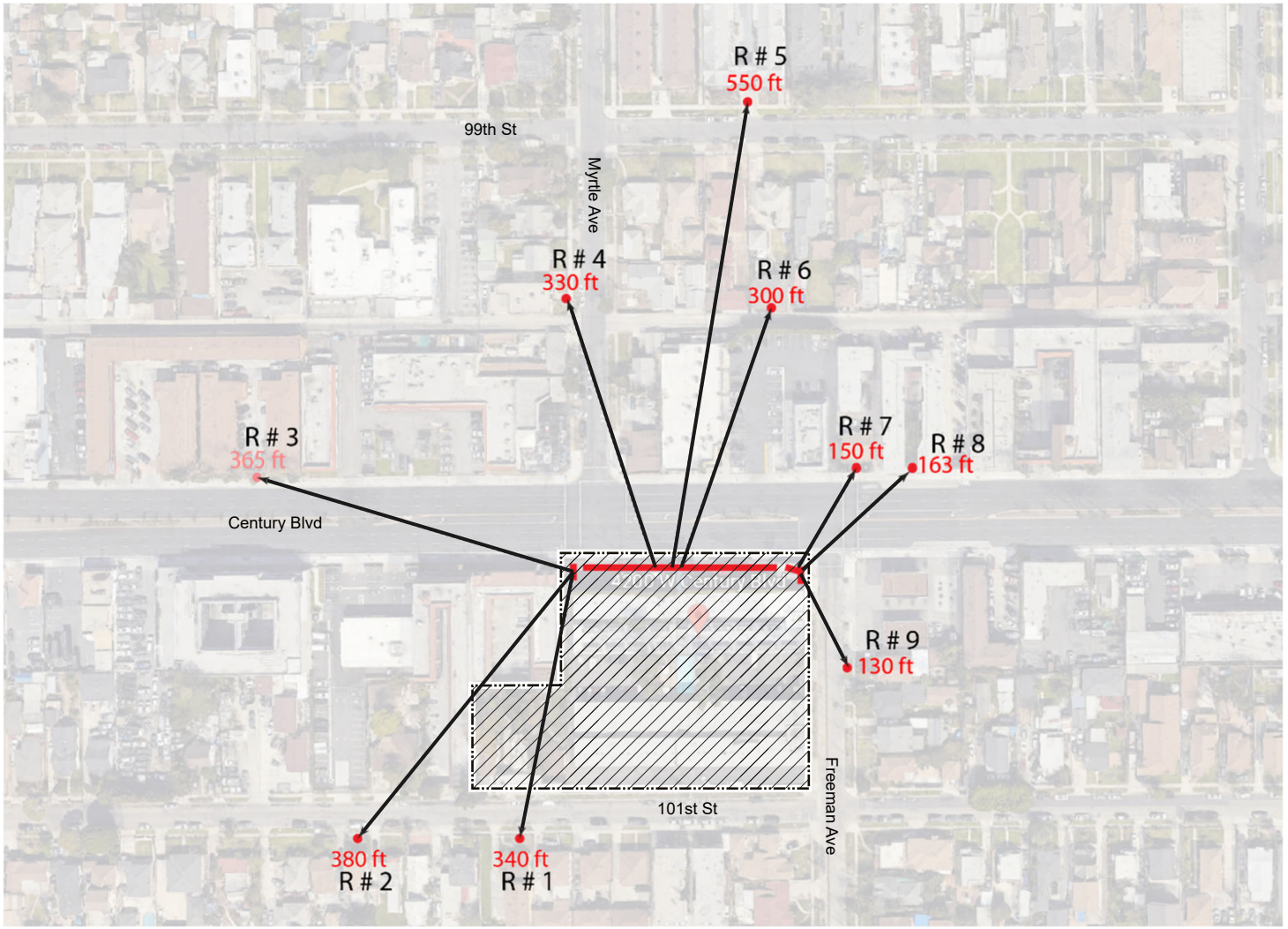


Figure I-2
Commercial and Residential Receptors in the Project Site Area



Receptors

R#1 - Residential
4228 W 101st Street
Inglewood, CA 90304

R#2 - Residential
4250 W 101st Street
Inglewood, CA 90304

R#3 - Commercial
4307 W Century Boulevard
Inglewood, CA 90304

R#4 - Residential
1231 Myrtle Avenue
Inglewood, CA 90301

R#5 - Residential
511 E 99th Street
Inglewood, CA 90301

R#6 - Residential
512 E 99th Street
Inglewood, CA 90301

R#7 - Residential
4143 W Century Boulevard
Inglewood, CA 90304

R#8 - Residential
4135 W Century Boulevard
Inglewood, CA 90304

R#9 - Residential
10014 S Freeman Avenue
Inglewood, CA 90304

Project Site

NORTH

Figure I-3
Receptor Distance from the Project Site

The luminance value indicates how much luminous power will be detected by an eye looking at the surface from a particular viewing angle and distance. This is an indicator of how bright the surface will appear, and if it will be a contributor to glare. Generally, if two objects are emitting the same amount of light, the larger-sized object will be perceived as brighter than the smaller object, and it may therefore present a greater perception of glare. The relative background and visual contrast must also be considered. If the object is very large in the viewer's field of view but not as bright as smaller sources, the large object would be considered as "glary."

The impact of glare within the field of view at any observer position is dependent on a variety of factors, including brightness of an object, brightness of an adjacent surface, size of an object, duration of time, viewing angle, and ambient lighting conditions. Luminance measurements of the existing site conditions (including existing signage examples) were recorded from a nearby proximity to the Project Site, and these measurements were used to create a framework to define the extent of glare from an object into three categories, based primarily on that object's measured brightness.

Estimated Glare Range, Based on Luminance Measurements (nits):

- High Glare -- Luminance exceeding 1,000 nits
- Medium Glare -- Luminance between 500 – 1000 nits
- Low Glare -- Luminance lower than 500 nits

Table I-2 summarizes the primary sources of glare observed along Century Blvd., as well as an average of the various spot illuminance measurements recorded during the site survey.

Table I-2
Spot Luminance and Illuminance Measurements

Location	Luminance (nits)	Illuminance (foot-candles, average)
Large streetlight	20,800	1.8
Small streetlight	5200	1.2
Between streetlights	N/A	0.18
Intersections (Average-High)	N/A	3.3 (5.8 maximum)
Intersections (Average-Low)	N/A	1.5 (3.7 maximum)
Source: The Lighting Design Alliance, Inc., 2024. Refer to Appendix B.		

Figure I-4 depicts the primary examples of existing signage lighting along Century Blvd. This includes existing digital displays, backlit signs, and externally flood-lit signs. Tables I-3 through I-5 summarize the luminance and illuminance measurements recorded at each type of existing signage location indicated in Figure I-4.

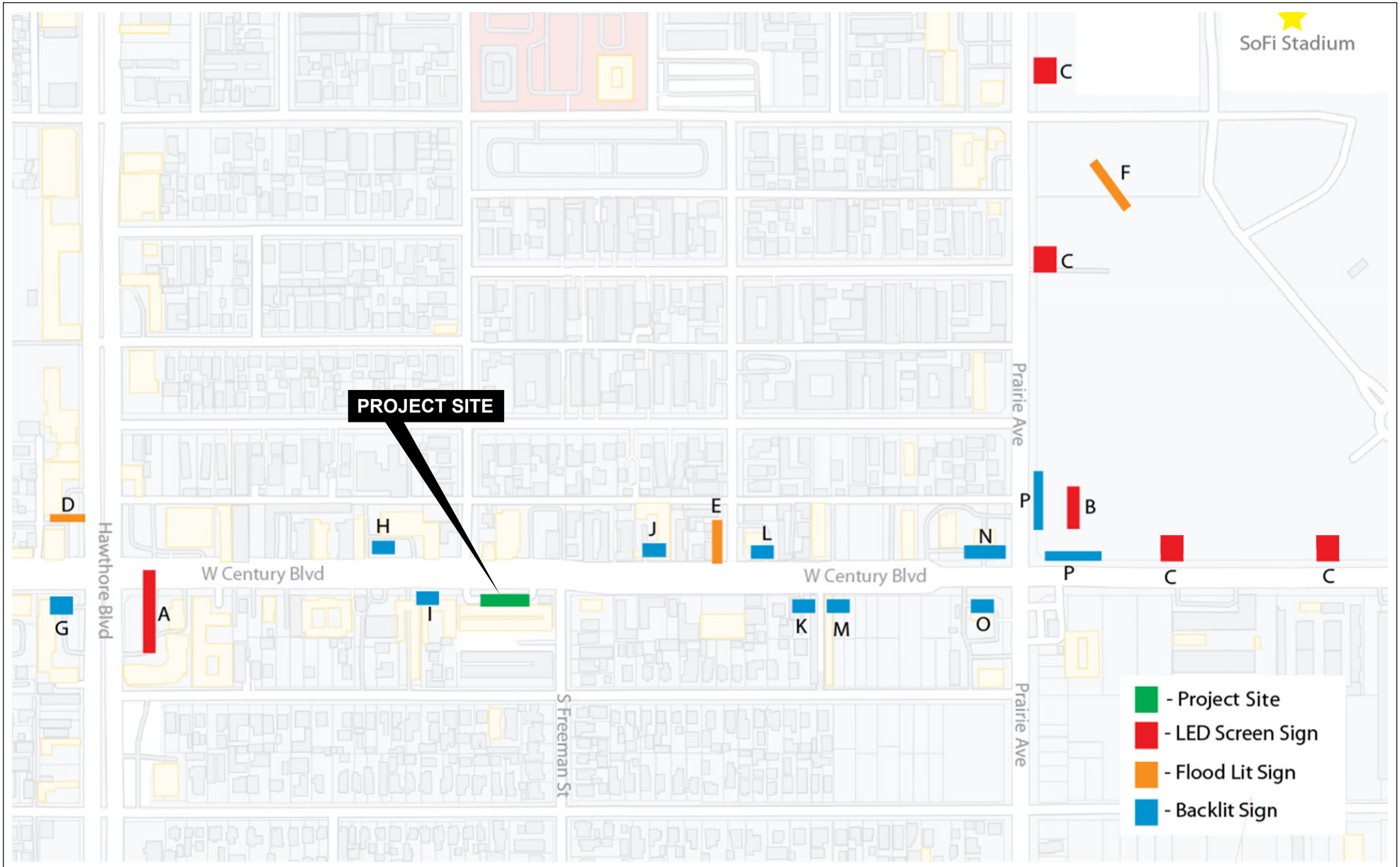


Figure I-4
Examples of Signage Lighting in the Project Site Area

Table I-3
Luminance Measurements for LED Screen Signs[1]

Sign	Luminance (nits)	Illuminance (foot-candles)
A	420	N/A
B	146	N/A
C	245	1.9

[1] *Refer to Figure I-4.*

Source: The Lighting Design Alliance, Inc., 2024. Refer to Appendix B.

Table I-4
Luminance Measurements for Floodlit Signs[1]

Sign	Luminance (nits)	Illuminance (foot-candles)
D	46	N/A
E	37	N/A
D	50	N/A

[1] *Refer to Figure I-4.*

Source: The Lighting Design Alliance, Inc., 2024. Refer to Appendix B.

Table I-5
Luminance Measurements for Backlit Signs[1]

Sign	Luminance (nits)	Illuminance (foot-candles)
Existing	215	5.8
G	46	N/A
H	37	N/A
I	144	N/A
J	111	N/A
K	460	3.8
L	263	4.7
M	300	N/A
N	5	N/A
O	150	N/A
P	287	N/A

[1] *Refer to Figure I-4.*

Source: The Lighting Design Alliance, Inc., 2024. Refer to Appendix B.

Applicable Regulations and Reference Standards

Exterior lighting, including lighting associated with illuminated signage, is regulated through the California Code of Regulations (CCR) as well as the California Vehicle Code. In addition, the Outdoor Advertising Association of America (OAAA) identifies a maximum 1.0 footcandle

threshold for light trespass conditions over the existing ambient light level. While local jurisdictions may also adopt thresholds addressing lighting and illumination, the City has not done so.

California Code of Regulations, Title 24

Title 24 of the CCR) also known as the California Building Standards Code, includes various lighting-related regulations relevant to the Project, as described below.

2019 California Energy Code, Title 24, Part 6

Section 140.8 (Maximum Allowed Lighting Power) of Part 6 of Title 24 regulates the wattage that any internally illuminated sign can produce. Specifically, Section 140.8 requires that power supplies for all exterior LED signs have an efficiency of 80 percent or greater and have a maximum allowed lighting power of less than 12 watts per square foot during the daytime and 5 watts per square foot during the nighttime (refer to Table I-6).

Table I-6
Title 24 Wattage Limits Affecting Exterior Internally-Illuminated Signs and Integral Electronic Displays

	Watt/SF (Full White)	Brightness at Full White (candelas/SM)	Hours On/Day	Total Watt-Hours/Day/SF of Sign
Daytime Usage (7 AM – 7 PM)	12	3,500	12	144
Nighttime Usage (7 PM – 2 AM)	5	1,500	7	35
			Total	**179**

SF = square feet SM = square meter

Note: The proposed digital displays consist of arrays of unfiltered LEDs, which means the Project must comply with these standards and may not exceed 12 watts per square foot during the daytime (at max. output at a white-light setting) and may not exceed 5 watts per square foot during the nighttime (at max. output at a white-light setting).

Source: The Lighting Design Alliance, Inc., 2024. Refer to Appendix B.

California Vehicle Code, Division 11

Division 11 of the California Vehicle Code (CVC) includes Sections 21466 and 21466.5, which address light sources adjacent to a roadway that may impair a driver.

Section 21466

No person shall place or maintain or display upon or in view of any highway any light in such position as to prevent the driver of a vehicle from readily recognizing any official traffic control device.

Section 21466.5

No person shall place or maintain or display, upon or in view of any highway, any light of any color of such brilliance as to impair the vision of drivers upon the highway. A light source shall be considered vision impairing when its brilliance exceeds the values listed below:

The brightness reading of an objectionable light source shall be measured with a 1½-degree photoelectric brightness meter placed at the driver's point of view. The maximum measured brightness of the light source within 10 degrees from the driver's normal line of sight shall not be more than 1,000 times the minimum measured brightness in the driver's field of view, except that when the minimum measured brightness in the field of view is 10 foot-lamberts(FL) or less, the measured brightness of the light source in foot-lambert shall not exceed 500 plus 100 times the angle, in degrees, between the driver's line of sight and the light source.

Project Design Features

Standard Vision (the manufacturer of the proposed digital displays) has identified the following standards, which would be incorporated into the Project as a Project Design Feature:

- **Maximum Brightness:** 150-600 nits (nighttime) and 6,500 nits (daytime). The digital displays shall be fully dimmable from 100 percent to 0 percent, with a target brightness of 600 nits at nighttime, which may be further reduced to a level of 150 nits. These target values are for the brightest color setting (white light) and would be reduced for any dark background or colored settings.

- **Transition and Refresh Rates:** The digital displays shall provide a smooth transition between day/night settings in relation to sunset time (i.e., begin dimming the system 45 minutes prior to sunset each day and gradually transition the system into its darker nighttime setting). Static images shall not be refreshed at a rate of any less than once every 8 seconds.

- **Viewing Angle:** The LEDs are to have a 140-degree viewing angle, defined by 50 percent intensity at 70 degrees off of center in both horizontal and vertical angles.

- **Hours of Operation:** The digital displays shall operate under the following schedule:

    - Nighttime Setting = 1 hour prior to sunrise until 45 minutes after sunrise

        - (Recommended 150-600 nits)

    - Daytime Setting = 45 minutes after sunrise until 45 minutes before sunset

        - (Recommended 6500 nits)

    - Nighttime Setting = 45 minutes before sunset until 2:00 AM

- (Recommended 150-600 nits)

Project Impact Analysis

Light Trespass

Light trespass is evaluated first at the identified receptor locations, then at the adjacent property lines across any major street and/or intersection. Reviewing both sets of locations allows for a greater understanding of the required light levels to ensure no disruption to existing conditions. The amount of light falling on an adjacent surface (i.e., illuminance) from the proposed digital display locations is to be determined by the angle to and distance from the source. This change in both angle and distance creates a non-linear relationship between the brightness perceived and amount of illuminance measured as a given location. With the source being large (i.e., 3,848 square feet for the largest of the proposed digital displays) and the relative distance from viewers being small (i.e., 5 feet and greater), standard methods of measuring light trespass becomes challenging. Accordingly, a Project-specific methodology was used to approximate a calculation showing light trespass on both horizontal and vertical surfaces (refer to Appendix C of the *Digital Signage Impact Analysis* included in Appendix B). Without the general assumption that the light source distance is greater than 5 times the size of the source (roughly 3.6 miles from the largest signage location and over 1200 feet from the smallest signage location), an accurate general assumption cannot be made. Instead, the existing conditions for both horizontal and vertical illuminance as well as the existing and surrounding luminance levels at various points around the Project Site were recorded. These measurements act as the maximum threshold for the sign brightness at any given time to comply with the OAAA maximum allowable illuminance threshold.

Based on the proposed digital display calculations in Appendix C of the *Digital Signage Impact Analysis* (refer to Appendix B of this document), the maximum light trespass from the proposed sign would be 2.3 foot-candles roughly 16 feet from the proposed building's façade, and the average light trespass in a 300-foot radius from the proposed digital displays would be 0.9 foot-candles. After surveying each receptor in relation to the proposed light trespass calculation for the digital displays, the highest measurement of light trespass would be at Receptor #7 (refer to Figure I-4) reading at 0.6 foot-candle. The average light trespass measurement from all receptor locations would be 0.12 foot-candles. Both of these measurements would be well below the maximum light trespass significance threshold of 1.0 foot-candles identified by the OAAA. Therefore, Project impacts related to light trespass would be less than significant.

Glare

To assess potential glare impacts, the brightness of the nighttime sky (0.22 nits), darker walls from surrounding buildings (0.2 to 5.8 nits), and other surfaces with moderately higher luminance levels (10 to 80 nits) were measured. When compared only to the surrounding dark sources, the low nighttime setting of the proposed digital displays at 150 nits would result in higher luminance levels that could potentially be considered a source of glare. However, when considering the brighter sources existing in the area (ranging from 200 to 11,000 nits) the proposed digital displays would not be considered a source of glare. As the Project Site's existing ambient light levels are relatively high, the lowest values of luminance are not appropriate to be used as the baseline

values for comparing overall brightness ratios but are to be considered in the overall average luminance ratios and environmental setting.

In relation to Century Boulevard, one of the main factors in determining potential glare effects would be the relation of the proposed digital displays to existing illuminated signs and other nearby light sources (e.g., streetlights, headlights, etc.). To relate the luminance levels of the proposed digital displays with existing illuminated signs along Century Boulevard, a "Low" range of glare would be a reading of 0 to 500 nits, a "Medium" range would be a reading of 500 to 1000 nits, and a "High" range would be a reading of 1000+ nits. The average luminance readings of the existing signs along Century Boulevard all fall within the "Low" range (i.e., 5 to 460 nits). The proposed digital displays would fall in line with the "Low" to "Medium" range given the maximum nighttime brightness would be 150 to 600 nits, resulting in an estimated average brightness of 375 nits. A similar comparison against other existing sources (car headlights at 1,300-5,800 nits, street poles at 5,200-20,800 nits, façade illumination at 4 to 53 nits, flood lights on surrounding properties 1,780 to 8,367 nits and even major intersections at 1.5 to 3.5 foot-candles or 5.14 to 11.99 nits), the digital displays would continue to fall within the "Low" to "Medium" contrast range in evening environments.

Pursuant to CVC Section 21466.5, a driver's 10-degree field of view would include building facades along Century Boulevard, which were measured as having an average of 5 nits (or the equivalent of approximately 1.5 foot-lamberts, to convert to the unit of measurement used by the CVC). 1.5 foot-lamberts times the maximum measured brightness as permitted by the CVC (x1000), would be 1,500 foot-lamberts (approximately 5,145 nits). The maximum brightness of the digital displays would read at 600 nits and thus, would not exceed the allowable 5,145 nits maximum brightness under CVC Section 21466.5. Therefore, Project impacts related to glare would be less than significant.

Mitigation Measures

Although no significant light and glare impacts have been identified, the following mitigation measures have been identified to further minimize potential light and glare affects:

AESTHETICS-1: All digital displays shall have a default mechanism that causes the sign to revert immediately to a black screen if the message board face malfunctions that would result in the display wholly or partly appearing to flash.

AESTHETICS-2: The refresh rate of the message on a digital display, exclusive of any change in whole or in part of the display image, shall be no more frequent than one refresh event every eight seconds, with an instant transition between images.

AESTHETICS-3: All digital displays shall be installed with an automatic dimming technology to adjust the brightness of the display relative to ambient light so that at no time the display shall exceed a brightness level of 0.75 foot-candles above ambient light for both daytime and nighttime conditions.

AESTHETICS-4: Before digital display operation, the Applicant shall prepare a lighting verification report demonstrating that all digital displays would operate in compliance with all identified specifications.

Cumulative Impacts

There are 6 related projects in the City (refer to Table 1-1 in Section 1 [Introduction]). Only two of these related projects (Nos. 3 and 4) are approximately 0.25 miles of the Project Site. As discussed previously, there are no scenic vistas available from the Project Site area, and neither the Project Site nor the two related project sites are visible from a designated scenic highway. All development in the City is assessed on a project-by-project basis for compliance with applicable design and lighting standards. Therefore, cumulative aesthetics impacts would be less than significant.

II. AGRICULTURE AND FORESTRY RESOURCES

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment Project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
d. Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

No Impact. The Extent of Important Farmland Map Coverage maintained by the Division of Land Protection indicates that no land within the City, including the Project Site, are included in the

Important Farmland category.[2] The closest mapped farmland is Prime Farmland located approximately 20 miles southeast of the Project Site. Therefore, the Project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) to non-agricultural use, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency. No impacts related to this issue would occur as a result of the Project.

b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?

No Impact. The Project Site is not zoned for agricultural use, and the site is not under a Williamson Act Contract.[3] Thus, the Project would not conflict with existing zoning for agricultural use or a Williamson Act Contract. Therefore, no impacts related to this issue would occur as a result of the Project.

c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?

No Impact. The Project Site is developed with a 137-room hotel and associated surface vehicle parking and is located in an entirely urbanized area. Neither the Project Site nor the surrounding area is zoned as forest land or timberland. Thus, the Project would not conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g)). Therefore, no impacts related to this issue would occur as a result of the Project.

d) Result in the loss of forest land or conversion of forest land to non-forest use?

No Impact. The Project Site is developed with a 137-room hotel and associated surface vehicle parking and is located in an entirely urbanized area. Neither the Project Site nor the surrounding area contains any forest land. Thus, the Project would not result in the loss of forest land or conversion of forest land to non-forest use. Therefore, no impacts related to this issue would occur as a result of the Project.

e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?

No Impact. The Project Site and surrounding area are developed with urban land uses. No agricultural uses are located on the Project Site or within the area. Thus, the Project would not

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[2] *State of California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program, Los Angeles County Important Farmland, 1998.*

[3] *Ibid.*

result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use. Therefore, no impacts related to this issue would occur as a result of the Project.

Cumulative Impacts

Neither the Project Site nor any of the related projects' sites are used for or designated as agricultural land or forest land. No conflicts with agriculture or forest lands zoning or conversion of agriculture and forest lands would occur as a result of cumulative development Therefore, no cumulative impacts related to agricultural or forestry resources would occur.

III. AIR QUALITY

Where available, the significance criteria established by the South Coast Air Quality Management District (SCAQMD) may be relied upon to make the following determinations.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	☒	☐
c. Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

The information and analysis provided below are primarily based the *Technical Air Quality Data* prepared by DKA Planning, included in Appendix C.

Regulatory Framework

Federal

The Federal Clean Air Act (CAA) was first enacted in 1955 and has been amended numerous times in subsequent years, with the most recent amendments in 1990. At the federal level, the United States Environmental Protection Agency (USEPA) is responsible for the implementation of some portions of the CAA (e.g., certain mobile sources and other requirements). Other portions of the CAA (e.g., stationary source requirements) are implemented by state and local agencies. In California, the CCAA is administered by the California Air Resources Board (CARB) at the state level and by the air quality management districts and air pollution control districts at the regional and local levels.

The 1990 amendments to the CAA identify specific emission reduction goals for areas not meeting the National Ambient Air Quality Standard (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 which are most applicable to the Project include Title I (Nonattainment Provisions) and Title II (Mobile Source Provisions).

NAAQS have been established for seven major air pollutants: carbon monoxide (CO) nitrogen dioxide (NO_2), ozone (O_3), particulate matter, 2.5 microns ($PM_{2.5}$), particulate matter, 10 microns (PM_{10}), sulfur dioxide (SO_2), and lead (Pb).

The Clean Air Act (CAA) requires the USEPA to designate areas as attainment, nonattainment, or maintenance (previously nonattainment and currently attainment) for each criteria pollutant based on whether the National Ambient Air Quality Standards (NAAQS) have been achieved. Title I provisions are implemented for the purpose of attaining NAAQS. The federal standards are summarized in Table III-1. The USEPA has classified the Los Angeles County portion of the South Coast Air Basin (Basin) as a nonattainment area for O_3, $PM_{2.5}$, and Pb.

CAA Title II pertains to mobile sources, such as cars, trucks, buses, and planes. Reformulated gasoline and automobile pollution control devices are examples of the mechanisms the USEPA uses to regulate mobile air emission sources. The provisions of Title II have resulted in tailpipe emission standards for vehicles, which have been strengthened in recent years to improve air quality. For example, the standards for NO_X emissions have been lowered substantially and the specification requirements for cleaner-burning gasoline are more stringent.

The USEPA regulates emission sources that are under the exclusive authority of the federal government, such as aircraft, ships, and certain types of locomotives. USEPA has jurisdiction over emission sources outside state waters (e.g., beyond the outer continental shelf) and establishes various emission standards, including those for vehicles sold in states other than California. Automobiles sold in California must meet stricter emission standards established by CARB. USEPA adopted multiple tiers of emission standards to reduce emissions from non-road diesel engines (e.g., diesel-powered construction equipment) by integrating engine and fuel controls as a system to gain the greatest emission reductions. The first federal standards (Tier 1) for new non-road (or off-road) diesel engines were adopted in 1994 for engines over 50 horsepower, to be phased in from 1996 to 2000. On August 27, 1998, USEPA introduced Tier 1 standards for equipment under 37 kW (50 horsepower) and increasingly more stringent Tier 2 and Tier 3 standards for all equipment with phase-in schedules from 2000 to 2008. The Tier 1 through 3 standards were met through advanced engine design, with no or only limited use of exhaust gas after-treatment (oxidation catalysts).

Tier 3 standards for NO_x and hydrocarbon are similar in stringency to the 2004 standards for highway engines. However, Tier 3 standards for particulate matter were never adopted. On May 11, 2004, USEPA signed the final rule introducing Tier 4 emission standards, which were phased in between 2008 and 2015. The Tier 4 standards require that emissions of particulate matter and NO_x be further reduced by about 90 percent. Such emission reductions are achieved through the use of control technologies—including advanced exhaust gas after-treatment.

Table III-1
State and National Ambient Air Quality Standards and Attainment Status for LA County

Pollutant	Averaging Period	California		Federal	
		Standards	Attainment Status	Standards	Attainment Status
Ozone (O_3)	1-hour	0.09 ppm (180 µg/m^3)	Non-attainment	--	--
	8-hour	0.070 ppm (137 µg/m^3)	N/A[1]	0.070 ppm (137 µg/m^3)	Non-attainment
Respirable Particulate Matter (PM_{10})	24-hour	50 µg/m^3	Non-attainment	150 µg/m^3	Maintenance
	Annual Arithmetic Mean	20 µg/m^3	Non-attainment	--	--
Fine Particulate Matter ($PM_{2.5}$)	24-hour	--	--	35 µg/m^3	Non-attainment
	Annual Arithmetic Mean	12 µg/m^3	Non-attainment	12 µg/m^3	Non-attainment
Carbon Monoxide (CO)	1-hour	20 ppm (23 mg/m^3)	Attainment	35 ppm (40 mg/m^3)	Maintenance
	8-hour	9.0 ppm (10 mg/m^3)	Attainment	9 ppm (10 mg/m^3)	Maintenance
Nitrogen Dioxide (NO_2)	1-hour	0.18 ppm (338 µg/m^3)	Attainment	100 ppb (188 µg/m^3)	Maintenance
	Annual Arithmetic Mean	0.030 ppm (57 µg/m^3)	Attainment	53 ppb (100 µg/m^3)	Maintenance
Sulfur Dioxide (SO_2)	1-hour	0.25 ppm (655 µg/m^3)	Attainment	75 ppb (196 µg/m^3)	Attainment
	24-hour	0.04 ppm (105 µg/m^3)	Attainment	--	--
Lead (Pb)	30-day average	1.5 µg/m^3	Attainment	--	--
	Calendar Quarter	--	--	0.15 µg/m^3	Non-attainment
Visibility Reducing Particles	8-hour	Extinction of 0.07 per kilometer	N/A	No Federal Standards	
Sulfates	24-hour	25 µg/m^3	Attainment	No Federal Standards	
Hydrogen Sulfide (H_2S)	1-hour	0.03 ppm (42 µg/m^3)	Unclassified	No Federal Standards	
Vinyl Chloride	24-hour	0.01 ppm (26 µg/m^3)	N/A	No Federal Standards	

[1]N/A = not available
Source: CARB, Ambient Air Quality Standards, and attainment status, 2020 (www.arb.ca.gov/desig/adm/adm.htm).

State

California Clean Air Act. In addition to being subject to the requirements of CAA, air quality in California is also governed by more stringent regulations under the California Clean Air Act (CCAA). In California, CCAA is administered by CARB at the state level and by the air quality management districts and air pollution control districts at the regional and local levels. CARB, which became part of the California Environmental Protection Agency in 1991, is responsible for meeting the state requirements of the CAA, administering the CCAA, and establishing the California Ambient Air Quality Standards (CAAQS). The CCAA, as amended in 1992, requires all air districts in the State to endeavor to achieve and maintain the CAAQS. CAAQS are generally more stringent than the corresponding federal standards and incorporate additional standards for sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particles.

CARB regulates mobile air pollution sources, such as motor vehicles. CARB is responsible for setting emission standards for vehicles sold in California and for other emission sources, such as consumer products and certain off-road equipment. CARB established passenger vehicle fuel specifications in March 1996. CARB oversees the functions of local air pollution control districts and air quality management districts, which, in turn, administer air quality activities at the regional and county levels. The state standards are summarized in Table III-1.

The CCAA requires CARB to designate areas within California as either attainment or nonattainment for each criteria pollutant based on whether the CAAQS thresholds have been achieved. Under the CCAA, areas are designated as nonattainment for a pollutant if air quality data shows that a state standard for the pollutant was violated at least once during the previous three calendar years. Exceedances that are affected by highly irregular or infrequent events are not considered violations of a state standard and are not used as a basis for designating areas as nonattainment. Under the CCAA, the non-desert Los Angeles County portion of the Basin is designated as a nonattainment area for O_3, PM_{10}, and $PM_{2.5}$.

Toxic Air Contaminant Identification and Control Act. The public's exposure to toxic air contaminants (TACs) is a significant public health issue in California. CARB's statewide comprehensive air toxics program was established in the early 1980s. The Toxic Air Contaminant Identification and Control Act created California's program to reduce exposure to air toxics. Under the Toxic Air Contaminant Identification and Control Act, CARB is required to use certain criteria in the prioritization for the identification and control of air toxics. In selecting substances for review, CARB must consider criteria relating to "the risk of harm to public health, amount or potential amount of emissions, manner of, and exposure to, usage of the substance in California, persistence in the atmosphere, and ambient concentrations in the community" [Health and Safety Code Section 39666(f)].

The Toxic Air Contaminant Identification and Control Act also requires CARB to use available information gathered from the Air Toxics "Hot Spots" Information and Assessment Act program to include in the prioritization of compounds. CARB identified particulate emissions from diesel-fueled engines (diesel PM) TACs in August 1998. Following the identification process, CARB was required by law to determine if there is a need for further control, which led to the risk management

phase of the program. For the risk management phase, CARB formed the Diesel Advisory Committee to assist in the development of a risk management guidance document and a risk reduction plan. With the assistance of the Diesel Advisory Committee and its subcommittees, CARB developed the Risk Reduction Plan to Reduce Particulate Matter Emissions from Diesel-Fueled Engines and Vehicles and the Risk Management Guidance for the Permitting of New Stationary Diesel-Fueled Engines. The Board approved these documents on September 28, 2000, paving the way for the next step in the regulatory process: the control measure phase. During the control measure phase, specific Statewide regulations designed to further reduce diesel PM emissions from diesel-fueled engines and vehicles have and continue to be evaluated and developed. The goal of each regulation is to make diesel engines as clean as possible by establishing state-of-the-art technology requirements or emission standards to reduce diesel PM emissions. Breathing hydrogen sulfide (H_2S) at levels above the state standard could result in exposure to a disagreeable rotten egg odor. The State does not regulate other odors.

California Air Toxics Program. The California Air Toxics Program was established in 1983 when the California Legislature adopted Assembly Bill (AB) 1807 to establish a two-step process of risk identification and risk management to address potential health effects from exposure to toxic substances in the air.[4] In the risk identification step, 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. Since inception of the program, a number of such substances have been listed, including benzene, chloroform, formaldehyde, and particulate emissions from diesel-fueled engines, among others.[5] In 1993, the California Legislature amended the program to identify the 189 federal hazardous air pollutants as TACs.

In the risk management step, CARB reviews emission sources of an identified TAC to determine whether regulatory action is needed to reduce risk. Based on results of that review, CARB has promulgated a number of airborne toxic control measures (ATCMs), both for mobile and stationary sources. In 2004, CARB adopted an ATCM to limit heavy-duty diesel motor vehicle idling in order to reduce public exposure to diesel PM and other TACs. The measure applies to 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 does not allow diesel-fueled commercial vehicles to idle for more than five minutes at any given time.

In addition to limiting exhaust from idling trucks, CARB adopted regulations on July 26, 2007 for off-road diesel construction equipment such as bulldozers, loaders, backhoes, and forklifts, as well as many other self-propelled off-road diesel vehicles to reduce emissions by installation of diesel particulate filters and encouraging the replacement of older, dirtier engines with newer emission-controlled models. In April 2021, CARB proposed a 2020 Mobile Source Strategy that seeks to move California to 100 percent zero-emission off-road equipment by 2035.

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4 *California Air Resources Board, California Air Toxics Program, www.arb.ca.gov/toxics/toxics.htm, last reviewed by CARB September 24, 2015.*

5 *California Air Resources Board, Toxic Air Contaminant Identification List, www.arb.ca.gov/toxics/id/taclist.htm, last reviewed by CARB July 18, 2011.*

Assembly Bill 2588 Air Toxics "Hot Spots" Program. The AB 1807 program is supplemented by the AB 2588 Air Toxics "Hot Spots" program, which was established by the California Legislature in 1987. Under this program, facilities are required to report their air toxics emissions, assess health risks, and notify nearby residents and workers of significant risks if present. In 1992, the AB 2588 program was amended by Senate Bill (SB) 1731 to require facilities that pose a significant health risk to the community to reduce their risk through implementation of a risk management plan.

Air Quality and Land Use Handbook: A Community Health Perspective. The *Air Quality and Land Use Handbook: A Community Health Perspective* provides important air quality information about certain types of facilities (e.g., freeways, refineries, rail yards, ports) that should be considered when siting sensitive land uses such as residences.[6] CARB provides recommended site distances from certain types of facilities when considering siting new sensitive land uses. The recommendations are advisory and should not be interpreted as defined "buffer zones." If a project is within the siting distance, CARB recommends further analysis. Where possible, CARB recommends a minimum separation between new sensitive land uses and existing sources.

Air Quality and Land Use Handbook. CARB published the *Air Quality and Land Use Handbook* (CARB Handbook) 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 roads 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 40 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 Code of Regulations. The California Code of Regulations (CCR) is the official compilation and publication of regulations adopted, amended or repealed by the state agencies pursuant to the Administrative Procedure Act. The CCR includes regulations that pertain to air quality emissions. Specifically, Section 2485 in CCR Title 13 states that the idling of all diesel-fueled commercial vehicles (weighing over 10,000 pounds) used during construction shall be limited to five minutes at any location. In addition, Section 93115 in CCR Title 17 states that operation of any stationary, diesel-fueled, compression-ignition engines shall meet specified fuel and fuel additive requirements and emission standards.

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6 *California Air Resources Board, Air Quality and Land Use Handbook, a Community Health Perspective, April 2005.*

Regional (South Coast Air Quality Management District)

The SCAQMD was created in 1977 to coordinate air quality planning efforts throughout Southern California. SCAQMD is the agency principally responsible for comprehensive air pollution control in the region. Specifically, SCAQMD is responsible for monitoring air quality, as well as planning, implementing, and enforcing programs designed to attain and maintain the CAAQS and NAAQS in the district. SCAQMD has jurisdiction over an area of 10,743 square miles consisting of Orange County; the non-desert portions of Los Angeles, Riverside, and San Bernardino counties; and the Riverside County portion of the Salton Sea Air Basin and Mojave Desert Air Basin. The Basin portion of SCAQMD's jurisdiction covers an area of 6,745 square miles. The Basin includes all of Orange County and the non-desert portions of Los Angeles (including the Project Site area), Riverside, and San Bernardino counties. The Basin is bounded by the Pacific Ocean to the west; the San Gabriel, San Bernardino and San Jacinto Mountains to the north and east; and the San Diego County line to the south.

Programs that were developed by SCAQMD to attain and maintain the CAAQS and NAAQS include air quality rules and regulations that regulate stationary sources, area sources, point sources, and certain mobile source emissions. SCAQMD is also responsible for establishing stationary source permitting requirements and for ensuring that new, modified, or relocated stationary sources do not create net emission increases. All projects in the SCAQMD jurisdiction are subject to SCAQMD rules and regulations, including, but not limited to the following:

- Rule 401 Visible Emissions – This rule prohibits an air discharge that results in a plume that is as dark or darker than what is designated as No. 1 Ringelmann Chart by the United States Bureau of Mines for an aggregate of three minutes in any one hour.

- Rule 402 Nuisance – This rule prohibits the discharge of "such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of people or the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property."

- Rule 403 Fugitive Dust – This rule requires that future projects reduce the amount of particulate matter entrained in the ambient air as a result of fugitive dust sources by requiring actions to prevent, reduce, or mitigate fugitive dust emissions from any active operation, open storage pile, or disturbed surface area.

- Rule 431.2 Sulfur Content of Liquid Fuels: This rule would require use of low-sulfur fuel in construction equipment.

- Rule 1113 Architectural Coatings: This rule limits the VOC content of architectural coatings.

- In accordance with Section 2485 in Title 13 of the California Code of Regulations, the idling of all diesel-fueled commercial vehicles (with gross vehicle weight over 10,000 pounds) during construction would be limited to five minutes at any location.

- In accordance with Section 93115 in Title 17 of the California Code of Regulations, operation of any stationary, diesel-fueled, compression-ignition engines would meet specific fuel and fuel additive requirements and emissions standards.

Air Quality Management Plan. The 2022 Air Quality Management Plan (AQMP) was adopted in December 2022 and represents the most updated regional blueprint for achieving federal air quality standards. The 2022 AQMP relies on emissions forecasts based on demographic and economic growth projections provided by the Southern California Association of Governments (SCAG) and their 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (2020-2045 RTP/SCS).

Multiple Air Toxics Exposure Study V. To date, the most comprehensive study on air toxics in the Basin is the Multiple Air Toxics Exposure Study V (released in August 2021).[7] The report included refinements in aircraft and recreational boating emissions and diesel conversion factors. The report finds a Basin average cancer risk of 455 in a million (population-weighted, multi-pathway), which represents a decrease of 54 percent compared to the number in MATES IV (2012) (page ES-13). The monitoring program measured more than 30 air pollutants, including both gases and particulates. The monitoring study was accompanied by a computer modeling study in which the SCAQMD estimated the risk of cancer from breathing toxic air pollution throughout the region based on emissions and weather data. About 88 percent of the risk is attributed to emissions associated with mobile sources, with the remainder attributed to toxics emitted from stationary sources, which include large industrial operations, such as refineries and metal processing facilities, as well as smaller businesses such as gas stations and chrome plating facilities (page ES-12). The results indicate that diesel PM is the largest contributor to air toxics risk, accounting on average for about 50 percent of the total risk (Figure ES-2).

Regional (Southern California Association of Governments)

SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino, and Imperial Counties, and addresses regional issues relating to transportation, the economy, community development and the environment. SCAG coordinates with various air quality and transportation stakeholders in Southern California to ensure compliance with the federal and state air quality requirements, including the Transportation Conformity Rule and other applicable federal, state, and air district laws and regulations. As the federally designated Metropolitan Planning Organization (MPO) for the six-county Southern California region, SCAG is required by law to ensure that transportation activities "conform" to, and are supportive of, the goals of regional and state air quality plans to attain the NAAQS. In addition, SCAG is a co-producer, with the SCAQMD, of the transportation strategy and transportation control measure sections of the AQMP for the Basin.

[7] *South Coast Air Quality Management District, MATES-V Study. https://www.aqmd.gov/home/air-quality/air-quality-studies/health-studies/mates-v.*

SCAG adopted the 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (2020-2045 RTP/SCS) on September 23, 2020.[8] The 2020-2045 RTP/SCS aims to address the transportation and air quality impacts of 3.7 million additional residents, 1.6 additional households, and 1.6 million additional jobs from 2016 to 2045. The Plan calls for $639 billion in transportation investments and reducing VMT by 19 percent per capita from 2005 to 2035. The updated plan accommodates 21.3 percent growth in population from 2016 (3,933,800) to 2045 (4,771,300) and a 15.6 percent growth in jobs from 2016 (1,848,300) to 2045 (2,135,900). The regional plan projects several benefits, including the following:

- Decreasing drive-along work commutes by 3 percent
- Reducing per capita VMT by 5 percent and vehicle hours traveled per capita by 9 percent
- Increasing transit commuting by 2 percent
- Reducing travel delay per capita by 26 percent
- Creating 264,500 new jobs annually
- Reducing greenfield development by 29 percent by focusing on smart growth
- Locating six more percent household growth in High Quality Transit Areas (HQTAs), which concentrate roadway repair investments, leverage transit and active transportation investments, reduce regional life cycle infrastructure costs, improve accessibility, create local jobs, and have the potential to improve public health and housing affordability.
- Locating 15 percent more jobs in HQTAs
- Reducing $PM_{2.5}$ emissions by 4.1 percent
- Reducing greenhouse gas (GHG) emissions by 19 percent by 2035

Local (City of Inglewood)

City of Inglewood General Plan Conservation Element. The Conservation Element of the City's General Plan was adopted on October 21, 1997 and acknowledges the role of the South Coast Air Quality Management District in adopting and implementing its Air Quality Management Plan. It also addresses the role of the Los Angeles County Metropolitan Transportation Authority (Metro) implement its Congestion Management Program. There are no objectives or policies for air quality that are germane for a development project.

California Environmental Quality Act. In accordance with CEQA requirements, the City assesses the air quality impacts of new development projects, requires mitigation of potentially significant air quality impacts by conditioning discretionary permits, and monitors and enforces

[8] *California Air Resources Board, Executive Order G-20-239, SCAG 2020 SCS ARB Acceptance of GHG Quantification Determination, October 2020.*

implementation of such mitigation. The City uses the SCAQMD's *CEQA Air Quality Handbook* and SCAQMD's supplemental online guidance/information for the environmental review of development proposals within its jurisdiction.

Existing Conditions

Pollutants and Effects

Air quality is defined by ambient air concentrations of seven specific pollutants identified by the USEPA to be of concern with respect to health and welfare of the general public. These specific pollutants, known as "criteria air pollutants," are defined as pollutants for which the federal and State governments have established ambient air quality standards, or criteria, for outdoor concentrations to protect public health. Criteria air pollutants include CO, ground-level O_3, NO_x, sulfur oxides (SO_x), PM_{10}, $PM_{2.5}$, and Pb. The descriptions of each criteria air pollutant and their health effects provided below are based on information provided by the SCAQMD.[9]

Carbon Monoxide (CO). CO is primarily emitted from combustion processes and motor vehicles due to incomplete combustion of fuel. Elevated concentrations of CO weaken the heart's contractions and lower the amount of oxygen carried by the blood. It is especially dangerous for people with chronic heart disease. Inhalation of CO can cause nausea, dizziness, and headaches at moderate concentrations and can be fatal at high concentrations.

Ozone (O_3). O_3 is a gas that is formed when volatile organic compounds (VOCs) and NO_X—both byproducts of internal combustion engine exhaust—undergo slow photochemical reactions in the presence of sunlight. O_3 concentrations are generally highest during the summer months when direct sunlight, light wind, and warm temperature conditions are favorable. An elevated level of O_3 irritates the lungs and breathing passages, causing coughing and pain in the chest and throat, thereby increasing susceptibility to respiratory infections and reducing the ability to exercise. Effects are more severe in people with asthma and other respiratory ailments. Long-term exposure may lead to scarring of lung tissue and may lower lung efficiency.

Nitrogen Dioxide (NO_2). NO_2 is a byproduct of fuel combustion and major sources include power plants, large industrial facilities, and motor vehicles. The principal form of nitrogen oxide produced by combustion is nitric oxide (NO), which reacts quickly to form NO_2, creating the mixture of NO and NO_2 commonly called NO_X. NO_2 absorbs blue light and results in a brownish-red cast to the atmosphere and reduced visibility. NO_2 also contributes to the formation of PM_{10}. NO_x irritate the nose and throat, and increase one's susceptibility to respiratory infections, especially in people with asthma. The principal concern of NO_X is as a precursor to the formation of O_3.

Sulfur Dioxide (SO_2). Sulfur oxides (SO_X) are compounds of sulfur and oxygen molecules. SO_2 is the pre- dominant form found in the lower atmosphere and is a product of burning sulfur or burning materials that contain sulfur. Major sources of SO_2 include power plants, large industrial facilities, diesel vehicles, and oil-burning residential heaters. Emissions of SO_2 aggravate lung

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9 *South Coast Air Quality Management District, Final Program Environmental Impact Report for the 2012 AQMP, December 7, 2012.*

diseases, especially bronchitis. It also constricts the breathing passages, especially in asthmatics and people involved in moderate to heavy exercise. SO_2 potentially causes wheezing, shortness of breath, and coughing. High levels of particulates appear to worsen the effect of SO_2, and long-term exposures to both pollutants leads to higher rates of respiratory illness.

Particulate Matter (PM_{10} and $PM_{2.5}$). The human body naturally prevents the entry of larger particles into the body. However, small particles, with an aerodynamic diameter equal to or less than 10 microns (PM_{10}), and even smaller particles with an aerodynamic diameter equal to or less than 2.5 microns ($PM_{2.5}$), can enter the body and become trapped in the nose, throat, and upper respiratory tract. These small particulates can potentially aggravate existing heart and lung diseases, change the body's defenses against inhaled materials, and damage lung tissue. The elderly, children, and those with chronic lung or heart disease are most sensitive to PM_{10} and $PM_{2.5}$. Lung impairment can persist for two to three weeks after exposure to high levels of particulate matter. Some types of particulates can become toxic after inhalation due to the presence of certain chemicals and their reaction with internal body fluids.

Lead (Pb). Pb is emitted from industrial facilities and from the sanding or removal of old Pb-based paint. Smelting or processing the metal is the primary source of Pb emissions, which is primarily a regional pollutant. Pb affects the brain and other parts of the body's nervous system. Exposure to Pb in very young children impairs the development of the nervous system, kidneys, and blood forming processes in the body.

State-Only Criteria Pollutants

Visibility-Reducing Particles. Deterioration of visibility is one of the most obvious manifestations of air pollution and plays a major role in the public's perception of air quality. Visibility reduction from air pollution is often due to the presence of sulfur and NOX, as well as PM.

Sulfates (SO_4^{2-}). Sulfates are the fully oxidized ionic form of sulfur. Sulfates occur in combination with metal and/or hydrogen ions. In California, emissions of sulfur compounds occur primarily from the combustion of petroleum-derived fuels (e.g., gasoline and diesel fuel) that contain sulfur. This sulfur is oxidized during the combustion process and subsequently converted to sulfate compounds in the atmosphere. Effects of sulfate exposure at levels above the standard include a decrease in ventilatory function, aggravation of asthmatic symptoms, and an increased risk of cardiopulmonary disease. Sulfates are particularly effective in degrading visibility, and, due to fact that they are usually acidic, can harm ecosystems and damage materials and property.

Hydrogen Sulfide (H_2S). H_2S is a colorless gas with the odor of rotten eggs. It is formed during bacterial decomposition of sulfur-containing organic substances. Also, it can be present in sewer gas and some natural gas and can be emitted as the result of geothermal energy exploitation. Breathing H_2S at levels above the state standard could result in exposure to a very disagreeable odor.

Vinyl Chloride. Vinyl chloride is a colorless, flammable gas at ambient temperature and pressure. It is also highly toxic and is classified as a known carcinogen by the American Conference of Governmental Industrial Hygienists and the International Agency for Research on Cancer. At

room temperature, vinyl chloride is a gas with a sickly-sweet odor that is easily condensed. However, it is stored at cooler temperatures as a liquid. Due to the hazardous nature of vinyl chloride to human health, there are no end products that use vinyl chloride in its monomer form. Vinyl chloride is a chemical intermediate, not a final product. It is an important industrial chemical chiefly used to produce polyvinyl chloride (PVC). The process involves vinyl chloride liquid fed to polymerization reactors where it is converted from a monomer to a polymer PVC. The final product of the polymerization process is PVC in either a flake or pellet form. Billions of pounds of PVC are sold on the global market each year. From its flake or pellet form, PVC is sold to companies that heat and mold the PVC into end products such as PVC pipe and bottles. Vinyl chloride emissions are historically associated primarily with landfills.

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 above 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 TAC can cause acute and chronic impacts to different target organ systems (e.g., eyes, respiratory, reproductive, developmental, nervous, and cardiovascular). CARB and OEHHA determine if a substance should be formally identified, or "listed," as a TAC in California. A complete list of these substances is maintained on CARB's website.[10]

Diesel PM, which is emitted in the exhaust from diesel engines, was listed by the state as a TAC in 1998. Diesel PM has historically been used as a surrogate measure of exposure for all diesel exhaust emissions. Diesel PM 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.

Exposure to diesel PM may be a health hazard, particularly to children whose lungs are still developing and the elderly who may have other serious health problems. Diesel PM levels and resultant potential health effects may be higher in close proximity to heavily traveled roadways with substantial truck traffic or near industrial facilities. According to CARB, diesel PM exposure may lead to the following adverse health effects: (1) aggravated asthma; (2) chronic bronchitis;

[10] *California Air Resources Board, Toxic Air Contaminant Identification List, www.arb.ca.gov/toxics/id/taclist.htm, last reviewed by CARB July 18, 2011.*

(3) increased respiratory and cardiovascular hospitalizations; (4) decreased lung function in children; (5) lung cancer; and (6) premature deaths for people with heart or lung disease.[11,12]

Project Site

The Project Site is located within the South Coast Air Basin (Basin), named so because of its geographical formation is that of a basin, with the surrounding mountains trapping the air and its pollutants in the valleys or basins below. The 6,745-square-mile Basin includes all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties. It is bounded by the Pacific Ocean to the west; the San Gabriel, San Bernardino and San Jacinto Mountains to the north and east; and the San Diego County line to the south. Ambient pollution concentrations recorded in Los Angeles County portion of the Basin are among the highest in the four counties comprising the Basin. USEPA has classified Los Angeles County as nonattainment areas for O_3, $PM_{2.5}$, and Pb. This classification denotes that the Basin does not meet the NAAQS for these pollutants. In addition, under the CCAA, the Los Angeles County portion of the Basin is designated as a nonattainment area for O_3, PM_{10}, and $PM_{2.5}$. 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 meteorology.

Air pollutant emissions are generated in the local vicinity by stationary and area-wide sources, such as commercial activity, space and water heating, landscaping maintenance, consumer products, and mobile sources primarily consisting of automobile traffic.

Air Pollution Climatology. The topography and climate of Southern California combine to make the Basin an area of high air pollution potential. During the summer months, a warm air mass frequently descends over the cool, moist marine layer produced by the interaction between the ocean's surface and the lowest layer of the atmosphere. The warm upper layer forms a cap over the cooler surface layer which inhibits the pollutants from dispersing upward. Light winds during the summer further limit ventilation. Additionally, abundant sunlight triggers photochemical reactions which produce O3 and the majority of particulate matter.

Air Monitoring Data. The SCAQMD monitors air quality conditions at 38 source receptor areas (SRA) throughout the Basin. The Project Site is located in SCAQMD's Southwest Coastal LA County receptor area. Historical data from the area was used to characterize existing conditions in the vicinity of the Project area. Table III-2 shows pollutant levels, State and federal standards, and the number of exceedances recorded in the area from 2018 through 2020. The one-hour State standard for O_3 was exceeded once during this three-year period, while the federal standard was exceeded twice in that same period. In addition, the daily State standard for PM_{10} was exceeded three times in this period. CO and NO_2 levels did not exceed the CAAQS from 2018 to 2020 for 1-hour (and 8-hour for CO).

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11 *California Air Resources Board, Overview: Diesel Exhaust and Health, www.arb.ca.gov/research/diesel/diesel-health.htm, last reviewed by CARB April 12, 2016.*

12 *California Air Resources Board, Fact Sheet: Diesel Particulate Matter Health Risk Assessment Study for the West Oakland Community: Preliminary Summary of Results, March 2008.*

Existing Health Risk in the Surrounding Area. Based on the MATES-V model, the calculated cancer risk in the Project Site area (zip code 90304) is approximately 561 in a million.[13] The cancer risk in this area is predominately related to nearby sources of diesel particulate matter (e.g., diesel trucks and traffic on the San Diego Freeway 1.05 miles to the west and on the I-105 freeway 4,100 feet to the south). In general, the risk at the Project Site is higher than 83 percent of the population across the South Coast Air Basin.

Table III-2
Ambient Air Quality Data

Pollutants and State and Federal Standards	Maximum Concentrations and Frequencies of Exceedance Standards		
	2018	2019	2020
Ozone (O_3)			
Maximum 1-hour Concentration (ppm)	0.065	0.067	0.117
Days > 0.09 ppm (State 1-hour standard)	0	0	1
Days > 0.070 ppm (Federal 8-hour standard)	0	0	2
Carbon Monoxide (CO)			
Maximum 1-hour Concentration (ppm)	1.8	1.8	1.6
Days > 20 ppm (State 1-hour standard)	0	0	0
Maximum 8-hour Concentration (ppm)	1.5	1.3	1.3
Days > 9.0 ppm (State 8-hour standard)	0	0	0
Nitrogen Dioxide (NO_2)			
Maximum 1-hour Concentration (ppm)	0.0596	0.0566	0.0597
Days > 0.18 ppm (State 1-hour standard)	0	0	0
PM_{10}			
Maximum 24-hour Concentration (µg/m^3)	45	62	43
Days > 50 µg/m^3 (State 24-hour standard)	0	3	0
$PM_{2.5}$			
Maximum 24-hour Concentration (µg/m^3)	N/A	N/A	N/A
Days > 35 µg/m^3 (Federal 24-hour standard)	N/A	N/A	N/A
Sulfur Dioxide (SO_2)			
Maximum 24-hour Concentration (ppb)	11.5	8.2	6.0
Days > 0.04 ppm (State 24-hour standard)	0	0	0

ppm = parts by volume per million of air.
µg/m^3 = micrograms per cubic meter.
N/A = not available at this monitoring station.
Source: SCAQMD annual monitoring data at Southwest Coastal LA County (http://www.aqmd.gov/home/air-quality/air-quality-data-studies/historical-data-by-year) accessed April 7, 2022.

The Office of Environmental Health Hazard Assessment, on behalf of the California Environmental Protection Agency (CalEPA), provides a screening tool called CalEnviroScreen that can be used to help identify California communities disproportionately burdened by multiple

[13] *South Coast Air Quality Management District, Multiple Air Toxics Exposure Study in the South Coast Air Basin (MATES-V), MATES V Interactive Carcinogenicity Map, 2021, https://experience.arcgis.com/experience/79d3b6304912414bb21ebdde80100b23/page/home/?data_id=dataSource_105-a5ba9580e3aa43508a793fac819a5a4d%3A26&views=view_39%2Cview_1, accessed April 2, 2022.*

sources of pollution. According to CalEnviroScreen, the Project Site (Census tract 6037601801) is located in the 80th percentile, which means the Project Site has an overall environmental pollution burden higher than at least 80 percent of other communities within California.[14]

Sensitive Receptors. Some land uses are considered more sensitive to changes in air quality than others, depending on the population groups and the activities involved. CARB has identified the following groups who are most likely to be affected by air pollution: children less than 14 years of age, the elderly over 65 years of age, athletes, and people with cardiovascular and chronic respiratory diseases. According to the SCAQMD, sensitive receptors include residences, schools, playgrounds, childcare centers, athletic facilities, long-term health care facilities, rehabilitation centers, convalescent centers, and retirement homes.

The Project Site is located on a major east-west arterial in Inglewood with a wide variety of land uses. Sensitive receptors within 1,000 feet of the Project Site include, but are not limited to, the following representative sampling:

- Crestridge Inn Motel, west of the Project Site
- Residences, 4200 block of 101st Street (south side), 50 feet south of the Project Site
- Residences, Freeman Avenue (east side), 50 feet east of the Project Site
- Residences, 4100 block of Century Boulevard; 110 feet northeast of the Project Site across Century Boulevard
- Residences, 1200 block of Myrtle Street; 180 feet north of the Project Site across Century Boulevard
- Sea Breeze Inn, 4307 Century Boulevard; 320 feet northwest of the Project Site across Century Boulevard

Existing Project Site Emissions. The Project Site is improved with a 137-room hotel and several surface parking lots. As summarized in Table III-3, most existing air quality emissions are associated with the 1,095 daily vehicle trips traveling to and from the Project Site.[15] When transit and pedestrian travel mode reductions are considered, the existing project generates about 844 daily vehicle trips.

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14 *Office of Environmental Health Hazard Assessment, CalEnviroScreen 4.0 MAP, https://experience.arcgis.com/experience/79d3b6304912414bb21ebdde80100b23/page/home/?data_id=dataSource_85-1727ac1da3ba490bbc43c6f4ebe91539%3A3535&views=view_38%2Cview_7, accessed April 2, 2022.*

15 *Linscott Law & Greenspan; Vehicle Miles Traveled Analysis, 4200 Century, June 2022.*

Table III-3
Existing Estimated Daily Operations Emissions

Emissions Source	Daily Emissions (Pounds Per Day)					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Area Sources	1.5	<0.1	<0.1	<0.1	<0.1	<0.1
Energy Sources	0.1	1.1	0.9	<0.1	0.1	0.1
Mobile Sources	3.5	3.9	31.5	<0.1	5.4	1.4
Regional Total	**5.1**	**4.1**	**32.4**	**<0.1**	**5.4**	**1.5**

Source: DKA Planning, 2024, based on CalEEMod 2022.1.1.24 model runs (included in Appendix C).

Thresholds of Significance

State CEQA Guidelines Appendix G

Would the Project:

a) *Conflict with or obstruct implementation of the applicable air quality plan;*

b) *Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or State ambient air quality standard;*

c) *Expose sensitive receptors to substantial pollutant concentrations; or*

d) *Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?*

SCAQMD Thresholds

Construction and Operational Emissions

The criteria set forth in SCAQMD's *CEQA Air Quality Handbook* serve as quantitative air quality standards to be used to evaluate project impacts under the Appendix G Checklist are included in Table III-4.

Table III-4
SCAQMD Construction and Operational Emissions Thresholds

Criteria Pollutant	Construction Emissions		Operational Emissions	
	Regional	Localized[1]	Regional	Localized[1]
Volatile Organic Compounds (VOC)	75	--	55	--
Nitrogen Oxides (NO_X)	100	91	55	91
Carbon Monoxide (CO)	550	664	550	664
Sulfur Oxides (SO_X)	150	--	150	--
Respirable Particulates (PM_{10})	150	5	150	1
Fine Particulates ($PM_{2.5}$)	55	3	55	1

[1] *Localized significance thresholds assumed a one-acre and 25-meter (82-foot) receptor distance in the Southwest Coastal LA County source receptor area. The SCAQMD has not developed LST values for VOC or SO_X. Pursuant to SCAQMD guidance, sensitive receptors closer than 25 meters to a construction site are to use the LSTs for receptors at 25 meters (SCAQMD Final Localized Significance Threshold Methodology, June 2008).*

Source: SCAQMD, South Coast AQMD Air Quality Significance Thresholds, 2019.

Consistency with the AQMP

CEQA Guidelines Section 15125 requires an analysis of project consistency with applicable governmental plans and policies. In accordance with the SCAQMD's *CEQA Air Quality Handbook*, the following criteria were used to evaluate the Project's consistency with the AQMP[16]:

- Will the Project result in any of the following:
    - An increase in the frequency or severity of existing air quality violations;
    - Cause or contribute to new air quality violations; or
    - Delay timely attainment of air quality standards or the interim emission reductions specified in the AQMP?
- Will the Project exceed the assumptions utilized in preparing the AQMP?
    - Is the Project consistent with the population and employment growth projections upon which AQMP forecasted emission levels are based;
    - Does the Project include air quality mitigation measures; or
    - To what extent is Project development consistent with the AQMP land use policies?

[16] *South Coast Air Quality Management District, CEQA Air Quality Handbook, April 1993, p. 12-3.*

The Project's impacts with respect to these criteria are discussed to assess the consistency with the SCAQMD's AQMP and SCAG regional plans and policies.

Methodology

The air quality analysis conducted for the Project is consistent with the methods described in SCAQMD's CEQA Air Quality Handbook (and updates), as provided on the SCAQMD website. SCAQMD recommends the use of the California Emissions Estimator Model (CalEEMod, version 2022.1) as a tool for quantifying emissions of air pollutants that would be generated by constructing and operating development projects. The analysis focuses on the potential change in air quality conditions due to Project implementation. Air pollutant emissions would result from both construction and operation of the Project. Specific methodologies used to evaluate these emissions are discussed below.

Construction

Sources of air pollutant emissions associated with construction activities include heavy-duty off-road diesel equipment and vehicular traffic to and from the Project construction site. Project-specific information was provided describing the schedule of construction activities and the equipment inventory required from the Applicant. CalEEMod provides default values for daily equipment usage rates and worker trip lengths, as well as emission factors for heavy-duty equipment, passenger vehicles, and haul trucks that have been derived by the CARB. Maximum daily emissions were quantified for each construction activity based on the number of equipment and daily hours of use, in addition to vehicle trips to and from the Project Site.

SCAQMD recommends that air pollutant emissions be assessed for both regional scale and localized impacts. The regional emissions analysis includes both on-site and off-site sources of emissions, while the localized emissions analysis focuses only on sources of emissions that would be located on the Project Site.

Localized impacts were analyzed in accordance with SCAQMD's Localized Significance Threshold (LST) methodology.[17] The localized effects from on-site portion of daily emissions were evaluated at sensitive receptor locations potentially affected by the Project according to the SCAQMD's LST methodology, which uses on-site mass emission look-up tables and Project-specific modeling, where appropriate.[18] SCAQMD provides LSTs applicable to the following criteria pollutants: NO_X, CO, PM_{10}, and $PM_{2.5}$. SCAQMD does not provide an LST for SO_2 since land-use development projects typically result in negligible construction and long-term operation emissions of this pollutant. Since VOCs are not a criteria pollutant, there is no ambient standard or SCAQMD LST for VOCs. Due to the role VOCs play in O_3 formation, it is classified as a precursor pollutant, and only a regional emissions threshold has been established.

LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality

17 *South Coast Air Quality Management District, Final Localized Significance Methodology, revised July 2008.*

18 *South Coast Air Quality Management District, LST Methodology Appendix C-Mass Rate LST Look-Up Table, October 2009.*

standard and are developed based on the ambient concentrations of that pollutant for each source receptor area and distance to the nearest sensitive receptor. The mass rate look-up tables were developed for each source receptor area and can be used to determine whether or not a project may generate significant adverse localized air quality impacts. SCAQMD provides LST mass rate look-up tables for projects with active construction areas that are less than or equal to five acres. If the project exceeds the LST look-up values, then the SCAQMD recommends that project-specific air quality modeling must be performed. In accordance with SCAQMD guidance, maximum daily emissions of NO_X, CO, PM_{10}, and $PM_{2.5}$ from on-site sources during each construction activity were compared to LST values for a one-acre site having sensitive receptors within 25 meters (82 feet).[19] Analyzing the Project Site as a one-acre site is conservative, as it is 1.98 acres. However, the use of more stringent thresholds of significance for a one-acre site ensures this analysis is more protective of public health.

Operations

CalEEMod also generates estimates of daily and annual emissions of air pollutants resulting from future operation of a project. Operational emissions of air pollutants are produced by mobile sources (vehicular travel) and stationary sources (utilities demand). The Project Site is serviced by Southern California Gas and Southern California Edison, for which CalEEMod has derived default emissions factors for electricity and natural gas usage that are applied to the size and land use type of the Project in question. CalEEMod also generates estimated operational emissions associated water use, wastewater generation, and solid waste disposal.

Similar to construction, SCAQMD's CalEEMod software was used for the evaluation of Project emissions during operation. CalEEMod was used to calculate on-road fugitive dust, architectural coatings, landscape equipment, energy use, mobile source, and stationary source emissions. To determine if a significant air quality impact would occur, the net increase in regional and local operational emissions generated by the Project was compared against the SCAQMD's significance thresholds.[20]

TAC Impacts (Construction and Operation)

Potential TAC impacts are evaluated by conducting a qualitative analysis consistent with the CARB Handbook followed by a more detailed analysis (i.e., dispersion modeling), as necessary. The qualitative analysis consists of reviewing the Project to identify any new or modified TAC emissions sources. If the qualitative evaluation does not rule out significant impacts from a new source, or modification of an existing TAC emissions source, a more detailed analysis is conducted.

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19 *South Coast Air Quality Management District, Fact Sheet for Applying CalEEMod to Localized Significance Thresholds, 2008.*

20 *South Coast Air Quality Management District, Air Quality Significance Thresholds, revised March 2015. SCAQMD based these thresholds, in part on the federal Clean Air Act and, to enable defining "significant" for CEQA purposes, defined the setting as the South Coast Air Basin. (See SCAQMD, CEQA Air Quality Handbook, April 1993, pp. 6-1-6-2).*

a) Would the Project conflict with or obstruct implementation of the applicable air quality plan?

Less Than Significant Impact. As discussed below, the Project would not conflict with or obstruct implementation of the 2022 AQMP. Therefore, Project impacts related to this issue would be less than significant.

- Would the Project result in any of the following:
    - An increase in the frequency or severity of existing air quality violations;
    - Cause or contribute to new air quality violations; or
    - Delay timely attainment of air quality standards or the interim emission reductions specified in the 2022 AQMP?

As discussed in response to Checklist Question III b), the Project's air quality emissions would not exceed any state or federal standards. Thus, the Project would not increase the frequency or severity of an existing violation or cause or contribute to new violations for these pollutants. As the Project would not exceed any of the state and federal standards, the Project would also not delay timely attainment of air quality standards or interim emission reductions specified in the AQMP.

- Would the Project exceed the assumptions utilized in preparing the 2022 AQMP?

The projections in the AQMP for achieving air quality goals are based on assumptions in SCAG's 2020-2045 RTP/SCS regarding population, housing, and growth trends. Determining whether or not a project exceeds the assumptions reflected in the AQMP involves the evaluation of three criteria: (1) consistency with applicable population, housing, and employment growth projections; (2) project mitigation measures; and (3) appropriate incorporation of AQMP land use planning strategies. These criteria are discussed below.

- Would the Project be consistent with the population, housing, and employment growth projections upon which the 2022 AQMP forecasted emission levels are based?

A project is consistent with the AQMP, in part, if the Project is consistent with the population, housing, and employment assumptions that were used in the development of the AQMP. In the case of the 2022 AQMP, two sources of data form the basis for the projections of air pollutant emissions: the City's General Plan and SCAG's 2020-2045 RTP/SCS. The General Plan serves as a comprehensive, long-term plan for future development of the City. The 2020-2045 RTP/SCS provides socioeconomic forecast projections of regional population growth.[21] The population, housing, and employment forecasts, which are adopted by SCAG's Regional Council, are based

[21] *The current applicable air quality attainment plan for the region is the 2016 AQMP, which is based on the growth assumptions in the 2016 RTP/SCS. As such, the 2016 RTP/SCS was used as the basis for this analysis.*

on local plans and policies applicable to the specific area; these are used by SCAG in all phases of implementation and review.

Development of the Project would generate approximately 380 employment positions on-site, based on the City's methodology for determining anticipated employment for the Project's 175-room hotel and 42,350 square feet of actively occupied event and entertainment space (excluding approximately 12,350 square feet of back-of-house area associated with the event and entertainment space).[22] However, the removal of the existing 137-room hotel facility would eliminate approximately 164 jobs, resulting in a net addition of approximately 216 jobs on-site.[23] This would represent 9.3 percent of the 12,100 jobs that are accommodated in the 2020-2045 RTP/SCS in the City from 2016 to 2045. As such, the Project's employment impact would not contribute to job growth that exceeds the capacity that is accommodated in the 2020-2045 AQMP. As a result, the Project would be consistent with the employment projections in the 2022 AQMP.

The Project would add a residential population of approximately 382 people to the Project Site based on the 129 residential condominium and serviced apartment extended stay units.[24] The Project's residential population would represent approximately 1.7 percent of the forecasted growth between 2016 and 2045 in the City and would be consistent with the projections in the AQMP. As such, the Project meets this criterion.

- Would the Project implement feasible air quality mitigation measures?

As discussed below in response to Checklist Questions III b), c), and d), the Project would not result in any significant air quality impacts and therefore would not require mitigation. In addition, the Project would comply with all applicable regulatory standards as required by SCAQMD. Furthermore, with compliance with the regulatory requirements identified above, no significant air quality impacts would occur. As such, the Project meets this criterion.

- To what extent would Project development be consistent with the land use policies set forth in the 2022 AQMP?

With regard to land use developments such as the Project, the 2022 AQMP's air quality policies focus on the reduction of vehicle trips and vehicle miles traveled (VMT) in part by focusing mixed-use development HQTAs. The Project would serve to implement a number of land use policies of the City, SCAQMD, and SCAG. The Project would be designed and constructed to support and promote environmental sustainability. The Project represents an infill development within an existing urbanized area that would concentrate more housing and population within an HQTA. "Green" principles are incorporated throughout the Project to comply with the City of Inglewood's Building Code and the California Green Building Standards Code (CALGreen) through energy

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22 *Southern California Association of Governments, "Employment Density Study"; 2001. Assumes median rates of one employee per 1,179 square feet of hotel/motel uses and one per 730 square feet of retail space (as proxy for event and entertainment areas).*

23 *Transportation Impact Analysis, LLG Engineers, June 14, 2024. Refer to Appendix I. City of Inglewood VMT Methodology, assumes 12 employees per 10 hotel guestrooms*

24 *California Department of Finance, Population and Housing Estimates for Cities, Counties, and the State, January 1, 2011-2020. Uses 2020 estimates.*

conservation, water conservation, and waste reduction features. As such, the Project would be consistent with this criterion.

b) Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

Less Than Significant Impact. As discussed below, Project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard. Therefore, Project impacts related to this issue would be less than significant.

Construction

Table III-5 summarizes the estimated construction schedule that was modeled for air quality impacts. Note that some overlap is proposed with two or more phases. Construction-related emissions were estimated using the SCAQMD's CalEEMod 2022.1 model and a projected construction schedule of approximately 26 months.

Table III-5
Approximate Construction Schedule

Phase	Duration	Notes
Demolition	Months 1-3	Removal of 61,000 square feet of building floor area and 40,502 square feet of asphalt/concrete parking lot hauled 30 miles to landfill in 10-cubic yard capacity trucks.
Site Preparation	Month 3	Removal of trees, plants, landscaping, weeds, grubbing
Grading/Shoring	Months 3-7	Approximately 112,813 cubic yards of soil (including swell factors for topsoil and dry clay) hauled 30 miles to landfill in 10-cubic yard capacity trucks.
Below Grade Parking Construction	Months 6-9	Pour in place construction.
Above Grading Parking Construction	Months 9-18	Pour in place construction.
Building Construction (Hotel-Apartment Structure)	Months 9-26	Includes framing, concrete pouring, welding; installing electrical, plumbing, and HVAC, installing insulation, interior drywall, flooring.
Architectural Coatings	Months 19-26	Application of interior and exterior coatings and sealants.
Source: DKA Planning, 2022.		

The Project would be required to comply with the following regulations, as applicable:

- SCAQMD Rule 403, which would reduce the amount of particulate matter entrained in ambient air as a result of anthropogenic fugitive dust sources by requiring actions to prevent, reduce or mitigate fugitive dust emissions.
- SCAQMD Rule 1113, which limits the VOC content of architectural coatings.
- SCAQMD Rule 402, which states that a person shall not discharge from any source whatsoever such quantities of air contaminants or other materials which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health, or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.
- In accordance with Section 2485 in Title 13 of the California Code of Regulations, the idling of all diesel-fueled commercial vehicles (with gross vehicle weight over 10,000 pounds) during construction would be limited to five minutes at any location.
- In accordance with Section 93115 in Title 17 of the California Code of Regulations, operation of any stationary, diesel-fueled, compression-ignition engines would meet specific fuel and fuel additive requirements and emissions standards.

Regional Emissions

Construction activity creates air quality impacts through the use of heavy-duty construction equipment and through vehicle trips generated by construction workers traveling to and from the Project Site. Fugitive dust emissions would peak during grading activities, where approximately 112,813 cubic yards of soil (including swell factors for topsoil and clay) would be exported from the Project Site to accommodate a one-level subterranean structure. NO_X emissions would primarily result from the use of construction equipment and truck trips.

All construction projects in the Basin must comply with SCAQMD Rule 403 for fugitive dust. Rule 403 control requirements include measures to prevent the generation of visible dust plumes. Measures include, but are not limited to, applying water and/or soil binders to uncovered areas, reestablishing ground cover as quickly as possible, utilizing a wheel washing system or other control measures to remove bulk material from tires and vehicle undercarriages before vehicles exit the Project Site, and maintaining effective cover over exposed areas. Compliance with Rule 403 would reduce regional $PM_{2.5}$ and PM_{10} emissions associated with construction activities by approximately 61 percent.

During the building finishing phase, the application of architectural coatings (e.g., paints) would potentially release VOCs (regulated by SCAQMD Rule 1113). The assessment of construction air quality impacts considers each of these potential sources. Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation and, for dust, the prevailing weather conditions.

As shown in Table III-6, construction of the Project would not produce VOC, NO_X, CO, SO_X, PM_{10} and $PM_{2.5}$ emissions in excess of SCAQMD's regional thresholds. As a result, construction of the Project would not contribute substantially to an existing violation of air quality standards for regional pollutants (e.g., O_3). Therefore, Project impacts related to regional construction emissions would be less than significant.

Localized Emissions

Maximum localized (on-site) emissions were quantified for each construction activity. The localized construction air quality analysis was conducted using the methodology promulgated by the SCAQMD. Look-up tables provided by the SCAQMD were used to determine localized construction emissions thresholds for the Project.[25] LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard and are based on the most recent background ambient air quality monitoring data (2018-2020) for the Project Site area.

Table III-6
Daily Construction Emissions

Construction Phase Year	Daily Emissions (Pounds Per Day)					
	VOC	**NO_X**	**CO**	**SO_X**	**PM_{10}**	**$PM_{2.5}$**
2022	1.9	19.2	18.5	<0.1	1.5	0.9
2023	18.6	60.3	78.5	<0.1	12.6	5.7
2024	18.3	31.5	73.8	<0.1	12.5	3.6
2025	2.4	1.9	32.2	<0.1	5.0	1.5
Maximum Regional Total	**18.6**	**60.3**	**78.5**	**<0.1**	**12.6**	**5.7**
Regional Threshold	**75**	**100**	**550**	**150**	**150**	**55**
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Maximum Localized Total	**25.9**	**17.5**	**16.3**	**<0.1**	**3.6**	**2.1**
Localized Threshold	**N/A**	**91**	**664**	**N/A**	**5**	**3**
Exceed Threshold?	**N/A**	**No**	**No**	**N/A**	**No**	**No**

The construction dates are used for the modeling of air quality emissions in the CalEEMod software. If construction activities commence later than what is assumed in the environmental analysis, the actual emissions would be lower than analyzed because of the increasing penetration of newer equipment with lower certified emission levels. Assumes implementation of SCAQMD Rule 403 (Fugitive Dust Emissions).

Source: DKA Planning, 2024 based on CalEEMod 2022.1.1.24 model runs. LST analyses based on 1-acre site with 25-meter distances to receptors in Southwest Coastal LA County source receptor area. Numbers may not add due to rounding. Modeling sheets included in Appendix C.

Maximum on-site daily construction emissions for NO_X, CO, PM_{10}, and $PM_{2.5}$ were calculated using CalEEMod and compared to the applicable SCAQMD LSTs for the Southwest Coastal LA

[25] *South Coast Air Quality Management District, LST Methodology Appendix C-Mass Rate LST Look-up Table, revised October 2009.*

County SRA based on construction site acreage that is less than or equal to one acre. Potential impacts were evaluated at the closest off-site sensitive receptor, which are the motels to the west of the Project Site on Century Boulevard. The closest receptor distance on the SCAQMD mass rate LST look-up tables is 25 meters.

As shown in Table III-6**,** the Project would not produce emissions in excess of SCAQMD's recommended localized standards of significance for NO_2 and CO during the construction phase. Similarly, construction activities would not produce PM_{10} and $PM_{2.5}$ emissions that exceed localized thresholds recommended by the SCAQMD. These estimates assume the use of Best Available Control Measures (BACMs) that address fugitive dust emissions of PM_{10} and $PM_{2.5}$ through SCAQMD Rule 403. This would include watering portions of the site that are disturbed during grading activities and minimizing tracking of dirt onto local streets. Therefore, Project impacts related to localized construction emissions would be less than significant.

Operation

Operational emissions of criteria pollutants would come from area, energy, and mobile sources. Area sources include hearths, consumer products such as household cleaners, architectural coatings for routine maintenance, and landscaping equipment. Energy sources include electricity and natural gas use for space heating and water heating. As shown in Table III-7, the Project's regional and localized emissions would not exceed the SCAQMD's significance thresholds. Therefore, Project impacts related to operational emissions would be less than significant.

Table III-7
Daily Operations Emissions

Emissions Source	Daily Emissions (Pounds Per Day)					
	VOC	**NO_X**	**CO**	**SO_X**	**PM_{10}**	**$PM_{2.5}$**
Area Sources	12.0	0.4	28.3	<0.1	0.1	0.1
Energy Sources	<0.1	0.4	0.2	<0.1	0.1	<0.1
Mobile Sources	13.3	9.8	11.0	0.3	22.6	5.8
Regional Total	***25.3***	***10.6***	***13.9***	***0.3***	***22.7***	***5.9***
Less Existing Total	*(-11.2)*	*(-4.8)*	*(-42.4)*	*(-<0.1)*	*(-2.7)*	*(-0.6)*
Net Regional Total	***14.1***	***5.8***	***96.6***	***0.3***	***15.0***	***5.3***
Regional Significance Threshold	**55**	**55**	**550**	**150**	**150**	**55**
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Net Localized Total	***10.0***	***0.3***	***24.9***	***<0.1***	***<0.1***	***<0.1***
Localized Significance Threshold	**N/A**	**91**	**664**	**N/A**	**1**	**1**
Exceed Threshold?	**N/A**	**No**	**No**	**N/A**	**No**	**No**

LST analyses based on 1-acre site with 25-meter distances to receptors in Southwest Coastal LA County SRA. Numbers may not add due to rounding.

Source: DKA Planning, 2024 based on CalEEMod 2022.1.1.24 model runs (included in Appendix C).

c) Expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact. Representative sensitive land uses in proximity to the Project Site include the following:

- Crestridge Inn Motel, immediately west of the Project Site
- Residences, 4200 block of 101st Street (south side), 50 feet south of the Project Site
- Residences, Freeman Avenue (east side), 50 feet east of the Project Site
- Residences, 4100 block of Century Boulevard; 110 feet northeast of the Project Site across Century Boulevard
- Residences, 1200 block of Myrtle Street; 180 feet north of the Project Site across Century Boulevard
- Sea Breeze Inn, 4307 Century Boulevard; 320 feet northwest of the Project Site across Century Boulevard

Construction

Construction of the Project could expose sensitive receptors to substantial pollutant concentrations if maximum daily emissions of regulated pollutants generated by sources located on and/or near the Project Site exceed the applicable LST values presented in Table III-4, or if construction activities generated significant emissions of TACs that could result in carcinogenic risks or non-carcinogenic hazards exceeding the SCAQMD Air Quality Significance Thresholds of 10 excess cancers per million or non-carcinogenic Hazard Index greater than 1.0, respectively. The LST values were derived by SCAQMD for the criteria pollutants NO_X, CO, PM_{10}, and $PM_{2.5}$ to prevent the occurrence of concentrations exceeding the air quality standards at sensitive receptor locations based on proximity and construction site size.

As shown in Table III-6, during construction of the Project, maximum daily localized unmitigated emissions of NO_2, CO, PM_{10}, and $PM_{2.5}$ from sources on the Project Site would remain below each of the respective LST values. Maximum daily localized emissions would not exceed any of the localized standards for receptors that are within 25 meters of the Project's construction activities. Therefore, based on SCAQMD guidance, localized emissions of criteria pollutants would not have the potential to expose sensitive receptors to substantial concentrations that would present a public health concern.

The primary TAC that would be generated by construction activities is diesel PM, which would be released from the exhaust stacks of construction equipment. The construction emissions modeling conservatively assumed that all equipment present on the Project Site would be operating simultaneously throughout most of the day, while in all likelihood this would rarely be the case. Average daily emissions of diesel PM would be less than one pound per day throughout

the course of Project construction. Thus, the magnitude of daily diesel PM emissions, would not be sufficient to result in substantial pollutant concentrations at off-site locations nearby.

Furthermore, according to SCAQMD methodology, health risks from carcinogenic air toxics are usually described in terms of individual cancer risk. “Individual Cancer Risk” is the likelihood that a person exposed to concentrations of TACs over a 30-year period will contract cancer based on the use of standard risk-assessment methodology. The entire duration of construction activities associated with implementation of the Project is anticipated to be approximately 26 months, and the magnitude of daily diesel PM emissions would vary over this time period. No residual emissions and corresponding individual cancer risk would occur after construction. Because of the short-term exposure period, construction TAC emissions would not be significant. Thus, construction of the Project would not expose sensitive receptors to substantial diesel PM concentrations. Therefore, the Project’s construction-related impact on sensitive receptors would be less than significant.

Operation

The Project Site would be redeveloped with multi-family residences, a hotel, and entertainment uses that are not typically associated with TAC emissions. Typical sources of acutely and chronically hazardous TACs include industrial manufacturing processes (e.g., chrome plating, electrical manufacturing, petroleum refinery). The Project would not include these types of potential industrial manufacturing process sources. It is expected that quantities of hazardous TACs generated on-site (e.g., cleaning solvents, paints, landscape pesticides, etc.) for the types of proposed land uses would be below thresholds warranting further study under the California Accidental Release Program.

When considering potential air quality impacts under CEQA, consideration is given to the location of sensitive receptors within close proximity of land uses that emit TACs. CARB has published and adopted the Air Quality and Land Use Handbook: A Community Health Perspective, which provides recommendations regarding the siting of new sensitive land uses near potential sources of air toxic emissions (e.g., freeways, distribution centers, rail yards, ports, refineries, chrome plating facilities, dry cleaners, and gasoline dispensing facilities).[26] The SCAQMD adopted similar recommendations in its Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning.[27] Together, the CARB and SCAQMD guidelines recommend siting distances for both the development of sensitive land uses in proximity to TAC sources and the addition of new TAC sources in proximity to existing sensitive land uses.

The primary sources of potential air toxics associated with Project operations include diesel PM from delivery trucks (e.g., truck traffic on local streets and idling on adjacent streets) and to a lesser extent, facility operations (e.g., natural gas-fired boilers). However, these activities and the land uses associated with the Project are not considered land uses that generate substantial TAC emissions. It should be noted that SCAQMD recommends that health risk assessments (HRAs)

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26 *CARB, Air Quality and Land Use Handbook, a Community Health Perspective, April 2005.*

27 *SCAQMD, Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning, May 6, 2005.*

be conducted for substantial individual sources of diesel PM (e.g., truck stops and warehouse distribution facilities that generate more than 100 trucks per day or more than 40 trucks with operating transport refrigeration units) and has provided guidance for analyzing mobile source diesel emissions.[28] Based on this guidance, the Project would not include these types of land uses and would not be considered a substantial source of diesel PM warranting a refined HRA since daily truck trips to the Project Site would not exceed 100 trucks per day or more than 40 trucks with operating transport refrigeration units. In addition, the CARB-mandated airborne toxic control measures (ATCM) limit diesel-fueled commercial vehicles (delivery trucks) to idle for no more than five minutes at any given time, which would further limit diesel PM emissions.

As the Project would not generate substantial TAC sources and is consistent with the CARB and SCAQMD guidelines, the Project would not result in the exposure of off-site sensitive receptors to carcinogenic or TACs that exceed the maximum incremental cancer risk of 10 in one million or an acute or chronic hazard index of 1.0.

Additionally, the Project would generate long-term emissions on-site from area and energy sources that would generate negligible pollutant concentrations of CO, NO_2, $PM_{2.5}$, or PM_{10} at nearby sensitive receptors (refer to Table III-7). While long-term operations of the Project would generate traffic that would produces off-site emissions, these emissions would not result in exceedances of CO air quality standards at roadways in the area due to three key factors. First, CO hotspots are extremely rare and only occur in the presence of unusual atmospheric conditions and extremely cold conditions, neither of which applies to Project Site area. Second, auto-related emissions of CO continue to decline because of advances in fuel combustion technology in the vehicle fleet. Finally, the Project would not contribute to the levels of congestion that would be needed to produce the amount of emissions needed to trigger a potential CO hotspot, adding 2,185 net vehicle trips to the local roadway network on a peak weekday at the start of operations in 2025.[29]

Therefore, for all the reasons discussed above, the Project's operational impacts on sensitive receptors would be less than significant.

d) Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Less Than Significant Impact. The Project would not result in activities that create objectionable odors. The Project is a mixed-use development, including residential, hotel, and entertainment uses, would not include any activities typically associated with unpleasant odors and local nuisances (e.g., rendering facilities, dry cleaners). SCAQMD regulations that govern nuisances (i.e., Rule 402, Nuisances) would regulate any occasional odors associated with any of the proposed uses. Thus, the Project would not result in other emissions (such as those leading to

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28 *SCAQMD, Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis, 2002.*

29 *Transportation Impact Analysis, LLG Engineers, June 14, 2024.*

odors) adversely affecting a substantial number of people. Therefore, Project impacts related to this issue would be less than significant.

Cumulative Impacts

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 also be considered cumulatively considerable.[30] Individual projects that generate emissions not in excess of SCAQMD's significance thresholds would not contribute considerably to any potential cumulative impact. The SCAQMD neither recommends quantified analyses of the emissions generated by a set of cumulative development projects nor provides thresholds of significance to be used to assess the impacts associated with these emissions. As discussed previously, the Project would not produce VOC, NO_X, CO, SO_X, $PM_{2.5}$, and PM_{10} emissions in excess of SCAQMD's significance thresholds. Therefore, cumulative air quality impacts would not be significant.

30 *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.*

IV. BIOLOGICAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. 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 Wildlife or U.S. Fish and Wildlife Service?	☐	☐		☒
b. 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 Wildlife or US Fish and Wildlife Service?	☐	☐	☐	☒
c. 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?	☐	☐	☐	☒
d. 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?	☐	☐	☒	☐
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☒
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

a) 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 Wildlife or U.S. Fish and Wildlife Service?

No Impact. The Project Site is located in an urbanized area of the City and is surrounded by existing urban development. The Project Site is completely developed with hotel uses. The Project Site does not contain habitat that would support any special-status species. Thus, the Project would not 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 Wildlife or U.S. Fish and Wildlife Service. Therefore, no impacts related to this issue would occur as a result of the Project.

b) 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 Wildlife or U.S. Fish and Wildlife Service?

No Impact. The Project Site is located in an urbanized area of the City and is surrounded by existing urban development. The Project Site is completely developed with hotel uses. No riparian habitat or other sensitive natural community exist at the Project Site or in the immediate vicinity of the site. Thus, the Project would not 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 Wildlife or U.S. Fish and Wildlife Service. Therefore, no impacts related to this issue would occur as a result of the Project.

c) 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?

No Impact. The Project Site is located in an urbanized area of the City and is surrounded by existing urban development. The Project Site is completely developed with hotel uses. No wetlands exist at the Project Site or in the immediate vicinity of the site.[31] Thus, the Project would not 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. Therefore, no impacts related to this issue would occur as a result of the Project.

d) Would the project 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?

Less Than Significant Impact. The Project Site is located in an urbanized area of the City and is surrounded by existing urban development. The Project Site is completely developed with hotel uses. The Project Site is not part of a migratory wildlife corridor or native wildlife nursery.

As listed below, a total of 59 trees are located on or near the Project Site and would be affected by the Project.[32] All of these trees would be removed as part of the Project. Depending on the time of year that removal would occur, it is possible that nesting migratory birds could occupy the trees. Thus, the Project would be required to comply with the Migratory Bird Treaty Act (MBTA) (Title 33, United States Code, Section 703 et seq., see also Title 50, Code of Federal Regulation, Part 10) and Section 3503 of the California Department of Fish and Wildlife Code, which regulates vegetation removal during the nesting season (February 15th to August 15th) to ensure that significant impacts to migratory birds would not occur. Compliance with these existing regulations would ensure impacts related to nesting migratory birds would be less than significant.

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31 *U.S. Fish & Wildlife Services, National Wetlands Inventory, Wetlands Mapper. https://www.fws.gov/program/national-wetlands-inventory/wetlands-mapper, accessed March 6, 2023.*

32 *City of Inglewood Tree Inventory Report, Carlberg Associates, February 13, 2022. Refer to Appendix A.*

On-site Trees

- Mexican fan palm (19 trees)
- Spanish dagger (2 trees)
- Fern pine (1 tree)
- Indian laurel fig (1 tree)
- King palm (9 trees)
- Weeping fig (2 trees)
- Umbrella tree (2 trees)
- Corkscrew willow (1 tree)
- Paper mulberry (2 trees)
- Mimosa (1 tree)
- Jacaranda (4 trees)
- Canary Island pine (2 trees)
- Pygmy date palm (1 tree)
- White mulberry (2 trees)
- Common guava (1 tree)
- Brush cherry (2 trees)

Right-of-Way Trees

- Mexican fan palm (7 trees)

e) Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

No Impact. The Project Site is located in an urbanized area of the City and is surrounded by existing urban development. The Project Site is completely developed with hotel uses. As stated previously, there are 59 trees that would be removed as part of the Project. Due to size, all of the trees are considered "protected trees" as defined by the City.[33] In accordance with Section 12-116 (Permits Required) of the City's Municipal Code, the Project Applicant would be required to obtain a tree removal permit and would be required to replace the trees as required by the City. Thus, the Project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. Therefore, no impacts related to this issue would occur as a result of the Project.

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[33] *The IMC defines "protected trees" as follows: (A) Trees having a minimum trunk diameter of eight inches measured 54 inches above the ground. When measuring a multi-trunk 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: 1. Big Leaf Maple (Acer macrophyllum); 2. California Buckeye (Aesculus californica); 3. Madrone (Arbutus menziesii); 4. Western Dogwood (Cornus nuttallii); 5. California Sycamore (Platanus racemosa); 6. Coast Live Oak (Quercus agrifolia); 7. Canyon Live Oak (Quercus chrysolepis); 8. Blue Oak (Quercus douglassii); 9. Oregon White Oak (Quercus garryana); 10. California Black Oak (Quercus kelloggii); 11. Valley Oak (Quercus lobate); 12. Interior Live Oak (Quercus wislizenii); 13. California Bay(Umbellularia californica); and (E) A tree or trees of any size planted as a replacement for a protected tree.*

f) Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

No Impact. The Project Site is not subject to a Habitat Conservation Plan, a Natural Community Conservation Plan, or other such plan. Therefore, the Project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. Therefore, no impacts related to this issue would occur as a result of the Project.

Cumulative Impacts

There are 6 related projects in the City that are within 0.5 miles of the Project Site (refer to Table 1-1 in Section 1 [Introduction]). All of the related projects are located in highly urban areas and likely do not contain significant biological resources, such as candidate, sensitive or special status species, riparian habitat, sensitive natural communities, and wetlands, and are not part of a wildlife corridor or significant ecological area (SEA) or subject to a habitat conservation plan, a natural community conservation plan, or other such plan. All related projects with existing trees would be required to comply with applicable City tree replacement regulations as well as the requirements of the MBTA. Because the Project would not result in any impacts related to biological resources, the Project does not have the potential to contribute to any cumulative biological resources impacts. Therefore, cumulative impacts related to biological resources would be less than significant.

V. CULTURAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?	☐	☐	☐	☒
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	☐	☒	☐	☐
c. Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☐	☒	☐

a) Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?

No Impact. A search of the California Office of Historic Preservation, California Historical Resources database indicated that none of the existing buildings located on or adjacent to the Project Site are listed in the National Register of Historic Places or the California Register of Historic Places.[34] Thus, the Project would not cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5. Therefore, no impacts related to historic resources would occur as a result of the Project.

b) Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?

Less Than Significant Impact with Mitigation Incorporated. The Project includes demolition and removal of all existing uses from the Project Site and development of the site with a 333,500-square-foot mixed-use building, which would include one subterranean level, requiring excavation depths of approximately 16 below ground surface (bgs). A database search conducted at the South Central Coastal Information Center (SCCIC) as part of the Environmental Impact Report (EIR) prepared for the Inglewood Basketball and Entertainment Center (IBEC) project located approximately 1,000 feet east of the Project Site at the intersection of Century Boulevard and Prairie Avenue noted that no known archaeological resources have been recorded within 0.5 miles of the IBEC project site, indicating that no known archaeological resources have been recorded at the Project Site.[35] Nonetheless, although the Project Site has been developed over the decades, disturbing native soils at the site, and no archaeological resources are known to exist at the Project Site, it is possible that unknown archaeological resources could exist at the site and could be encountered during the Project's grading and excavation phases. However, implementation of Mitigation Measure ARCHEO-1 would ensure the protection of any resources

[34] *National Park Service, National Register of Historic Places, National Register Database and Research, https://www.nps.gov/subjects/nationalregister/database-research.htm, access July 6, 2022.*

[35] *Inglewood Basketball and Entertainment Center EIR, Appendix F: Cultural Resources Report, Environmental Science Associates, July 2019, page 26.*

encountered, and Project impacts related to archaeological resources would be less than significant.

Mitigation Measures

To ensure that Project impacts related to previously unknown archaeological resources would be less than significant, the following mitigation measure is required:

ARCHEO-1 Prior to issuance of grading permits, a qualified archaeological monitor shall be identified to be on call during ground-disturbing activities. If archeological resources are discovered during excavation and/or construction activities, construction shall stop within 25 feet of the find, and the qualified archaeologist shall be consulted to determine whether the resource requires further study. The archaeologist shall make recommendations to the applicant to protect the discovered resources. Archaeological resources recovered shall be provided to the South Central Coast Information Center (SCCIC) and Los Angeles Natural History Museum, or any other local museum or repository willing and able to accept and house the resource to preserve for future scientific study.

c) Would the project disturb any human remains, including those interred outside of formal cemeteries?

Less Than Significant Impact. The Project includes demolition and removal of all existing uses from the Project Site and development of the site with a 333,500-square-foot mixed-use building, which would include one subterranean level, requiring excavation depths of approximately 16 bgs. Given the long-term use of the site as a hotel as well as the disturbed nature of the soil at the site as a result of previous construction, the potential to encounter unknown human remains as a result of the Project would be minimal. However, in the unlikely event that unknown human remains were encountered at the site, the Project Applicant would be required to comply with the State's Health and Safety Code Section 7050.5, in the event of discovery or recognition of any human remains at the Project Site, no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains shall occur until the Los Angeles County Coroner has determined, in accordance with Chapter 10 (commencing with Section 27460) of Part 3 of Division 2 of Title 3 of the Government Code, that the remains are not subject to the provisions of Section 27491 of the Government Code or any other related 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 for the excavation, or to his or her authorized representative, in the manner provided in Public Resources Code (PRC) Section 5097.98. 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 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 Native American Heritage Commission (NAHC).

Through compliance with existing regulatory standards, Project impacts to human remains would be less than significant.

Cumulative Impacts

There are 6 related projects in the City that are within 0.5 miles of the Project Site (refer to Table 1-1 in Section 1 [Introduction]). As discussed above, the Project would not result in significant impacts on any historical resource. Thus, the Project would not have the potential to contribute toward any significant cumulative impacts related to historical resources. Impacts related to archaeological resources and human remains are site-specific and are assessed on a site-by-site basis. All development in the City (including the Project and the related projects) that involves ground-disturbing activities is required to consider potential impacts on archaeological resources and human remains and identify mitigation measures where applicable (similar to Mitigation Measure ARCHEO-1 identified for the Project), as well as existing state and City regulations related to discovery of human remains. For these reasons, cumulative impacts related to cultural resources would be less than significant.

VI. ENERGY

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐

a) Would the project result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Less Than Significant Impact. In accordance with Appendix F of the CEQA Guidelines, the following are considered in determining the significance of the Project's energy impacts:

1. The Project's energy requirements and its energy use efficiencies by amount and fuel type for each stage of the Project including construction, operation, maintenance, and/or removal. If appropriate, the energy intensiveness of materials may be discussed;

2. The effects of the Project on local and regional energy supplies and on requirements for additional capacity;

3. The effects of the Project on peak and base period demands for electricity and other forms of energy;

4. The degree to which the Project complies with existing energy standards;

5. The effects of the Project on energy resources;

6. The Project's projected transportation energy use requirements and its overall use of efficient transportation alternatives;

7. The degree to which the Project design and/or operations incorporate energy-conservation measures, particularly those that go beyond City requirements; and

8. Whether the Project conflicts with adopted energy conservation plans.

Electricity is provided to the Project Site by Southern California Edison (SCE). Natural gas is provided to the Project Site by The Southern California Gas Company (The Gas Company). Existing natural gas distribution infrastructure near the Project Site includes a 4-inch line in

Century Boulevard. Both forms of energy are provided to the Project Site via existing infrastructure located adjacent to the site. The Project would be served by this infrastructure and would not require the need for new, expanded, or relocated energy infrastructure. For the reasons discussed below, Project impacts related to energy would be less than significant.

Construction

During Project construction, energy would be consumed in the form of electricity associated with the conveyance of water used for dust control and on a limited basis, powering lights, electronic equipment, or other construction activities necessitating electrical power. Construction activities typically do not involve the consumption of natural gas. Project construction would also consume energy in the form of petroleum-based fuels associated with the use of off-road construction vehicles and equipment on the Project Site, construction worker travel to and from the Project Site, and delivery and haul truck trips (e.g., hauling of demolition material to off-site reuse and disposal facilities).

As shown in Table VI-1, Project construction would consume approximately 240,817 gallons of gasoline and 181,903 gallons of diesel. Project construction is expected to be completed in 2025.

Table VI-1
Summary of Energy Use During Project Construction[1]

Fuel Type	Quantity
Electricity	
Water Consumption (Dust Control)	7,096 kWh
Gasoline	
On-Road Construction Equipment	240,817 gallons
Off-Road Construction Equipment	0 gallons[2]
Total Gasoline	***240,817 gallons***
Diesel	
On-Road Construction Equipment	140,121 gallons
Off-Road Construction Equipment	41,783 gallons
Total Diesel	***181,904 gallons***
Total Petroleum-Based Fuel	**422,721 gallons**

kWh = kilowatt-hours

[1] Detailed calculations are included in Appendix D.
[2] Off-road construction equipment uses diesel fuel.

As shown in Table VI-1, a total of approximately 7,096 kWh of electricity is anticipated to be consumed during Project construction. 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. When not in use, electric equipment would be powered off so as to avoid unnecessary energy consumption.

Construction activities, including the construction of the new building, typically do not involve the consumption of natural gas. Accordingly, natural gas would not be supplied to support Project

construction activities. Thus, there would be no demand generated by construction.

The petroleum-based fuel use summary provided in Table VI-1 represents the amount of transportation energy that could potentially be consumed during Project construction based on a conservative set of assumptions outlined in Appendix D. As shown, on- and off-road vehicles would consume an estimated 240,817 gallons of gasoline and approximately 181,904 gallons of diesel fuel throughout the Project's construction.

The Project would utilize construction contractors who demonstrate compliance with applicable CARB regulations governing the accelerated retrofitting, repowering, or replacement of heavy-duty diesel on- and off-road equipment. CARB has adopted an Airborne Toxic Control Measure to limit heavy-duty diesel motor vehicle idling in order to reduce public exposure to diesel PM and other TACs. This measure prohibits diesel-fueled commercial vehicles greater than 10,000 pounds from idling for more than five minutes at any given time.[36] CARB has also approved the Truck and Bus regulation (CARB Rules Division 3, Chapter 1, Section 2025, subsection (h)) to reduce NO_X, PM_{10}, and $PM_{2.5}$ emissions from existing diesel vehicles operating in California; this regulation will be phased in with full implementation by 2023.[37] In addition to limiting exhaust from idling trucks, CARB promulgated emission standards for off-road diesel construction equipment of greater than 25 horsepower. The regulation aims to reduce emissions by requiring the installation of diesel soot filters and encouraging the retirement, replacement, or repower of older, dirtier engines with newer emission-controlled models. Implementation began January 1, 2014 and the compliance schedule requires that best available control technology turnovers or retrofits be fully implemented by 2023 for large and medium equipment fleets and by 2028 for small fleets. Compliance with the above anti-idling and emissions regulations would result in efficient use of construction-related energy and the minimization or elimination of wasteful and unnecessary consumption of energy. Idling restrictions and the use of newer engines and equipment would result in less fuel combustion and energy consumption, as would use of haul trucks with larger capacities.

Operation

During operation of the Project, energy would be consumed for multiple purposes, including, but not limited to HVAC; refrigeration; lighting; and the use of electronics, equipment, and machinery. Energy would also be consumed during Project operations related to water usage, solid waste disposal, and vehicle trips. As shown in Table VI-2 the Project would result in a net increase in electricity consumption of approximately 2,027,760 kWh per year when compared to the existing hotel use. As shown in Table VI-3, the Project would result in a net increase in natural gas consumption of approximately 3,723,025 thousand British thermal units (kBTU) per year when compared to the existing hotel use. As shown in Table VI-4, the Project would result in a net increase in fuel of approximately 445,210 gallons per year when compared to the existing hotel

36 *CARB, https://ww2.arb.ca.gov/our-work/programs/atcm-to-limit-vehicle-idling/about, accessed, May 6, 2022.*

37 *California Air Resources Board, Final Regulation Order, Amendments to the Regulation to Reduce Emissions of Diesel Particulate Matter, Oxides of Nitrogen and Other Criteria Pollutants from In-Use On-Road Diesel-Fueled Vehicles, http://www.arb.ca.gov/msprog/onrdiesel/documents/tbfinalreg.pdf.*

use.

Table VI-2
Estimated Project Electricity Demand[1]

Land Use	Size	Total (kw-h/yr)
Existing		
Hotel	137 rooms	1,917,137
Proposed		
Residential	129 du	483,082
Hotel	175 rooms	1,847,449
Event	54,700 sf	525,394
Enclosed Parking with Elevator	295,000 sf	1,088,972
	Project Total	**3,944,897**
	Less Existing	*(1,917,137)*
	Net Total	**2,027,760**

kw-h = kilowatt-hour yr = year sf =square feet

[1] *Calculated via CalEEMod. Refer to Appendix C.*

Table VI-3
Estimated Project Natural Gas Demand[1]

Land Use	Size	Total (kBTU/yr)
Existing		
Hotel	137 rooms	4,007,820
Proposed		
Residential	129 du	1,574,941
Hotel	175 rooms	3,811,642
Event	54,700 sf	2,344,262
Enclosed Parking with Elevator	295,000 sf	-
	Project Total	**7,730,845**
	Less Existing	*(4,007,820)*
	Net Total	**3,723,025**

kBTU = 1,000 British Thermal Units yr = year sf =square feet

[1] *Calculated via CalEEMod. Refer to Appendix C.*

Table VI-4
Estimated Project Transportation Petroleum-Based Fuel

Fuel Type	Gallons Per Year
Existing	
Gasoline	107,858
Diesel	30,597
Total Existing Fuel Use	***138,455***
Project	
Gasoline	454,681
Less Existing	*(107,858)*
Net Total Gasoline Use	***346,823***
Diesel	128,984
Less Existing	*(30,597)*
Net Total Diesel Use	***98,387***
Net Total Fuel Use	**445,210**
Detailed calculations are included in Appendix D. *Note: Numbers might not add up due to rounding.*	

Both SCE and The Gas Company have confirmed that the electrical services and natural gas supplies (respectively) are available to serve the Project's electricity and gas demand. Accordingly, the Project's operation would not result in an increase in demand for electricity and natural gas that exceeds available supply or distribution infrastructure capabilities that could result in the relocation or construction of new or expanded electrical power and natural gas facilities, the construction of which would cause significant environmental effects. Additionally, the Project would be required to comply with the City's Green Building Code standards, which would ensure energy efficiency measures are incorporated into the Project. Further, the Project's proximity to established transit services along Century Boulevard, Hawthorne Boulevard, La Brea Avenue, and Prairie Avenue, including Metro Local Lines 40, 117, 211/215, 212 and the Los Angeles County Department of Public Works' The Link – Lennox shuttle, would reduce the Project's consumption of transportation fuel. For these reasons, Project impacts related to energy would be less than significant.

b) Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Less Than Significant Impact. In March 2013, the City adopted the *Inglewood Energy and Climate Action Plan* (ECAP), which outlines a roadmap for achieving community-wide energy consumption and GHG emissions reductions. The ECAP includes several strategies and actions related to energy efficiency and conservation, including energy and water conservation design features in new development projects.

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 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.

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 water
- Promote local food production

Through compliance with the City's Green Building Code as required of the Project by the City, the Project would support the energy consumption reductions outlined in the ECAP, which may include the following:

- Meeting/exceeding Title 24 energy standards

- Provision of electric vehicle (EV) charging stations

- Implement Transportation Demand Management (TDM) measures in accordance with Section 12-42.1 (Transportation Demand Management Requirements for Carpool Parking and Bicycle Facilities) of the City's Municipal Code and the provisions of the Project's proposed PAD zoning regulations

- Installation and use of solar panels

- Use of porous materials on all paved areas
- Use of high-albedo paving materials with a solar reflectance index of at least 29
- Unbundled parking
- Provision of continuous row(s) of street trees
- Separate utility meters for each residential unit
- Landscaping that minimizes summer heat gain
- Provision of additional trees beyond Municipal Code requirements
- Minimize driveway cuts
- Designation of recycling area
- Use of high-efficiency lighting
- Use of reclaimed water/gray water
- Use of drought-tolerant landscaping
- Use of efficient irrigation systems
- Provision of sidewalk amenities

Additionally, the Project represents a more intense use of the Project Site compared to the existing condition and includes a diverse mix of complementary uses. Along with the Project Site's proximity to transit, the Project would allow for a reduction in traffic trips, VMT, and associated consumption of fossil fuels.

For these reasons, the Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency, and no impacts related to this issue would occur as a result of the Project.

Cumulative Impacts

The geographic context for the cumulative analysis of energy is the service areas of SCE and The Gas Company. Growth within these service areas is anticipated to increase the demand for energy and associated infrastructure. As with the Project, development in the service areas 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 additional reduction measures, as necessary. Therefore, cumulative energy impacts would be less than significant.

VII. GEOLOGY AND SOILS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Directly or indirectly cause substantial adverse effects, including the risk of loss, injury, or death involving:				
i. 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.	☐	☐	☐	☒
ii. Strong seismic ground shaking?	☐	☐	☒	☐
iii. Seismic-related ground failure, including liquefaction?	☐	☐	☐	☒
iv. Landslides?	☐	☐	☐	☒
b. Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c. Be located on a geologic unit 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?	☐	☐	☐	☒
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐

a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

i) 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?

No Impact. The Project Site is not located within an Alquist-Priolo Earthquake Fault Zone, and no known faults exist on the Project Site.[38] The fault closest to the Project Site is the Newport-

[38] *Preliminary Geotechnical Assessment, Geotechnologies, Inc., January 12, 2022. Refer to Appendix E.*

Inglewood fault, located approximately 0.8 miles northwest of the Project Site.[39] Thus, the Project would not directly or indirectly cause 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 on the Project Site. Therefore, no impacts related to this issue would occur as a result of the Project.

ii) Strong seismic ground shaking caused in whole or in part by the project's exacerbation of the existing environmental conditions?

Less Than Significant Impact. Given the Project Site's location in a seismically active region, the Project Site could experience seismic groundshaking in the event of an earthquake. The fault closest to the Project Site is the Newport-Inglewood fault, located approximately 0.8 miles northwest of the Project Site. However, the Project Applicant would be required to design and construct the Project in conformance to the most recently adopted Building Code and applicable recommendations made in the Preliminary Geotechnical Assessment prepared for the Project, dated January 12, 2022, and any updates to this assessment. Conformance with the City's current Building Code requirements would minimize the potential for structural failure, injury, and loss of life during an earthquake event and thus, not cause or accelerate geologic hazards or expose people to substantial risk of injury. Therefore, Project impacts related to groundshaking would be less than significant.

iii) Seismic-related ground failure, including liquefaction, caused in whole or in part by the project's exacerbation of the existing environmental conditions?

No Impact. The California Geological Survey does not identify the Project Site within an area susceptible to liquefaction.[40] Additionally, testing of site conditions for liquefaction potential showed that protentional for liquefaction to occur at the site is remote.[41] Thus, the Project would not directly or indirectly cause substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction, caused in whole or in part by the Project's exacerbation of the existing environmental conditions. Therefore, no impacts related to this issue would occur as a result of the Project.

iv) Landslides caused in whole or in part by the project's exacerbation of the existing environmental conditions?

No Impact. The topography of the Project Site and surrounding area are flat. No landslides are located on or near the Project Site. Thus, the Project would not directly or indirectly cause substantial adverse effects, including the risk of loss, injury, or death involving landslides. Therefore, no impacts related to this issue would occur as a result of the Project. No mitigation measures are required.

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39 *Ibid.*

40 *Ibid.*

41 *Ibid.*

b) Would the project result in substantial soil erosion or the loss of topsoil?

Less Than Significant Impact. The Project Site and surrounding area are completely developed and do not contain large areas of exposed soil. During the Project's construction phase, soil would be exposed. However, the Project Applicant would be required to implement SCAQMD Rule 403 – Fugitive Dust to minimize wind and water-borne erosion at the site. Also, because the Project Site exceeds one acre, the Applicant would be required to prepare and implement a Stormwater Pollution Prevention Plan (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 any ground-disturbing activities and would be implemented during Project construction. The SWPPP would include best management practices (BMPs) and erosion control measures to prevent pollution in storm water 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 handling and storage of hazardous materials, etc.) and erosion/sediment control measures (e.g., silt fences, fiber rolls, gravel bags, storm water inlet protection, and soil stabilization measures, etc.). The SWPPP would be subject to review and approval by the City. Additionally, all Project construction activities would comply with the City's regulations. Through compliance with these existing regulations, the Project would not result in any significant impacts related to soil erosion during ground-disturbing activities.

Additionally, during the Project's operational phase, as under current conditions, most of the Project Site 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. Therefore, with compliance with applicable regulatory requirements, development of the Project would not cause or exacerbate soil erosion or loss of topsoil and Project impacts related to soil erosion would be less than significant.

c) Would the project 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?

No Impact. As discussed in response to Checklist Question VII(a)(iii) (Geology and Soils – Liquefaction), no Project impacts related to liquefaction would occur. As discussed in response to Checklist Question VII(c) (Geology and Soils – Landslides), no impacts related to landslides would occur as a result of the Project. The *Geotechnical Engineering Exploration Report* prepared for the Project (refer to Appendix E) did not identify any issues related to lateral spreading, subsidence, or collapse. Thus, the Project would not 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. Therefore, no impacts related to this issue would occur as a result of the Project.

d) Would the project be located on expansive soil, as identified on Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

Less Than Significant Impact. Based on laboratory test results of sites near the Project Site and preliminary testing of samples obtained at the Project Site, the geologic materials within the site are anticipated to be in the low to moderate expansion range.[42] Special design considerations for mitigation of highly expansive soils would not likely be required for the Project.[43] Design of the Project in accordance with City and State Building Codes would ensure that impacts related to expansive soil would be less than significant.

e) Would the project 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?

No Impact. The 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 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 where sewers are not available for the disposal of wastewater. Therefore, no impacts related to this issue would occur as a result of the Project.

f) Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less Than Significant With Mitigation Incorporated. The Project includes demolition and removal of all existing uses from the Project Site and development of the site with a 333,500-square-foot mixed-use building, which would include one subterranean level, requiring excavation depths of approximately 16 bgs. The *Paleontological Resources Assessment Report* prepared as part of the EIR for the IBEC project located approximately 1,000 feet east of the Project Site at the intersection of Century Boulevard and Prairie Avenue noted that the surficial geology of the IBEC project site consists of Pleistocene-aged older alluvium, which are known to contain significant fossil vertebrate remains.[44] Results of a paleontological records search conducted by the Natural History Museum of Los Angeles County as part of the *Paleontological Resources Assessment Report* indicated the closest known paleontological resource recorded in proximity to the IBEC project site is approximately 2.0 miles to the north, found within older alluvial sediments.[45]

The surficial geology at the Project Site is also Pleistocene-aged older alluvium.[46] Although the Project Site has been developed over the decades, disturbing native soil at the Project Site, and

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42 *Ibid.*

43 *Ibid.*

44 *Inglewood Basketball and Entertainment Center EIR, Appendix I: Paleontological Resources Report, Environmental Science Associates, May 2019, page ES-1.*

45 *Ibid, pg. 11.*

46 *Preliminary Geotechnical Assessment, Geotechnologies, Inc., January 12, 2022. Refer to Appendix E.*

no paleontological resources are known to exist at the site, it is possible that unknown paleontological resources could exist at the site and could be encountered during the Project's grading and excavation phases. However, implementation of Mitigation Measure PALEO-1 would ensure the protection of any resources encountered, and Project impacts related to paleontological resources would be less than significant.

Mitigation Measures

To ensure that Project impacts on paleontological resources would be less than significant, the following mitigation measure is required:

PALEO-1 If paleontological resources are encountered, the Applicant would be required to notify the Building Safety Division immediately, and all work shall cease in the area of the find until a qualified paleontologist evaluates the find. Construction activity may continue unimpeded on other portions of the Project Site. The paleontologist shall determine the location, the time frame, and the extent to which any monitoring of earthmoving activities shall be required. The found deposits would be treated in accordance with federal, state, and local guidelines, including those set forth in PRC Section 5097.5.

Cumulative Impacts

Geotechnical impacts related to future development in the City involve hazards related to site-specific soil conditions, erosion, and ground-shaking during earthquakes. The impacts on each site are specific to that site and its users and would not be in common or contribute to (or shared with, in an additive sense) the impacts on other sites. In addition, development on each site is subject to uniform site development and construction standards that are designed to protect public safety. Further, all development in the City (including the Project and the related projects) that involves ground-disturbing activities is required to consider potential impacts on paleontological resources and identify mitigation measures where applicable (similar to Mitigation Measure PALEO-1 identified for the Project). Therefore, cumulative geotechnical impacts related would be less than significant.

VIII. GREENHOUSE GAS EMISSIONS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

The information and analysis provided below is based primarily on *Technical GHG Emissions Data* prepared by DKA Planning, included in Appendix F.

Environmental Setting

Global climate change refers to changes in average climatic conditions on Earth as a whole, including changes in temperature, wind patterns, precipitation, and storms. Global warming, a related concept, is the observed increase in average temperature of Earth's surface and atmosphere. One identified cause of global warming is an increase of GHG emissions in the atmosphere. GHG emissions are those compounds in Earth's atmosphere that play a critical role in determining Earth's surface temperature.

Earth's natural warming process is known as the "greenhouse effect." It is called the greenhouse effect because Earth and the atmosphere surrounding it are similar to a greenhouse with glass panes in that the glass allows solar radiation (sunlight) into Earth's atmosphere but prevents radiative heat from escaping, thus warming Earth's atmosphere. Some levels of GHG emissions keep the average surface temperature of Earth close to a hospitable 60 degrees Fahrenheit. However, it is believed that excessive concentrations of anthropogenic GHG emissions in the atmosphere can result in increased global mean temperatures, with associated adverse climatic and ecological consequences.

Scientists studying the particularly rapid rise in global temperatures have determined that human activity has resulted in increased emissions of GHG emissions, primarily from the burning of fossil fuels (from motor vehicle travel, electricity generation, consumption of natural gas, industrial activity, manufacturing), deforestation, agricultural activity, and the decomposition of solid waste. Scientists refer to the global warming context of the past century as the "enhanced greenhouse effect" to distinguish it from the natural greenhouse effect.

Global GHG emissions due to human activities have grown since pre-industrial times. As reported by the USEPA, global carbon emissions from fossil fuels increased by over 16 times between 1900 and 2008 and by about 1.5 times between 1990 and 2008. In addition, in the Global Carbon Budget 2014 report, published in September 2014, atmospheric CO_2 concentrations in 2013 were

found to be 43 percent above the concentration at the start of the Industrial Revolution, and the present concentration is the highest during at least the last 800,000 years. Global increases in CO2 concentrations are due primarily to fossil fuel use, with land use change providing another significant but smaller contribution. With regard to emissions of non-CO_2 GHG, these have also increased significantly since 1990. In particular, studies have concluded that it is very likely that the observed increase in methane (CH_4) concentration is predominantly due to agriculture and fossil fuel use.

In August 2007, international climate talks held under the auspices of the United Nations Framework Convention on Climate Change (UNFCCC) led to the official recognition by the participating nations that global GHG emissions must be reduced. According to the "Ad Hoc Working Group on Further Commitments of Annex I Parties under the Kyoto Protocol," avoiding the most catastrophic events forecast by the United Nations Intergovernmental Panel on Climate Change (IPCC) would entail emissions reductions by industrialized countries in the range of 25 to 40 percent below 1990 levels. Because of the Kyoto Protocol's Clean Development Mechanism, which gives industrialized countries credit for financing emission-reducing projects in developing countries, such an emissions goal in industrialized countries could ultimately spur efforts to cut emissions in developing countries as well.

With regard to the adverse effects of global warming, as reported by SCAG, "Global warming poses a serious threat to the economic well-being, public health and natural environment in southern California and beyond. The potential adverse impacts of global warming include, among others, a reduction in the quantity and quality of water supply, a rise in sea level, damage to marine and other ecosystems, and an increase in the incidences of infectious diseases. Over the past few decades, energy intensity of the national and state economy has been declining due to the shift to a more service-oriented economy. California ranked fifth lowest among the states in CO_2 emissions from fossil fuel consumption per unit of Gross State Product. However, in terms of total CO_2 emissions, California is second only to Texas in the nation and is the 12th largest source of climate change emissions in the world, exceeding most nations. Southern California, with close to half of the state's population and economic activities, is also a major contributor to the global warming problem."

GHG Emissions Background. GHG emissions include CO_2, CH_4, nitrous oxide (N_2O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulfur hexafluoride (SF_6), and nitrogen trifluoride (NF_3). CO_2 is the most abundant GHG. Other GHG emissions are less abundant but have higher global warming potential than CO_2. Thus, emissions of other GHG emissions are frequently expressed in the equivalent mass of CO_2, denoted as CO_2e. Forest fires, decomposition, industrial processes, landfills, and consumption of fossil fuels for power generation, transportation, heating, and cooking are the primary sources of GHG emissions. A general description of the GHG emissions is provided in Table VIII-1.

Table VIII-1
Description of Identified GHG Emissions[a]

Greenhouse Gas	General Description
Carbon Dioxide (CO_2)	An odorless, colorless GHG, which 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, racecars, 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 non-toxic, non-flammable, 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 a substitute for CFCs as refrigerants. HFCs deplete stratospheric ozone, but to a much lesser extent than CFCs.
Perfluorocarbons (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-conductor manufacturing.
Sulfur Hexafluoride (SF_6)	An inorganic, odorless, colorless, non-toxic, and non-flammable 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, non-toxic, odorless, non-flammable gas. NF_3 is used in the manufacture of semi-conductors, as an oxidizer of high-energy fuels, for the preparation of tetrafluorohydrazine, as an

Table VIII-1
Description of Identified GHG Emissions[a]

Greenhouse Gas	General Description
	etchant gas in the electronic industry, and as a fluorine source in high power chemical lasers.

[a] *GHG emissions identified in this table are ones identified in the Kyoto Protocol and other synthetic gases recently added to the IPCC's Fifth Assessment Report.*

Source: Association of Environmental Professionals, Alternative Approaches to Analyze Greenhouse Gas Emissions and Global Climate Change in CEQA Documents, Final, June 29, 2007; Environmental Protection Agency, Acute Exposure Guideline Levels (AEGLs) for Nitrogen Trifluoride; January 2009.

Global Warming Potential (GWP) is one type of simplified index based upon radiative properties used to estimate the potential future impacts of emissions of different gases on the climate system. The GWP is based on a number of factors, including the radiative efficiency (heat-absorbing ability) of each gas relative to that of CO_2, as well as the decay rate of each gas (the amount removed from the atmosphere over a given number of years) relative to that of CO_2. The larger the GWP, the more that a given gas warms the Earth compared to CO_2 over that time period. A summary of the atmospheric lifetime and GWP of selected gases is presented in Table VIII-2. As indicated in the table, the GWP ranges from 1 to 22,800.

Projected Impacts of Global Warming in California. 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 significant 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 the Earth's climate system and inability to accurately model it, the uncertainty surrounding climate change may never be completely eliminated. Nonetheless, the IPCC's Fifth Assessment Report, Summary for Policy Makers states that, "it is extremely likely that more than half of the observed increase in global average surface temperature from 1951 to 2010 was caused by the anthropogenic increase in greenhouse gas concentrations and other anthropogenic forces together." A report from the National Academy of Sciences concluded that 97 to 98 percent of 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.

Table VIII-2
Atmospheric Lifetimes and Global Warming Potential

Gas	Atmospheric Lifetime (years)	Global Warming Potential (100-year time horizon)
Carbon Dioxide (CO_2)	50–200	1
Methane (CH_4)	12 (+/-3)	25
Nitrous Oxide (N_2O)	114	298
HFC-23: Fluoroform (CHF_3)	270	14,800
HFC-134a: 1,1,1,2-Tetrafluoroethane (CH_2FCF_3)	14	1,430
HFC-152a: 1,1-Difluoroethane ($C_2H_4F_2$)	1.4	124
PFC-14: Tetrafluoromethane (CF_4)	50,000	7,390
PFC-116: Hexafluoromethane (C_2F_6)	10,000	12,200
Sulfur Hexafluoride (SF_6)	3,200	22,800
Nitrogen Trifluoride (NF_3)	740	17,200
Source: IPCC, Climate Change 2007: Working Group I: The Physical Science Basis, Direct Global Warming Potentials		

According to CARB, the potential impacts in California due to global climate change may include: loss in snow pack; sea level rise; more extreme heat days per year; more high ozone days; more large forest fires; more drought years; 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. Below is a summary of some of the potential effects that could be experienced in California as a result of global warming and climate change.

Air Quality. Higher temperatures, conducive to air pollution formation, could worsen air quality in California. Climate change may increase the concentration of ground-level ozone, but the magnitude of the effect and, therefore, its indirect effects, are uncertain. If higher temperatures are accompanied by drier conditions, the potential for large wildfires could increase, which, in turn, would exacerbate air quality. 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. However, if higher temperatures are accompanied by wetter, rather than drier conditions, the rains would temporarily clear the air of particulate pollution and reduce the incidence of large wildfires, thus ameliorating the pollution associated with wildfires.

In 2009, the California Natural Resources Agency (CNRA) published the California Climate Adaptation Strategy as a response to the Governor's Executive Order S-13-2008. The CNRA report lists specific recommendations for state and local agencies to best adapt to the anticipated risks posed by a changing climate. In accordance with the California Climate Adaptation Strategy, 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 website, known as

Cal-Adapt, became operational in 2011. The information provided on the Cal-Adapt website represents a projection of potential future climate scenarios. The data are comprised of the average values (i.e., temperature, sea-level rise, snowpack) from a variety of scenarios and models and are meant to illustrate how the climate may change based on a variety of different potential social and economic factors. According to the Cal-Adapt website, the portion of the city in which the Project Site is located could result in an average increase in temperature of approximately 5.4 to 8.0°F by 2070–2099, compared to the baseline 1961–1990 period.

Water Supply. Uncertainty remains with respect to the overall impact of global climate change on future water supplies in California. Studies have found that, "[c]onsiderable uncertainty about precise impacts of climate change on California hydrology and water resources will remain until we have more precise and consistent information about how precipitation patterns, timing, and intensity will change." For example, some studies identify little change in total annual precipitation in projections for California while others show significantly more precipitation. 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.

The California Department of Water Resources report on climate change and effects on the State Water Project (SWP), the Central Valley Project, and the Sacramento-San Joaquin Delta, concludes that "climate change will likely have a significant effect on California's future water resources…[and] future water demand." It also reports that "much uncertainty about future water demand [remains], especially [for] those aspects of future demand that will be directly affected by climate change and warming. While climate change is expected to continue through at least the end of this century, the magnitude and, in some cases, the nature of future changes is uncertain." It also reports that the relationship between climate change and its potential effect on water demand is not well understood, but "[i]t is unlikely that this level of uncertainty will diminish significantly in the foreseeable future." Still, changes in water supply are expected to occur, and many regional studies have shown that large changes in the reliability of water yields from reservoirs could result from only small changes in inflows. In its Fifth Assessment Report, the IPCC states "Changes in the global water cycle in response to the warming over the 21st century will not be uniform. The contrast in precipitation between wet and dry regions and between wet and dry seasons will increase, although there may be regional exceptions."

Hydrology and Sea Level Rise. As discussed above, climate change could potentially affect the amount of snowfall, rainfall and snowpack; 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 saltwater intrusion. Sea level rise can be a product of global warming through two main processes: expansion of seawater 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. Increased storm intensity and frequency could affect the ability of flood-control facilities, including levees, to handle storm events.

Agriculture. California has a $30 billion agricultural industry that produces half the country's fruits and vegetables. Higher CO_2 levels can stimulate plant production and increase plant water-use efficiency. However, if temperatures rise and drier conditions prevail, water demand could increase; crop yield could be threatened by a less reliable water supply; and greater ozone pollution could render plants more susceptible to pest and disease outbreaks. In addition, temperature increases could change the time of year certain crops, such as wine grapes, bloom or ripen, and thus affect their quality.

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. Increasing 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. Soil moisture is likely to decline in many regions, and intense rainstorms are likely to become more frequent. Sea level could rise as much as 2 feet along most of the United States coastline. Rising temperatures could have four major impacts on plants and animals: (1) timing of ecological events; (2) geographic range; (3) species' composition within communities; and (4) ecosystem processes such as carbon cycling and storage.

Regulatory Framework

In response to growing scientific and political concern with global climate change, federal and state entities have adopted a series of laws to reduce emissions of GHG emissions to the atmosphere.

Federal Clean Air Act. The U.S. Supreme Court ruled in *Massachusetts v. Environmental Protection Agency*, 127 S.Ct. 1438 (2007), that CO_2 and other GHG emissions are pollutants under the federal CAA, which the USEPA must regulate if it determines they pose an endangerment to public health or welfare. The U.S. Supreme 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 GHG emissions do not contribute to climate change or if it offered a "reasonable explanation" for not determining that GHG emissions contribute to climate change.

On April 17, 2009, the USEPA issued a proposed finding that GHG emissions 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. The USEPA stated that high atmospheric levels of GHG emissions "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 findings were signed by the USEPA Administrator on December 7, 2009. The final findings were published in the Federal Register on December 15, 2009. The final rule was effective on January 14, 2010. While these findings alone do not impose any requirements on industry or other entities, this action is a prerequisite to regulatory actions by the USEPA, including, but not limited to, GHG emissions standards for light-duty vehicles.

On April 4, 2012, the USEPA published a proposed rule to establish, for the first time, a new source performance standard for GHG emissions. Under the proposed rule, new fossil fuel–fired electric generating units larger than 25 megawatts (MW) are required to limit emissions to 1,000 pounds of CO_2 per MW-hour (CO_2/MWh) on an average annual basis, subject to certain exceptions. Subsequently, on April 23, 2018, the USEPA issued a policy stating that CO_2 emissions from biomass-fired and other biogenic sources would be considered carbon neutral when used for energy production at stationary sources.

On April 17, 2012, the USEPA issued emission rules for oil production and natural gas production and processing operations, which are required by the CAA under Title 40 of the Code of Federal Regulations, Parts 60 and 63. The final rules include the first federal air standards for natural gas wells that are hydraulically fractured, along with requirements for several other sources of pollution in the oil and gas industry that currently are not regulated at the federal level.

Corporate Average Fuel Economy (CAFE) Standards. In response to the Massachusetts v. Environmental Protection Agency ruling, the George W. Bush Administration issued Executive Order 13432 in 2007, directing the USEPA, the United States Department of Transportation (USDOT), and the United States Department of Energy (USDOE) to establish regulations that reduce GHG emissions from motor vehicles, non-road vehicles, and non-road engines by 2008. In 2009, the National Highway Traffic Safety Administration (NHTSA) issued a final rule regulating fuel efficiency for and GHG emissions from cars and light-duty trucks for model year 2011; in 2010, the USEPA and the NHTSA issued a final rule regulating cars and light-duty trucks for model years 2012–2016.

In 2010, President Obama issued a memorandum directing the USEPA, USDOT, USDOE, and NHTSA to establish additional standards regarding fuel efficiency and GHG emissions reduction, clean fuels, and advanced vehicle infrastructure. In response to this directive, the USEPA and NHTSA proposed stringent, coordinated federal GHG emissions and fuel economy standards for model years 2017–2025 light-duty vehicles. The proposed standards are projected to achieve 163 grams/mile of CO_2 in model year 2025, on an average industry fleet-wide basis, which is equivalent to 54.5 miles per gallon (mpg) if the standards were achieved solely through fuel efficiency. The final rule was adopted in 2012 for model years 2017–2021. In March 2020, NHTSA and USEPA adopted new less stringent standards covering model years 2021 through 2026.

In addition to the regulations applicable to cars and light-duty trucks described above, in 2011 the USEPA and the NHTSA announced fuel economy and GHG emissions standards for medium- and heavy-duty trucks for model years 2014–2018. The standards for CO_2 emissions and fuel consumption are tailored to three main vehicle categories: combination tractors, heavy-duty pickup trucks and vans, and vocational vehicles. According to the USEPA, this regulatory program would reduce GHG emissions and fuel consumption for the affected vehicles by 6 to 23 percent over the 2010 baselines.

Building on the success of the first phase of standards, in August 2016, the USEPA and the NHTSA finalized Phase 2 standards for medium and heavy-duty vehicles through model year 2027 that will improve fuel efficiency and cut carbon pollution. The Phase 2 standards were to

lower CO_2 emissions by approximately 1.1 billion metric tons and save vehicle owners fuel costs of about $170 billion. On August 10, 2021, NHTA proposed new CAFE standards for 2024-2026 that would increase the stringency of standards by 8 percent per year rather than the previous 1.5 percent.

On September 19, 2019, the U.S. Department of Transportation's National Highway Traffic Safety Administration (NHTSA) and USEPA issued a final action entitled the "One National Program Rules" to enable the federal government to provide nationwide uniform fuel economy and greenhouse gas (GHG) emission standards for automobile and light duty trucks. This action finalizes the Safe Affordable Fuel Efficient (SAFE) Vehicles Rule and clarifies that federal law preempts state and local tailpipe GHG emissions standards as well as zero emission vehicle (ZEV) mandates. The SAFE Vehicle Rule also withdraws the CAA waiver granted to the State of California that allowed the state to enforce its own Low Emission Vehicle program. On March 31, 2020, Part II of the SAFE Vehicles was issued and sets carbon dioxide emissions and CAFE standards for passenger vehicles and light duty trucks, covering model years 2021-2026. On April 22, 2021, NHTA proposed to repeal the SAFE I Rule, which was finalized in 2019. In response, several states including California filed a lawsuit challenging the withdrawal of the EPA waiver.[47] In April 2021, the USEPA announced it will move to reconsider its previous withdrawal and grant California permission to set more stringent climate requirements for cars and SUVs.[48] On December 21, 2021, the NHTA repealed the SAFE I Rule.

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 the USEPA and the NHTSA actions described above, (i) establishing miles per gallon targets for cars and light trucks, and (ii) directing the NHTSA to establish

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47 *United States District Court for the District Court of Columbia, State of California vs. Chao, Case 1:19-cv-02826, 2019.*

48 *United States Federal Register, California State Motor Vehicle Pollution Control Standards; Advanced Clean Car Program; Reconsideration of a Previous Withdrawal of a Waiver of Preemption; Opportunity for Public Hearing and Public Comment (Document Number: 2021-08826), April 28, 2021.*

a fuel economy program for medium- and heavy-duty trucks and create a separate fuel economy standard for trucks.

Additional provisions of the 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."

California Executive Order S-3-05 and Executive Order B-30-15. Executive Order S-3-05, issued by Governor Schwarzenegger in June 2005, established GHG emissions targets for the state, as well as a process to ensure the targets are met. The order directed the Secretary of the California Environmental Protection Agency (CalEPA) to report every two years on the state's progress toward meeting the Governor's GHG emission reduction targets. The statewide GHG emissions reduction targets are as follows:

- By 2010, reduce to 2000 emission levels;
- By 2020, reduce to 1990 emission levels;
- By 2030, reduce to 40 percent below 1990 levels; and
- By 2050, reduce to 80 percent below 1990 levels.

Executive Order B-30-15, issued by Governor Brown in April 2015, established an additional statewide policy goal to reduce GHG emissions 40 percent below their 1990 levels by 2030. 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 in the U.S. to limit global warming below 2 degrees Celsius.

The State Legislature adopted equivalent 2020 and 2030 statewide targets in the California Global Warming Solutions Act of 2006 (also known as Assembly Bill [AB] 32) and Senate Bill 32, respectively, both of which are discussed below. However, the Legislature has not yet adopted a target for the 2050 horizon year.

As a result of Executive Order S-3-05, the California CAT, led by the Secretary of CalEPA, was formed. The CAT is made up of representatives from a number of state agencies and was formed to implement global warming emission reduction programs and to report on the progress made toward meeting statewide targets established under the Executive Order. The CAT reported several recommendations and strategies for reducing GHG emissions and reaching the targets established in the Executive Order. The CAT stated that smart land use is an umbrella term for strategies that integrate transportation and land-use decisions. 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.

California Assembly Bill 32 (California Global Warming Solutions Act of 2006) and Senate Bill 32. The California Global Warming Solutions Act of 2006 (also known as AB 32) commits the state to achieving the following:

- By 2010, reduce to 2000 GHG emission levels, and
- By 2020, reduce to 1990 levels**

To achieve these goals, which are consistent with the California CAT GHG emissions reduction targets for 2010 and 2020, AB 32 mandates that CARB establish a quantified emissions cap, institute a schedule to meet the cap, implement regulations to reduce statewide GHG emissions from stationary sources consistent with the CAT strategies, and develop tracking, reporting, and enforcement mechanisms to ensure that reductions are achieved. In order to achieve the reduction targets, AB 32 requires CARB to adopt rules and regulations in an open public process that achieve the maximum technologically feasible and cost-effective GHG emissions reductions.

Senate Bill (SB) 32, signed September 8, 2016, updates AB 32 (Global Warming Solutions Act) to include an emissions reductions goal for 2030. Specifically, SB 32 requires the state board to ensure that statewide GHG emissions are reduced to 40 percent below the 1990 level by 2030. The new plan, outlined in SB 32, involves increasing renewable energy use, imposing tighter limits on the carbon content of gasoline and diesel fuel, putting more electric cars on the road, improving energy efficiency, and curbing emissions from key industries.

Climate Change Scoping Plan. In 2008, CARB approved the original Climate Change Scoping Plan as required by AB 32. Subsequently, CARB approved updates to the Climate Change Scoping Plan in 2014 (First Update) and 2017 (2017 Update), with the 2017 Update considering SB 32 (adopted in 2016) in addition to AB 32.

The original Climate Change 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. The original Climate Change Scoping Plan identified a range of GHG reduction actions that included direct regulations, alternative compliance mechanisms, monetary and non-monetary incentives, voluntary actions, market-based mechanisms, such as a cap-and-trade system, and an AB 32 implementation fee to fund the program.

The original Climate Change Scoping Plan called for a “coordinated set of solutions” to address all major categories of GHG emissions. Transportation emissions were addressed through a combination of higher standards for vehicle fuel economy, implementation of the Low Carbon Fuel Standard (LCFS), 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 use energy more efficiently. Utility energy providers were required change to include more renewable energy sources through implementation of the Renewables Portfolio Standard (RPS). Additionally, the original Climate Change 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 by 25 percent."

The original Climate Change Scoping Plan identified a number of specific issues relevant to the Project, including the following:

- The potential of using the green building framework as a mechanism, which could enable GHG emissions reductions in other sectors (i.e., electricity, natural gas), noting the following:

  A Green Building strategy will produce greenhouse gas savings through buildings that exceed minimum energy efficiency standards, decrease consumption of potable water, reduce solid waste during construction and operation, and incorporate sustainable materials. Combined, these measures can also contribute to healthy indoor air quality, protect human health, and minimize impacts to the environment.

- The importance of supporting the Department of Water Resources' work to implement the Governor's objective to reduce per capita water use by 20 percent by 2020. Specific measures to achieve this goal include water use efficiency, water recycling, and reuse of urban runoff. The original Climate Change Scoping Plan noted that water use requires significant amounts of energy, including approximately one-fifth of statewide electricity.

- Encouraging local governments to set quantifiable emission reduction targets for their jurisdictions and use their influence and authority to encourage reductions in emissions caused by energy use, waste and recycling, water and wastewater systems, transportation, and community design.

Forecasting the amount of emissions that would occur in 2020 if no actions are taken was necessary to assess the scope of the reductions California has to make to return to the 1990 emissions level by 2020 as required by AB 32. CARB originally defined the "business-as-usual" or BAU scenario as emissions in the absence of any GHG emission reduction measures discussed in the original Climate Change Scoping Plan. For example, in further explaining CARB's BAU methodology, CARB assumed that all new electricity generation would be supplied by natural gas plants, no further regulatory action would impact vehicle fuel efficiency, and building energy efficiency codes would be held at 2005 standards. In the original Climate Change Scoping Plan, CARB determined that achieving the 1990 emissions level in 2020 would require a reduction in GHG emissions of approximately 28.5 percent from the otherwise projected 2020 emissions level (i.e., those emissions that would occur in 2020, absent GHG-emissions--reducing laws and regulations).

Subsequent to adoption of the original Climate Change Scoping Plan, a lawsuit was filed challenging CARB's approval of the Climate Change Scoping Plan Functional Equivalent Document (FED to the Climate Change Scoping Plan). On May 20, 2011 (Case No. CPF-09-509562), the Court found that the environmental analysis of the alternatives in the FED to the Climate Change Scoping Plan was not sufficient under CEQA. CARB staff prepared a revised

and expanded environmental analysis of the alternatives, and the Supplemental FED to the Climate Change Scoping Plan was approved on August 24, 2011 (Supplemental FED). The Supplemental FED indicated that there is the potential for adverse environmental impacts associated with implementation of the various GHG emission reduction measures recommended in the Climate Change Scoping Plan.

As part of the Supplemental FED, CARB updated the projected 2020 BAU emissions inventory based on then current economic forecasts (i.e., as influenced by the economic downturn) and emission reduction measures already in place, replacing its prior 2020 BAU emissions inventory. CARB staff derived the updated emissions estimates by projecting emissions growth, by sector, from the state's average emissions from 2006 through 2008. Specific emission reduction measures included were the million-solar-roofs program, the AB 1493 (Pavley I) motor vehicle GHG emission standards, and the LCFS. In addition, CARB also factored into the 2020 BAU inventory emissions reductions associated with a 33-percent RPS for electricity generation. Based on the new economic data, CARB determined that achieving the 1990 emissions level by 2020 would require a reduction in GHG emissions of 21.7 percent (down from 28.5 percent) from BAU conditions. When the 2020 emissions level projection also was updated to account for newly implemented regulatory measures discussed above, CARB determined that achieving the 1990 emissions level in 2020 would require a reduction in GHG emissions of 16 percent (down from 28.5 percent) from the BAU conditions.

In 2014, CARB adopted the First Update to the Climate Change Scoping Plan: Building on the Framework (First Update). The stated purpose of the First Update was to "highlight… California's success to date in reducing its GHG emissions and lay…the foundation for establishing a broad framework for continued emission reductions beyond 2020, on the path to 80 percent below 1990 levels by 2050. The First Update found that California is on track to meet the 2020 emissions reduction mandate established by AB 32 and noted that California could reduce emissions further by 2030 to levels squarely in line with those needed to stay on track to reduce emissions to 80 percent below 1990 levels by 2050 if the state realizes the expected benefits of existing policy goals.

In conjunction with the First Update, CARB identified "six key focus areas comprising major components of the state's economy to evaluate and describe the larger transformative actions that will be needed to meet the state's more expansive emission reduction needs by 2050. Those six areas were: (1) energy; (2) transportation (vehicles/equipment, sustainable communities, housing, fuels, and infrastructure); (3) agriculture; (4) water; (5) waste management; and (6) natural and working lands. The First Update identified key recommended actions for each sector that would facilitate achievement of the 2050 reduction target.

Based on CARB's research efforts, it has a "strong sense of the mix of technologies needed to reduce emissions through 2050." Those technologies include energy demand reduction through efficiency and activity changes; large-scale electrification of on-road vehicles, buildings and industrial machinery; decarbonizing electricity and fuel supplies; and the rapid market penetration of efficient and clean energy technologies.

The First Update discussed new residential and commercial building energy efficiency improvements, specifically identifying progress towards zero net energy buildings as an element of meeting mid-term and long-term GHG emissions reduction goals. The First Update expressed CARB's commitment to working with the California Public Utilities Commission (CPUC) and California Energy Commission (CEC) to facilitate further achievements in building energy efficiency.

In December 2017, CARB adopted California's 2017 Climate Change Scoping Plan Update: The Strategy for Achieving California's 2030 Greenhouse Gas Target (2017 Scoping Plan Update). The 2017 Scoping Plan Update builds upon the framework established by the original Climate Change Scoping Plan and the First Update while identifying new, technologically feasible, and cost-effective strategies to ensure that California meets its GHG reduction targets in a way that promotes and rewards innovation, continues to foster economic growth, and delivers improvements to the environment and public health. The 2017 Scoping Plan Update includes policies to require direct GHG emissions reductions at some of the state's largest stationary sources and mobile sources. These policies include the use of lower GHG fuels, efficiency regulations, and the Cap-and-Trade program, which constrains and reduces emissions at covered sources.

CARB adopted its 2022 Scoping Plan update on December 15, 2022 that lays the groundwork to achieving carbon neutrality statewide by 2045. The 2022 Scoping Plan is designed to also reduce GHG emissions 85 percent below 1990 levels by 2045. Most reductions would come from conversion from combustion-based industries and technologies to electricity. While statewide programs calling for electrifying the vehicle fleet and energy sources would account for the vast majority of GHG reductions needed by 2030, local actions are needed to supplement these.

Assembly Bill 197. Assembly Bill (AB) 197, signed September 8, 2016, is a bill linked to SB 32 that prioritizes efforts to cut GHG emissions in low-income or minority communities. AB 197 requires CARB to make available, and update at least annually, on its Internet Web site the emissions of greenhouse gases, criteria pollutants, and toxic air contaminants for each facility that reports to CARB and air districts. In addition, AB 197 adds two Members of the Legislature to the CARB board as ex officio, non-voting members and also creates the Joint Legislative Committee on Climate Change Policies to ascertain facts and make recommendations to the Legislature and the houses of the Legislature concerning the state's programs, policies, and investments related to climate change.

Cap-and-Trade Program. The original Climate Change Scoping Plan identified a cap-and-trade program as one of the strategies for California to reduce GHG emissions. Under cap-and-trade, an overall limit on GHG emissions from capped sectors is established, and facilities subject to the cap are able to trade permits to emit GHG emissions within the overall limit. According to CARB, a cap-and-trade program will help put California on the path to meet its goal of reducing GHG emissions to 1990 levels by the year 2020.

CARB adopted a California Cap-and-Trade Program pursuant to its authority under AB 32 and the State Legislature extended the Program through 2030 with the adoption of Assembly Bill 398.

The Cap-and-Trade Program is designed to reduce GHG emissions from major sources, such as refineries and power plants, (deemed "covered entities"). "Covered entities" subject to the Cap-and-Trade Program are sources that emit more than 25,000 metric tons CO_2e ($MTCO_2e$) per year. Triggering of the 25,000 $MTCO_2e$ per year "inclusion threshold" is measured against a subset of emissions reported and verified under the California Regulation for the Mandatory Reporting of Greenhouse Gas Emissions (Mandatory Reporting Rule or MRR).

Under the Cap-and-Trade Program, CARB issues allowances equal to the total amount of allowable emissions over a given compliance period and distributes these to regulated entities. Covered entities are allocated free allowances in whole or in part (if eligible) and may buy allowances at auction, purchase allowances from others, or purchase offset credits. Each covered entity with a compliance obligation is required to surrender an allowance for each metric ton CO_2e of GHG they emit.

The Cap-and-Trade Program provides a firm cap, ensuring that the 2030 statewide emission limit will not be exceeded. An inherent feature of the Cap-and-Trade program is that it does not guarantee GHG emissions reductions in any discrete location or by any particular source. Rather, GHG emissions reductions are only guaranteed on a cumulative basis. As summarized by CARB in the First Update:

> *The Cap-and-Trade Regulation gives companies the flexibility to trade allowances with others or take steps to cost-effectively reduce emissions at their own facilities. Companies that emit more have to turn in more allowances or other compliance instruments. Companies that can cut their GHG emissions have to turn in fewer allowances. But as the cap declines, aggregate emissions must be reduced.*

For example, a covered entity theoretically could increase its GHG emissions every year and still comply with the Cap-and-Trade Program if there is a commensurate reduction in GHG emissions from other covered entities. Such a focus on aggregate GHG emissions is considered appropriate because climate change is a global phenomenon, and the effects of GHG emissions are considered cumulative.

The Cap-and-Trade Program works with other direct regulatory measures and provides an economic incentive to reduce emissions. If California's direct regulatory measures reduce GHG emissions more than expected, then the Cap-and-Trade Program will be responsible for relatively fewer emissions reductions. If California's direct regulatory measures reduce GHG emissions less than expected, then the Cap-and-Trade Program will be responsible for relatively more emissions reductions. Thus, the Cap-and-Trade Program assures that California will meet its 2030 GHG emissions reduction mandate.

> *The Cap-and-Trade Program establishes an overall limit on GHG emissions from most of the California economy—the "capped sectors." Within the capped sectors, some of the reductions are being accomplished through direct regulations, such as improved building and appliance efficiency standards, the [Low Carbon Fuel Standard] LCFS, and the 33 percent [Renewables Portfolio Standard] RPS. Whatever additional reductions are needed to bring emissions within the cap is accomplished through price incentives posed*

by emissions allowance prices. Together, direct regulation and price incentives assure that emissions are brought down cost-effectively to the level of the overall cap. […]

[T]he Cap-and-Trade Regulation provides assurance that California's 2020 limit will be met because the regulation sets a firm limit on 85 percent of California's GHG emissions.

Overall, the Cap-and-Trade Program will achieve aggregate, rather than site-specific or project-level, GHG emissions reductions. Also, due to the regulatory framework adopted by CARB in AB 32, the reductions attributed to the Cap-and-Trade Program can change over time depending on the state's emissions forecasts and the effectiveness of direct regulatory measures. The Cap-and-Trade Program covered approximately 450 businesses responsible for about 85 percent of California's GHG emissions.

The Cap-and-Trade Program covers the GHG emissions associated with electricity consumed in California, whether generated in-state or imported. Accordingly, GHG emissions associated with CEQA projects' electricity usage are covered by the Cap-and- Trade Program. The Cap-and-Trade Program also covers fuel suppliers (natural gas and propane fuel providers and transportation fuel providers) to address emissions from such fuels and from combustion of other fossil fuels not directly covered at large sources in the Program's first compliance period. Furthermore, the Cap-and-Trade Program also covers the GHG emissions associated with the combustion of transportation fuels in California, whether refined in state or imported. The point of regulation for transportation fuels is when they are "supplied" (i.e., delivered into commerce). Accordingly, as with stationary source GHG emissions and GHG emissions attributable to electricity use, virtually all, if not all, of GHG emissions from CEQA projects associated with VMT are covered by the Cap-and-Trade Program.

Assembly Bill 398 (AB 398) was enacted in 2017 to extend and clarify the role of the State's Cap-and-Trade Program from January 1, 2021, through December 31, 2030. As part of AB 398, refinements were made to the Cap-and-Trade program to establish updated protocols and allocation of proceeds to reduce GHG emissions.

California Renewables Portfolio Standard. The California RPS program (2002, SB 1078) required that 20 percent of the available energy supplies are from renewable energy sources by 2017. In 2006, SB 107 accelerated the 20 percent mandate to 2010. These mandates apply directly to investor-owned utilities. On April 12, 2011, California Governor Jerry Brown signed into law SB 2X, which modified California's RPS program to require that both public and investor-owned utilities in California receive at least 33 percent of their electricity from renewable sources by the year 2020. California SB 2X also requires regulated sellers of electricity to meet an interim milestone of procuring 25 percent of their energy supply from certified renewable resources by 2016. These levels of reduction are consistent with SCE's commitment to increase its renewables portfolio over time.

Senate Bill 350. Senate Bill (SB) 350, signed October 7, 2015, is the Clean Energy and Pollution Reduction Act of 2015. SB 350 is the implementation of some of the goals of Executive Order B-30-15. The objectives of SB 350 are: (1) to increase the procurement of electricity from renewable sources from 33 percent to 50 percent by December 31, 2030; and (2) to double the energy

efficiency savings in electricity and natural gas final end uses of retail customers through energy efficiency and conservation.

Senate Bill 1368. Senate Bill (SB) 1368, signed September 29, 2006, is a companion bill to AB 32 that requires the CPUC and the CEC to establish GHG emission performance standards for the generation of electricity. These standards also generally apply to power that is generated outside of California and imported into the state. SB 1368 provides a mechanism for reducing the emissions of electricity providers, thereby assisting CARB to meet its mandate under AB32. On January 25, 2007, the CPUC adopted an interim GHG Emissions Performance Standard, which is a facility-based emissions standard requiring that all new long-term commitments for baseload generation to serve California consumers be with power plants that have GHG emissions no greater than a combined cycle gas turbine plant. That level is established at 1,100 pounds of CO_2 per MWh. Furthermore, on May 23, 2007, the CEC adopted regulations that establish and implement an identical Emissions Performance Standard of 1,100 pounds of CO2 per MWh (see CEC Order No. 07-523-7).

Assembly Bill 1493 (Pavley I). Assembly Bill (AB) 1493, passed in 2002, requires the development and adoption of regulations to achieve "the maximum feasible reduction of greenhouse gases" emitted by noncommercial passenger vehicles, light-duty trucks, and other vehicles used primarily for personal transportation in the state. CARB originally approved regulations to reduce GHG emissions from passenger vehicles in September 2004, with the regulations to take effect in 2009. On September 24, 2009, CARB adopted amendments to these "Pavley" regulations that reduce GHG emissions in new passenger vehicles from 2009 through 2016. Although setting emission standards on automobiles is solely the responsibility of the USEPA, the federal CAA allows California to set state-specific emission standards on automobiles if the state first obtains a waiver from the USEPA. The USEPA granted California that waiver on July 1, 2009. A comparison between the AB 1493 standards and the Federal CAFE standards was completed by CARB and the analysis determined that California emission standards are 16 percent more stringent through the 2016 model year and 18 percent more stringent for 2020 model year. California is also committed to further strengthening these standards beginning with 2020 model year vehicles to obtain a 45-percent GHG reduction in comparison to the 2009 model year.

Executive Order S-1-07 (California Low Carbon Fuel Standard). Executive Order S-1-07, the LCFS (issued on January 18, 2007), requires a reduction of at least 10 percent in the carbon intensity of California's transportation fuels by 2020. Regulatory proceedings and implementation of the LCFS were directed to CARB. The LCFS has been identified by CARB as a discrete early action item in the adopted Climate Change Scoping Plan. The LCFS program was re-adopted in 2015 and will continue to complement other AB 32 measures, transform and diversify the fuel pool, and is a key part of the State's petroleum reduction goals for 2030.

Advanced Clean Cars Regulations. In 2012, CARB approved the Advanced Clean Cars (ACC) program, a new emissions-control program for model years 2015–2025. The components of the Advance Clean Car program include the Low-Emission Vehicle (LEV) regulations that reduce criteria pollutants and GHG emissions from light- and medium-duty vehicles, and the Zero-

Emission Vehicle (ZEV) regulation, which requires manufacturers to produce an increasing number of pure ZEVs (meaning battery electric and fuel cell electric vehicles), with provisions to also produce plug-in hybrid electric vehicles (PHEV) in the 2018 through 2025 model years. In March 2017, CARB voted unanimously to continue with the vehicle greenhouse gas emission standards and the ZEV program for cars and light trucks sold in California through 2025.

Senate Bill 375. Acknowledging the relationship between land use planning and transportation sector GHG emissions, Senate Bill (SB) 375 was passed by the State Assembly on August 25, 2008 and signed by the Governor on September 30, 2008. This legislation links regional planning for housing and transportation with the GHG reduction goals outlined in AB 32. Reductions in GHG emissions would be achieved by, for example, locating employment opportunities close to transit. Under SB 375, each Metropolitan Planning Organization (MPO) would be required to adopt a Sustainable Community Strategy (SCS) to encourage compact development that reduce passenger VMT and trips so that the region will meet a target, created by CARB, for reducing GHG emissions. If the SCS is unable to achieve the regional GHG emissions reduction targets, then the MPO is required to prepare an alternative planning strategy that shows how the GHG emissions reduction target could be achieved through alternative development patterns, infrastructure, and/or transportation measures.

California Appliance Efficiency Regulations (Title 20, Sections 1601 through 1608). The 2014 Appliance Efficiency Regulations, adopted by the CEC, include standards for new appliances (e.g., refrigerators) and lighting, if they are 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.

California Building Energy Efficiency Standards (Title 24, Part 6). California's Energy Efficiency Standards for Residential and Nonresidential Buildings, located at Title 24, Part 6 of the California Code of Regulations 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 building components to conserve energy. The standards are updated periodically to allow consideration and possible incorporation of new energy efficiency technologies and methods. The CEC adopted the 2016 Title 24 standards, which became effective on January 1, 2017. The 2019 standards continue to improve upon the 2013 Title 24 standards for new construction of, and additions and alterations to, residential and non-residential buildings and became effective January 1, 2020. Compliance with Title 24 is enforced through the building permit process.

California Green Building Standards (CALGreen Code). The California Green Building Standards Code (California Code of Regulations, Title 24, Part 11), commonly referred to as the CALGreen Code, went into effect on January 1, 2017. Most mandatory measure changes in the 2016 CALGreen Code from the previous 2013 CALGreen Code were related to the definitions and to the clarification or addition of referenced manuals, handbooks, and standards. For example, several definitions related to energy that were added or revised affect electric vehicles chargers and charging and hot water recirculation systems. For new multi-family dwelling units, the residential mandatory measures were revised to provide additional electric vehicle charging

space requirements, including quantity, location, size, single EV space, multiple EV spaces, and identification. For nonresidential mandatory measures, the table (Table 5.106.5.3.3) identifying the number of required EV charging spaces has been revised in its entirety. Compliance with Title 24 is enforced through the building permit process. The 2019 CalGreen code updates were published July 1, 2019 with an effective date of January 1, 2020.

Assembly Bill 1279. This 2022 legislation creates a legally binding goal that California achieve carbon neutrality by 2045. The bill also requires the state to reduce GHG emissions by 85 percent below 1990 levels by 2045.

Senate Bill 97. On June 19, 2008, the Office of Planning and Research (OPR) released a technical advisory on addressing climate change. This guidance document outlines suggested components to CEQA disclosure, including quantification of GHG emissions from a project's construction and operation; determination of significance of the project's impact to climate change; and if the project is found to be significant, the identification of suitable alternatives and mitigation measures.

Senate Bill (SB) 97, passed in August 2007, is designed to work in conjunction with CEQA and AB 32. SB 97 requires OPR to prepare and develop guidelines for the mitigation of GHG emissions or the effects thereof, including, but not limited to, the effects associated with transportation and energy consumption. The Draft Guidelines Amendments for Greenhouse Gas Emissions (Guidelines Amendments) were adopted on December 30, 2009 and address the specific obligations of public agencies when analyzing GHG emissions under CEQA to determine a project's effects on the environment.

However, neither a threshold of significance nor any specific mitigation measures are included or provided in the Guidelines Amendments. The Guidelines Amendments require a lead agency to make a good-faith effort, based on the extent possible on scientific and factual data, to describe, calculate, or estimate the amount of GHG emissions resulting from a project. The Guidelines Amendments give discretion to the lead agency whether to: (1) use a model or methodology to quantify GHG emissions resulting from a project, and which model or methodology to use; or (2) rely on a qualitative analysis or performance- based standards. Furthermore, the Guidelines Amendments identify the following three factors that should be considered in the evaluation of the significance of GHG emissions:

1. The extent to which a project may increase or reduce GHG emissions as compared to the existing environmental setting;

2. Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project; and

3. The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions.

The administrative record for the Guidelines Amendments also clarifies "that the effects of greenhouse gas emissions are cumulative and should be analyzed in the context of CEQA's requirements for cumulative impact analysis."

The California Natural Resources Agency is required to periodically update the Guidelines Amendments to incorporate new information or criteria established by CARB pursuant to AB 32. SB 97 applies to any environmental impact report (EIR), negative declaration, mitigated negative declaration, or other document required by CEQA, which has not been finalized.

Senate Bill 743. This 2013 legislation updates the way transportation impacts are measured in California, focusing on VMT rather than level of service as the main measure of transportation impacts. It calls on decision-makers throughout the State to focus on reducing overall VMT and the GHG emissions from such vehicle activity. Traffic studies in the City began formally analyzing projects in this fashion effective July 1, 2020.

South Coast Air Quality Management District. The SCAQMD adopted a "Policy on Global Warming and Stratospheric Ozone Depletion" on April 6, 1990. The policy commits the SCAQMD to consider global impacts in rulemaking and in drafting revisions to the Air Quality Management Plan. 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.

Southern California Association of Governments. To implement SB 375 and reduce GHG emissions by correlating land use and transportation planning, SCAG adopted the 2016–2040 RTP/SCS on April 7, 2016. The 2016–2040 RTP/SCS reaffirms the land use policies that were incorporated into the 2012–2035 RTP/SCS. These foundational policies, which guided the development of the 2016–2040 RTP/SCS's strategies for land use, include the following:

- Identify regional strategic areas for infill and investment;
- Structure the plan on a three-tiered system of centers development;
- Develop "Complete Communities";

- Develop nodes on a corridor;
- Plan for additional housing and jobs near transit;
- Plan for changing demand in types of housing;
- Continue to protect stable, existing single-family areas;
- Ensure adequate access to open space and preservation of habitat; and
- Incorporate local input and feedback on future growth.

The 2016–2040 RTP/SCS recognizes that transportation investments and future land use patterns are inextricably linked, and continued recognition of this close relationship will help the region make choices that sustain existing resources and expand efficiency, mobility, and accessibility for people across the region. In particular, the 2016–2040 RTP/SCS draws a closer connection between where people live and work, and it offers a blueprint for how Southern California can grow more sustainably. The 2016–2040 RTP/SCS also includes strategies focused on compact infill development and economic growth by building the infrastructure the region needs to promote the smooth flow of goods and easier access to jobs, services, educational facilities, healthcare and more.

The 2016–2040 RTP/SCS states that the SCAG region is home to about 18.3 million people in 2012 and currently includes approximately 5.9 million homes and 7.4 million jobs. By 2040, the integrated growth forecast projects that these figures will increase by 3.8 million people, with nearly 1.5 million more homes and 2.4 million more jobs. HQTAs will account for 3 percent of regional total land but are projected to accommodate 46 percent and 55 percent of future household and employment growth respectively between 2012 and 2040. The 2016–2040 RTP/SCS overall land use pattern reinforces the trend of focusing new housing and employment in the region's HQTAs. HQTAs are a cornerstone of land use planning best practice in the SCAG region because they concentrate roadway repair investments, leverage transit and active transportation investments, reduce regional life cycle infrastructure costs, improve accessibility, create local jobs, and have the potential to improve public health and housing affordability.

On September 3, 2020, SCAG adopted the 2020-2045 RTP/SCS, which calls for $639 billion in transportation investments and reducing VMT by 19 percent per capita from 2005 to 2035. The updated plan accommodates 21.3 percent growth in population from 2016 (3,933,800) to 2045 (4,771,300) and a 15.6 percent growth in jobs from 2016 (1,848,300) to 2045 (2,135,900). The updated RTP/SCS calls for a number of land use-based strategies to accommodate growth, minimize criteria pollutant emissions, and achieve the following climate change objectives:

- Decreasing drive-along work commutes by three percent
- Reducing per capita VMT by five percent and vehicle hours traveled per capita by nine percent

- Increasing transit commuting by two percent
- Reducing travel delay per capita by 26 percent
- Creating 264,500 new jobs annually
- Reducing greenfield development by 29 percent by focusing on smart growth
- Locating six more percent household growth in HQTAs, which concentrate roadway repair investments, leverage transit and active transportation investments, reduce regional life cycle infrastructure costs, improve accessibility, create local jobs, and have the potential to improve public health and housing affordability.
- Locating 15 percent more jobs in HQTAs

The 2020-2045 RTP/SCS calls for a 19 percent reduction in per capita GHG emissions by 2035 from 2005 levels. This is intended to be consistent with CARB's performance targets during this same period. The bulk of these reductions are to come from transportation investments, pricing strategies, TDM strategies, and land use programs. On October 30, 2020, CARB accepted the RTP/SCS quantification of GHG emissions on October 30, 2020 (Executive Order G-20-239, SCAG 2020 SCS ARB Acceptance of GHG Quantification Determination).

City of Inglewood Building Code. On December 10, 2019, the City adopted the 2019 Title 24 building codes. These regulations build upon the 2019 California Green Building Standards Code (CalGreen, effective January 1, 2020) that promote green building requirements that reduce carbon-based emissions from new construction and remodels.

City of Inglewood Energy and Climate Action Plan. In March 2013, the City adopted the Energy and Climate Action Plan (ECAP) that documents the City's GHG emissions inventory and sets a 2020 GHG emission reduction target of 15 percent below 2005 levels and a 2035 target of 32.5 percent below 2005 levels. The plan also identified strategies and an implementation plan that highlights budget-neutral measures. In January 2018, the City adopted a Supplemental Energy Climate Action Plan that updated the City's carbon reduction plan for the next 20 years in light of the passage of SB 32 and the State's 2017 Climate Action Plan. It focuses on five categories of strategies: land use and transportation, energy efficiency, energy generation, solid waste, and urban greening.

In 2015, the South Bay Cities Council of Governments developed the City of Inglewood Energy Efficiency Climate Action Plan (EECAP) which updates the ECAP by updating the emissions in inventory for the city, revising forecasts, and identifying reductions to achieve ECAP targets. The 2015 EECAP states that new residential and/or commercial development should be encouraged to exceed Title 24 Building Code Standards. This encouragement is provided by the ECAP Climate-Ready Development Standards discussed later in this analysis.

Existing Conditions

Existing Statewide GHG Emissions. GHG emissions are the result of both natural and human-influenced activities. Regarding human-influenced activities, motor vehicle travel, consumption of fossil fuels for power generation, industrial processes, heating and cooling, landfills, agriculture, and wildfires are the primary sources of GHG emissions. Without human intervention, Earth maintains an approximate balance between the emission of GHG emissions into the atmosphere and the storage of GHG emissions in oceans and terrestrial ecosystems. Events and activities, such as the industrial revolution and the increased combustion of fossil fuels (e.g., gasoline, diesel, coal, etc.), have contributed to the rapid increase in atmospheric levels of GHG emissions over the last 150 years.

As reported by the CEC, California contributes approximately one percent of global and 8.2 percent of national GHG emissions. California represents approximately 12 percent of the national population. Approximately 80 percent of GHGs in California are CO_2 produced from fossil fuel combustion. The current California GHG inventory compiles statewide anthropogenic GHG emissions and carbon sinks/storage from years 2000 through 2018. It includes estimates for CO_2, CH_4, N_2O, HFCs, PFCs, and SF_6. The GHG emissions inventory for California for years 2010 through 2018 is presented in Table VIII-3. As shown therein, the GHG inventory for California in 2018 was 425.4 million $MTCO_2e$.

Table VIII-3
California GHG Inventory
(million metric tons CO_2e)

	2012	2013	2014	2015	2016	2017	2018
Transportation	**161.22**	**160.90**	**162.28**	**166.14**	**169.38**	**171.04**	**169.58**
On Road	***147.71***	***147.07***	***148.04***	***151.52***	***154.64***	***156.42***	***154.44***
Passenger Vehicles	111.77	111.52	112.20	116.33	119.03	119.93	119.43
Heavy Duty Vehicles	35.93	35.55	35.83	35.19	35.62	36.45	35.00
Ships & Commercial Boats	***3.43***	***3.42***	***3.49***	***3.42***	***3.24***	***3.82***	***3.74***
Aviation (Intrastate)	***3.75***	***3.93***	***3.90***	***4.22***	***4.44***	***4.68***	***4.65***
Rail	***2.38***	***2.38***	***2.38***	***2.38***	***2.37***	***1.83***	***2.22***
Off Road	***2.23***	***2.33***	***2.43***	***2.53***	***2.63***	***2.73***	***2.83***
Unspecified	***1.71***	***1.77***	***2.04***	***2.07***	***2.07***	***1.55***	***1.61***
Industrial	**91.07**	**93.73**	**93.96**	**91.58**	**89.61**	**88.73**	**89.18**
Refineries and Hydrogen	***29.88***	***29.22***	***29.40***	***28.21***	***29.61***	***30.05***	***30.07***
General Fuel Use	***18.91***	***19.31***	***19.87***	***19.23***	***18.53***	***18.79***	***18.57***
Natural Gas	14.48	14.36	15.56	14.79	14.99	15.01	15.49
Other Fuels	4.43	4.94	4.31	4.45	3.53	3.78	3.07
Oil & Gas: Production &	***16.73***	***19.11***	***19.47***	***19.58***	***17.93***	***16.87***	***16.68***
Fuel Use	14.87	16.99	17.18	17.22	15.66	14.94	14.61
Fugitive Emissions	1.86	2.12	2.29	2.36	2.27	1.93	2.08
Cement Plants	***6.92***	***7.20***	***7.61***	***7.56***	***7.60***	***7.66***	***7.88***
Clinker Production	4.65	4.93	5.27	5.17	5.15	4.85	4.96
Fuel Use	2.26	2.28	2.34	2.39	2.45	2.81	2.91
Cogeneration Heat Output	***10.81***	***10.99***	***9.64***	***8.98***	***8.00***	***7.59***	***8.10***
Other Fugitive and Process	***7.81***	***7.90***	***7.98***	***8.01***	***7.95***	***7.77***	***7.88***
Natural Gas Transmission &	3.88	3.82	3.87	3.94	3.99	4.01	4.00
Manufacturing	0.19	0.20	0.17	0.18	0.10	0.11	0.12
Wastewater Treatment	1.85	1.85	1.86	1.85	1.85	1.86	1.95
Other	1.90	2.03	2.08	2.04	2.01	1.78	1.81
Electric Power	**95.09**	**89.65**	**88.24**	**83.67**	**68.58**	**62.13**	**63.11**
In-State Generation	***51.03***	***49.47***	***51.72***	***49.93***	***42.30***	***38.18***	***38.54***
Natural Gas	45.77	45.66	46.43	45.16	38.28	34.65	35.00
Other Fuels	4.44	2.91	4.40	3.65	2.55	2.66	2.71
Fugitive and Process Emissions	0.82	0.90	0.90	1.13	1.48	0.88	0.83
Imported Electricity	***44.07***	***40.17***	***36.51***	***33.74***	***26.28***	***23.95***	***24.57***
Unspecified Imports	17.48	11.82	13.44	11.21	9.68	8.85	11.57
Specified Imports	26.59	28.35	23.07	22.52	16.60	15.10	13.00
Commercial and Residential	**42.89**	**43.54**	**37.37**	**37.94**	**39.36**	**41.27**	**41.37**
Residential Fuel Use	***27.34***	***28.14***	***22.87***	***23.29***	***24.20***	***25.99***	***25.74***
Natural Gas	25.76	26.52	21.58	21.90	22.80	23.62	23.23
Other Fuels	1.58	1.62	1.28	1.39	1.40	1.48	1.62
Commercial Fuel Use	***13.41***	***13.30***	***12.51***	***12.67***	***12.92***	***12.99***	***13.46***
Natural Gas	11.25	11.28	10.39	10.50	10.89	11.06	11.13

Table VIII-3
California GHG Inventory
(million metric tons CO_2e)

	2012	2013	2014	2015	2016	2017	2018
Other Fuels	2.16	2.02	2.12	2.16	2.03	1.93	2.32
Commercial Cogeneration Heat	***0.76***	***0.71***	***0.58***	***0.56***	***0.81***	***0.85***	***0.72***
Other Commercial and	***1.38***	***1.40***	***1.41***	***1.42***	***1.43***	***1.44***	***1.45***
Agriculture	**36.08**	**34.61**	**35.95**	**34.41**	**33.84**	**32.32**	**32.57**
Livestock	***24.47***	***23.49***	***23.81***	***23.10***	***22.99***	***22.88***	***22.82***
Enteric Fermentation (Digestive	12.10	11.78	11.85	11.40	11.35	11.14	11.13
Manure Management	12.38	11.71	11.96	11.70	11.64	11.744	11.69
Crop Growing & Harvesting	***7.73***	***7.42***	***7.48***	***6.91***	***6.89***	***6.33***	***6.52***
Fertilizers	5.93	5.65	5.72	5.28	5.25	5.02	5.08
Soil Preparation and	1.73	1.69	1.68	1.56	1.56	1.22	1.35
Crop Residue Burning	0.08	0.08	0.08	0.08	0.08	0.09	0.10
General Fuel Use	***3.88***	***3.71***	***4.66***	***4.39***	***3.95***	***3.11***	***3.23***
Diesel	2.47	2.53	3.54	3.66	3.19	2.40	2.48
Natural Gas	0.70	0.69	0.63	0.64	0.72	0.67	0.74
Gasoline	0.71	0.49	0.49	0.10	0.04	0.05	0.01
Other Fuels	0.00	0.00	0.00	0.00	0.00	0.00	0.00
High GWP	**15.54**	**16.65**	**17.70**	**18.93**	**19.78**	**19.90**	**20.46**
Ozone Depleting Substance	***15.25***	***16.38***	***17.42***	***18.37***	***19.24***	***19.64***	***20.15***
Electricity Grid SF_6 Losses	***0.24***	***0.18***	***0.14***	***0.42***	***0.37***	***0.18***	***0.14***
Semiconductor	***0.06***	***0.08***	***0.14***	***0.14***	***0.16***	***0.17***	***0.17***
Recycling and Waste	**8.49**	**8.52**	**8.59**	**8.73**	**8.81**	**8.99**	**9.09**
Landfills	***8.20***	***8.22***	***8.28***	***8.40***	***8.47***	***8.64***	***8.73***
Composting	***0.29***	***0.30***	***0.31***	***0.33***	***0.34***	***0.35***	***0.36***
Included Inventory	***450.38***	***447.59***	***444.10***	***441.40***	***429.35***	***424.50***	***425.35***

Source: California GHG Inventory for 2000–2018—by Category as Defined in the Climate Change Scoping Plan million metric tons of CO_2e—(based upon IPCC Fourth Assessment Report's Global Warming Potentials).

Existing Conditions

Existing GHG emissions associated with the existing 137-room hotel on the Project Site are shown in Table VIII-4.

Table VIII-4
Existing Annual GHG Emissions Summary[a]
($MTCO_2e$)

Year	$MTCO_2$[a]
Area[b]	1
Energy[c] (electricity and natural gas)	678
Mobile	1,290
Solid Waste[d]	23
Water/Wastewater[e]	11
Refrigerants	16
Total Emissions	**2,019**

[a] *CO_2e was calculated using CalEEMod model, version 2022.1.*
[b] *Area source emissions are from landscape equipment and other operational equipment.*
[c] *Energy source emissions are based on CalEEMod default electricity and natural gas usage rates.*
[d] *Solid waste emissions are calculated based on CalEEMod default solid waste generation rates.*
[e] *Water/Wastewater emissions are calculated based on CalEEMod default water consumption rates.*

Source: DKA Planning, 2022. Modeling results included in Appendix F.

Thresholds of Significance

In accordance with Appendix G of the CEQA Guidelines, a project's GHG emissions impacts would be significant if the project would do the following:

a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment; or

b. Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

Methodology

Because there is no "bright line" threshold of significance for GHG emissions, the methodology for evaluating a project's impacts related to GHG emissions focuses on its consistency with statewide, regional, and local plans adopted for the purpose of reducing and/or mitigating GHG emissions. This evaluation is the sole basis for determining the significance of a project's GHG-related impacts on the environment.

However, for informational purposes, this analysis also discloses the amount of GHG emissions emitted through the use of recommended air quality models. This disclosure ensures the estimate of a project's GHG emissions satisfies State CEQA Guidelines Section 15064.4(a), which calls for a good-faith effort to describe and calculate emissions. This emissions inventory also demonstrates the reduction in a project's incremental contribution of GHG emissions that result from regulations and requirements adopted to implement plans for the reduction or mitigation of GHG emissions. As such, it provides further justification that a project is consistent with plans adopted for the purpose of reducing and/or mitigating GHG emissions by a project and over time.

The significance of a project's GHG emissions impacts is not based on the amount of GHG emissions resulting from that project.

The California Climate Action Registry (Climate Registry) General Reporting Protocol provides basic procedures and guidelines for calculating and reporting GHG emissions from a number of general and industry-specific activities. The General Reporting Protocol is based on the "Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard" developed by the World Business Council for Sustainable Development and the World Resources Institute through "a multi-stakeholder effort to develop a standardized approach to the voluntary reporting of GHG emissions." Although no numerical thresholds of significance have been developed, and no specific protocols are available for land use projects, the General Reporting Protocol provides a basic framework for calculating and reporting GHG emissions from the project. The information provided in this section is consistent with the General Reporting Protocol's reporting requirements.

The General Reporting Protocol recommends the separation of GHG emissions into three categories that reflect different aspects of ownership or control over emissions. They include the following:

- Scope 1: Direct, onsite combustion of fossil fuels (e.g., natural gas, propane, gasoline, and diesel).

- Scope 2: Indirect, offsite emissions associated with purchased electricity or purchased steam.

- Scope 3: Indirect emissions associated with other emissions sources, such as third-party vehicles and embodied energy (e.g., energy used to convey, treat, and distribute water and wastewater).

The General Reporting Protocol provides a range of basic calculations methods. However, the General Reporting Protocol calculations are typically designed for existing buildings or facilities. These retrospective calculation methods are not directly applicable to planning and development situations where buildings do not yet exist.

CARB recommends consideration of indirect emissions to provide a more complete picture of the GHG emissions footprint of a facility. Annually reported indirect energy usage aids the conservation awareness of a facility and provides information to CARB to be considered for future strategies. For example, CARB has proposed requiring the calculation of direct and indirect GHG emissions as part of the AB 32 reporting requirements. Additionally, OPR has noted that lead agencies "should make a good-faith effort, based on available information, to calculate, model, or estimate… GHG emissions from a project, including the emissions associated with vehicular traffic, energy consumption, water usage and construction activities." Thus, direct and indirect emissions have been calculated for the Project.

A fundamental difficulty in the analysis of GHG emissions is the global nature of the existing and cumulative future conditions. Changes in GHG emissions can be difficult to attribute to a particular

planning program or project because the planning effort or project may cause a shift in the locale for some type of GHG emissions, rather than causing "new" GHG emissions. As a result, there is an inability to conclude whether a project's GHG emissions represent a net global increase, reduction, or no change in GHG emissions that would exist if the project were not implemented. The analysis of the Project's GHG emissions is particularly conservative in that it assumes all of the GHG emissions are new additions to the atmosphere.

CalEEMod is a statewide land use emissions computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify potential criteria pollutant and GHG emissions associated with both construction and operations from a variety of land use projects. CalEEMod was developed in collaboration with the air districts of California, who provided data (e.g., emission factors, trip lengths, meteorology, source inventory) to account for local requirements and conditions. The model is considered by SCAQMD to be an accurate and comprehensive tool for quantifying air quality and GHG emissions impacts from land use projects throughout California.

Construction Emissions

The Project's construction emissions were calculated using CalEEMod Version 2022.1. CalEEMod calculates emissions from off-road equipment usage and on-road vehicle travel associated with haul, delivery, and construction worker trips. GHG emissions during construction were calculated based on the estimated construction schedule and included the mobile-source and fugitive dust emissions factors derived from CalEEMod.

The calculations of the emissions generated during Project construction activities reflect the types and quantities of construction equipment that would be used to remove existing development, grade, and excavate the Project Site; construct the proposed building and related improvements; and plant new landscaping within the Project Site.

In accordance with SCAQMD's guidance, GHG emissions from construction were amortized (i.e., averaged annually) over the lifetime of the Project. Because emissions from construction activities occur over a relatively short-term period of time, they contribute a relatively small portion of the overall lifetime GHG emissions for the Project. In addition, GHG emissions reduction measures for construction equipment are relatively limited. Thus, SCAQMD recommends that construction emissions be amortized over a 30-year lifetime, so that GHG emissions reduction measures will address construction GHG emissions as part of the operational GHG reduction strategies. As a result, the Project's total construction GHG emissions were divided by 30 to determine approximate annual construction emissions estimate comparable to operational emissions.

Operational Emissions

Similar to construction, CalEEMod is used to calculate potential GHG emissions generated by new land uses on the Project Site, including area sources, electricity, natural gas, mobile sources, stationary sources (i.e., emergency generators), solid waste generation and disposal, and water usage/wastewater generation.

Area source emissions include landscaping equipment that are based on the size of the land uses (e.g., square footage or dwelling unit), the GHG emission factors for fuel combustion, and the GWP values for the GHG emissions emitted.

GHG emissions associated with electricity demand are based on the size of the land uses, the electrical demand factors for the land uses, the GHG emission factors for the electricity utility provider, and the GWP values for the GHG emissions emitted. As with electricity, the emissions of GHG emissions associated with natural gas combustion are based on the size of the land uses, the natural gas combustion factors for the land uses in units of million British thermal units (MMBtu), the GHG emission factors for natural gas combustion, and the GWP values for the GHG emissions emitted.

Mobile source GHG emissions are calculated based on an estimate of the Project's annual VMT, which is derived using CalEEMod based on the trip generation provided in the Transportation Study prepared for the Project. The CalEEMod-derived VMT values account for the daily and seasonal variations in trip frequency and length associated with new residential, employee, and visitor trips to and from the Project Site and other activities that generate a vehicle trip.

Stationary source GHG emissions are based on proposed stationary sources (i.e., emergency generators) that would be provided on the Project Site.

GHG emissions associated with solid waste disposal are based on the size of the Project's proposed land uses, the waste disposal rate for the land uses, the waste diversion rate, the GHG emission factors for solid waste decomposition, and the GWP values for the GHG emissions emitted.

GHG emissions related to water usage and wastewater generation are based on the size of the land uses, the water demand factors, the electrical intensity factors for water supply, treatment, and distribution, electrical intensity factors for wastewater treatment, the GHG emission factors for the electricity utility provider, and the GWP values for the GHG emissions emitted. GHG emissions from refrigerants reflect the carbon-based emissions from substances used in equipment for air conditioning and refrigeration.

The analysis of Project GHG emissions at buildout uses assumptions in CARB's EMFAC2021 model and also takes into account actions and mandates expected to be in force in 2025 (e.g., Pavley I Standards, full implementation of California's 33 percent RPS by 2030 and 50 percent by 2050 and the California LCFS). In addition, because mobile source GHG emissions are directly dependent on the number of vehicle trips, a decrease in the number of Project-generated trips as a result of Project features (e.g., close proximity to transit) would provide a proportional reduction in mobile source GHG emissions compared to a generic project without such locational benefits. Calculation of Project GHG emissions conservatively did not include actions and mandates that are not already in place but are expected to be enforced in 2025 (e.g., Pavley II, which could further reduce GHG emissions from use of light-duty vehicles by 2.5 percent). Similarly, emissions reductions regarding Cap-and-Trade were not included in this analysis as they applied to other future reductions in non-transportation sectors. As for the Cap-and-Trade program's benefits for the transportation sector, the analysis utilizes CARB's assumptions in EMFAC2021 for any short-

term reductions in GHG emissions. By not speculating on potential regulatory conditions, the analysis takes a conservative approach that likely overestimates the Project's GHG emissions at buildout, because the state is expected to implement a number of policies and programs aimed at reducing GHG emissions from the land use and transportation sectors to meet the state's long-term climate goals.

Consistency with Applicable Plans and Policies

A consistency analysis has been provided that describes the Project's compliance with or exceedance of performance-based standards, and consistency with applicable plans and policies adopted for the purpose of reducing GHG emissions, included in the applicable portions of the Climate Change Scoping Plan, the 2020-2045 RTP/SCS, and the City's ECAP.

As part of the Climate Change Scoping Plan, a statewide emissions inventory was developed as required by AB 32 which directs CARB to develop and track GHG emissions reductions to document progress towards the state GHG target. The emissions inventory also takes into account GHG emissions reduction measures developed by CARB to achieve state targets. Consistency with the Climate Change Scoping Plan is evaluated by comparing the Project's GHG emissions reduction measures to those contained in the Scoping Plan.

As noted in CEQA Guidelines Section 15064.4(b)(3), consistency with such plans and policies "must reduce or mitigate the project's incremental contribution of greenhouse gas emissions." To demonstrate such incremental reductions, this chapter estimates reductions of Project-related GHG emissions resulting from consistency with plans. Consistent with evolving scientific knowledge, approaches to GHG emissions quantification may continue to evolve in the future.

While there are many ways to quantify the efficiency of the GHG reduction measures provided for in the plans and policies, this analysis compares the Project's GHG emissions to the emissions that would be generated by the Project in the absence of any GHG emissions reduction measures (i.e., the No Action Taken [NAT] Scenario. This approach is consistent with the concepts used in CARB's 2017 Climate Change Scoping Plan. This methodology is used to analyze consistency with applicable GHG emissions reduction plans and policies and demonstrate the efficacy of the measures contained therein, but it is not a threshold of significance.[49]

The analysis in this section includes potential emissions under NAT scenarios and from the Project at build-out based on actions and mandates expected to be in force in 2025. Early-action measures identified in the Climate Change Scoping Plan that have not been approved were not credited in this analysis. By not speculating on potential regulatory conditions, the analysis takes a conservative approach that likely overestimates the Project's GHG emissions at build-out. The NAT scenario is used to establish a comparison with project-generated GHG emissions. The NAT scenario does not consider site-specific conditions, project design features, or prescribed

[49] *Specifically, and consistent with the holding in Center for Biological Diversity v. California Department of Fish and Wildlife and Newhall Land and Farming, 62 Cal.4th.204, 220 (2015), the comparison to a NAT Scenario is being used to provide information and a quantitative metric to measure the Project's GHG emissions and level of reductions due to regulatory compliance measures, and is not being utilized as a determinative "business as usual" threshold of significance to identify potential Project impacts.*

mitigation measures. As an example, a NAT scenario would apply a base Institute of Transportation Engineers (ITE) trip-generation rate for the Project and would not consider site-specific benefits resulting from the proposed mix of uses or close proximity to public transportation.

Based on guidance from the 2022 Scoping Plan, this analysis also evaluates whether the Project would incorporate the following key GHG emissions reduction strategies identified in the 2022 Scoping Plan for multi-family residential and mixed-use projects[50]:

- Provide EV charging infrastructure that, at a minimum, meets the most ambitious voluntary standard in the California Green Building Standards Code.
- Locate projects on infill sites surrounded by urban uses and is served by existing utilities and essential public services (e.g., transit, streets, water, sewer).
- Does not result in the loss or conversion of natural and working lands.
- Consists of transit-supportive densities (i.e., 20 dwelling units per acre), is within 0.5 miles of transit stops, or satisfies more detailed and stringent criteria in the regional SCS.
- Reduces parking requirements.
- Dedicating at least 20 percent of residential units as affordable to lower-income residents.
- Results in no net loss of existing affordable units.
- Uses all-electric appliances without any natural gas connections and does not use propane of other fossil fuels for space heating, water heating, or indoor cooking.

Pursuant to the 2022 Scoping Plan, these project attributes help identify residential and mixed-use projects that are "clearly consistent with the State's climate goals."

a) Would the project generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?

b) Would the project conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of GHG emissions?

Less Than Significant Impact. As discussed previously, whether the Project would generate GHG emissions that could have a significant impact on the environment is based on whether the Project would conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of GHG emissions. As such, both of these Checklist Questions are addressed together.

[50] *California Air Resources Board, 2022 Scoping Plan for Achieving Carbon Neutrality, Appendix D (Local Actions) Table 3; November 2022.*

Project Emissions

The Project would generate direct and indirect GHG emissions as a result of different types of emissions sources, including the following:

- Construction: emissions associated with demolition of the existing motel uses and parking areas, shoring, excavation, grading, and construction-related equipment and vehicular activity;
- Area source: emissions associated with landscape equipment;
- Energy source (building operations): emissions associated with electricity and natural gas use for space heating and cooling, water heating, energy consumption, and lighting;
- Stationary source: emissions associated with stationary equipment (e.g., emergency generators);
- Mobile source: emissions associated with vehicles accessing the Project Site;
- Solid Waste: emissions associated with the decomposition of the waste, which generates methane based on the total amount of degradable organic carbon; and
- Water/Wastewater: emissions associated with energy used to pump, convey, deliver, and treat water.
- Refrigerants: carbon-based emissions from substances used in equipment for air conditioning and refrigeration.

Construction

Project construction is anticipated to be completed in 2025 with occupancy the same year. A summary of construction details (e.g., schedule, equipment mix, and vehicular trips) and CalEEMod modeling output files are provided in Appendix F. The GHG emissions associated with the Project's construction phase were calculated for each year of construction activity. A summary of GHG emissions for each year of construction is presented in Table VIII-5.

As presented in Table VIII-5, construction of the Project would generate 5,248 $MTCO_2e$. As recommended by the SCAQMD, total GHG construction emissions were amortized over the 30-year lifetime of the Project (i.e., construction emissions were divided by 30 to determine annual emissions that can be added to the Project's operational emissions) in order to determine the Project's annual GHG emissions inventory. This results in annual Project construction emissions of 175 $MTCO_2e$.

Table VIII-5
Combined Construction-Related Emissions ($MTCO_2e$)

Year	$MTCO_2e$[a]
2022	50
2023	2,559
2024	2,230
2025	410
Total	**5,248**
Amortized Over 30 Years	***175***

[a] *CO_2e was calculated using CalEEMod and the results are provided in the Construction CalEEMod output file in Appendix C and Appendix F.*

Source: DKA Planning, 2024.

Operation

Area Source Emissions

Area source emissions were calculated using the CalEEMod emissions inventory model, which includes landscape maintenance equipment, use of consumer products, and other everyday sources. As shown in Table VIII-6, net Project GHG emissions from area sources would result in 14 $MTCO_2e$ per year.

Electricity and Natural Gas Generation Emissions

GHG emissions are emitted as a result of activities in buildings when electricity and natural gas are used as energy sources. Combustion of any type of fuel emits CO_2 and other GHG emissions directly into the atmosphere; when this occurs in a building, it is a direct emission source associated with that building. GHG emissions are also emitted during the generation of electricity from fossil fuels. When electricity is used in a building, the electricity generation typically takes place off-site at the power plant; electricity use in a building generally causes emissions in an indirect manner.

Electricity and natural gas emissions were calculated for the Project using the CalEEMod emissions inventory model, which multiplies an estimate of the energy usage by applicable emissions factors chosen by the utility company. GHG emissions from electricity use are directly dependent on the electricity utility provider. In this case, GHG emissions intensity factors for SCE were selected in CalEEMod. The carbon intensity ([pounds per megawatt an hour (lbs/MWh]) for electricity generation was calculated for the Project buildout year based on SCE projections. A straight-line interpolation was performed to estimate the SCE carbon intensity factor for the Project buildout year. SCE's carbon intensity projections also take into account SB 350 RPS requirements for renewable energy.

Table VIII-6
Annual GHG Emissions Summary (Project Buildout)[a]
($MTCO_2e$)

Source	Project GHG Emissions	Less Existing GHG Emissions	Net GHG Emissions
Area[b]	15	*(1)*	14
Energy[c] (electricity and natural gas)	1,039	*(678)*	361
Mobile	4,418	*(1,290)*	3,128
Solid Waste[d]	157	*(23)*	134
Water/Wastewater[e]	94	*(11)*	83
Refrigerants	34	*(16)*	18
Construction	175	*(-)*	175
Total Emissions	**5,662**	***(2,019)***	**3,643**

a CO₂e was calculated using CalEEMod and the results are provided in Section 2.0 of the Operation CalEEMod output file in Appendix F.
b Area source emissions are from landscape equipment and other operational equipment only; hearths omitted.
c Energy source emissions are based on CalEEMod default electricity and natural gas usage rates.
d Solid waste emissions are calculated based on CalEEMod default solid waste generation rates.
e Water/Wastewater emissions are calculated based on CalEEMod default water consumption rates.

Source: DKA Planning, 2024.

This approach is conservative, given the 2018 chaptering of SB 100 (De Leon), which requires electricity providers to provide renewable energy for at least 60 percent of their delivered power by 2030 and 100 percent use of renewable energy and zero-carbon resources by 2045. SB 100 also increases existing renewable energy targets, called Renewables Portfolio Standard (RPS), to 44 percent by 2024 and 52 percent by 2027.

Energy use in buildings is divided into energy consumed by the built environment and energy consumed by uses that are independent of the construction of the building, such as in plug-in appliances. CalEEMod calculates energy use from systems covered by Title 24 (e.g., heating, ventilation, and air conditioning [HVAC] system, water heating system, and lighting system); energy use from lighting; and energy use from office equipment, appliances, plug-ins, and other sources not covered by Title 24 or lighting.

CalEEMod electricity and natural gas usage rates are based on the CEC-sponsored California Commercial End-Use Survey (CEUS) and the California Residential Appliance Saturation Survey (RASS) studies. The data are specific for climate zones; therefore, Zone 12 was selected for the Project Site based on the zip code tool.

As shown in Table VIII-6, net Project GHG emissions from electricity and natural gas usage would result in a total of 361MTCO_2e per year.

Mobile Source Emissions

Mobile-source emissions were calculated by applying the SCAQMD-recommended CalEEMod emissions inventory model to vehicle trip activity from the Project's traffic impact analysis. CalEEMod calculates the emissions associated with on-road mobile sources associated with residents, employees, visitors, and delivery vehicles visiting the Project Site based on the number of daily trips generated and VMT.

The Project represents an infill development within an urbanized area that would concentrate residential, hotel, and entertainment uses within an HQTA. The Project Site is located in the dense Century Boulevard corridor with proximity to Metro local and future rail services. Furthermore, pursuant to Section 12-42.1 (Transportation Demand Management Requirements for Carpool Parking and Bicycle Facilities) of the City's Municipal Code as well as the standards of the Project's proposed PAD zoning regulations, the Project would be required to incorporate measures to reduce traffic trips and associated VMT and GHG emissions.

The Project characteristics listed below are consistent with the CAPCOA guidance document, Quantifying Greenhouse Gas Mitigation Measures, which provides emission reduction values for transportation-related design techniques. These techniques would reduce vehicle trips and VMT associated with the Project relative to the standard ITE trip generation rates that would result in a comparable reduction in VMT and associated GHG emissions. Techniques applicable to the Project include the following (a brief description of the Project's relevance to the measure is also provided):

- **CAPCOA Measure LUT-**1 – Increase Density: Increased density, measured in terms of persons, jobs, or dwelling units per unit area, reduces emissions associated with transportation as it reduces the distance people travel for work or services and provides a foundation for the implementation of other strategies, such as enhanced transit services.

- **CAPCOA Measure LUT-3 – Increase Diversity of Urban and Suburban Developments (Mixed-Use)**: The Project would introduce new uses on the Project Site, including new residential and entertainment uses. The increases in land use diversity on the Project Site would reduce vehicle trips and VMT by encouraging residents, workers, and visitors to walk and use non-automotive forms of transportation (e.g., walking and biking), which would result in corresponding reductions in transportation-related emissions.

- **CAPCOA Measure LUT-4 – Increase Destination Accessibility**: The Project Site is located in the dense Century Boulevard corridor, a regional job center, also easily accessible by public transportation. Access to multiple destinations, and commercial and retail uses in proximity to the Project Site would reduce vehicle trips and VMT compared to the statewide average and encourage walking and non-automotive forms of transportation and would result in corresponding reductions in transportation-related emissions as a result of the Project.

- **CAPCOA Measure LUT-5 – Increase Transit Accessibility**: The Project would be located near several Metro bus routes. The Project would also provide bicycle parking spaces to encourage utilization of alternative modes of transportation.

CalEEMod calculates VMT based on the type of land use, trip purpose, and trip type percentages for each land use subtype in the project (primary, diverted, and pass-by). As shown in Table VIII-6, net Project GHG emissions from mobile sources would result in a total of 3,128 $MTCO_2e$ per year. This estimate reflects reductions attributable to the Project's characteristics (e.g., infill development near transit that supports multi-modal transportation options).

Solid Waste Generation Emissions

Emissions related to solid waste were calculated using the CalEEMod emissions inventory model, which multiplies an estimate of the waste generated by applicable emissions factors provided in Section 2.4 of the USEPA's AP-42, Compilation of Air Pollutant Emission Factors. CalEEMod solid waste generation rates for each applicable land use were selected for this analysis. As shown in Table VIII-6, net Project GHG emissions from solid waste would result in a total of 134 $MTCO_2e$ per year, including accounting for a 50-percent recycling/diversion rate.

Water Usage and Wastewater Generation Emissions

GHG emissions are related to the energy used to convey, treat, and distribute water, and treat wastewater. Thus, these emissions are generally indirect emissions from the production of electricity to power these systems. Three processes are necessary to supply potable water; these include: (1) supply and conveyance of the water from the source; (2) treatment of the water to potable standards; and (3) distribution of the water to individual users. After use, energy is used as the wastewater is treated and reused as reclaimed water.

Emissions related to water usage and wastewater generation were calculated for the Project using the CalEEMod emissions inventory model, which multiplies an estimate of the water usage by the applicable energy intensity factor to determine the embodied energy necessary to supply potable water. GHG emissions are then calculated based on the amount of electricity consumed multiplied by the GHG emissions intensity factors for the utility provider. In this case, embodied energy for Southern California supplied water and GHG emissions intensity factors for SCE were selected in CalEEMod. Water usage rates were calculated consistent with the requirements under the 2019 California Plumbing Code, 2019 CALGreen, 2020 Plumbing Code, and 2020 Building Code, and reflect an approximately 20-percent reduction as compared to the base demand.

As shown in Table VII-6, net Project GHG emissions from water/wastewater usage would result in a total of 83 $MTCO_2e$ per year, which reflects a 20-percent reduction in water/wastewater emissions consistent with building code requirements as compared to the Project without sustainability features related to water conservation.

Combined Construction and Operational Emissions

As shown in Table VIII-6, when taking into consideration implementation of project design features, including the requirements set forth in the City's Building Code and the full implementation of state mandates, net GHG emissions for the Project would equal 175 $MTCO_2e$ annually (as amortized over 30 years) during construction.

Estimated Reduction of Project Related GHG Emissions Resulting from Consistency with Plans

As noted earlier, one approach to demonstrating a project's consistency with GHG-emissions-reduction plans is to show how a project will reduce its incremental contribution through a NAT comparison. This section includes estimated GHG emissions associated with the Project under a NAT scenario and from the Project based on actions and mandates in force in 2025.

As shown in Table VIII-7, the Project would emit 5,662 $MTCO_2e$ annually. When existing GHG emissions from the Project Site (i.e., 2,019 $MTCO_2e$) are considered, the Project would result in a net increase of 3,643 $MTCO_2e$. The gross emissions for the Project and its associated CARB 2025 NAT scenario are estimated to be 5,662 and 8,171 $MTCO_2e$ per year, respectively, which shows the Project would reduce emissions by 34 percent from CARB's 2020 NAT scenario.

While the AB 32 Scoping Plan's cumulative statewide objectives were not intended to serve as the basis for project-level assessments, this analysis finds that its NAT comparison based on the Scoping Plan is appropriate, because the Project would contribute to statewide GHG emissions reduction goals. Specifically, the Project's mixed-use nature and location in an existing urban setting in the Inglewood community provide opportunities to reduce transportation-related emissions. First, it would capture vehicle travel on-site that would have normally been destined for off-site locations. This produces substantial reductions in the amount of vehicle trips and VMT that no longer are made. Second, it would eliminate many vehicle trips, because travel to and from the Project Site could be captured by public transit and pedestrian travel instead. Finally, the Project would attract existing trips on the street network that would divert to the proposed uses.

Table VIII-7
Estimated Reduction of Project-Related GHG Emissions
Resulting from Consistency with Plans

Scenario and Source	NAT Scenario*	As Proposed Scenario	Reduction from NAT Scenario	Change from NAT Scenario
Area Sources	15	15	-	0%
Energy Sources	1,792	1,039	-753	-42%
Mobile Sources	5,908	4,148	-1,761	-30%
Waste Sources	157	157	-	0%
Water Sources	94	94	-	0%
Refrigerant Sources	34	34	-	0%
Construction	175	175	-	0%
Total Emissions	***8,175***	***5,662***	***-2,513***	***-31%***
Less Existing Emissions	*(2,019)*	*(2,019)*	-	-
Net Emissions	**6,156**	**3,643**	**-2,513**	**-59%**

Daily construction emissions amortized over 30-year period pursuant to SCAQMD guidance. Annual construction emissions derived by taking total emissions over duration of activities and dividing by construction period.

** NAT scenario does not assume 30% reduction in in mobile source emissions from Pavley emission standards (19.8%), low carbon fuel standards (7.2%), vehicle efficiency measures 2.8%); does not assume 42% reduction in energy production emissions from the State's renewables portfolio standard (33%), natural gas extraction efficiency measures (1.6%), and natural gas transmission and distribution efficiency measures (7.4%).*

Source: DKA Planning, 2024.

Consistency with Applicable Plans and Policies

The discussion included in this section describes the extent to which the Project complies with or exceeds the performance-based standards included in the regulations outlined in the City's ECAP. This discussion also provides informational assessment that illustrates the Project's consistency with additional applicable plans, including the 2022 Scoping Plan and the 2020-2045 RTP/SCS, both of which identifies GHG-emissions-reducing measures that directly and indirectly apply to the Project. As shown herein, the Project would be substantially consistent with the applicable GHG emissions-reduction plans and policies.

Inglewood Energy and Climate Action Plan (ECAP)

The ECAP includes the following strategies and actions that are applicable to the Project:

- **Strategy 2: Increase Energy Efficiency.** Specific actions under this strategy include making commercial buildings more efficient and increasing the energy efficiency of street and traffic lights. The Project would support this strategy by incorporating energy efficiency measures required by the CalGreen building code, including but not limited to use of LED lighting and installation of high efficiency HVAC systems and plumbing fixtures.

- **Strategy 3: Support Renewable Energy Generation.** This strategy is focused on City actions that promote more renewal energy generation in the community, like permit streamlining and support for funding and financing programs that help make renewable energy affordable. The Project would not conflict with this goal due to its reservation of solar-ready areas on the building's roof, in compliance with CalGreen requirements.

- **Strategy 4: Improve Transportation Options and Manage Transportation Demand.** Specific actions under this strategy include improving the safety and efficiency of existing roadways, improving transit systems, improving bicycle facilities, making parking more efficient, reducing commute trips, and encourage land use intensification and diversity. As described under Checklist Topic XVII (Transportation) [and pending City confirmation], the Project would implement a TDM Program that would be consistent with these goals by encouraging use of transit, active transportation and alternatives to single-occupant vehicle travel.

- **Strategy 5: Reduce Consumption and Waste.** Specific actions under this strategy include using less water, producing less waste, and promote local food production. The Project would be consistent with this strategy through its incorporation of water conservation measures such as low flow plumbing fixtures in the Project's residential, hotel, and commercial areas, and recycling of demolition materials in compliance with State law requirements.

Based on the energy efficiency strategies discussed above, the Project would be consistent with the City's ECAP.

2022 Scoping Plan

The goal to reduce GHG emissions to 1990 levels by 2020 (Executive Order S-3-05) was codified by the Legislature as the 2006 Global Warming Solutions Act (AB 32). In 2008, CARB approved a Climate Change Scoping Plan as required by AB 32 that has been updated over time to reflect updated strategies. In addition, SB 32 was approved in 2016, calling for deeper GHG emissions reductions by 2030. The 2022 Scoping Plan also addresses the 2030 horizon in addition to the objective of carbon neutrality by 2045 and has a range of GHG emissions reduction actions that include direct regulations, alternative compliance mechanisms, monetary and non-monetary incentives, voluntary actions, market-based mechanisms such as a cap-and-trade system, and an AB 32 implementation fee to fund the program. The following discussion demonstrates how the pertinent reduction actions relate to and reduce project-related GHG emissions.

Table VIII-8 includes a discussion of the Project's consistency with applicable reduction actions/strategies by emissions source category outlined in the 2022 Scoping Plan. As discussed therein, the Project would be consistent with the GHG emissions reduction-related actions and strategies of the 2022 Scoping Plan.

Table VIII-8
Consistency Analysis—2022 Scoping Plan Update

Sector	Actions and Strategies	Statutes, Executive Orders, Other Direction	Project Consistency Analysis
Smart Growth / Vehicle Miles Traveled (VMT)	VMT per capita reduced 25% below 2019 levels by 2030, and 30% below 2019 levels by 2045	SB 375: Reduce demand for fossil transportation fuels and GHGs and improve air quality. In response to Board direction and EJ Advisory Committee recommendations.	**Consistent.** The Project represents an infill development within an urbanized area that would concentrate new residences, hotel rooms, and entertainment uses within an HQTA and reduce per capita VMT and GHG emissions. The Project would be consistent with SB 375 and its VMT reduction goals, as well as the GHG and transportation goals of the 2020-2045 RTP/SCS. As discussed in response to Checklist Question XVII(a) (Transportation – VMT), with mitigation, the Project would not result in any significant VMT impacts.
Light-duty Vehicle (LDV) Zero Emission Vehicles (ZEVs)	100% of Light Duty Vehicle sales are ZEV by 2035	EO N-79-20: Reduce demand for fossil transportation fuels and GHGs, and improve air quality. In November 2022, the Advanced Clean Cars II regulations took effect, setting ZEV and plug-in hybrid vehicle sales requirements for model years 2026 to 2035 (ZEV program) and increasingly stringent emission standards (LEV program) to ensure automakers phase out sales of internal combustion engine vehicles.	**No Conflict.** Emissions from vehicle engines from the Project would be controlled by state regulations governing technology and cleaner emissions.

Table VIII-8
Consistency Analysis—2022 Scoping Plan Update

Sector	Actions and Strategies	Statutes, Executive Orders, Other Direction	Project Consistency Analysis
Truck ZEVs	100% of medium-duty (MDV)/HDV sales are ZEV by 2040 (AB 74 University of California Institute of Transportation Studies [ITS] report)	EO N-79-20: Reduce demand for fossil transportation fuels and GHGs, and improve air quality. CARB's Advanced Clean Truck Regulation accelerates the transition of zero-emission medium- and heavy-duty vehicles from 2024 to 2035. CARB also adopted the Innovative Clean Transit measure in 2018 that requires all public transit agencies to transition to zero emission fleets.	**No Conflict.** The Project would not generate substantial medium- and heavy-duty truck traffic. The Project would not impede the advancement of cleaner trucks over time.
Aviation	20% of aviation fuel demand is met by electricity (batteries) or hydrogen (fuel cells) in 2045. Sustainable aviation fuel meets most or the rest of the aviation fuel demand that has not already transitioned to hydrogen or batteries.	CARB focuses on reducing emissions from ground support equipment and airport transit vehicles. It is also working with national and international entities to tighten aircraft emission standards. AB 197: direct emissions reductions for sources covered by the AB 32 Inventory	**No Conflict.** While the Project would not impact the aviation industry and would not impede the advancement of a cleaner aviation industry over time.
Ocean-going Vessels (OGVs)	2020 OGV At-Berth regulation fully implemented, with most OGVs utilizing shore power by 2027. 25% of OGVs utilize hydrogen fuel cell electric technology by 2045.	AB 197: direct emissions reductions for sources covered by the AB 32 Inventory In 2015, Executive Order B-32-15 called. For a less polluting freight transport system that addressed OGVs, transport refrigeration units, and clean trucks.	**No Conflict.** While the Project would not impact trade or OGVs and would not impede the advancement of a cleaner on- or off-shore sources over time.
Port Operations	100% of cargo handling equipment is zero-emission by 2037. 100% of drayage	Executive Order N-79-20: Reduce demand for petroleum fuels and GHGs, and improve air quality. AB 197: direct	**No Conflict.** The Project would not impact trade or port operations and would not impede

Table VIII-8
Consistency Analysis—2022 Scoping Plan Update

Sector	Actions and Strategies	Statutes, Executive Orders, Other Direction	Project Consistency Analysis
	trucks are zero emission by 2035.	emissions reductions for sources covered by the AB 32 Inventory. In 2015, Executive Order B-32-15 called. For a less polluting freight transport system that addressed OGVs, transport refrigeration units, and clean trucks.	the advancement of a cleaner on-shore sources over time.
Freight and Passenger rail	100% of passenger and other locomotive sales are ZEV by 2030. 100% of line haul locomotive sales are ZEV by 2035. Line haul and passenger rail rely primarily on hydrogen fuel cell technology, and others primarily utilize electricity.	AB 197: direct emissions reductions for sources covered by the AB 32 Inventory In 2015, Executive Order B-32-15 called. For a less polluting freight transport system that addressed OGVs, transport refrigeration units, and clean trucks.	**No Conflict.** The Project would not impact freight or passenger rail and would not impede the advancement of a cleaner locomotives over time.
Oil and Gas Extraction	Reduce oil and gas extraction operations in line with petroleum demand by 2045.	AB 197: direct emissions reductions for sources covered by the AB 32 Inventory	**No Conflict.** The Project would not impact oil extraction.
Petroleum Refining	CCS on majority of operations by 2030, beginning in 2028 Production reduced in line with petroleum demand.	AB 197: direct emissions reductions for sources covered by the AB 32 Inventory	**No Conflict.** The Project would not impact oil extraction.
Electricity Generation	Sector GHG target of 38 million metric tons of carbon dioxide equivalent (MMTCO2e) in 2030 and 30 MMTCO2e in 2035 Retail sales load coverage134 20 gigawatts (GW) of offshore	SB 350 and SB 100: Reduce GHGs and improve air quality. AB 197: direct emissions reductions for sources covered by the AB 32 Inventory	**No Conflict.** The Project would not impact the sources of electricity generation.

Table VIII-8
Consistency Analysis—2022 Scoping Plan Update

Sector	Actions and Strategies	Statutes, Executive Orders, Other Direction	Project Consistency Analysis
	wind by 2045 Meet increased demand for electrification without new fossil gas-fired resources.		
New Residential and Commercial Buildings	All electric appliances beginning 2026 (residential) and 2029 (commercial), contributing to 6 million heat pumps installed statewide by 2030	AB 197: direct emissions reductions for sources covered by the AB 32 Inventory	**No Conflict.** The Project would incorporate appliances that are consistent with Title 24 and Green Building requirements and consistent with the reduction of residential energy use.
Existing Residential Buildings	80% of appliance sales are electric by 2030 and 100% of appliance sales are electric by 2035. Appliances are replaced at end of life such that by 2030 there are 3 million all-electric and electric-ready homes—and by 2035, 7 million homes—as well as contributing to 6 million heat pumps installed statewide by 2030.	AB 197: direct emissions reductions for sources covered by the AB 32 Inventory	**No Conflict.** The Project would not impede the replacement of appliances in existing residential buildings.
Existing Commercial Buildings	80% of appliance sales are electric by 2030, and 100% of appliance sales are electric by 2045. Appliances are replaced at end of life, contributing to 6 million heat pumps installed statewide by 2030.	AB 197: direct emissions reductions for sources covered by the AB 32 Inventory	**No Conflict.** The Project would not impede the replacement of appliances in commercial buildings.

Table VIII-8
Consistency Analysis—2022 Scoping Plan Update

Sector	Actions and Strategies	Statutes, Executive Orders, Other Direction	Project Consistency Analysis
Food Products	7.5% of energy demand electrified directly and/or indirectly by 2030; 75% by 2045	AB 197: direct emissions reductions for sources covered by the AB 32 Inventory	**No Conflict.** The Project would not impact the sources of energy for food production.
Construction Equipment	25% of energy demand electrified by 2030 and 75% electrified by 2045	AB 197: direct emissions reductions for sources covered by the AB 32 Inventory	**No Conflict.** The Project would not impact sources of energy for construction equipment.
Chemicals and Allied Products; Pulp and Paper	Electrify 0% of boilers by 2030 and 100% of boilers by 2045. Hydrogen for 25% of process heat by 2035 and 100% by 2045 Electrify 100% of other energy demand by 2045.	AB 197: direct emissions reductions for sources covered by the AB 32 Inventory	**No Conflict.** The Project would not impact the sources of energy for boilers.
Stone, Clay, Glass, and Cement	CCS on 40% of operations by 2035 and on all facilities by 2045 Process emissions reduced through alternative materials and CCS	SB 596: Reduce demand for fossil energy, process emissions, and GHGs, and improve air quality. AB 197: direct emissions reductions for sources covered by the AB 32 Inventory	**No Conflict.** The Project would not impact the sources of energy for stone, clay, glass, and cement facilities.
Other Industrial Manufacturing	0% energy demand electrified by 2030 and 50% by 2045	AB 197: direct emissions reductions for sources covered by the AB 32 Inventory	**No Conflict.** The Project would not impact the sources of energy for industrial facilities.
Combined Heat and Power	Facilities retire by 2040.	AB 197: direct emissions reductions for sources covered by the AB 32 Inventory	**No Conflict.** The Project would not affect facilities that produce heat and power.
Agriculture Energy Use	25% energy demand electrified by 2030 and 75% by 2045	AB 197: direct emissions reductions for sources covered by the AB 32 Inventory	**No Conflict.** The Project would not affect agricultural sources of energy.
Low Carbon Fuels for Transportation	Biomass supply is used to produce conventional and advanced biofuels, as well as hydrogen.	AB 197: direct emissions reductions for sources covered by the AB 32 Inventory	**No Conflict.** This regulatory program applies to fuel suppliers, not directly to land use development. GHG emissions

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Sector	Actions and Strategies	Statutes, Executive Orders, Other Direction	Project Consistency Analysis
		In November 2022, the Advanced Clean Cars II regulations took effect, setting low emission standards for transportation.	related to vehicular travel associated with the Project would benefit from this regulation because fuel used by Project-related vehicles would be required to comply with the LCFS. Mobile source GHG emissions estimates were calculated using CalEEMod that includes implementation of the LCFS into mobile source emission factors. The current LCFS targets a 20% reduction in CI from a 2010 baseline by 2030. GHG emissions generated by Project-related vehicular travel would benefit from the Advanced Clean Cars Program.
Low Carbon Fuels for Buildings and Industry	In 2030s biomethane blended in pipeline Renewable hydrogen blended in fossil gas pipeline at 7% energy (~20% by volume), ramping up between 2030 and 2040 In 2030s, dedicated hydrogen pipelines constructed to serve certain industrial clusters	SB 350: The Clean Energy and Pollution Reduction Act of 2015 increases the standards of the California RPS program by requiring that the amount of electricity generated and sold to retail customers per year from eligible renewable energy resources be increased to 50 percent by 2030.[a] Required measures include increasing RPS to 50 percent of retail sales by 2030, establishing annual targets for statewide energy efficiency that achieve a cumulative doubling of statewide energy efficiency savings in	**No Conflict.** The Project would comply with this this action/strategy being located within the service area of the Southern California Edison (SCE) and would comply with CalGreen and Title 24 energy efficiency standards. SCE must generate electricity that would increase renewable energy resources to 33 percent by 2020 and 50 percent by 2030. As SCE would provide electricity service to the

Table VIII-8
Consistency Analysis—2022 Scoping Plan Update

Sector	Actions and Strategies	Statutes, Executive Orders, Other Direction	Project Consistency Analysis
		electricity and natural gas end uses by 2030. SB 100: The California Renewables Portfolio Standard Program (2018) requires retail sellers to procure renewable energy that is at least 50 percent by December 31, 2026 and 60 percent by December 31, 2030. It requires local publicly owned electric utilities to procure a minimum quantity of electricity from renewable energy resources of 44 percent of retail sales by December 31, 2024 and 60 percent by December 31, 2030.	Project Site, by 2030 the Project would use electricity consistent with the requirements of SB 350.
Non-combustion Methane Emissions	Increase landfill and dairy digester methane capture. Some alternative manure management deployed for smaller dairies Moderate adoption of enteric strategies by 2030 Divert 75% of organic waste from landfills by 2025. Oil and gas fugitive methane emissions reduced 50% by 2030 and further reductions as infrastructure components retire in line with reduced fossil gas demand	SB 1383 (2016) requires CARB to set 2030 emission reduction targets of 40 percent for methane and hydrofluorocarbons and 50 percent black carbon emissions below 2013 levels.[e] The Project would comply with the CARB SLCP Reduction Strategy by using HVAC equipment with lower GWP refrigerants.	**No Conflict.** This program applies to state regulators looking to reduce methane emissions from landfill and dairy facilities and is not directly related to development of the Project. However, the Project would not impede efforts to reduce such pollutants.

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Sector	Actions and Strategies	Statutes, Executive Orders, Other Direction	Project Consistency Analysis
High GWP Potential Emissions	Low GWP refrigerants introduced as building electrification increases, mitigating HFC emissions	SB 605 (2014) directed CARB to develop a comprehensive Short-Lived Climate Pollutant (SLCP) strategy.	**No Conflict.** This program applies to state regulators looking to reduce high GWP refrigerants and is not directly related to development of the Project. However, the Project would not impede efforts to reduce such pollutants.
Natural and Working Lands	Conserve 30% of the state's NWL and coastal waters by 2030. Implement near- and long-term actions to accelerate natural removal of carbon and build climate resilience in our forests, wetlands, urban greenspaces, agricultural soils, and land conservation activities in ways that serve all communities—and in particular low-income, disadvantaged, and vulnerable communities.	EO N-82-20 and SB 27: CARB to include an NWL target in the Scoping Plan. AB 1757: Establish targets for carbon sequestration and nature-based climate solutions. SB 1386: NWL are an important strategy in meeting GHG reduction goals.	**No Conflict.** This program applies to state regulators governing Natural and Working Lands and is not directly related to development of the Project. However, the Project would not impede implementation of the Integrated Natural and Working Lands Implementation Plan, EO N-82-20, SB 27, or SB 1386.
Forests and Shrublands	At least 2.3 million acres treated statewide annually in forests, shrublands/chaparral, and grasslands, comprised of regionally specific management strategies that include prescribed fire, thinning, harvesting, and	Restore health and resilience to overstocked forests and prevent carbon losses from severe wildfire, disease, and pests. Improve air quality and reduce health costs related to wildfire emissions. Improve water quantity and quality and improve rural economies. Provide forest biomass for resource utilization.	**No Conflict.** This program applies to state regulators governing forest and shrubland management and is not directly related to development of the Project. However, the Project would not interfere or impede implementation of EO B-52-18,

Table VIII-8
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Sector	Actions and Strategies	Statutes, Executive Orders, Other Direction	Project Consistency Analysis
	other management actions. No land conversion of forests, shrublands/chaparral, or grasslands.	EO B-52-18: CARB to increase the opportunity for using prescribed fire. AB 1504 (Skinner, Chapter 534, Statutes of 2010): CARB to recognize the role forests play in carbon sequestration and climate mitigation.	AB 1504, or the Forest Carbon Plan.
Grasslands	At least 2.3 million acres treated includes increased management of grasslands interspersed in forests to reduce fuels surrounding communities using management strategies appropriate for grasslands. No land conversion of forests, shrublands/chaparral, or grasslands.		**No Conflict.** This program applies to state regulators of grasslands and is not directly related to development of the Project. However, the Project would not interfere or impede efforts to reduce fuels in grasslands surrounding communities.
Croplands	Implement climate smart practices for annual and perennial crops on ~80,000 acres annually. Land easements/ conservation on annual crops at ~5,500 acres annually. Increase organic agriculture to 20% of all cultivated acres by 2045 (~65,000 acres annually).	SB 859: Recognizes the ability of healthy soils practices to reduce GHG emissions from agricultural lands.	**No Conflict.** This program applies to state regulators overseeing croplands and is not directly related to development of the Project. However, the Project would not impede SB 859 and efforts to increase organic agriculture and conserve croplands.

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Sector	Actions and Strategies	Statutes, Executive Orders, Other Direction	Project Consistency Analysis
Developed Lands	Increase urban forestry investment by 200% above current levels and utilize tree watering that is 30% less sensitive to drought. Establish defensible space that accounts for property boundaries.	AB 2251 (Calderon, Chapter 186, Statutes of 2022): Increase urban tree canopy 10% by 2035.	**No Conflict.** This program applies to state regulators addressing urban forestry and is not directly related to development of the Project. However, the Project would not impede implementation of AB 2251 and efforts to increase the urban canopy.
Wetlands	Restore 60,000 acres of Delta wetlands		**No Conflict.** This program applies to State regulators restoring Delta wetlands and is not directly related to development of the Project. However, the Project would not impede efforts to restore wetland ecologies.
Sparsely Vegetated Lands	Land conversion at 50% of the Reference Scenario land conversion rate.		**No Conflict.** This program applies to State regulators slowing the conversion of sparsely vegetated lanes and is not directly related to development of the Project. However, the Project would not impede efforts to slow urban conversion of such lands.
Cap-and-Trade Program	Implement the post-2020 Cap-and-Trade Program with declining annual caps.	AB 398 was enacted in 2017 to extend and clarify the role of the state's Cap-and-Trade Program from January 1, 2021, through December 31, 2030. As part of AB 398, refinements were made to the Cap-and-Trade program to establish updated	**Not Applicable.** This applies to the market-based program to reduce GHG emissions over time and is not applicable to a development project. However,

Table VIII-8
Consistency Analysis—2022 Scoping Plan Update

Sector	Actions and Strategies	Statutes, Executive Orders, Other Direction	Project Consistency Analysis
		protocols and allocation of proceeds to reduce GHG emissions.	the Project would not impede implementation.
Source: DKA Planning, 2023, based on California Air Resources Board, 2022 Scoping Plan for Achieving Carbon Neutrality, Scoping Plan Scenario.			

Independent studies confirm CARB's determination that the state's existing and proposed regulatory framework will put the state on a pathway to reduce its GHG emissions level to 40 percent below 1990 levels by 2030, and to 85 percent below 1990 levels by 2045 to meet carbon neutrality objectives. Even though these studies did not provide an exact regulatory and technological roadmap to achieve the 2030 and 2045 goals, they demonstrated that various combinations of policies could allow the statewide emissions level to remain very low through 2045, suggesting that the combination of new technologies and other regulations not analyzed in the studies could allow the state to meet the 2045 target.

When compared to SB 32, the Project would be consistent with its objectives and the GHG emissions reduction-related actions and strategies of the 2022 Scoping Plan. The 2022 Scoping Plan and the SB 32 objectives that drive it involve increasing renewable energy use, imposing tighter limits on the carbon content of gasoline and diesel fuel, putting more electric cars on the road, improving energy efficiency, and curbing emissions from key industries. Although a number of these strategies are currently promulgated, some have not yet been formally proposed or adopted. It is expected that these measures or similar actions to reduce GHG emissions will be adopted as required to achieve statewide GHG emissions targets. Based the analysis in Table VIII-9, the Project would be consistent with the 2022 Scoping Plan's objective of reducing 2030 GHG emissions in accord with SB 32.

In addition to the Project's consistency with applicable GHG emissions reduction regulations and strategies, the Project would not conflict with future anticipated statewide GHG emissions reductions goals. Specifically, CARB has outlined strategies for achieving the 2030 reduction target of 40 percent below 1990 levels, as mandated by SB 32 as well as carbon neutrality by 2045. These strategies include renewable resources for the state's electricity, increasing the fuel economy of vehicles and the penetration of zero-emission or hybrid vehicles into the vehicle fleet, reducing the rate of growth in VMT, supporting high-speed rail and other alternative transportation options, and use of high-efficiency appliances, water heaters, and HVAC systems.

The Project would also benefit from statewide and utility-provider efforts towards increasing the portion of electricity provided from renewable resources. SCE has committed to increasing renewable sources that exceed the Renewables Portfolio Standard requirements. The Project would include energy efficient mechanical systems, energy efficient glazing and window frames, Energy-Star appliances to be installed on-site, and the use of high-efficiency lighting. The Project would also benefit from statewide efforts to improve fuel economy of vehicles.

The Project would also help reduce VMT growth given its design and complementary mix of uses at an infill site that is accessible to existing public transit. This includes Metro Line 117, which provides east-west service that connects the LAX Transit Center in Westchester on the west to the City of Downey in the east via Century Boulevard and other arterials. Metro also operates north-south service via Lines 212 and 212 on Prairie Avenue 1,300 feet to the east and north-south service via Line 40 on Hawthorne Boulevard 960 feet to the west of the Project Site. The Inglewood Transit Connector also proposes to locate a rail station on Prairie Avenue at Hardy Street, approximately 1,900 feet northeast of the Project Site.

Further, the Project would include electric vehicle (EV) parking spaces in accordance with Title 24 requirements and would not result in the loss of natural lands or affordable units.

For all the reasons above the Project would be consistent with the 2022 Scoping Plan.

2020-2045 RTP/SCS

On September 3, 2020, SCAG adopted the 2020-2045 RTP/SCS. The 2020-2045 RTP/SCS calls for more than $638 billion in transportation system investments through 2045. It was prepared through a collaborative, continuous, and comprehensive process with input from local governments, county transportation commissions, tribal governments, non-profit organizations, businesses and local stakeholders within the counties of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura. The 2020-2045 RTP/SCS includes strategies for accommodating projected population, household, and employment growth in the SCAG region by 2045 as well as a transportation investment strategy for the region. These land use strategies are directly tied to supporting related GHG emissions reductions through increasing transportation choices with a reduced dependence on automobiles and an increased growth in walkable, mixed-use communities and HQTAs and by encouraging growth near destinations and mobility options, promoting diverse housing choices, leveraging technology innovations, supporting implementation of sustainability policies, and promoting a green region. Table VIII-9 provides a discussion of the Project's consistency with the applicable GHG-emissions-related objectives of the 2020-2045 RTP/SCS. As discussed therein, the Project would be consistent with the 2020-2045 RTP/SCS, and impacts would be less than significant.

Table VIII-9
Project Consistency with the 2020-2045 RTP/SCS

Objectives	Consistency Analysis[a]
Increase percentage of region's total household growth occurring within HQTAs.	**Consistent.** The Project Site is located less than 0.25 miles from Hawthorne Boulevard, which is identified in the 2020-2045 RTP/SCS as an HQTC. Thus, the Project Site is located within an HQTA. The Project is an infill development that includes 129 residential units, including 118 rental units and 11 ownership-condominium units. Thus, the Project would increase the number of households within an HQTA.
Increase percent of the region's total employment growth occurring within HQTAs.	**Consistent.** The Project is an infill development within an HQTA that would create hospitality jobs. Thus, the Project would increase employment within an HQTA.
Decrease total acreage of greenfield or otherwise rural land uses converted to urban use.	**Consistent.** The Project is an infill development that would not contribute toward decreasing greenfield or rural sites.
Decrease daily vehicle miles driven per person.	**Consistent.** The Project's mixed-use nature and location near transit and sources of housing, employment, shopping, and entertainment would reduce VMT associated with the Project.

Table VIII-9
Project Consistency with the 2020-2045 RTP/SCS

Objectives	Consistency Analysis[a]
Decrease average daily distance traveled for work and non-work trips (in miles)	**Consistent.** The Project's mixed-use nature and location near transit and sources of housing, employment, shopping, and entertainment would reduce VMT associated with the Project.
Increase percentage of work and non-work trips which are less than 3 miles in length.	**Consistent.** The Project's mixed-use nature and location near transit and sources of housing, employment, shopping, and entertainment would reduce trip length associated with the Project.
Increase share of short trip lengths for commute purposes.	**Consistent.** The Project's mixed-use nature and location near transit and sources of housing, employment, shopping, and entertainment would reduce commute trip lengths associated with the Project.
Decrease average minutes of delay experienced per capita due to traffic congestion.	**Consistent.** The Project's mixed-use nature and location near transit and sources of housing, employment, shopping, and entertainment would reduce trips and VMT associated with the Project that would decrease service delay.
Increase percentage of PM peak period trips completed within 45 minutes by travel mode.	**Consistent.** The Project's mixed-use nature and location near transit and sources of housing, employment, shopping, and entertainment would reduce trips and VMT associated with the Project, contributing to a shorter PM peak-period timeframe.
Increase percentage of trips that use transit (work and all trips)	**Consistent.** The Project's mixed-use nature and location near multiple transit options would allow Project residents, employees, and visitors to use transit to and from work/home, contributing to an increase transit ridership.
Decrease average travel time to work (all modes)	**Consistent.** The Project's mixed-use nature and location near transit and sources of housing and employment would reduce trips and VMT associated with the Project, contributing to shorter travel time to/from work.
Increase percentage of trips using either walking or biking (by trip type)	**Consistent.** The Project would provide bicycle parking and pedestrian connections in accordance with IMC Section 12-42.1 (Transportation Demand Management Requirements for Carpool Parking and Bicycle Facilities) and the Project's proposed PAD zoning designation, which would promote increased bicycle and pedestrian trips.
Reduce per capita GHG emissions (from 2005 levels)	**Consistent.** The Project's mixed-use nature and location near transit and sources of housing, employment, shopping, and entertainment would reduce Project trips, VMT, and associated GHG emissions. Additionally, the Project would be

Table VIII-9
Project Consistency with the 2020-2045 RTP/SCS

Objectives	Consistency Analysis[a]
	required to comply with the City's Green Building Code, which would also reduce GHG emissions associated with onsite operations.
Increase percentage of trips using a travel mode other than single occupancy vehicle (SOV)	**Consistent.** The Project's mixed-use nature, inclusion of bicycle parking, and location near pedestrian infrastructure, transit, and sources of housing, employment, shopping, and entertainment would reduce the opportunities to use alternative modes of transportation and decrease SOVs.
Source: SCAG. 2020-2045 RTP/SCS.	

Conclusion

The analysis in this section uses the Scoping Plan's statewide goals as one approach to evaluate the Project's incremental contribution to climate change. The methodology is to compare the Project's emissions as proposed to the Project's emissions as if the Project were built using a NAT approach in terms of design, methodology, and technology. This means the Project's emissions were calculated as if the Project was constructed with project design features to reduce GHG emissions that are not required by state or local code and with several regulatory measures adopted in furtherance of AB 32.

While the AB 32 Scoping Plan's cumulative statewide objectives were not intended to serve as the basis for project-level assessments, this analysis finds that its NAT comparison based on the Scoping Plan is appropriate, because the Project would contribute to statewide GHG emissions reduction goals. Specifically, the Project's mixed-use nature and location in an existing urban setting in the Inglewood community provide opportunities to reduce transportation-related emissions. First, it would capture vehicle travel on-site that would have normally been destined for off-site locations. This produces substantial reductions in the amount of vehicle trips and VMT that no longer are made. Second, it would eliminate many vehicle trips, because travel to and from the Project Site could be captured by public transit and pedestrian travel instead. Finally, the Project would attract existing trips on the street network that would divert to the proposed uses.

The plan consistency analysis provided above demonstrates that the Project complies with the applicable plans, policies, regulations and GHG emissions reduction actions/strategies outlined in the Climate Change Scoping Plan and Updates, the 2020-2045 RTP/SCS, and the City's ECAP. Consistency with these plans and GHG emissions reduction actions/strategies would reduce the Project's incremental contribution of GHG emissions. Thus, the Project would not conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing emissions of GHG emissions. Furthermore, because the Project is consistent and does not conflict with these plans, policies, and regulations, the Project's incremental increase in GHG emissions as described above would not result in a significant impact on the environment. Therefore, Project impacts with regard to GHG emissions would be less than significant.

Post-2030 Analysis

Recent studies show that the state's existing and proposed regulatory framework will put the state on a pathway to reduce its GHG emissions level to 40 percent below 1990 levels by 2030 and to 80 percent below 1990 levels by 2050, if additional appropriate reduction measures are adopted. Even though these studies did not provide an exact regulatory and technological roadmap to achieve the 2030 and 2050 goals, they demonstrated that various combinations of policies could allow the statewide emissions level to remain very low through 2050, suggesting that the combination of new technologies and other regulations not analyzed in the studies could allow the state to meet the 2050 target. Subsequent to the findings of these studies, SB 32 was passed on September 8, 2016, and would require the state board to ensure that statewide GHG emissions are reduced to 40 percent below the 1990 level by 2030. As discussed above, the new plan, outlined in SB 32, involves increasing renewable energy use, imposing tighter limits on the carbon content of gasoline and diesel fuel, putting more electric cars on the road, improving energy efficiency, and curbing emissions from key industries.

As discussed above, SCAG's 2020-2045 RTP/SCS establishes a regulatory framework for achieving GHG emissions reductions from the land use and transportation sectors pursuant to SB 375 and the state's long-term climate policies. The 2020-2045 RTP/SCS ensures VMT reductions and other measures that reduce regional emissions from the land use and transportation sectors.

The Project is the type of land use development that is encouraged by the 2020-2045 RTP/SCS to reduce VMT and expand multi-modal transportation options in order for the region to achieve the GHG emissions reductions from the land use and transportation sectors required by SB 375, which in turn, advances the state's long-term climate policies. By furthering implementation of SB 375, the Project supports regional land use and transportation GHG reductions consistent with state climate targets for 2020 and beyond. In addition, the Project would be consistent with the Actions and Strategies set forth in the 2020-2045 RTP/SCS.

Cumulative Impacts

The analysis of the Project's GHG emissions impacts above is a cumulative impact analysis. Given the Project's consistency with statewide, regional, and local plans adopted for the reduction of GHG emissions, it is concluded that the Project's incremental contribution to GHG emissions and their effects on climate change would not be cumulatively considerable. As such, the Project's cumulative contribution to global climate change is less than significant.

IX. HAZARDS AND HAZARDOUS MATERIALS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b. 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?	☐	☐	☒	☐
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☒
d. 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 create a significant hazard to the public or the environment?	☐	☐	☐	☒
e. For a project located within 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 result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☒	☐	☐
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☐	☒

Some of the information and analysis presented below is based on the following sources (refer to Appendix G):

- *Environmental Site Assessment, ARA Environmental Services, September 14, 2020.*
- *4200 West Century Blvd Building Project Obstruction Evaluation & Airspace Analysis, July 27, 2021.*
- *Determination of No Hazard to Air Navigation, Federal Aviation Administration, September 21, 2021.*

a) Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Less Than Significant Impact. The Project includes demolition and removal of all existing uses from the Project Site and development of the site with a 333,500-square-foot mixed-use building, which would include residential, hotel, and event uses. The types of hazardous materials that would be used during construction of the Project would be typical of those hazardous materials necessary for construction of a residential development (e.g., paints, solvents, fuel for construction equipment, building materials, etc.). Although construction of the Project would require the temporary transport, use, and disposal of hazardous waste, construction activities associated with Project would be required to comply with all applicable federal, state, and local regulations governing such activities.

The proposed mixed-use development would be similar to other mixed-use developments already found in the Project Site area and region. During its operational phase, the Project would use common types of cleaning products, paint, petroleum products, etc., and would not require the routine transport, use, or disposal of hazardous materials that would pose a significant hazard to the public or environment. Therefore, Project impacts related to the transport, use, and disposal of hazardous materials would be less than significant.

b) Would the project create significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Less Than Significant Impact. The Project includes demolition and removal of all existing uses from the Project Site and development of the site with a 333,500-square-foot mixed-use building, which would include one subterranean level, requiring excavation depths of approximately 16 bgs. Given the age of the existing building, it is possible that asbestos-containing materials (ACMs) and lead-based paint (LBP) could be encountered at the Project Site during the demolition period.

The identification, removal, and disposal of ACMs is regulated under 8 California Code of Regulations (CCR) 1529 and 5208. The identification, removal ,and disposal of LBP is regulated under 8 CCR 1532.1. For both ACM and LBP, the City would require all work to be conducted by a State-certified professional. If ACMs and/or LBP are determined to exist on site, the City would require the Project Applicant to prepare and submit a site-specific hazard control plan to the appropriate agency detailing removal methods and specific instructions for providing protective clothing and equipment for abatement personnel (SCAQMD for asbestos and the California Department of Industrial Relations, Division of Occupational Safety and Health Administration [Cal/OSHA] for LBP). If necessary, a State-certified LBP and an ACMs removal contractor would be retained to conduct the appropriate abatement measures as required by the plan. Wastes from abatement and demolition activities would be disposed of at a landfill(s) licensed to accept such waste. Once all abatement measures have been implemented, the Project Applicant would conduct a clearance examination and provide written documentation to the City that testing and abatement have been completed in accordance with all federal, state, and local laws and regulations.

A Phase I Environmental Site Assessment (Phase I ESA) was prepared for the Project (refer to Appendix Ga) by ARA Environmental Services. The purpose of the Phase I ESA was to determine if there are any recognized environmental concerns (RECs) associated with the Project Site.[51] The Phase I ESA included a site reconnaissance, review of current and historical data describing development of the Project Site, and an environmental records search. ARA Environmental Services noted no RECs, historical RECs, or controlled RECs in connection with the Project Site. Additionally, no off-site RECs were identified that would impact the Project Site.

For these reasons, the Project would not 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. Therefore, Project impacts related to this issue would be less than significant.

c) Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

No Impact. No schools are located within 0.25 miles of the Project Site. The school closest to the Project Site is Dolores Huerta Elementary School, located approximately 0.4 miles southeast of the Project Site. Thus, the Project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. Therefore, no impacts related to this issue would occur.

d) Would the project 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?

No Impact. The Project is not included on any list compiled pursuant to Government Code Section 65962.5 (i.e., certain hazardous waste facilities, sites that include leaking USTs, landfills with migrating hazardous waste).[52] Thus, the Project would not create a significant hazard to the public or the environment as a result of being listed on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Therefore, no impacts related to this issue would occur. No mitigation measures are required.

e) For a project located within 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 result in a safety hazard or excessive noise for people residing or working in the project area?

Less Than Significant With Mitigation Incorporated. The Project Site is located within 2.0 miles of both Los Angeles International Airport (LAX) and Jack Northrop Field/Hawthorn Municipal Airport (HHR). Accordingly, an evaluation of the Project's potential to result in obstructions or

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51 *An REC is defined by the ASTM Standard Practice E1527-13 as the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: (1) due to release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment.*

52 *Department of Toxic Substance Control, https://www.envirostor.dtsc.ca.gov/public/map/?myaddress, accessed March 3, 2022. Environmental Site Assessment, Rara Environmental Services, September 14, 2020. (Refer to Appendix Ga.)*

other safety hazards in relation to one or both of these airports was prepared.[53] In relation to LAX, this analysis concluded that although the Project Site is within the boundaries of LAX's Airport Influence Area (AIA), the Project's proposed height would not result in any potential obstructions or related airspace impacts requiring further review by the Federal Aviation Administration (FAA). In relation to HHR, this analysis concluded that the Project's proposed height would exceed this airport's "imaginary surface" and as a result, to determine whether any associated hazard would result from this exceedance, the FAA conducted an aeronautical study to assess the Project's potential to affect navigable airspace or operations.[54] The FAA's study concluded that the Project structure would have no substantial adverse effect on the safe and efficient utilization of the navigable airspace by aircraft or on the operation of air navigation facilities and as such, the Project would not be a hazard to air navigation provided the following condition(s) is(are) met:

- The Project building is to be marked/lighted in accordance with FAA Advisory Circular 70/7460-1 M, Obstruction Marking and Lighting, red lights – Chapters 4, 5, and 15.

- Any failure or malfunction that lasts more than 30 minutes and affects a top light or flashing obstruction light, regardless of its position, should be reported immediately to (877) 487-6867, so a Notice to Airmen (NOTAM) can be issued. As soon as the normal operation is restored, notify the same number.

These conditions have been incorporated into Mitigation Measure HAZARDS-1, provided below.

Furthermore, due to the Project's location within the LAX AIA, prior to the City's review and approval of the Project's requested land use entitlements, the Project would be required to undergo review and approval by the Los Angeles County Airport Land Use Commission (ALUC), which would assess the Project's consistency with the Los Angeles County Airport Land Use Plan (ALUP). Through this required regulatory compliance and with implementation of the below mitigation measure, Project impacts related to airport safety hazards would be less than significant.

Mitigation Measures

To ensure that Project impacts related to airport safety hazards would be less than significant, the following mitigation measure is required:

HAZARDS-1 The Project building shall be marked/lighted in accordance with FAA Advisory Circular 70/7460-1 M, Obstruction Marking and Lighting, red lights – Chapters 4, 5, and 15. Any failure or malfunction that lasts more than 30 minutes and affects a top light or flashing obstruction light, regardless of its position, shall be reported immediately to the Federal Notice to Airman (NOTAM) System at (877) 487-6867, so NOTAM can be issued. As soon as the normal operation

53 *4200 West Century Blvd Building Project, Obstruction Evaluation and Airspace Analysis, Capitol Airspace Group, July 27, 2021. Refer to Appendix Gb.*

54 *FAA Letter, Determination of No Hazard to Air Navigation, September 21, 2021. Refer to Appendix Gc.*

is restored, the Project operator shall notify the Federal NOTAM System at the same phone number.

f) Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

No Impact. The Project Site is not located on a designated emergency evacuation route.[55] The Project would not require the closure of any public or private streets and would not impede emergency vehicle access to the Project Site or surrounding area. Thus, the Project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. Therefore, no impacts related to this issue would occur as a result of the Project.

g) Would the project expose people or structures either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

No Impact. The Project is located in a highly urbanized area of the City that is not subject to wildland fires. Therefore, the Project would not 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. No mitigation measures are required.

Cumulative Impacts

The geographic extent of the Project's environmental impacts is limited to the Project Site and would not contribute to any other potential environmental impact that may occur beyond the boundaries of the Project Site. All related projects would be subject to discretionary or ministerial review by their respective jurisdictions, which would be responsible for assessing potential hazards risks associated with those related projects, and if necessary, the applicants of those projects would be required to implement measures appropriate for the type and extent of hazardous materials present and the land use proposed to reduce the risk associated with the hazardous materials to an acceptable level. As stated previously, with mitigation, the Project would not result in any significant impacts related to hazards and hazardous materials. Therefore, no significant Project cumulative impacts related to hazards and hazardous materials would occur.

[55] *Los Angeles County Public Works, Disaster Route Maps by City, https://pw.lacounty.gov/dsg/DisasterRoutes/map/Inglewood.pdf.*

X. HYDROLOGY AND WATER QUALITY

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☐	☒
c. 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:				
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?	☐	☐	☐	☒
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	☒
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

a) Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater?

Less Than Significant Impact. In its existing condition, the Project Site is completely developed with impervious surface, including buildings and paved parking areas. All stormwater that encounters the site is directed to the City's local storm drain system. The Project includes demolition and removal of all existing uses from the Project Site and development of the site with a 333,500-square-foot mixed-use building, which would include one subterranean level, requiring excavation depths of approximately 16 bgs.

During the Project's construction phase, soil would be temporarily exposed. In addition, on-site watering activities to reduce airborne dust would occur in accordance with typical best construction management practices and SCQAMD's Rule 403 (Fugitive Dust). Also, construction-

related materials, including adhesives, coatings, lubricants, and fuel would be temporarily stored on the Project Site. However, the Project Applicant would be required to comply with the National Pollutant Discharge Elimination System (NPDES) General Construction Permit including the preparation of a Stormwater Pollution Prevention Plan (SWPPP) and implementation of best management practices (BMPs), required to minimize soil erosion/sedimentation and other runoff from the Project Site from entering the storm drains during the construction period. In addition, the Project would be subject to Section 10-208 (Low Impact Development Requirements for New Development and Redevelopment) of the City's Municipal Code to ensure pollutant loads from the Project Site would be minimized for downstream receiving waters. Compliance with the NPDES and implementation of the SWPPP and BMPs, as well as the City's discharge requirements would ensure that any construction stormwater runoff would not violate water quality and/or discharge requirements.

Additionally, during the Project's operational phase, similar to existing site conditions, most of the Project Site 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. However, the Project Applicant would still be required to comply with the City's LID requirements, including preparation and implementation of a Stormwater Mitigation Plan, which are required to include a site design approach and BMPs that address runoff and pollution at the source. Further, to comply with LID requirements the Project would be required to capture and treat the first 3/4-inch of rainfall from a storm event or the runoff associated with the 85th percentile, 24-hour storm event, whichever is greater, in accordance with established stormwater treatment priorities. Compliance with the LID requirements would control the amount of surface water runoff leaving the Project Site and would ensure that operation of the Project would not violate water quality standard and discharge requirements or otherwise substantially degrade water quality.

Conformance with existing regulations would ensure construction and operational activities would not violate water quality standards, waste discharge requirements, or otherwise substantially degrade water quality. Therefore, Project impacts related to water quality would be less than significant.

b) Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

No Impact. The Project Site in its existing condition is nearly completely developed with buildings and associated surface parking areas, which are impervious surfaces. During storm events, all of the storm water that encounters the Project Site is directed to the existing local storm drain system. No storm water at the Project Site reaches groundwater levels. As such, the Project Site is not a source of groundwater recharge. Under the Project, all storm water would continue to be directed toward the local storm drain system and would not have the ability to reach groundwater level at the Project Site. Additionally, all water consumption associated with the Project would be supplied by City and not from groundwater beneath the Project Site. Thus, the Project would have no effect on groundwater supplies or recharge, and no impacts related to this issue would occur.

c) Would the project 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?

Less Than Significant Impact. In its existing condition, the Project Site is completely developed with impervious surface, including buildings and paved parking areas. All stormwater that encounters the site is directed to the City's local storm drain system. No rivers or streams are located on or near the Project Site. The Project includes demolition and removal of all existing uses from the Project Site and development of the site with a 333,500-square-foot mixed-use building, which would include one subterranean level, requiring excavation depths of approximately 16 bgs. During the Project's construction phase, soil would be exposed. However, the Project Applicant would be required to comply with NPDES SWPPP requirements as well as Section 10-208 (Low Impact Development Requirements for New Development and Redevelopment) of the City's Municipal Code which would preserve water quality during construction of the Project (refer to response to Checklist Question X(a) (Hydrology and Water Quality – Water Quality). While grading and construction activities may temporarily alter the existing drainage patterns of the site, BMPs would be implemented to minimize soil erosion impacts during Project grading and construction activities. In addition, the Project Applicant would be required to implement a LID Plan (during operation), which would reduce the amount of surface water runoff leaving the Project Site after a storm event. Specifically, the LID Plan would require the implementation of stormwater BMPs to retain or treat the runoff from a storm event producing 3/4-inch of rainfall in a 24-hour period. Thus, the Project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner, which would result in substantial erosion or siltation on- or off-site. Therefore, Project impacts related to erosion or siltation would be less than significant.

ii) Substantially increase the rate or amount or amount of surface runoff in a manner which would result in flooding on- or off-site?

No Impact. As stated previously, given that the Project Site is nearly completely developed with buildings and surface parking areas, during storm events, all of the stormwater flows from the site to the local streets where the runoff enters the City's storm drain system. Under the post-Project conditions, most of the Project Site would also be developed with impervious surfaces, and all stormwater would be directed toward BMP features and/or the local storm drain system. The Project would not increase the rate or amount of surface runoff from the site. Nonetheless, the Project Applicant would still be required to implement BMPs and to develop appropriate drainage infrastructure on the site to meet regulatory water quality requirements and to control drainage from the site to not exceed existing rates. Thus, the Project would not increase the runoff from the site entering the City's existing storm drain facilities. As such, the Project would not cause flooding on or off site. Therefore, no impacts related to this issue would occur as a result of the Project.

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?

Less Than Significant Impact. As stated previously, given that the Project Site is completely developed with buildings and surface parking areas, during storm events, nearly all of the stormwater flows from the site to the local streets where the runoff enters the City's storm drain system. Under the post-Project conditions, most of the Project Site would also be developed with impervious surfaces. The Project developer would be required to implement BMPs and to develop appropriate drainage infrastructure on the site to meet regulatory water quality requirements and to control drainage from the site to not exceed existing rates. Thus, the Project would not increase the runoff from the site entering the City's existing storm drain facilities. As such, the Project would not exceed the capacity of the existing or planning drainage system. Therefore, Project impacts related to storm drain capacity would be less than significant.

iv) Impede or redirect flood flows?

No Impact. The Project Site is located in an area of minimal flood risk (Zone X) and is not located within a 100-year zone, as mapped by the Federal Emergency Management Agency (FEMA).[56] Thus, the Project would not have the potential to impede or redirect flood flows. Therefore, no impacts related to this issue would occur as a result of the Project.

d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

No Impact. The Project Site is not located near any large bodies of water. The Pacific Ocean is located approximately five miles west of the Project Site. As such, the Project Site is not in an area susceptible to seiche, tsunamis, or mudflows.[57] Thus, the Project would not expose people or structures to a significant risk of loss, injury, or death involving inundation by seiche, tsunami, or mudflow. Therefore, no impacts related to this issue would occur as a result of the Project.

e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Less Than Significant Impact. As discussed previously in response to Checklist Question X(a) (Hydrology and Water Quality – Water Quality), Project impacts related to water quality would be less than significant. As discussed in response to Checklist Question X(b) (Hydrology and Water Quality – Groundwater), no impacts related to groundwater would occur as a result of the Project. No mitigation measures are required.

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56 *FEMA, Flood Map Panel #06037C1780G, effective on 12/21/2018, https://msc.fema.gov/portal/search?AddressQuery#searchresultsanchor, accessed July 6, 2022.*

57 *California Department of Conservation, California Tsunami Maps and Data, https://www.conservation.ca.gov/cgs/tsunami/maps, accessed March 7, 2023.*

Cumulative Impacts

There are 6 related projects in the City (refer to Table 1-1 in Section 1 [Introduction]). The site of the Project and the related projects are located in an urbanized area where most of the surrounding properties are already developed. The existing storm drainage system serving this area has been designed to accommodate runoff from an urban built-out environment. When new construction occurs, it generally does not lead to substantial additional runoff, since new development is required to control the amount and quality of stormwater runoff coming from their respective sites. Additionally, all new development in the City is required to comply with the City's LID Ordinance and incorporate appropriate stormwater pollution control measures into the design plans to ensure that water quality impacts are minimized. Therefore, Project cumulative impacts related to hydrology and water quality would be less than significant.

XI. LAND USE AND PLANNING

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Physically divide an established community?	☐	☐	☐	☒
b. 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?	☐	☐	☒	☐

a) Would the project physically divide an established community?

No Impact. The Project Site is located in an urbanized area of the City and is currently developed. The Project Site is surrounded by existing development and roadway and utility infrastructure. Thus, the Project would not physically divide an established community. Therefore, no impacts related to this issue would occur. No mitigation measures are required.

b) 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?

Less Than Significant Impact. As discussed below, the Project would be substantially consistent with all of the applicable plans, policies, and regulations associated with development of the Project Site. Therefore, Project impacts related to land use and planning would be less than significant. No mitigation measures are required.

Regulatory Framework

Regional Plans

Southern California Association of Governments

SCAG functions as the Metropolitan Planning Organization for six counties: Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial. The SCAG region encompasses a population exceeding 18 million persons in an area of more than 38,000 square miles. As the federally-designated Metropolitan Planning Organization, SCAG is mandated to research and create plans for transportation, growth management, hazardous waste management, and air quality. Applicable SCAG publications are discussed below.

2020-2045 RTP/SCS

On September 30, 2008, SB 375 was instituted to help achieve AB 32 goals through regulation of cars and light trucks. SB 375 aligns three policy areas of importance to local government: (1)

regional long-range transportation plans and investments; (2) regional allocation of the obligation for cities and counties to zone for housing; and (3) a process to achieve GHG emissions reductions targets for the transportation sector. It establishes a process for the CARB to develop GHG emissions reductions targets for each region (as opposed to individual local governments or households). SB 375 also requires Metropolitan Planning Organizations to prepare a Sustainable Communities Strategy (SCS) within the RTP that guides growth while taking into account the transportation, housing, environmental, and economic needs of the region. SB 375 uses CEQA streamlining as an incentive to encourage residential projects, which help achieve AB 32 goals to reduce GHG emissions.

The 2020-2045 RTP/SCS land use pattern continues the trend of focusing new housing and employment growth in the region's High Quality Transit Areas (HQTAs) and aims to enhance and build out the region's transit network. At the time of the previous 2016-2040 RTP/SCS, HQTAs accounted for just 3 percent of total land in the SCAG region, but they are projected to accommodate 46 percent of the region's future household growth and 55 percent of the region's future employment growth by 2040.[58] HQTAs are a cornerstone of land use planning best practice in the SCAG region, and studies by the California Department of Transportation, the USEPA, and the Metropolitan Transportation Commission have found that focusing development in areas served by transit can result in local, regional, and statewide benefits including reduced air pollution and energy consumption. In addition, HQTAs concentrate roadway repair investments, leverage transit and active transportation investments, reduce regional life cycle infrastructure costs, improve accessibility, create local jobs, and have the potential to improve public health and housing affordability. As a result, HQTAs are vital to the attainment of regional GHG emissions reduction targets: successful implementation of the 2020-2045 RTP/SCS would result in more complete communities with a variety of transportation and housing choices, reducing automobile use and, crucially, associated GHG emissions.

The Project's consistency with the 2020-2045 RTP/SCS is discussed in Table VIII-9 in response to Checklist Question VIII (b) (Greenhouse Gas Emissions – Consistency with GHG Emissions Reduction Plans, Policies, or Regulations). As discussed there, the Project would be substantially consistent with the 2020-2045 RTP/SCS. Therefore, impacts related to consistency with the 2020-2045 RTP/SCS would be less than significant.

South Coast Air Quality Management District

Air Quality Management Plan

The Project Site is located within the jurisdiction of the SCAQMD. In conjunction with SCAG, the SCAQMD is responsible for formulating and implementing air pollution control strategies, including periodic updates to the AQMP, and guidance to local government about how to incorporate these strategies into their land use plans and decisions about development.

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58 *SCAG, Final 2016-2040 RTP/SCS, April 2017. HQTAs are defined as areas within one-half mile of a fixed guideway transit stop or a bus transit corridor where buses pick up passengers at a frequency of every 15 minutes or less during peak commuting hours.*

SCAG is responsible for generating the socio-economic profiles and growth forecasts on which land use, transportation, and air quality management and implementation plans are based. The growth forecasts provide the socioeconomic data used to estimate vehicle trips and VMT. Emission estimates then can be forecast by SCAQMD based on these projected estimates. Reductions in emissions due to changes in the socio-economic profile of the region are an important way of taking account of changes in land use patterns. For example, changes in jobs/housing balance induced by changes in urban form and transit-oriented development induce changes in VMT by more closely linking housing to jobs. Thus, socio-economic growth forecasts are a key component to guide the Basin toward attainment of the NAAQS.

The current AQMP establishes a comprehensive regional air pollution control program leading to the attainment of State and federal air quality standards in the Basin. In addition to setting minimum acceptable exposure standards for specified pollutants, the AQMP incorporates SCAG's growth management strategies that can be used to reduce vehicle trips and VMT, and hence air pollution. These include, for example, co-location of employment and housing, and mixed-use land patterns that allow the integration of residential and non-residential uses.

Consistency of the Project with the AQMP are discussed in response to Checklist Question III(a) (Air Quality – AQMP Consistency) of this IS/MND. As discussed there, the Project would be substantially consistent with the AQMP, and impacts would be less than significant.

Local Plans

City of Inglewood

General Plan

The current General Plan land use designation for the Project Site as well as the immediately surrounding area is Industrial. In 1980, the City adopted a revised Land Use Element that re-designated this area from residential/commercial land uses to industrial in an effort to promote the development of new industrial and office park uses. However, today the Project Site and surrounding area remain predominantly developed with a mix of commercial and lodging uses along Century Boulevard with single-family residential uses located to the south. Accordingly, the area's current and foreseeably future uses are not currently consistent with the General Plan's Industrial designation.

In consideration of this existing inconsistency as well as existing and foreseeable land use patterns in the vicinity of the Project Site, a General Plan Amendment to re-designate the Project Site for Commercial/Residential land uses is being proposed in conjunction with the Project. This designation is intended to allow for a mix of residential and commercial uses in conjunction with application of the City's Planned Assembly Development (PAD) entitlement process, which encourages more creative approaches to the development of land than would be possible through the strict application of the City's standard zoning regulations. Accordingly, in addition to the proposed General Plan Amendment, the Project will seek PAD approval to establish specific development standards for the Project Site.

Following the City's adoption of the requested General Plan Amendment, the Project will be fully consistent with the applicable goals and policies of the City's General Plan discussed in Table XI-1. As discussed there, the Project would be substantially consistent with the General Plan, and impacts would be less than significant.

Table XI-1
Project Consistency with the General Plan

Goals and Policies	Consistency Analysis
Housing Element	
Goal 1: Promote the construction of new housing and new housing opportunities. Policy 1.1 Provide adequate sites for all types of housing.	**Consistent.** As part of a mixed-use development, the Project includes 129 new dwelling units of varying size.
Goal 7: Encourage Energy Efficiency and Greenhouse Gas Reductions. Policy 7.1 Facilitate residential energy efficient construction and upgrades.	**Consistent.** The Project would be required by the City to incorporate applicable energy efficiency measures outlined in the City's Building Code, Green Building Code, and Section 12-42.1 (Transportation Demand Management Requirements for Carpool Parking and Bicycle Facilities) of the City's Municipal Code as well as the standards of the Project's proposed PAD zoning regulations. The infill and mixed-use nature of the Project and the Project Site's proximity to existing transit, housing, employment, shopping and entertainment would reduce vehicle trips, VMT, and associated GHG emissions.
Land Use Element	
Major Mixed-Use Goal Large·scale development sites integrating commercial, office, entertainment, and/or housing that actively engage and enhance pedestrian activity, enable Inglewood's residents to live close to businesses and employment; respect the site characteristics, and are well-designed reflecting the traditions of the City. Policies 1. Land Use Mix. Allow for planned development mixed·use districts that integrate housing with retail, office, entertainment, and public uses where the housing may be developed on the upper floors of non·residential buildings or distributed horizontally on the site. 2. Ground Floor Development. Require that the ground floor of buildings integrating housing	**Consistent.** The Project includes the development of a mixed-use building, which would include residential, hotel, and event/entertainment uses. The ground floor of the building would contain the hotel lobby, event space, and parking, with all residential units on floors 7 through 12. The Project would be designed and constructed in accordance with the City's design requirements including those established as part of the Project's PAD approval. The residential and non-residential portions of the Project would be integrated through design, lighting, and wayfinding signage, but would be separated by floors. The proposed building would be oriented toward Century Boulevard, Freeman Avenue, and 101st Street, providing the primary pedestrian access on Century Boulevard and the primary vehicular access on 101st Street.

Table XI-1
Project Consistency with the General Plan

Goals and Policies	Consistency Analysis
with non·residential uses must be occupied by retail, dining, and other uses that engage and activate pedestrian activity. 3. Architectural Design Quality. Require that development in mixed·use districts conveys a high level of architectural design quality and landscape amenities, reflecting the traditions that historically have defined the City. 4. Design Integration. Require that residential and non·residential portions of mixed·use buildings be seamlessly integrated by architectural design, pedestrian walkways, and landscape. 5. Cohesive and Integrated Development. Require that planned development mixed·use districts seamlessly integrate uses and buildings as a cohesive project characterized by: • A connected and unifying street and sidewalk network • Consistent property setbacks, frontage design, and building massing • Orientation and design of the ground floor of buildings to promote pedestrian activity • Inclusion of attractively landscaped public sidewalks and open spaces • Consideration of shared parking in lieu of separate parking for each use 6. Site Development. Require that buildings and improvements respect their setting and address elements such as location, slopes, drainages, native landscapes, and view sheds, as applicable. 7. Compatibility of Residential and Non-Residential Uses. Require that buildings integrating housing with non-residential uses be designed to assure compatibility among uses and public safety including separate access, fire suppression barriers, secured resident parking, noise insulation, and similar elements.	
Noise Element	
<u>Goals</u> 1. Provide for the reduction of noise where the noise environment represents a threat to the	**Consistent.** As part of this IS/MND, an assessment of the Project's noise impacts on the surrounding area was conducted. (Refer to Checklist Topic XIII. Noise.) As discussed there,

Table XI-1
Project Consistency with the General Plan

Goals and Policies	Consistency Analysis
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. 2. Reduce noise impacts in degraded areas. In those areas where the environment is degraded, but not to an extent that represents an immediate hazard to public health and welfare, it is the objective of the City to reduce environmental degradation as much as feasible and practical within the limits imposed by conflicting objectives. 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. 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 incompatibilities 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. <u>Policies</u> *4.1 Provide for measures to reduce noise impacts from traffic noise sources.* *4.2 Incorporate noise considerations into land use planning decisions.* *4.3 Develop measures to control non-transportation noise impacts.* 4.4 *Reduce noise conflicts at the source.* 4.5 Reduce noise conflicts at the receiver.	the Project's operational noise impacts would be less than significant. With implementation of Mitigation Measure NOISE-1, the Project's construction noise impacts would be less than significant.

<u>Zoning Code</u>

The current zoning designation for the Project Site as well as the immediately surrounding area is C-2A (Airport Commercial), which allows commercial and hotel uses but does not permit residential uses. In conjunction with the requested General Plan Amendment to establish a

Commercial/Residential land use designation for the Project Site, a corresponding PAD approval is being requested that would establish specific development standards for the Project and Project Site, in furtherance of the PAD process's purpose of encouraging more creative approaches to the development of land than would be possible through the strict application of standard zoning regulations. Specifically, the proposed PAD approval would facilitate the redevelopment of the Project Site's existing hotel uses with a new vertically integrated development containing commercial, lodging, entertainment, and housing uses that will enhance pedestrian activity and reflect high architectural design quality. The proposed PAD standards will achieve this goal by establishing specific use, development, and design standards that will ensure the compatibility of the Project with both nearby uses as well as the City's long-range planning and policy goals to encourage increased commercial activity along its key corridors.

Consistent with the requirements of the Inglewood Municipal Code, the Project would require City Council approval of the following discretionary entitlements:

- General Plan Amendment to change Project Site's land use designation from Industrial to Commercial/Residential;
- Zoning Code Amendment regarding extended-stay hotel;
- Approval of a Planned Assembly Development and Special Use Permit for the Project Site to allow certain deviations from various IMC provisions;
- Tract Map and Condominium Plan;
- Site Plan Review;
- Sign Agreement to allow Project's proposed digital signage; and
- Tree Removal Permit

Following approval of the above entitlements, the Project would be fully consistent with the City's applicable zoning regulations.

Cumulative Impacts

As discussed previously, the Project would not result in any inconsistencies with any of the applicable plans, policies, or regulations associated with development of the Project Site. The City would assess the consistency of the related projects with all applicable plans, policies, and regulations associated with those projects, individually. Regardless of any potential inconsistencies the related projects may result in, because the Project would not result in any inconsistencies, the Project would not have the potential to contribute to any cumulative inconsistency impacts.

XII. MINERAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
b. 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?	☐	☐	☐	☒

a) Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

No Impact. The Project Site is located in an urbanized part of the City. The Project Site is not located in an area designated for Portland cement concrete-grade (PCC-grade) aggregate or land classified Mineral Resource Zone 2 (MRZ-2).[59] [60] Thus, the Project would not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state. Therefore, no impacts related to this issue would occur. No mitigation measures are required.

b) Would the project 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?

No Impact. The Project Site is located in an urbanized part of the City. The Project Site is not identified as a mineral resource recovery site. Thus, the Project would not 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. Therefore, no impacts related to this issue would occur. No mitigation measures are required.

Cumulative Impacts

As discussed previously, the Project would not result in any impacts related to mineral resources. Regardless to what degree the related projects could result in impacts related to mineral resources, because the Project would not result in any impacts related to mineral resources, the Project would not have the potential to contribute to any cumulative impacts.

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59 *California Geological Survey, Updated Mineral Resource Zones for Portland Content Concrete Aggregate in the San Fernando Valley and Saugus-Newhall Production-Consumption Regions, 2021.*

60 *MRZ-2 is defined as "Areas where adequate information indicates that significant mineral deposits are present, or where it is judged that a high likelihood for their presence exists. This zone shall be applied to known mineral deposits or where well-developed lines of reasoning, based upon economic-geologic principles and adequate data, demonstrate that the likelihood for occurrence of significant mineral deposits is high."*

XIII. NOISE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project result in:				
a. 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?	☐	☒	☐	☐
b. Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
c. 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?	☐	☐	☒	☐

The information and analysis presented below is based primarily on the Noise Technical Data prepared by DKA Planning, included in Appendix H.

Fundamentals of Noise

Characteristics of Sound

Sound can be described in terms of its loudness (amplitude) and frequency (pitch). The standard unit of measurement for sound is the decibel (i.e., dB). Because the human ear is not equally sensitive to sound at all frequencies, the A-weighted scale (dBA) is used to reflect the normal hearing sensitivity range. On this scale, the range of human hearing extends from 3 to 140 dBA. Table XIII-1 provides examples of A-weighted noise levels from common sources.

Table XIII-1
A-Weighted Decibel Scale

Typical A-Weighted Sound Levels	Sound Level (dBA L_{eq})
Near Jet Engine	130
Rock and Roll Band	110
Jet flyover at 1,000 feet	100
Power Motor	90
Food Blender	80
Living Room Music	70
Human Voice at 3 feet	60
Residential Air Conditioner at 50 feet	50
Bird Calls	40
Quiet Living Room	30
Average Whisper	20
Rustling Leaves	10
Source: Cowan, James P., Handbook of Environmental Acoustics, 1993. *These noise levels are approximations intended for general reference and informational use.*	

Noise Definitions. This noise analysis discusses sound levels in terms of equivalent noise level (L_{eq}), maximum noise level (L_{max}) and the Community Noise Equivalent Level (CNEL).

- Equivalent Noise Level (L_{eq}): L_{eq} represents the average noise level on an energy basis for a specific time period. Average noise level is based on the energy content (acoustic energy) of sound. For example, the L_{eq} for one hour is the energy average noise level during that hour. L_{eq} can be thought of as a continuous noise level of a certain period equivalent in energy content to a fluctuating noise level of that same period.

- Maximum Noise Level (L_{max}): L_{max} represents the maximum instantaneous noise level measured during a given time period.

- CNEL: CNEL is an adjusted noise measurement scale of average sound level during a 24-hour period. Due to increased noise sensitivities during evening and night hours, human reaction to sound between 7:00 P.M. and 10:00 P.M. is as if it were actually 5 dBA higher than had it occurred between 7:00 A.M. and 7:00 P.M. From 10:00 P.M. to 7:00 A.M., humans perceive sound as if it were 10 dBA higher. To account for these sensitivities, CNEL figures are obtained by adding an additional 5 dBA to evening noise levels between 7:00 P.M. and 10:00 P.M. and 10 dBA to nighttime noise levels between 10:00 P.M. and 7:00 A.M. As such, 24-hour CNEL figures are always higher than their corresponding actual 24-hour averages.

Effects of Noise. The degree to which noise can impact an environment ranges from levels that interfere with speech and sleep to levels that can cause adverse health effects. Most human response to noise is subjective. Factors that influence individual responses include the intensity, frequency, and pattern of noise; the amount of background noise present; and the nature of work or human activity exposed to intruding noise. According to the National Institute of Health (NIH), extended or repeated exposure to sounds at or above 85 dB can cause hearing loss. Sounds of

70 dBA or less, even after continuous exposure, are unlikely to cause hearing loss. The World Health Organization (WHO) reports that adults should not be exposed to sudden "impulse" noise events of 140 dB or greater. For children, this limit is 120 dB.

Exposure to elevated nighttime noise levels can disrupt sleep, leading to increased levels of fatigue and decreased work or school performance. For the preservation of healthy sleeping environments, the WHO recommends that continuous interior noise levels not exceed 30 dBA, L_{eq} and that individual noise events of 45 dBA or higher be avoided. Assuming a conservative exterior to interior sound reduction of 15 dBA, continuous exterior noise levels should therefore not exceed 45 dBA L_{eq}. Individual exterior events of 60 dBA or higher should also be limited. Some epidemiological studies have shown a weak association between long-term exposure to noise levels of 65 to 70 dBA, L_{eq} and cardiovascular effects, including ischemic heart disease and hypertension. However, at this time, the relationship is largely inconclusive.

People with normal hearing sensitivity can recognize small perceptible changes in sound levels of approximately 3 dBA. Changes of at least 5 dBA can be readily noticeable and may cause community reactions. Sound level increases of 10 dBA or greater are perceived as a doubling in loudness and can provoke a community response. However, during daytime, few people are highly annoyed by noise levels below 55 dBA L_{eq}.

Noise Attenuation. Noise levels decrease as the distance from noise sources to receivers increases. For each doubling of distance, noise from stationary sources can decrease by about 6 dBA over hard surfaces (e.g., reflective surfaces such as parking lots) and 7.5 dBA over soft surfaces (e.g., absorptive surfaces such as soft dirt and grass). For example, if a point source produces a noise level of 89 dBA at a reference distance of 50 feet and over an asphalt surface, its noise level would be approximately 83 dBA at a distance of 100 feet, 77 dBA at 200 feet, etc. Noises generated by mobile sources such as roadways decrease by about 3 dBA over hard surfaces and 4.5 dBA over soft surfaces for each doubling of distance. It should be noted that because decibels are logarithmic units, they cannot be added or subtracted. For example, two cars each producing 60 dBA of noise would not produce a combined 120 dBA.

Noise is most audible when traveling by direct line of sight, an unobstructed visual path between noise source and receptor. Barriers that break line of sight between sources and receivers, such as walls and buildings, can greatly reduce source noise levels by allowing noise to reach receivers by diffraction only. As a result, sound barriers can generally reduce noise levels by up to 15 dBA. The effectiveness of barriers can be greatly reduced when they are not high or long enough to completely break line of sight from sources to receivers.

Fundamentals of Vibration

Characteristics of Vibration. Vibration is an oscillatory motion through a solid medium in which the motion's amplitude can be described in terms of displacement, velocity, and acceleration. Unlike noise, vibration is not a common environmental problem, as it is unusual for vibration from vehicle sources to be perceptible. Common sources of vibration include trains, construction activities, and certain industrial operations.

Vibration Definitions. This analysis discusses vibration in terms of Peak Particle Velocity (PPV). PPV is commonly used to describe and quantify vibration impacts to buildings and other structures. PPV levels represent the maximum instantaneous peak of a vibration signal and are usually measured in inches per second.

Effects of Vibration. High levels of vibration may cause physical personal injury or damage to buildings. However, groundborne vibration levels rarely affect human health. Instead, most people consider groundborne vibration to be an annoyance that can disrupt concentration or disturb sleep. Groundborne vibration can also interfere with certain types of highly sensitive equipment and machines, especially imaging devices used in medical laboratories.

Perceptible Vibration Changes. Unlike noise, groundborne vibration is not an environmental issue that most people experience every day. Background vibration levels in residential areas are usually well below the threshold of perception for humans, approximately 0.01 inches per second. Perceptible indoor vibrations are most often caused by sources within buildings themselves, such as slamming doors or heavy footsteps. Common outdoor sources of groundborne vibration include construction equipment, trains, and traffic on rough or unpaved roads. Traffic vibration from smooth and well-maintained roads is typically not perceptible.

Regulatory Framework

Noise

Federal. Currently, no federal noise standards regulate environmental noise associated with short-term construction activities or long-term operations of development projects. As such, temporary and long-term noise impacts produced by the Project would be largely regulated or evaluated by State and City of Inglewood standards designed to protect public well-being and health.

State. The State's 2017 General Plan Guidelines establish county and city standards for acceptable exterior noise levels based on land use. These standards are incorporated into land use planning processes to prevent or reduce noise and land use incompatibilities. Table 2 illustrates State compatibility considerations between various land uses and exterior noise levels.

California Government Code Section 65302 also requires each county and city to prepare and adopt a comprehensive long-range general plan for its physical development. Section 65302(f) requires a noise element to be included in the general plan. This noise element must identify and appraise noise problems in the community, recognize Office of Noise Control guidelines, and analyze and quantify current and projected noise levels.

Table XIII-2
State of California Noise/Land Use Compatibility Matrix

Land Use Category	Community Noise Exposure (dB, L_{dn} or CNEL)						
	55	60	65	70	75	80	
Residential - Low Density Single-Family, Duplex, Mobile Homes							
Residential - Multi-Family							
Transient Lodging - Motels Hotels							
Schools, Libraries, Churches, Hospitals, Nursing Homes							
Auditoriums, Concert Halls, Amphitheaters							
Sports Arena, Outdoor Spectator Sports							
Playgrounds, Neighborhood Parks							
Golf Courses, Riding Stables, Water Recreation, Cemeteries							
Office Buildings, Business Commercial and Professional							
Industrial, Manufacturing, Utilities, Agriculture							

	Normally Acceptable - Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction without any special noise insulation requirements.
	Conditionally Acceptable - New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply system or air conditioning will normally suffice.
	Normally Unacceptable - New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design.
	Clearly Unacceptable - New construction or development should generally not be undertaken.

Source: California Office of Planning and Research "General Plan Guidelines, Noise Element Guidelines (Appendix D, Figure 2), 2017.

The state has also established noise insulation standards for new multi-family residential units, hotels, and motels that are subject to relatively high levels of noise from transportation. The noise insulation standards, collectively referred to as the California Noise Insulation Standards (Title 24, California Code of Regulations) set forth an interior standard of 45 dBA CNEL for habitable rooms. The standards require an acoustical analysis which indicates that dwelling units meet this interior standard where such units are proposed in areas subject to exterior noise levels greater than 60 dBA CNEL. Local jurisdictions typically enforce the California Noise Insulation Standards through the building permit application process.

Los Angeles County Airport Land Use Plan. The Los Angeles County Regional Planning Commission serves as the State-mandated airport land use commission (ALUC) that plans development and ensures compatibility of Los Angeles International Airport (LAX) with surrounding land uses. This is done through review of proposed development surrounding LAX and through policy and guidance provided in the Los Angeles County Airport Land Use Plan (ALUP). The 1991 ALUP, as revised in December 2004, establishes safe airport operations through the delineation of Runway Protections Zones (RPZs) and height restriction boundaries and to reduce noise exposure to sensitive uses through noise insulation or land reuse.

LAX Airport Land Use Plans. Los Angeles World Airports (LAWA), the entity that owns and operates LAX, has adopted the 2017 LAX Plan and 2017 LAX Specific Plan. These documents provide a framework to guide land use decisions for the LAWA Master Plan. While these plans govern areas near LAX west of La Cienega Boulevard, they do not regulate land uses to the east. As such, the Project Site is not regulated by these plans. Further, the Project Site is not within the RPZ and is not subject to land use restrictions that apply, including restrictions on residential uses.

LAX Noise Exposure Map Report Update. In 2015, LAWA updated its Noise Exposure Map Report to document noise exposure in Inglewood and other communities from aircraft operations. While the update helps ensure that aircraft noise mitigation programs can receive federal funding, it also helps guide noise mitigation programs for new development in the City. Figure 3 of the LAX Noise Exposure Map Report Update shows the Project Site's southeasternmost portion is located just inside the 65 dBA CNEL noise contour.

City of Inglewood General Plan Noise Element. The City of Inglewood General Plan includes a 1987 Noise Element that includes policies and standards in order to guide the control of noise to protect residents, workers, and visitors. Its primary goal is to regulate long-term noise impacts to preserve acceptable noise environments for all types of land uses. The Noise Element includes the following three relevant goals for the 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 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.

The Noise Element includes the following relevant policies:

4.1 Provide for measures to reduce noise impacts from traffic noise sources.

4.2 Incorporate noise considerations into land use planning decisions.

4.3 Develop measures to control non-transportation noise impacts

4.4 Reduce noise conflicts at the source.

4.5 Reduce noise conflicts at the receiver.

4.6 Protect those who live and work in the City from dangerous on-the-job noise exposure.

4.7 Provide support for the above programs.

There are programs applicable to construction projects that call for protection of noise sensitive uses and use of best practices to minimize short-term noise impacts. However, the Noise Element contains no quantitative thresholds of significance for evaluating a project's noise impacts.

City of Inglewood Municipal Code. The Chapter 5 (Offenses, Miscellaneous), Article 2 (Noise Regulations) of the City's Municipal Code, establishes "criteria and standards for the regulation of noise levels within the community." These regulations protect "the comfort, repose, health, or peace of residents in the area," and define noise levels that are considered public nuisances and subject to abatement through the City's enforcement authority. They include the following key provisions:

- 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 (see Table XIII-3), the measured noise level shall be employed as the base ambient noise level.

Table XIII-3
Base Ambient Noise Levels

Decibels	Time	Land Use Zone
45 dBA	10:00 P.M.-7:00 A.M.	Residential
55 dBA	7:00 A.M.-10:00 P.M.	Residential
65 dBA	Anytime	Commercial and uses not specified
75 dBA	Anytime	Industrial
Source: City of Inglewood Municipal Code Section 5-27.		

- 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. Refer to Tables XIII-4 and XIII-5.

Table XIII-4
Maximum Residential Noise Levels – Exterior Noise

Noise Level Exceeded	Maximum Duration Period
Base Ambient Noise Level (BANL)	30 minutes in any hour
5 dB(A) above BANL	15 minutes in any hour
10 dB(A) above BANL	5 minutes in any hour
15 dB(A) above BANL	1 minute in any hour
20 dB(A) above BANL	Not permitted
Source: City of Inglewood Municipal Code.	

Table XIII-5
Maximum Residential Noise Levels – Interior Noise

Noise Level Exceeded	Maximum Duration Period
Base Ambient Noise Level (BANL)	5 minutes in any hour
5 dB(A) above BANL	1 minute in any hour
10 dB(A) above BANL	Not permitted
Source: City of Inglewood Municipal Code.	

- 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 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 noise in excess of 90 dBA at any place or point 300 hundred feet or more distant from the source of such sound.

Vibration

Federal. In 2018, the Federal Transit Administration (FTA) published the Transit Noise and Vibration Impact Assessment Manual to aid in the estimation and analysis of vibration impacts. Typically, potential building and structural damages are the foremost concern when evaluating the impacts of construction-related vibrations. Table XIII-6 summarizes FTA's vibration guidelines for building and structural damage. While these are reference values for vibration levels at 25 feet of distance, this analysis uses logarithmic equations to determine whether building damage would occur regardless of actual distance between construction activity and nearby buildings.

Table XIII-6
FTA Vibration Damage Potential Threshold Criteria

Structure and Condition	Threshold Criteria (in/sec PPV) at 25 Feet
I. Reinforced-concrete, steel or timber (no plaster)	0.5
II. Engineered concrete and masonry (no plaster)	0.3
III. Non-engineered timber and masonry buildings	0.2
IV. Buildings extremely susceptible to vibration damage	0.12
Source: Federal Transit Administration "Transit Noise and Vibration Impact Assessment Manual", September 2018.	

The FTA Assessment Manual also cites criteria for cases where more detailed analysis may be required. For buildings consisting of concrete wall and floor foundations, masonry or concrete walls, or stone masonry retaining walls, continuous vibrations of 0.3 inches per second PPV can be damaging. For buildings consisting of steel or reinforced concrete, such as factories, retaining walls, bridges, steel towers, open channels, underground chambers and tunnels with and without concrete alignment, continuous vibrations of 0.5 inches per second PPV can be damaging.

Existing Conditions

Noise Sensitive Receptors

The Project Site is located on a major east-west arterial in the City with a wide variety of land uses. Representative sensitive receptors in the vicinity of the Project Site include the following:

- Crestridge Inn, 4230 Century Boulevard. This motel is located directly west of the Project Site, where it is approximately 5 feet from the common property line between the two parcels.
- Super 8 Motel, 4238 Century Boulevard. This motel is also located directly west of the Project Site, where it is approximately 3 feet from the common property line between the two parcels.
- Residences, 4200 block of 101st Street (south side), 50 feet south of the Project Site.
- Residences, Freeman Avenue (east side), 50 feet east of the Project Site.
- Residences, 4100 block of Century Boulevard; 110 feet northeast of the Project Site across Century Boulevard
- Residences, 1200 block of Myrtle Street; 180 feet north of the Project Site across Century Boulevard.
- Sea Breeze Inn, 4307 Century Boulevard; 320 feet northwest of the Project Site across Century Boulevard.

Existing Ambient Noise Levels

The Project Site is developed with a 137-room hotel and surface parking areas all of which have minor sources of on-site operational noise. These include wall-mounted air conditioning units that occasionally generate noise levels of approximately 81.9 dBA at one foot of distance. The primary source of most on-site noise is from the approximately 1,088 daily vehicle trips traveling to and from the Project Site to the drop-off area off Century Boulevard or into the parking lot entrance off 101st Street. There is minor noise from the operation of the parking lot, including tire friction as vehicles navigate to and from parking spaces, doors slamming, car alarms, and engine acceleration. Most of these sources are instantaneous (e.g., car alarm chirp, door slam) while others may last a few seconds. Intermittent noise from solid waste management and collection activities is of short duration, as are occasional loading of goods for the hotel.

The primary source of noise near the Project Site is vehicle traffic, as transportation noise is the main source of noise in urban environments, largely from the operation of vehicles with internal combustion engines and frictional contact with the ground and air. The major source of vehicle noise in the area is traffic on Century Boulevard, which carries about 37,612 daily vehicles between Freeman Avenue and Myrtle Avenue, equating to about 3,000 vehicles during the P.M. peak hour.

In March 2022, DKA Planning took short-term noise measurements near the Project Site to determine the ambient noise conditions of the neighborhood at sensitive receptors. As shown in Table XIII-7, noise levels along roadways near the Project Site ranged from 56.8 to 65.8 dBA L_{eq}, which was generally consistent with the traffic volumes on local streets.

Table XIII-7
Existing Noise Levels

Noise Measurement Locations, Dates, and Times	Primary Noise Source	Sound Levels		Nearest Sensitive Receptor(s)	Base Ambient Noise Level	Noise/Land Use Compatibility[b]
		dBA (L_{eq})	dBA (CNEL)[a]			
A. Super 8 Motel March 8, 2022 at 8:03 A.M.	Traffic on Century Blvd.	64.3	62.3	Sea Breeze Inn, Motels – Century Blvd.	65	Conditionally Acceptable
B. 1233 Myrtle Ave. June 29, 2022 at 9:09 A.M.	Traffic on Myrtle Ave.	62.3	60.3	Residences – Myrtle Ave.	55	Normally Acceptable
C. 4141 Century Blvd. Mark 8, 2022 at 8:20 A.M.	Traffic on Century Blvd.	65.8	63.8	Residences – Century Blvd.	55	Conditionally Acceptable
D. 4130 Freeman Ave. March 8, 2022 at 7:44 A.M.	Traffic on Century Blvd.	65.0	63.0	Residences – Freeman Ave (10000 and 10100 blocks)	55	Conditionally Acceptable
E. 4214 101st St. March 8, 2022 at 7:26 A.M.	Traffic on 101st St.	56.8	54.8	Residences – 101st St.	55	Conditionally Acceptable

[a] *Estimated based on short-term (15-minute) noise measurement using Federal Transit Administration procedures from 2016 Transit Noise and Vibration Impact Assessment Manual, Appendix E, Option 4.*

[b] *Pursuant to California Office of Planning and Research "General Plan Guidelines, Noise Element Guidelines, 2017. When noise measurements apply to two or more land use categories, the more noise-sensitive land use category is used. See Table XIII-2 for definition of compatibility designations.*

Source: DKA Planning, 2022

Ambient noise levels are influenced by aircraft operations at LAX, located approximately two miles to the east, particularly with inbound traffic that approaches the airport from the east. As shown in Table XIII-8, aircraft from LAX represent a source of noise near the Project Site.

Table XIII-8
Aircraft Noise Levels in Inglewood (2013, dBA CNEL)

Address	LAX Aircraft	All Aircraft	Community	Total
944 S. Eucalyptus Ave.	61.6	61.6	60.8	64.2
215 W. Kelso St.	66.5	66.5	95.4	95.4
800 La Brea Dr.	67.4	67.4	83.4	83.5
11028 Doty Ave.	58.4	58.7	70.6	70.8
10220 S. Yukon Ave.	69.6	69.6	67.8	71.8
9601 6th Ave.	61.1	61.0	87.0	87.0

Source: Los Angeles World Airports. Noise Exposure Map Report Update; Title 14, Code of Federal Regulations Part 150; August 2015. https://www.lawa.org/-/media/lawa-web/noise-management/files/150-noise-exposure/final-lax-nem-entire-report.ashx

All measured noise levels were higher than the base ambient noise levels identified in the Section 5-27 of the City's Municipal Code, with the exception of the Super 8 Motel. As such, the analysis below uses the Municipal Code's base ambient noise level of 65 dBA as the existing noise level for any sensitive receptors in the commercial zone along Century Boulevard (e.g., Super 8 Motel).

Existing Ambient Vibration Levels

The Project Site includes a hotel facility with a surface parking lot, neither of which involves use of equipment or heavy-duty vehicles that generate substantive groundborne vibration.

The primary source of groundborne vibration near the Project Site is vehicle travel, including the 1,088 daily vehicle trips traveling to and from the Project Site. The blend of passenger vehicles, and trucks, with occasional delivery trucks, generate minimal levels of vibration. Consistent with federal guidance, "[i]t is unusual for vibration from sources such as buses and trucks to be perceptible…" As such, vehicle movement generates imperceptible ground vibration, with the occasional exception of heavy-duty vehicles that travel over speed bumps, potholes, and other street irregularities.

a) Would the project result in 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?

Less Than Significant With Mitigation Incorporated. As discussed below, with mitigation, the Project would not result in 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, and noise impacts would be less than significant.

Thresholds of Significance

Construction Noise Thresholds. While the City does not have adopted guidelines for determining the significance of temporary noise impacts, the on-site construction noise impact would be considered significant if the following would occur:

- Construction activities would elevate existing ambient exterior sound levels by 5 dBA (hourly L_{eq}) or more at a noise-sensitive use during the daytime (7:00 A.M. to 8:00 P.M.) or 8:00 P.M. to 7:00 A.M., if a permit is approved allowing nighttime work.

Operational Noise Thresholds. In addition to applicable City standards and guidelines that would regulate or otherwise moderate the Project's operational noise impacts, the following criteria are adopted to assess the impact of the Project's operational noise sources:

- Project operations would cause ambient noise levels at off-site locations to increase by 3 dBA CNEL or more to or within "normally unacceptable" or "clearly unacceptable"

noise/land use compatibility categories, as defined by the State's 2017 General Plan Guidelines.

- Project operations would cause any 5 dBA CNEL or greater noise increase.

Project Impacts

Construction

On-Site Construction Activities

Construction of the Project would generate noise during the construction process that would span approximately 26 months of demolition; grading; building construction of the garage, hotel, and residences; and application of architectural coatings, as shown in Table XIII-9. During all construction phases, noise-generating activities could occur at the Project Site between 7:00 A.M. and 8:00 P.M. Monday through Saturday, in accordance with Section 5-41 of the City's Municipal Code.

Table XIII-9
Construction Schedule Assumptions

Phase	Duration	Notes
Demolition	Months 1-3	Removal of 61,000 square feet of building floor area and 40,502 square feet of asphalt/concrete parking lot hauled 30 miles to landfill in 10-cubic yard capacity trucks.
Site Preparation	Month 3	Removal of trees, plants, landscaping, weeds
Grading/Shoring	Months 3-7	Approximately 112,813 cubic yards of soil (including swell factors for topsoil and dry clay) hauled 30 miles to landfill in 10-cubic-yard capacity trucks.
Below Grade Parking Construction	Months 6-9	Pour in place construction.
Above Grading Parking Construction	Months 9-18	Pour in place construction.
Building Construction	Months 9-26	Includes framing, welding; installing electrical, plumbing, and HVAC, insulation, interior drywall, flooring.
Architectural Coatings	Months 19-26	Application of interior and exterior coatings and sealants.
Source: DKA Planning, 2022.		

Noise levels would generally peak during the demolition and grading phases, when diesel-fueled heavy-duty equipment like excavators and dozers are used to move large amounts of debris and dirt, respectively. This equipment is mobile in nature and does not always operate at in a steady-state mode full load, but rather powers up and down depending on the duty cycle needed to conduct work. As such, equipment is occasionally idle during which time no noise is generated.

During other phases of construction (e.g., building construction, architectural coatings), noise impacts are generally lesser than during demolition and grading because they are less reliant on using heavy equipment with internal combustion engines. Smaller equipment such as forklifts, generators, and various powered hand tools and pneumatic equipment would generally be utilized. Off-site secondary noises would be generated by construction worker vehicles, vendor deliveries, and haul trucks.

As shown in Table XIII-10, when considering ambient noise levels, the use of multiple pieces of powered equipment simultaneously would increase ambient noise negligibly. However, construction activities could elevate noise levels at the residences across 101st Street by up to 8.4 dBA L_{eq}. This noise level would exceed the significance threshold of 5 dBA and be considered significant but mitigable.

Table XIII-10
Construction Noise Levels at Off-Site Sensitive Receptors (Unmitigated)

Receptor	Maximum Construction Noise Level (dBA L_{eq})	Existing Ambient Noise Levels (dBA L_{eq})	New Ambient Noise Levels (dBA L_{eq})	Increase (dBA L_{eq})	Potentially Significant ?
1. Sea Breeze Inn	48.9	65.0*	65.1	0.1	No
2. Residences – Myrtle Ave.	45.7	62.3	62.4	0.1	No
3. Residences – Century Blvd.	57.8	65.8	66.4	0.6	No
4. Motels – Century Blvd.	53.3	65.0*	65.3	0.3	No
5. Residences – Freeman Ave. (10000 block)	63.0	65.0	67.1	2.1	No
6. Residences – Freeman Ave. (10100 block)	59.5	65.0	66.1	1.1	No
7. Residences – 101st St.	64.5	56.8	65.2	8.4	Yes

** Reflects Section 5-27 of the Municipal Code base ambient noise level for commercial zones. If measured noise levels were used, construction impacts would still be less than 5 dBA Leq threshold of significance.*

Source: DKA Planning, 2022 and SoundPLAN Essential model (version 5.1).

Mitigation Measures

NOISE-1 The Project developer shall install temporary noise barriers and insulation blankets along the southern perimeter of the Project Site along 101st Street at least 8.2 feet in height and a surface density of four pounds per square foot or more with no gaps between barrier panels and between the barrier and the ground.

As shown in Table XIII-11, Mitigation Measure NOISE-1 would ensure that construction noise levels would not elevate ambient noise levels at any nearby sensitive receptors by more than 5 dBA L_{eq}. Therefore, with mitigation, the Project's noise impact associated with on-site construction activities would be less than significant.

Table XIII-11
Construction Noise Levels at Off-Site Sensitive Receptors (Mitigated)

Receptor	Maximum Construction Noise Levels (dBA L_{eq})	Existing Ambient Noise Levels (dBA L_{eq})	New Ambient Noise Levels (dBA L_{eq})	Increase (dBA L_{eq})	Potentially Significant ?
1. Sea Breeze Inn	49.0	65.0*	65.1	0.1	No
2. Residences – Myrtle Ave.	45.9	62.3	62.4	0.1	No
3. Residences – Century Blvd.	58.0	65.8	66.5	0.7	No
4. Motels – Century Blvd.	53.3	65.0*	65.3	0.3	No
5. Residences – Freeman Ave. (10000 block)	63.2	65.0	67.2	2.2	No
6. Residences – Freeman Ave. (10100 block)	58.8	65.0	65.9	0.9	No
7. Residences – 101st St.	59.8	56.8	61.6	4.8	No

** Reflects Section 5-27 of the Municipal Code base ambient noise level for commercial zones.*

Source: DKA Planning, 2022.

Off-Site Construction Activities

The Project would generate noise at off-site locations from haul trucks moving debris and dirt from the Project Site during demolition and grading activities, respectively. Other sources of off-site noise would include vendor and contractor trips and worker commute trips. These activities would generate up to an estimated 510 peak-hourly passenger-car-equivalency (PCE) vehicle trips

(refer to Table XIII-12) during the grading phase, which includes converting noise from heavy-duty truck trips to an equivalent number of PCE trips. This would represent approximately 17 percent of traffic volumes on Century Boulevard, which would be used as part of the haul route. As Century Boulevard carries approximately 3,000 vehicles between Freeman Avenue and Myrtle Avenue in the peak hour of traffic, the Project's construction-related trips would not double traffic volumes (i.e., a 100 percent increase), the threshold at which traffic noise levels could increase by 3 dBA or more. Therefore, noise impacts from construction-related traffic would be less than significant.

Table XIII-12
Construction Vehicle Trips (Maximum Hourly)

Construction Phase	Worker Trips	Vendor Trips	Haul Trips	Total Trips	Percent of Peak Hour Trips on Century Blvd.[a]
Demolition	6	0	17[b]	23	0.8
Site Preparation	4	0	0	4	0.1
Grading	5	0	505[c]	510	17.0
Construction: Below Grade Parking	148	253[d]	0	401	13.4
Construction: Above Grade Parking	148	253[d]	0	401	13.4
Construction: Hotel and Apartments	148	253[d]	0	401	13.4
Architectural Coatings	89	0	0	89	3.0

[a] *Percent of existing traffic volumes on Century Boulevard between Freeman Avenue and Myrtle Avenue.*
[b] *The Project would generate approximately 376 haul trips over a 62-day period with seven-hour workdays. Because haul trucks emit more noise than passenger vehicles, a 19.1 passenger car equivalency (PCE) was used to convert haul truck trips to a passenger car equivalent.*
[c] *The project would generate 22,563 haul trips over 122 days with seven-hour workdays. Assumes a 19.1 PCE.*
[d] *This phase would generate about 93 vendor truck trips daily over a seven-hour workday. Assumes a 19.1 PCE.*

Source: DKA Planning, 2022

Operation

On-Site Operational Noise

During the Project's operational phase, the Project would produce noise from both on- and off-site sources. As discussed below, the Project would not result in an exposure of persons to or a generation of noise levels in excess of standards established in the local general plan or noise

ordinance, or applicable standards of other agencies. As illustrated in Table XIII-13, the Project would not increase surrounding noise levels by more than 5 dBA CNEL, the threshold of significance utilized in this analysis. As a result, the Project's on-site and offsite operational noise impacts would be less than significant.

Mechanical Equipment

The Project would operate mechanical equipment in several locations throughout the development, including an outdoor space on the southeast corner of the 12th floor. This area would be dedicated to mechanical, electrical, and plumbing (MEP) equipment, approximately 122 feet above grade. This would include heating, ventilation, and air conditioning (HVAC) equipment that heats and cools large volumes of air. This equipment would include a number of sound sources, including compressors, condenser fans, supply fans, return fans, and exhaust fans that could generate a sound pressure level of up to 81.9 dBA at one foot.

Noise levels from operating this MEP equipment on nearby sensitive receptors would be negligible for several reasons. First, there would be no line of sight from the MEP area to sensitive receptors. Because the residences near the Project Site are one to two stories in height, there would be no sound path from the HVAC equipment to residences that would be over 100 feet lower. Second, the presence of the proposed building's edge would create an effective noise barrier that would further reduce noise levels from equipment by 8 dBA or more. A 12-foot and 6-inch barrier around the MEP area would further shield sensitive receptors near the Project Site.

As illustrated in Table XIII-13, noise from outdoor MEP equipment would negligibly elevate noise levels. Compliance with Section 5-39 of the City's Municipal Code would ensure the operation of any machinery would not elevate noise levels at any off-site locations by 5 dBA. Any booster (supply and exhaust) fans that ventilate the subterranean garage would be located on the above-ground garage levels. Otherwise, all equipment (e.g., electrical room, transformer, elevator equipment (including hydraulic pump, switches, controllers), house pool and spa equipment and pumps, utility fan rooms, other operational equipment) would be fully enclosed within the structure, shielded from outside sources, and would therefore produce minimal noise impacts for off-site sensitive receptors. This includes MEP vaults in the basement garage, ground level, and the aforementioned 12th floor.

Table XIII-13
Composite Operational Noise Levels

Receptor	Existing Ambient Noise Levels (dBA CNEL)	Calculated Project-Related Noise Sources (dBA CNEL)				Project Composite Noise Levels (dBA CNEL)	Ambient + Project Noise Levels (dBA CNEL)	Significance Criterion (dBA CNEL)	Significant Impact?
		Traffic	Mechanical Equipment	Loading and Trash Compactor	Outdoor Spaces				
1. Sea Breeze Inn	63.0*	59.8	24.4	0	30.7	59.8	64.7	68.0	No
2. Residences – Myrtle Ave.	56.2	37.9	23.9	0	31.3	38.9	60.3	61.2	No
3. Residences – Century Blvd.	63.8	59.3	29.6	0	34.3	59.3	64.7	68.8	No
4. Motels – Century Blvd.	63.0*	59.8	13.5	0	31.3	59.8	64.7	68.0	No
5. Residences – Freeman Ave. (10000 block)	63.0	56.6	33.6	0	27.8	56.6	63.9	68.0	No
6. Residences – Freeman Ave. (10100 block)	63.0	53.3	33.0	14.6	25.6	53.3	63.4	68.0	No
7. Residences – 101st St.	54.8	57.6	13.5	28.2	31.3	57.6	59.4	59.8	No

** Reflects Section 5-27 of the Municipal Code base ambient noise level for commercial zones.*

Source: DKA Planning, 2024.

Outdoor Uses

While most operations would be conducted inside the proposed building, outdoor activities would also generate noise. This would include human conversation, trash collection, landscape maintenance, and commercial loading. These are discussed below.

- Human conversation. Noise could include passive activities such as human conversation and socializing in outdoor spaces. This includes the following:

    - Street-level café tables along the Century Boulevard frontage.

    - Interior courtyard off 101st Street would be available for passive recreation. Any noise would be open to 101st Street but shielded from off-site sensitive receptors to the north, west, and east.

    - Private decks for some condominiums. These outdoor spaces would be recessed from the edge of the building to shield any noise on three sides. Private endless pools and/or Jacuzzis would be located on some decks.

    - Roof-top swimming pool and patio. While no amplified music is anticipated at this facility, this analysis assumes daily operation from 8:00 A.M. to 10:00 P.M.

    All these areas would be used for passive socializing and recreation. There would be intermittent activities that would produce negligible noise levels from human speech, based on the Lombard effect. This phenomenon recognizes that voice noise levels in face-to-face conversations generally increase proportionally to background ambient noise levels, but only up to approximately 67 dBA at a reference distance of one meter. Specifically, vocal intensity increases about 0.38 dB for every 1.0 dB increase in noise levels above 55 dB, meaning people talk slightly above ambient noise levels in order to communicate. Any conversations on the private patios would be intermittent and would not elevate noise levels at the adjacent residences over a 24-hour period by 5 dBA CNEL or more.

- Trash collection. On-site trash and recyclable materials for residents, the hotel, and commercial uses would be managed from the dock area on the first floor of the parking garage. Haul trucks would access solid waste from 101st Street at least once weekly, where refuse trucks would use trash compactors and hydraulics that generate noise. These noise levels would reach approximately 71 dBA L_{eq} and 66 dBA L_{eq} for collection trucks and trash compactors, respectively, at 50 feet of distance and be similar in impact to existing trash and recycling service for the existing hotel.[61] As summarized in Table XIII-11, these intermittent trash collection activities would not substantially elevate 24-hour noise levels at off-site locations by 5 dBA CNEL or more.

61 *RK Engineering Group, Inc. Wal-Mart/Sam's Club reference noise level, 2003.*

- Landscape maintenance. Noise from gas-powered leaf flowers, lawnmowers, and other landscape equipment can generate substantial bursts of noise during regular maintenance. For example, gas-powered leaf blowers and other equipment with two-stroke engines can generate 100 dBA L_{eq} and cause nuisance or potential noise impacts for nearby receptors. Any intermittent use of landscape equipment would operate during the day and would represent a negligible impact that would not increase 24-hour noise levels at off-site locations by 5 dBA CNEL or more.

- Commercial loading. On-site loading and unloading activities would be managed at the entrance to the dock area on the first floor of the parking garage, which would be accessible from 101st Street. Light- and medium-duty vehicles and trucks would perform their activities within the enclosed dock area, largely shielded from off-site receptors; as a result, there would be negligible noise impacts on off-site receptors and impacts would not increase CNEL noise levels at off-site locations (refer to Table XIII-13). In addition, compliance with of the City's Municipal Code would help ensure that any noise level does not exceed base ambient noise levels for commercial uses for more than 30 minutes in any hour.

Auto-Related Activities

The majority of vehicle-related noise at the Project Site would come from vehicles entering and exiting the development. During the P.M. peak hour, up to 378 vehicles would generate noise in and out of the Project Site. Access would be located at the front entrance on Freeman Avenue, which would access the underground parking garage. Secondary access would be available off 101st Street, where vehicles could access the underground garage or the above-ground parking levels. As shown in Table XIII-13, the contribution of traffic to and from the Project Site would have a minimal impact on noise levels at local receptors.

Parking garage noise would include tire friction as vehicles navigate to and from parking spaces, doors slamming, car alarms, and minor engine acceleration. Most of these sources are instantaneous (e.g., car alarm chirp, door slam) while others may last a few seconds. Regardless, the Project's parking garage activities would be within the enclosed garage structure. As existing parking activities are done in an open-air surface parking lot, the Project could reduce parking-related noise.

As summarized in Table XIII-13, the combined noise impact of all these operational sources on sensitive receptors near the Project Site would not elevate current ambient noise levels by 5 dBA CNEL or more. As a result, the impact of the Project's on-site operational noise sources would be less than significant.

Off-Site Operational Noise

During the P.M. peak hour, approximately 378 vehicles would travel to and from the Project Site. This would represent about 12.6 percent of traffic volumes on Century Boulevard, which carries about 3,000 vehicles between Freeman Avenue and Myrtle Avenue in the peak hour of traffic. Because it takes a doubling of traffic volumes (i.e., 100 percent) to increase ambient noise levels

by 3 dBA L_{eq}, the Project's traffic would neither increase ambient noise levels at nearby sensitive receptors by 3 dBA or more into "normally unacceptable" or "clearly unacceptable" noise/land use compatibility categories, nor increase ambient noise levels 5 dBA or more. Therefore, the Project's offsite operational noise impacts would be less than significant.

b) Would the project result in generation of excessive groundborne vibration or groundborne noise levels?

Less Than Significant Impact. As discussed below, the Project would not result in generation of excessive groundborne vibration or groundborne noise levels, and impacts would be less than significant.

Threshold of Significance

There are no adopted City standards or other applicable regulations that would govern the Project's vibration impacts. The FTA's criteria in its 2018 Transit Noise and Vibration Impact Assessment manual have been used where applicable and relevant to assist in assessing groundborne vibration levels.

Project Impacts

Construction

Construction equipment can produce groundborne vibration based on equipment and methods employed. While this spreads through the ground and diminishes in strength with distance, buildings on nearby soil can be affected. This ranges from no perceptible effects at the lowest levels, low rumbling sounds and perceptible vibration at moderate levels, and slight damage at the highest levels. Table XIII-14 summarizes vibratory levels for common construction equipment.

Groundborne vibration would be generated by construction activities at the Project Site. As a result of equipment that could include on-site bulldozer operations or the vibrational equivalent, vibration velocities of up to 0.171 inches per second PPV are projected to occur at the Crestridge Inn and Super 8 Motel, the nearest structures. This impact is below the 0.20 inches per second PPV threshold from FTA that is considered potentially harmful to Class III buildings. And as shown in Table XIII-14, a more distant building would experience even lower levels of groundborne vibration. Other potential construction activities would produce less vibration and have lesser potential impacts on nearby sensitive receptors. As a result, construction-related structural vibration impacts would be considered less than significant.

Table XIII-14
Vibration Source Levels for Construction Equipment

Equipment	Approximate PPV at 25 feet (in/sec)
Pile Driver (impact)	0.644
Pile Drive (sonic)	0.170
Clam shovel drop (slurry wall)	0.202
Hydromill (slurry wall)	0.008
Vibratory Roller	0.210
Hoe Ram	0.089
Large Bulldozer	0.089
Caisson Drilling	0.089
Loaded Truck	0.076
Jackhammer	0.035
Small Bulldozer	0.003
Source: Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, 2018.	

As shown in Table XIII-15, the Project's estimated construction vibration impacts at the nearest off-site structures would not exceed FTA thresholds for potential damage. As a result, construction activities would not compromise the structures near the Project Site. Therefore, the Project's vibration impacts as generated by on-site construction activities would be considered less than significant.

Table XIII-15
Building Damage Vibration Levels – On-Site Sources

Off-Site Receptor Location	Distance to Project Site (feet)[a]	Vibration Velocity Levels at Off-Site Sensitive Receptors from Construction Equipment (in/sec PPV)					Significance Criteria (PPV)	Potentially Significant Impact?
		Large Bulldozer	Caisson Drilling	Loaded Trucks	Jack-hammer	Small Bulldozer		
FTA Reference Vibration Level (25 Feet)	N/A	0.089	0.089	0.076	0.035	0.003	--	--
Crestridge Inn	15	0.148	0.148	0.127	0.058	0.005	0.20[b]	No
Super 8 Motel	13	0.171	0.171	0.146	0.067	0.006	0.20[b]	No
Residences, 101st St.	60	0.037	0.037	0.032	0.015	0.001	0.20[b]	No
Residences, Freeman Ave	60	0.037	0.037	0.032	0.015	0.001	0.20[b]	No

[a] *Includes a ten-foot setback for equipment maneuverability.*
[b] *FTA criterion for Category III (non-engineered timber and masonry buildings).*

Source: DKA Planning, 2022.

Operation

During operation of the mixed-use housing, hotel, and entertainment facility, there would be no significant stationary sources of groundborne vibration, such as heavy equipment or industrial operations. Operational groundborne vibration in the Project Site's vicinity would be generated by its related vehicle travel on local roadways. However, road vehicles rarely create vibration levels perceptible to humans. As a result, the Project's long-term vibration impacts would be less than significant.

c) 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?

Less Than Significant Impact. The Project Site is located approximately 1.75 miles east of Aviation Boulevard, which serves as the eastern boundary for the majority of LAX activities. The 1991 ALUP, as revised in December 2004, defined a planning boundary for LAX by identifying a CNEL noise contours which identify the level of compatibility for land uses within the planning area boundaries. Residential uses are identified as non-compatible for parcels exposed to 65 dBA CNEL or higher. Commercial land uses are identified as compatible 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.

The Project Site is not within the Runway Protection Zone of the 1991 ALUP, as revised in December 2004. This is confirmed in the 2015 LAX Noise Exposure Map Report Update (Figure 3), which shows only the southeasternmost portion of the Project Site as located just inside the 65 dBA CNEL noise contour.[62] As noted earlier, the Project Site is not regulated by the LAX Plan or the LAX Specific Plan.

As a result, the Project would not be subject to land-use restrictions or noise insulation requirements for residential and other uses to reduce noise exposure. The Project would not expose people residing or working in the project area to excessive noise levels. Therefore, no impacts related to this issue would occur as a result of the Project.

Cumulative Impacts

There are two related projects located in proximity to the Project Site, including Related Project #4 located at 4049-4055 Century Boulevard (750 feet east of the Project Site) and Related Project #3 located at 616-620 East 99th Street (800 feet east of the Project Site). As demonstrated by the analysis below, cumulative noise impacts would be less than significant.

62 *The figure is included in Appendix H.*

Table XIII-16
Cumulative Construction Noise Levels at Off-Site Sensitive Receptors

Receptor	Maximum Construction Noise Level (dBA L_{eq})	Existing Ambient Noise Levels (dBA L_{eq})	New Ambient Noise Levels (dBA L_{eq})	Increase (dBA L_{eq})[1]	Potentially Significant ?
1. Sea Breeze Inn	49.1	65.0[2]	65.1	0.1	No
2. Residences – Myrtle Ave.	46.6	62.3	62.4	0.1	No
3. Residences – Century Blvd.	58.0	65.8	66.5	0.7	No
4. Motels – Century Blvd.	53.3	65.0*	65.3	0.3	No
5. Residences – Freeman Ave. (10000 block)	63.0	65.0	67.1	2.1	No
6. Residences – Freeman Ave. (10100 block)	58.9	65.0	66.0	1.0	No
7. Residences – 101st St.	60.0	56.8	61.7	4.9	No

[1] *Assumes implantation of Mitigation Measure NOISE-1 identified previously.*
[2] *Reflects Section 5-27 of the Municipal Code base ambient noise level for commercial zones.*
Source: DKA Planning, 2024.

XIV. POPULATION AND HOUSING

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Induce substantial unplanned population 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)?	☐	☐	☒	☐
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

a) Would the project induce substantial unplanned population 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)?

Less Than Significant Impact. The Project includes demolition and removal of a hotel from the Project Site and development of the site with a 333,500-square-foot mixed-use building, which would include residential, hotel, and event space uses.

The Project Site is located within SCAG's jurisdiction. SCAG's mandated responsibilities include development plans and policies with respect to the region's population growth, transportation programs, air quality, housing, and economic development. The 2020-2045 RTP/SCS includes the following growth forecast for population, households, and employment for the City:[63]

- Population: 114,300 persons in 2016 and 137,100 in 2045
- Households: 37,500 households in 2016 and 47,700 in 2045
- Employment: 33,800 jobs in 2016 and 45,900 in 2045

Table XIV-1 lists SCAG's forecasts for population, housing, and employment for the City, as well as the number and percent change.[64]

[63] *SCAG, 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy, Demographics and Growth Forecast, Table 14, https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal_demographics-and-growth-forecast.pdf?1606001579.*

[64] *Employment information is provided for informational purposes only.*

Table XIV-1
Population, Housing, and Employment
Forecasts for the City
Based on the 2020-2045 RTP/SCS

Year	Population	Households	Employment[1]
2022[2]	119,017	39,610	36,303
2025[3]	121,376	40,666	37,555
2045	137,100	47,700	45,900
Change 2022 to 2025[3]			
Number Changed	2,359	1,055	1,252
Percent Changed	1.98%	2.66%	3.44%
Change 2025 to 2045			
Number Changed	15,724	7,034	8,345
Percent Changed	12.95%	17.29%	22.22%

[1] *Employment information is provided for information purposes only.*
[2] *Population, housing and employment rate data for 2022 (baseline year) and 2025 (anticipated buildout year of the Project) was calculated based on a linear interpolation of growth projections in SCAG's 2020-2045 RTP/SCS.*
[3] *Represents a comparison of baseline year to Project buildout year.*

Project Impacts

Construction

The construction activities associated with the Project would create temporary construction-related jobs. Nevertheless, the work requirements of most construction activities are highly specialized, so that construction workers remain at a job site only for the time in which their specific skills are needed to complete a particular phase of the construction process. Thus, construction workers would not be anticipated to relocate their residence to the Project area and would not induce substantial population growth and/or require permanent housing. Therefore, the Project's population growth impacts associated with construction activities would be less than significant.

Operation

Indirect Growth

The Project includes infill development of a site that is located in an urbanized area. The Project would be served by existing infrastructure and would not require or include the development of any new utility or roadway infrastructure beyond what is required to accommodate the Project

only. Thus, the Project would not indirectly induce substantial population growth, and no impacts related to indirect population growth would occur as a result of the Project.

Direct Growth

The Project Site is currently developed with a 137-room hotel and associated surface parking. The Project includes demolition and removal of all existing uses from the Project Site and development of the site with a 333,500-square-foot mixed-use building, which would include 11 condominium units, 118 serviced apartment units, 175 hotel rooms, and 54,700-square-foot event space (including restaurant, bar, and retail space).

As shown on Table XIV-2, the Project's residential population would represent approximately 16.23 percent of the forecasted growth between 2022 and 2025 and approximately 2.43 percent of the forecasted growth between 2025 and 2045. Additionally, the Project's housing units would represent approximately 12.22 percent of the forecasted growth between 2022 and 2025 and approximately 1.83 percent of the forecasted growth between 2025 and 2045. Thus, the Project's population and housing growth would fall within the forecasted growth for the City. Thus, the Project would not represent substantial or significant unplanned growth as compared to projected growth for the City. Therefore, Project impacts related to population and housing growth would be less than significant.

Table XIV-2
Project Estimated Comparison for the City
Based on the 2020-2045 RTP/SCS

Project	Comparison Amount[1]	% of Comparison
As compared to Growth Forecast from 2022 to 2025		
383 residents[2]	2,359	16.23%
129 units	1,055	12.22%
380 jobs[3]	1,252	30.35%
As compared to Growth Forecast from 2025 to 2045		
383 residents	15,724	2.43%
129 units	7,034	1.83%
380 jobs[3]	8,345	4.55%

[1] *Refer to Table XIV-1.*
[2] *Assumes 2.97 persons per household. Source: US Census.*
[3] *Refer to the Transportation Impact Analysis, LLG Engineers, June 14, 2024 in Appendix I. City of Inglewood VMT Methodology assumes 12 employees per 10 hotel guestrooms and 4 employees per 1,000 square feet of event and entertainment floor area.*

b) Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

No Impact. No housing is located on the Project Site. As such, the Project would not displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere, and no impacts related to this issue would occur. No mitigation measures are required.

Cumulative Impacts

There are 6 related projects in the City that are within 0.5 miles of the Project Site (refer to Table 1 in Section 1 [Introduction]). The related projects could result in a net increase in the number of housing units and associated population and the amount of employment in the Project Site area and could contribute to growth in the City. However, as discussed previously, the Project would not result in unplanned growth. Thus, the Project would not have the potential to contribute to any cumulative impacts related to unplanned growth. Therefore, cumulative impacts related to unplanned growth would be less than significant.

XV. PUBLIC SERVICES

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:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Fire protection?	☐	☐	☒	☐
b. Police protection?	☐	☐	☒	☐
c. Schools?	☐	☐	☒	☐
d. Parks?	☐	☐	☒	☐
e. Other public facilities?	☐	☐	☒	☐

a) Fire protection?

Less Than Significant Impact. The Project includes demolition and removal of a 137-room hotel from the Project Site and development of the site with a 333,500-square-foot mixed-use building, including residential, hotel, and event space uses, which could result in an increased demand for fire protection services.

The Los Angeles County Fire Department (LACFD) provides fire protection and paramedic services to residents and businesses within the City, including to the existing developed uses on the Project Site. Los Angeles County Fire Station No. 18, located at 4518 Lennox Boulevard approximately 0.5 miles southwest of the Project Site, is the closest fire station to the Project Site. The proximity of the Project Site to this fire station would allow for a relatively quick response time. In addition, the Project would be constructed in compliance with the requirements of the City's Fire Code (Chapter 6 of the City's Municipal Code), which requires that there is adequate fire flow serving the site, fire prevention and suppression measures, fire access, and a sufficient number of hydrants.

The Project Applicant would be required to submit Project plans to LACFD and incorporate LACFD fire protection and suppression features that are appropriate for the Project. Compliance with the City's Fire Code and the inclusion of the LACFD fire prevention measures would ensure that the Project would not require the LACFD to expand existing facilities or construct new facilities. Therefore, impacts related to fire protection services would be less than significant.

Cumulative Impacts

There are 6 related projects in the City that are within 0.5 miles of the Project Site (refer totable 1 in Section 1 [Introduction]). Implementation of the related projects could result in a net increase in the number of residents and employees in the Project Site area and could further increase the demand for fire protection services. Cumulative development requires the LACFD to continually evaluate the need for new or physically altered facilities in order to maintain adequate service ratios. Similar to the Project, the related projects would be subject to the City's Fire Code through the process of compliance, the ability of the LACFD to provide adequate facilities to accommodate future growth and maintain acceptable levels of service would be ensured. Furthermore, the increased demands for additional LACFD staffing, equipment, and facilities would be funded via existing mechanisms (e.g., property taxes and government funding) to which the Project and related projects would contribute. Therefore, the cumulative impact to fire protection would be less than significant.

b) Police protection?

Less Than Significant Impact. The Inglewood Police Department (IPD) provides police protection services to residents and businesses within the City, including to the existing developed uses on the Project Site. IPD headquarters is located at One West Manchester Boulevard approximately 2.3 miles north of the Project Site.

The Project includes demolition and removal of a 137-room hotel from the Project Site and development of the site with a 333,500-square-foot mixed-use building, including residential, hotel, and event space uses, which could result in an increased demand for police protection services. Given the net increased intensity of use of the Project Site that would occur as a result of the Project, it is possible that the Project could result in an increased need for police protection services at the site. However, the Project would include security features, such as secured parking facilities, entrances/exists, on-site security personnel, and surveillance cameras. Additionally, the Project would be required to submit Project plans to the IPD Crime Prevention unit for review and would be required to incorporate any additional security features identified by the IPD. The Project would not result in the need for IPD to expand existing facilities or develop new facilities. Therefore, Project impacts related to police protection services would be less than significant.

Cumulative Impacts

There are 6 related projects in the City that are within 0.5 miles of the Project Site (refer to Table 1 in Section 1 [Introduction]). Implementation of the related projects could result in a net increase in the number of residents and employees in the Project Site area and could further increase the demand for police protection services. Related projects would be reviewed by City Police Department staff prior to development permit approval to ensure adequate security measures are provided for each site-specific cumulative development project in the City. Because the City is currently urbanized and future site-specific projects would consist of infill development and would not require physical expansion of the geography served by IPD, it is anticipated that future development could result in the need for additional sworn officers and equipment but not for a

new or expanded station. Therefore, the cumulative impact on police protection services would be less than significant.

c) Schools?

Less Than Significant Impact. The Project includes demolition and removal of a 137-room hotel from the Project Site and development of the site with a 333,500-square-foot mixed-use building, including residential, and event space uses, which could result in a demand for school services. However, pursuant to Section 65995 of the Government Code, the applicant would be required to pay developer school impact fees to Inglewood Unified School District (IUSD). Pursuant to Section 65995(3)(h) of the California Government Code (Senate Bill 50, chaptered August 27, 1998), the payment of statutory fees "...is deemed to be full and complete mitigation of the impacts of any legislative or adjudicative act, or both, involving, but not limited to, the planning, use, or development of real property, or any change in governmental organization or reorganization." Therefore, Project impacts on school services would be less than significant.

Cumulative Impacts

There are 6 related projects in the City that are within 0.5 miles of the Project Site (refer to Table 1 in Section 1 [Introduction]). The related projects could result in an increase in the number of families with school-age children in the Project Site area. However, similar to the applicant of the Project, the applicants of all the related projects would be required to pay the state-mandated applicable school fees to the IUSD to ensure that no significant impacts on school services would occur. Therefore, cumulative impacts on school services would be less than significant.

d) Parks?

Less Than Significant Impact. Parks and recreational amenities in the City include the following:

- Siminski Park
- Darby Park (playground, picnic and sports areas)
- Ashwood Park (tennis, volleyball, and basketball courts, wading pool, and workout area)
- Grevillea Art Park
- Center Park
- Queen Park Learning Garden
- Rogers Park (playground, recreation building, wading pool, and various sporting fields)
- Edward Vincent Jr. Park (multiple playgrounds, athletic facilities, picnic areas, pool)
- North Park

The Project includes demolition and removal of a 137-room hotel from the Project Site and development of the site with a 333,500-square-foot mixed-use building, including residential, hotel, and event space uses. The residential portion of the Project (129 units or 383 new residents) could result in a demand for parks and recreational facilities. However, the Project would incorporate on-site open space and recreational amenities, including courtyards, sky decks, and swimming and exercise facilities, for Project occupants and guests. Additionally, per Section 12-105.9 of the City's Municipal Code, the Project would be required to pay a development impact

fee to offset demand for and impacts on parks and recreational facilities as a result of the Project. Thus, the Project would not 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 or other performance objectives for parks and recreational facilities. Therefore, Project impacts on parks and recreational facilities would be less than significant.

Cumulative Impacts

There are 6 related projects in the City that are within 0.5 miles of the Project Site (refer to Table 1 in Section 1 [Introduction]). The related projects could result in an increase demand for parks and recreational facilities. Similar to the Project, the applicants of the residential related projects would be required to comply with the City's open space requirements and to pay fees in accordance with Section 12-105.9 of the City's Municipal Code to offset demand for and impacts on parks and recreational facilities. Therefore, cumulative impacts on parks and recreational facilities would be less than significant.

e) Other public facilities?

Library Services

Less Than Significant Impact. The Inglewood Public Library, the Lennox Library, and the Crenshaw Imperial Branch Library are located within a 2.0-mile radius of the Project Site. The Project includes demolition and removal of a 137-room hotel from the Project Site and development of the site with a 333,500-square-foot mixed-use building, including residential, hotel, and event space uses. The residential portion of the Project (129 units or 383 new residents) could result in a demand for library services. The Inglewood Public Library System is financed by the City's General Fund, the majority of whose revenues come from property taxes, utility user taxes, sales and use taxes, and motor vehicle in-lieu taxes. The Project would contribute to the financing of library services through property taxes and utility user taxes, which would offset the Project's demand for library services. Thus, the Project would not 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 or other performance objectives for library services. Therefore, Project impacts on library services would be less than significant.

Cumulative Impacts

There are 6 related projects in the City that are within 0.5 miles of the Project Site (refer to Table 1 in Section 1 [Introduction]). Implementation of the related projects in concert with the Project could increase the demand for library services in the Project Site area. As with the Project, the related projects would contribute to the financing of library services through property taxes and utility user taxes, which would offset cumulative demand for library services. Therefore, cumulative impacts on library services would be less than significant.

XVI. RECREATION

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Would the project 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?	☐	☐	☒	☐
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☐	☒

a) Would the project 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?

Less Than Significant Impact. Refer to the response to Checklist Question XI(a)(iv) (Public Services – Parks). As discussed there, parks and recreational amenities in the City include the following:

- Siminski Park
- Darby Park (playground, picnic and sports areas)
- Ashwood Park (tennis, volleyball, and basketball courts, wading pool, and workout area)
- Grevillea Art Park
- Center Park
- Queen Park Learning Garden
- Rogers Park (playground, recreation building, wading pool, and various sporting fields)
- Edward Vincent Jr. Park (multiple playgrounds, athletic facilities, picnic areas, pool)
- North Park

The Project includes demolition and removal of a 137-room hotel from the Project Site and development of the site with a 333,500-square-foot mixed-use building, including residential, hotel, and event space uses. The residential portion of the Project (129 units or 383 new residents) could result in a demand for parks. However, the Project would incorporate on-site open space and recreational amenities, including courtyards, sky decks, and swimming and exercise facilities, for Project occupants and guests. Additionally, per Section 12-105.9 of the City's Municipal Code, the Project would be required to pay a development impact fee to offset demand for and impacts on parks and recreational facilities as a result of the Project. Thus, the Project would not 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. Therefore, Project impacts on parks and recreational facilities would be less than significant.

b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

No Impact. The Project does not include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment. No impacts related to this issue would occur as a result of the Project.

Cumulative Impacts

Refer to the response to Checklist Question XI(a)(iv) (Public Services – Parks).

XVII. TRANSPORTATION

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☒	☐
b. Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	☐	☒	☐	☐
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
d. Result in inadequate emergency access?	☐	☐	☒	☐

The information and analysis presented below is based primarily on the following source (refer to Appendix I):

- *Transportation Impact Analysis, Linscott Law & Greenspan Engineers, August 16, 2024.*

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

Less Than Significant Impact. The methodology for determining a project's transportation impact associated with conflicts with plans, programs, ordinances, or policies is described in the Transportation Impact Analysis (TIA) Guidelines as follows:

> *A project that generally conforms with and does not obstruct the City's development policies and standards will generally be considered to be consistent. The Project Applicant should review the documents and ordinances identified in the TIA Guidelines (refer to Table 3.1-1 thereof) for City plans, policies, programs, ordinances, and standards relevant to determining project consistency.*

The City has prepared and adopted many plans, programs, ordinances, or policies that establish the framework for transportation planning involving all travel modes. These policies have overall goals to provide a safe, accessible, and sustainable transportation infrastructure for all users.

Generally, the City's transportation policies or standards that protect the environment are outlined to support multi-modal transportation options resulting in a reduction of VMT. A project would not specifically be shown to result in an impact by virtue of not implementing a plan, program, ordinance, or policy as a whole, since many of these are implemented by the City over time, and over a broader area, but the intention of this threshold is to ensure that proposed development projects and plans do not preclude the City from implementing these plans, programs, ordinances,

or programs. The project should coordinate with the City to ensure compliance with the City's current list of plans, programs, ordinances, or policies.

As confirmed in Table XVII-1, the Project would not conflict with the relevant City plans, programs, ordinances, or policies and does not include any features that would preclude the City from completing and complying with these guiding documents and policy objectives. The Project would not conflict with any plans or policies that govern the public right-of-way, such as Circulation Element of the City's General Plan. As discussed in Section VIII (Greenhouse Gas Emissions), the Project has been found to be consistent with the GHG emissions reduction strategies in 2020-2045 RTP/SCS. Furthermore, the Project Applicant would comply with existing applicable City ordinances and other requirements pursuant to the City's Municipal Code. Thus, the Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadways, bicycle, and pedestrian facilities. Therefore, Project impacts related to this issue would be less than significant.

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Plans, Program, Ordinance, or Policy	Consistency Discussion
General Plan Circulation Element (1992)	
The Circulation Element of the City of Inglewood General Plan identifies the system of freeways, major and minor arterials, and collector streets needed to carry traffic within and through the City. The primary purpose of the Circulation Element, as stated within, is to require that the provision of adequate street access and traffic capacity is considered for current and future land use needs. The Circulation Element also describes transit services within the City and designates truck routes and bicycle routes throughout the City. The I-405 Freeway is a north-south freeway that runs through the western portion of the City, and the I-105 Freeway is an east-west freeway that runs along the southernmost portion of the City. The Circulation Element defines the following classifications of streets: • Major Arterials. Major arterials are the most important surface streets, functioning as primary intercity routes and collecting and distributing a large portion of local traffic. Major arterials are typically designed to carry over 30,000 vehicles per day with a minimum of two travel lanes in each direction and a separate median lane to accommodate left-turn movement. • Minor Arterials. Minor arterials, also referred to as secondary arterials, are similar to major arterials except that they may be discontinuous within the City and may carry less traffic volume. Minor	**Consistent**: Based on review of the Circulation Element, the street classifications for roadways within the immediate vicinity of the Project (i.e., Century Boulevard, Freeman Avenue, 101st Street, etc.) would not change due to the Project. Furthermore, street widenings are not required or recommended as a result of the Project. In addition, the Circulation Element designates truck routes and bicycle routes within the City. Century Boulevard is designated as a truck route, and the Project would not disrupt the flow of trucks along the Century Boulevard corridor. While Century Boulevard, Freeman Avenue, and 101st Street have not been identified as potential bicycle routes within the City, the Project would not preclude the City from installing bicycle infrastructure along these roadways in the future. Therefore, the Project would not conflict with the Circulation Element.

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Plans, Program, Ordinance, or Policy	Consistency Discussion
arterials are typically designed to carry 15,000 to 30,000 vehicles per day with a minimum of two travel lanes in each direction. A separate median lane to accommodate left-turn movement is desirable if there is sufficient roadway width. • Collectors. Collectors are transitional streets between arterials and local streets, collecting vehicles from the local street system and transporting them to the arterial system. Collectors may also provide cross-city access. Collectors may be designed to carry up to 15,000 vehicles per day, although 3,000 to 10,000 vehicles is more typical. Collectors will have at least one travel lane in each direction, although two travel lanes may be utilized depending upon volume and function.	
General Plan Land Use Element (2020)	
The Project is currently designated for Commercial Land Uses, but the Project includes a request to designate the site for the Commercial Residential land use designation. This designation is intended to allow for the development of mixed commercial and residential uses pursuant to the City's Planned Assembly Development (PAD) procedures	**Consistent.** The Project includes the development of a mixed-use building, which would include residential, hotel, and event/entertainment uses. The ground floor of the building would contain the hotel lobby, event space, and parking, with all residential units on floors 7 through 12. The residential and non-residential portions of the Project would be integrated through design, lighting, and wayfinding signage, but would be separated by floors. The proposed building would be oriented toward Century Boulevard, Freeman Avenue, and 101st Street, providing the primary pedestrian access on Century Boulevard and the primary vehicular access on 101st Street. As part of the Project's land use entitlement requests, a PAD approval and corresponding Special Use Permit approval would be requested, which would establish Project-specific use and development standards intended to ensure the development of the Project as a high-quality integrated mixed use development. The Project's consistency with primary purpose of the Commercial Residential land use designation therefore supports the alignment of the Project with the aspects of the Land Use Element that relate to

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	the circulation system, including transit, roadways, bicycle and pedestrian facilities.
Envision Inglewood - 2019 City of Inglewood Mobility Plan (2019)	
The Envision Inglewood - 2019 City of Inglewood Mobility Plan ("Mobility Plan") is designed to provide the framework for addressing current and future infrastructure needs in a responsible, sustainable manner. It also provides the tools necessary to help the City assess future transportation infrastructure demands as it evaluates proposed development projects and the potential for public-private partnerships, considering all implementation tools. The Mobility Plan establishes the vision, goals, policies, infrastructure enhancements and program requirements, including transportation and traffic control measures and strategies necessary to improve and augment the City's local transportation network and access to the regional transportation system so as to minimize neighborhood intrusion caused by increased traffic resulting from entertainment and sporting events. The Mobility Plan features seven goals that are equal in weight and define the City's high-level mobility priorities. Each of the goals contain strategies that are specific, measurable, and outline how the goals are met. For each goal, several objectives or strategies were established to guide the City as it implements its Mobility Plan. Goal 1: Sustainability and Environmental Considerations Goal 2: Neighborhood Protection and Preservation Goal 3: Create an Efficient, Balanced, Multimodal Mobility Network Goal 4: Congestion Reduction and Transportation Management System Goal 5: Safety Goal 6: Accessibility Goal 7: Reliability	**Consistent:** The Mobility Plan draws upon the 1992 Circulation Element, as well as state laws like SB 743 that seek to promote alternative forms of mobility and circulation to support the goal of reducing greenhouse gas emissions. The Project implements many goals and strategies of the Mobility Plan and does not conflict with the Mobility Plan. These features of the Project include: • Providing EV charging stations and infrastructure • Providing bicycle parking facilities • Providing new residential and commercial uses near public transit • Consolidating the overall number of curb cuts/driveways • Making new ADA-compliant pedestrian improvements and ensuring pedestrian safety through improvement of the sidewalk and right of way • Enhancing on-site lighting to provide safer pedestrian pathways The Project is consistent with the goals and strategies of the Mobility Plan relative to the circulation system, including transit, roadways, bicycle and pedestrian facilities.

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To achieve these goals, the City continues to embrace previous mobility concepts, including several from the 1992 City of Inglewood General Plan Circulation Element, but also seeks to broaden its overall approach and priorities to advance mobility, innovation and climate action.	
General Design Guidelines (1979)	
The General Design Guidelines provide guidelines for the improvement and development of property in the City of Inglewood, which are intended to supplement the standards in the Zoning Ordinance. The guidelines below are relevant to circulation: <u>Parking Guidelines</u> 1. Outdoor parking lots may be a cheaper method of providing required parking spaces; however, they consume valuable site area and there must be landscaped to be visually attractive. Parking structures may be a greater initial expense but generally provide a more efficient use or the land. 2. Generally, the most economical parking patterns are achieved with spaces located on both sides of each aisle and with the spaces aligned at 90 degrees. Deviation from the 90-degree parking angle may add to the ease of entering and backing out of parking spaces, but the additional area required for the same number of parking spaces may restrict the use of parking patterns that are less than 90 degrees. 3. Entrances and exits to parking facilities should be limited in number and should be designed and located to minimize any interference with the flow of street traffic. 4. To reduce intrusion into residential neighborhoods, parking lots should take access from other than residential streets except when a lot is serving a residential use. 5. Barren parking lots are considered to be unsightly and distracting. Parking areas should be located and designed to minimize direct exposure to public view. These areas should be buffered with landscaping to reduce the visual	**Consistent:** Vehicle parking would be provided in one subterranean level and a five-story parking garage at the back of the proposed building. Entrances/exits to the parking would be limited to one access point on Freeman Avenue and two access points on 101st Street, none of which are on residential streets. All parking spaces would be constructed and located in accordance with the City's requirements and as set forth in the proposed PAD zone regulations.

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impact and may be located at the rear of buildings, or by taking advantage of natural topography or planned grading, created in areas which are above or below adjacent street and property grades. <u>Residential Standards</u> 1. Parking spaces shall be located on the same lot as the use and be within 200 feet of the entrance to the residence. They shall not be located in the required side yards and shall be farther than 40 feet from the front line except for two spaces which are permitted within 40 feet of the front line. 2. A minimum of two enclosed parking spaces shall be provided for each residential unit. The spaces required for one or two-unit developments shall be fully enclose and include garage doors. Carports do not satisfy the requirements for residential parking spaces. 3. All parking spaces located within a building shall have the following minimum inside dimensions. • Each space adjacent to another with no intervening obstructions (8 feet wide x 19 feet long) • Any single space separated by walls or other obstructions (9 feet and 6 inches wide x 19 feet long) 4. Garage door clearances shall be a minimum of 8 feet wide per space and 6 feet and 8 inches high. 5. Garage entrances facing the front street shall be 22 feet or more from the front lot line. 6. Garage entrances facing the side street of a corner lot shall not be located within the strip which is defined by drawing lines 10 feet and 22 feet from the exterior side lot line and parallel to it. 7. Required driveways for residential developments shall provide the unobstructed minimum widths of 10 feet for one to 9 living units, and 16 feet for 10 to 20 living units. Refer to the Municipal Code when residential driveways serve more than 20 living units. No driveway shall exceed 28 feet in width at the front or exterior side lot line.	

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8. Residential driveways shall be paved with not less than 3 1/2 inches of Portland cement concrete. 9. When access to any parking space requires a 90 degree or right angle turn, an unobstructed area with a depth of 25 feet shall be provided for maneuvering into the space. 10. When access to any parking space involves a reverse turn or "S" turn, an unobstructed area shall be provided for maneuvering into the space. The required minimum depth of unobstructed area is dependent upon the encroachment into the line of direct access to the parking space, and is shown in the following diagram and table [refer to page 20 in the Design and Development Standards and Guidelines]. 11. Residential parking facilities, including the driveway, for 3 or more living units shall be separated from any abutting residential property by a masonry wall not less than 5 feet high. All portions of this required wall which are adjacent to the required front yard of the residential property shall be 3 feet 6 inches high. (See Walls and Fences.) 12. All required parking spaces shall be maintained for parking purposes only. <u>Commercial and Industrial Standards</u> 1. Parking facilities shall be located within 300 feet of the use for which they are provided. 2. Every development shall provide the minimum number of standard size off-street parking spaces as specified by the Inglewood Municipal Code. The following is provided only to indicate that the required number of spaces varies with the use and gross floor area. • Theaters and recreational uses = 1 space/35 sf • Restaurants and grocery stores = 1 space/150 sf • Offices and general commercial = 1 space/300 sf • Manufacturing and general industrial = 1 space/500 sf • Warehouse = 1 space/1,500 sf	

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1. All parking spaces located outside of a building shall have the following minimum dimensions. • Spaces not alongside a wall or obstruction = 8 feet and 6 inches wide x 20 feet long • Spaces alongside a wall or obstruction = 9 feet and 6 inches wide x 20 feet long 2. All parking spaces located within a building shall have the following minimum inside dimensions. • Each space adjacent to another with no intervening obstruction = 8 feet wide x 19 feet long • Any single space separated by walls or other obstructions 9 feet and 6 inches x 19 feet long 3. Each parking lot shall provide a minimum of one parking space, 12 feet wide, specifically for the use of the handicapped. This space shall be in close proximity to the main entrance of the building and shall be clearly designated, "RESERVED FOR THE HANDICAPPED."	
<u>Loading Guidelines</u> 1. Entrances and exits to loading facilities should be limited in number and should be designed and located to minimize any interference with the flow of traffic along the street. 2. To reduce the intrusion into residential neighborhoods, loading areas should have access from other than residential streets. 3. Loading areas are considered to be unsightly and should be located and designed to minimize direct exposure to public view. These areas should be buffered with landscaping to reduce the visual impact. 4. The design of loading facilities must take into consideration the specific dimensions required for maneuvering the combinations of trucks and tractor-trailers into and out of loading position at docks or in stalls and driveways. The maneuvering space required is largely dependent on three factors: (1) overall length of the tractor-trailer unit; (2) the width-of the space	**Consistent**: The Project would include one loading entrance/exit, which would occur from 101st Street, and would be constructed in accordance with applicable standards.

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in which the vehicle must be placed; and (3) the turning radius of the tractor-truck which pulls the unit. Inasmuch as the tractor-trailer uses slightly more space to pull out than to back in, all reference to maneuvering space is based on the requirements for pulling out. <u>Standards</u> 1. Every commercial development shall provide a loading stall for service vehicles. Industrial developments shall be designed to provide loading stalls in accordance with the expected use of the property. 1. Loading areas shall be visibly separated from public entrances and parking areas. 2. Loading stalls shall be designed to not interfere with circulation or parking, and to permit trucks to fully maneuver on the property without backing from or onto a public street. 3. The minimum loading stall width shall be 12 feet. The recommended width of 15 feet is required for loading stalls alongside a wall or other obstruction. 4. For general commercial developments the minimum loading stall length shall be 20 feet. For other developments in which trucking is an activity the minimum stall length shall be 30 feet or equal to the length of the longest trucks and tractor-trailers expected at the facility, whichever is greater. 5. The depth of the loading apron shall be sufficient to permit trucks to maneuver into and out of the loading stalls. The minimum loading apron depth shall be 25 feet or equal to the length of the loading stall, whichever is greater. 6. Loading areas shall be graded to drain surface water to an alley, street or public storm drain. Surface water shall be conducted under any intervening public sidewalk by a drain approved by the Public Works Department. 7. The surface area used for any loading activity shall be paved with not less than 2 inches of asphaltic concrete on 4 inches of crushed rock base, or with 3 1/2 inches of Portland cement concrete. Soil conditions or the nature of the trucking activity may necessitate greater	

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requirements as determined by the Division of Building and Safety. 8. Each loading space aligned with and directly adjacent to a parking space shall be clearly designated "LOADING ONLY." 9. Poured concreate curbs shall be provided at the perimeter of the planter areas that abut paved vehicle areas. 10. A combination of masonry walls and landscaping shall be provided to buffer or screen loading areas from direct public view and from abutting residential properties. (See Landscaping.) 11. All artificial illumination shall be installed, directed, and shielded to confine all direct rays within the property. 12. All loading facility improvements, including the pavement, striping, curbs, and landscaping shall be continuously maintained, which includes repairs, repainting, replacement, and regular cleaning.	
<u>Pedestrian Guidelines</u> 1. Where grades become excessive, ramps or stairs must be used. It is best to have a set of stairs no higher than eye level so that a pedestrian may judge the distance to the top of the landing safely. 2. The width of walks or plazas in a pedestrian circulation system depends on capacity requirements, scale, and their relation to other elements. 3. A clearly defined and delineated access from the public sidewalk to the primary building entrance should be provided. 4. Special attention should be given to the provision of convenient access to the pedestrian circulation system for handicapped persons. This will require extra consideration in designing the placement of building entrances in relation to parking lots and/or public sidewalks. <u>Standards</u> 1. Width: Minimum acceptable sidewalk width is 4 feet without obstructions. In appropriate	**Consistent**: The Project would provide pedestrian circulation amenities in compliance with all City size and location standards, including those set forth in the Project's requested PAD approval. Additionally, the Project would be required to comply with Americans with Disabilities Act (ADA) requirements.

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locations, methods other than paved walkways may be utilized to delineate pedestrian ways. 2. Ramps: Grades in excess of 6.67% (1 vertical to 15 horizontal) shall be considered a ramp and shall meet building code requirements for ramps. The maximum acceptable ramp grade is 12.5% (1 vertical to 8 horizontal). 3. Handrails: Any ramp or set of steps shall be provided with handrails for pedestrian safety. 4. Handicapped Access: All new construction is required to have an entrance accessible to handicapped persons. To qualify as a handicapped entrance there must be access from a parking lot with designated handicapped spaces or access from a public sidewalk that meets the following: a. no steps or curbs b. no sidewalk grade greater than 5% c. no ramp grade greater than 8.33% (1 vertical to 12 horizontal) d. adequate platform space at the building entrance to provide a wheelchair while opening the door. (See Building Code.) 5. Handicapped Access – Public Right-of-Way: If a curb or sidewalk is reconstructed within a pedestrian crosswalk area, or is located before a site that is being developed, the developer shall construct a sidewalk access ramp (wheelchair ramp) for the handicapped as part of the improvements required by the Department of Public Works, unless directed otherwise by the Engineer.	
Hollywood Park Specific Plan (2015)	
The Hollywood Park Specific Plan project site is located on the northeast corner of Prairie Avenue and Century Boulevard. The streets that border the Specific Plan area include, Prairie Avenue on the west and Century Boulevard to the south. Access to the site can also be obtained from Pincay Drive to the north. Manchester Boulevard (State Route 42) and Crenshaw Boulevard are located a few blocks north and east, respectively. All of the roads, mentioned above, provide access to the nearby regional freeway network. The purpose of the Hollywood Park Specific Plan is to provide the land use framework	**Not Applicable / Consistent:** The Project is not located within the boundaries of the Hollywood Park Specific Plan area and it is located approximately 1,500 feet southwest corner of the Specific Plan area at Century Boulevard and Prairie Avenue. Nevertheless, the Project aligns with the transportation and circulation goals of the Hollywood Park Specific Plan by co-locating housing, commercial uses that generate jobs, and

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for the redevelopment of the 238-acre Hollywood Park site with a mix of parks, retail, housing, entertainment, gaming, hotel and civic uses. The transportation goals for the Specific Plan area are to: • Provide pedestrian connections from Hollywood Park to major transit corridors on Century Boulevard and Prairie Avenue. • Reduce reliance on the private automobile by enhancing opportunities for transit ridership, walking and biking. • 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.	other visitor serving amenities in close proximity to each other. The Project would provide adequate on-site parking and bicycle parking which would accommodate the demands of the Project and avoid conflict with the Hollywood Park redevelopment. The Project would provide pedestrian circulation amenities in compliance with all City size and location standards, which would complement the new amenities generated through implementation of the Specific Plan. The Project is consistent with the policies of the Hollywood Park Specific Plan that address circulation.
Active Transportation Plan (Imagine Inglewood) (2022)	
The City of Inglewood has developed an Active Transportation Plan and Safe Routes to School Plan (ATP/SRTS) that incorporates bicycling, walking, safe routes to school, and Americans with Disabilities Act (ADA) considerations. The ATP/SRTS establishes a vision for the City and will guide the community toward a future where active transportation is a viable option for all ages who live, work, and play within its borders. The Plan also allows access to increasing public transit connectivity to the rest of the Los Angeles region and it will create a network that will meet the needs for those who are transit dependent, those looking for alternatives, and recreational users. The purpose of this ATP/SRTS is to create a Complete Streets update to the City of Inglewood General Plan. This Plan is comprised of the following four main components: (1) Bicycle Facilities Plan, (2) Pedestrian Facilities Plan, (3) SRTS Plan, and an (4) ADA Transition Framework Plan.	**Consistent:** The Project is consistent with and does not conflict with the Active Transportation Plan and Safe Routes to School Plan (ATP/SRTS). The Project implements many goals and strategies that are included within the ATP/SRTS. These features of the Project include: • Providing bicycle parking facilities • Providing new residential and commercial uses near public transit • Consolidating the overall number of curb cuts/driveways • Making new ADA-compliant pedestrian improvements and ensuring pedestrian safety through improvement of the sidewalk and right of way • Enhancing on-site lighting to provide safer pedestrian pathways
City of Inglewood Municipal Code, Chapter 3: Motor Vehicles and Traffic	
City of Inglewood Municipal Code, Chapter 3: Motor Vehicles and Traffic includes standards related to traffic enforcement, parking, truck route regulations, parking meter regulations, bicycle regulations, seizure and forfeiture of vehicles, regulations for nuisance vehicles, and prohibitions of illegal motor vehicle speed contests.	**Not Applicable / Consistent**: The Project would include off- street vehicle parking and bicycle parking facilities as required and conditioned. These off-street facilities would follow all applicable regulations and are not proposed in such a way that would conflict with the City's enforcement of City of

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These regulations primarily address regulation and enforcement of standards in the public way.	Inglewood Municipal Code, Chapter 3: Motor Vehicles and Traffic. All users, guests, patrons, employees, and others who visit or reside at the Project would still be subject to the enforcement of applicable public regulations and traffic enforcement. As such, the Project would not conflict with the regulations of the City of Inglewood Municipal Code, Chapter 3: Motor Vehicles and Traffic relative to the circulation system, including transit, roadways, bicycle and pedestrian facilities.
City of Inglewood Municipal Code, Chapter 12: Planning and Zoning	
The Project is currently designated for Commercial Land Uses, but the Project includes a request to designate the site within the Major Mixed-Use land use designation and proposes the establishment of site-specific standards. This application is being reviewed by the Planning Department and will be subject to final approval. The site-specific overlay standards will be determined by the Planning Department and subject to approval by the City Council.	**Consistent:** The current zoning designation for the Project Site as well as the immediately surrounding area is C-2A (Airport Commercial), which allows commercial and hotel uses but does not permit residential uses. In conjunction with the requested General Plan Amendment to establish a Commercial Residential land use designation for the Project Site, a corresponding PAD approval is being requested to allow for the development of the mixed-use residential and commercial Project, which is what the Commercial Residential land use designation is specifically intended to allow for. Specifically, the proposed PAD approval would facilitate the redevelopment of the Project Site's existing hotel uses with a new vertically integrated development containing commercial, lodging, entertainment, and housing uses that would enhance pedestrian activity and reflect high architectural design quality. The proposed PAD approval will achieve this goal by establishing specific use, development, and design standards that will ensure the compatibility of the Project with both nearby uses as well as the City's long-range planning and policy goals to encourage increased commercial activity along its key corridors.
ConnectSoCal: 2020-2045 SCAG RTP/SCS (2020)	
On September 3, 2020, SCAG adopted the 2020-2045 RTP/SCS, which calls for $639 billion in transportation investments and reducing VMT by 19 percent per capita from 2005 to 2035. The updated plan accommodates 21.3 percent growth in population from 2016 (3,933,800) to 2045 (4,771,300) and a 15.6 percent growth in jobs from 2016 (1,848,300) to 2045 (2,135,900). The updated	The Project is consistent with the goals and policies of ConnectSoCal: 2020-2045 SCAG RTP/SCS (2020), as it: • Provides EV charging infrastructure that, at minimum, meets the most ambitious voluntary standard in the California Green

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Consistency Discussion

Plans, Program, Ordinance, or Policy	Consistency Discussion
RTP/SCS calls for a number of land use-based strategies to accommodate growth, minimize criteria pollutant emissions, and achieve the following climate change objectives: • Decreasing drive-along work commutes by three percent • Reducing per capita VMT by five percent and vehicle hours traveled per capita by nine percent • Increasing transit commuting by two percent • Reducing travel delay per capita by 26 percent • Creating 264,500 new jobs annually • Reducing greenfield development by 29 percent by focusing on smart growth • Locating six more percent household growth in HQTAs, which concentrate roadway repair investments, leverage transit and active transportation investments, reduce regional life cycle infrastructure costs, improve accessibility, create local jobs, and have the potential to improve public health and housing affordability. • Locating 15 percent more jobs in HQTAs	Building Standards Code at the time of project approval. • Is located on infill sites that are surrounded by existing urban uses and reuses or redevelops previously undeveloped or underutilized land that is presently served by existing utilities and essential public services (e.g., transit, streets, water, sewer) • Consists of transit-supportive densities (minimum of 20 residential dwelling units per acre), or is in proximity to existing transit stops (within a half mile), or satisfies more detailed and stringent criteria specified in the region's SCS. The Project is consistent with and does not conflict with the ConnectSoCal: 2020-2045 SCAG RTP/SCS plan.
Metro 2020 Long Range Transportation Plan (2020)	
The 2020 Long Range Transportation Plan (LRTP) provides a detailed roadmap for how Metro will plan, build, operate, maintain, and partner for improved mobility in the next 30 years. The LRTP will guide future funding plans and policies needed to move LA County forward for a more mobile, resilient, accessible and sustainable future.	**Not Applicable / Consistent**: The Project does not propose any public transportation improvements nor would it conflict with any long-range proposals in the Metro 2020 Long Range Transportation Plan. The Project is consistent with the Metro 2020 Long Range Transportation Plan as it proposes new housing and commercial uses that would locate employment opportunities near transit. The Project users would have access to bus and rail transit opportunities that are proposed for and currently exist within Inglewood. The Project would also include bike parking and pedestrian improvements that would provide opportunities for alternative mobility, as prioritized by the Metro plan. The Project is consistent with and would not conflict with this plan.
Metro Short Range Transportation Plan 2014 (2014)	
The Short Range transportation Plan was developed as a focused ten-year plan to guide Metro actions through 2024. The Plan will advance Metro toward the long-term goals outlined in the 2009 Long Range transportation Plan (LRTP), a 30-year vision for addressing growth and	**Not Applicable / Consistent**: The Project does not propose any public transportation improvements nor would it conflict with any long range proposals in the Metro Short Range transportation Plan 2014.

Table XVII-1
Consistency Discussion

Plans, Program, Ordinance, or Policy	Consistency Discussion
traffic in LA County. The Plan monitors Metro's progress in moving projects and programs forward to ensure our system moves people and goods safely.	The Project is consistent with the Metro Short Range transportation Plan 2014 as it proposes new housing and commercial uses that would locate employment opportunities near transit. The Project users would have access to bus and rail transit opportunities that are proposed for and currently exist within Inglewood. The Project would also include bike parking and pedestrian improvements that would provide opportunities for alternative mobility, as prioritized by the Metro plan. The Project is consistent with and would not conflict with this plan.
Inglewood First/Last Mile Plan 2019 (2019)	
The Inglewood First/Last Mile Plan is a joint effort between Metro and the City of Inglewood to develop first/last mile improvements for improving the walking and bicycling environment for four Metro stations in and adjacent to the City. With Metro's coordination with local jurisdictions and other agencies including the City of Inglewood, City of Los Angeles, City of Hawthorne, and LAWA, the Inglewood First/Last Mile Plan builds on the ongoing development and transportation changes occurring in the area. The four stations are: • Fairview Heights Crenshaw/LAX Line Station • Downtown Inglewood Crenshaw/LAX Line Station • Westchester/Veterans Crenshaw/LAX Line Station • Crenshaw Green Line Station The First/Last Mile Plan identified some key challenges to pedestrian and bicycle access to the stations. The challenges included the following: • Long blocks • Wide arterial streets to cross • Freeway crossings • Lack of streetscape amenities The top recommendations include: • Crosswalk improvements (high-visibility crosswalks, dual curb ramps, pedestrian signals, etc.)	**Not Applicable / Consistent**: As described herein, the Project is not located within one mile of any of the specified transit stations. The Project does not propose any major infrastructural improvements that are contrary to the recommendations of the First/Last Mile Plan. Nevertheless, the Project includes amenities and features that would complement the goals and intent of the First/Last Mile Plan 2019 including: bicycle parking, sidewalk repaving, addition of street-adjacent landscaping, intentionally designed lighting for user safety, and visual enhancements that improve the pedestrian experience. The Project does not conflict with the First/Last Mile Plan 2019.

Table XVII-1
Consistency Discussion

Plans, Program, Ordinance, or Policy	Consistency Discussion
• New sidewalks and sidewalk repaving • Bicycle infrastructure • Additional lighting • Visual enhancements that reflect characteristics of the city and local neighborhoods	
City of Los Angeles Crenshaw Boulevard Streetscape Plan (2015)	
In September 2015, the City of Los Angeles approved the Crenshaw Boulevard Streetscape Plan to create a complete, multi-modal street that reflects the future Metro Crenshaw/LAX Light Rail Transit Project. The boundaries of the Crenshaw Boulevard Streetscape Plan extend along Crenshaw Boulevard from Adams Boulevard to the north, and the 79th Street to the south, within the City of Los Angeles boundary. While the Streetscape Plan does not apply to boundaries within the City of Inglewood, it recommends street improvements along Crenshaw Boulevard from 67th Street to 70th Street: • Existing: Six lanes, center turn lane • Proposed: Two lanes, center turn lane (with scattered medians), parking/bus platform on both travel directions, buffered bike lanes (6' bike lanes with 4' raised buffer)	**Not Applicable / Consistent:** The Project is located on Century Boulevard, approximately 2.5 miles from Crenshaw Boulevard and 70th Street, where the Streetscape Plan is applicable. The Project does not propose any improvements which would conflict with the policies in the City of Los Angeles Crenshaw Boulevard Streetscape Plan that address circulation. The Project includes improvement and maintenance of the public right of way and new landscaping as required by the City, which would support the intent of the Streetscape Plan to improve pedestrian connectivity and walkability.
City of Inglewood Pedestrian Safety Assessment (2015)	
In 2013, the City commissioned a Pedestrian Safety Assessment (PSA) which analyzed current safety conditions for pedestrians and to a limited degree, bicyclists. The assessment documented that Inglewood has a need to plan for effective investments to reduce serious pedestrian and safety issues, and to provide a disadvantaged community with a broader range of high-quality transportation options. Recommendations included general and location-specific improvements such as enhancements to motorist's visibility of pedestrians, intersection improvements, ADA-compliancy, and suggested bikeway treatments. As part of the pedestrian safety assessment a walking audit was conducted at five focus areas, and site-specific improvements were recommended at each of the focus areas. These locations are listed below: • La Tijera School • La Tijera Blvd/Fairview Blvd. • La Tijera Blvd./64th Pl. • Downtown Inglewood	**Not Applicable / Consistent:** None of the site-specific locations for recommended improvements are within the immediate proximity of the Project site. Even so, the Project includes sidewalk improvements and maintenance of the public right of way as required by the City, which would improve the pedestrian experience and enhance safety for pedestrians. The Project is consistent with and would not conflict with the recommendations of the City of Inglewood Pedestrian Safety Assessment.

Table XVII-1
Consistency Discussion

Plans, Program, Ordinance, or Policy	Consistency Discussion
• Mid-block crosswalk on Market St between Queen St. and Regent St. • Market St./Regent St. • Market St./Florence Ave. • Locust St./Florence Ave • Locust St./Grace Ave. • Parking garage on Locust St. between Queen St. and Manchester Blvd. • Locust St./Hillcrest Blvd. • Market St. at Hillcrest Blvd./Kelso St. • Maitland Ave. between 80th St. and Van Ness Ave. • Crenshaw Blvd. between Imperial Blvd. and I-105 light rail station • Imperial Blvd./Crenshaw Blvd. • Crenshaw Blvd. near Crenshaw LRT station	
City of Inglewood Energy and Climate Action Plan (2013)	
In March 2013, the City adopted the Inglewood Energy and Climate Action Plan (ECAP), which outlines a roadmap for achieving community-wide energy consumption and GHG emissions reductions. The ECAP includes several strategies and actions related to energy efficiency and conservation, including energy and water conservation design features in new development projects. Strategy 4 specifically addresses transportation and circulation. 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	**Consistent**: Through compliance with the City's Green Building Code as required of the Project by the City, the Project would support the energy consumption reductions outlined in the ECAP, which may include the following: • Meeting/exceeding Title 24 energy standards • Provision of electric vehicle (EV) charging stations • Implement Transportation Demand Management (TDM) measures in accordance with Section 12-42.1 (Transportation Demand Management Requirements for Carpool Parking and Bicycle Facilities) of the City's Municipal Code and the provisions of the Project's proposed Mixed-Use Overlay zoning designation • Unbundled parking • Minimize driveway cuts • Provision of sidewalk amenities Additionally, the Project represents a more intense use of the Project Site with a diverse mix of complementary uses. Along with the Project Site's proximity to transit, the Project would allow for a reduction in traffic trips, VMT, and associated consumption of fossil fuels.

Table XVII-1
Consistency Discussion

Plans, Program, Ordinance, or Policy	Consistency Discussion
	For these reasons, the Project would not conflict with the Inglewood Energy and Climate Action Plan (ECAP) policies relative to the circulation system, including transit, roadways, bicycle and pedestrian facilities.
Westchester/Veterans Station Area Transit Oriented Development Plan and Design Guidelines (2021)	
The Westchester/Veterans TOD Plan area consists of roughly 379 acres on the western side of the City of Inglewood. The TOD Plan area lies roughly within one-half mile of the Westchester/Veterans Metro station, which is currently under construction as part of the Crenshaw/LAX Line at the northwest corner of Florence and Hindry Avenues. A key purpose explained in the Westchester/Veterans TOD Plan is to maximize the utilization of the Metro Crenshaw/LAX Line as a means of accessing both housing and jobs for transit riders both departing from and entering Inglewood.	**Not Applicable / Consistent:** The Project is not located within the boundaries of the Westchester/Veterans TOD Plan area and it is located approximately 1.8 miles away from the Westchester/Veterans Metro Station. Nevertheless, the Project would bring new residential tenants, commercial visitors, and commercial jobs to Century Boulevard, near several local bus stops. The Project would supplement the Westchester/Veterans TOD Plan goal of locating housing and jobs in Inglewood within proximity to transit resources. The Project is consistent with and would not conflict with the TOD Plan policies relative to the circulation system, including transit, roadways, bicycle and pedestrian facilities.
Crenshaw/Imperial Transit Oriented Development Plan and Design Guidelines (2021)	
The Crenshaw/Imperial TOD Plan area consists of roughly 103 acres in the southern part of the City of Inglewood. Most of the TOD Plan area lies within one-half mile of Crenshaw Station on the Metro Green Line, located in the median of the 105 freeway at Crenshaw Boulevard. A key purpose of the Crenshaw/Imperial TOD Plan area is to maximize the utilization of the Metro Green Line as a means of accessing both housing and jobs for transit riders both departing from and entering Inglewood.	**Not Applicable / Consistent:** The Project is not located within the boundaries of the Crenshaw/Imperial TOD Plan area and it is located approximately 1.8 miles away from the Crenshaw/Imperial Metro Station. Nevertheless, the Project would bring new residential tenants, commercial visitors, and commercial jobs to Century Boulevard, near several local bus stops. The Project would supplement the Crenshaw/Imperial TOD Plan goal of locating housing and jobs in Inglewood within proximity to transit resources. The Project is consistent with and would not conflict with the TOD Plan policies relative to the circulation system, including transit, roadways, bicycle and pedestrian facilities.
Source: LLG, 2024. Refer to Appendix I.	

b) Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3?

Less Than Significant With Mitigation Incorporated. VMT is defined as a measurement of miles traveled by vehicles within a specified region and for a specified period of time. VMT is a

measure of the use and efficiency of the transportation network and is calculated based on individual vehicle trips generated and their associated trip lengths. VMT accounts for two-way (round-trip) travel and is often estimated for a typical weekday for the purposes of measuring transportation impacts.

In September 2013, the Governor's Office signed Senate Bill 743 (SB 743), starting a process that fundamentally changes the way transportation impact analysis is conducted under CEQA. Within the State's CEQA Guidelines, these changes include the elimination of auto delay, level of service (LOS), and similar measurements of vehicular roadway capacity and traffic congestion as the basis for determining significant traffic impacts. SB 743 identifies VMT as the most appropriate CEQA transportation metric, along with the elimination of auto delay/LOS for CEQA purposes statewide. The justification for this paradigm shift is that LOS impacts lead to improvements that increase roadway capacity and therefore induce more traffic and GHG emissions.

The State of California Governor's Office of Planning and Research (OPR) issued proposed updates to the CEQA Guidelines in November 2017 and an accompanying technical advisory guidance in April 2018 (OPR *Technical Advisory*) that amends the Appendix G question for transportation impacts to delete reference to vehicle delay and level of service and instead refer to Section 15064.3, subdivision (b)(1) of the CEQA Guidelines asking if the project will result in a substantial increase in VMT. Section 15064.3, subdivision (b)(1) states the following:

> *Land Use Projects. Vehicle miles traveled exceeding an applicable threshold of significance may indicate a significant impact. Generally, projects within one-half mile of either an existing major transit stop or a stop along an existing high-quality transit corridor should be presumed to cause a less than significant transportation impact. Projects that decrease vehicle miles traveled in the project area compared to existing conditions should be considered to have a less than significant transportation impact.*

Comprehensive updates to the State CEQA Guidelines were certified and adopted by the California Natural Resources Agency in December 2018. Accordingly, the City adopted significance criteria for transportation impacts based on VMT for land use projects and plans in accordance with the amended Appendix G question:

> *Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?*

For land use projects, the intent of this threshold is to assess whether a land use project causes substantial vehicle miles traveled. The City has developed screening criteria to address this question. The criteria below are based on the OPR *Technical Advisory* but reflect local considerations.

If the project requires discretionary action, and the answer is no to the following question, further analysis will not be required and a "less than significant" determination can be made:

- Does the development project generate a net increase of 250 or more daily vehicle trips?

As summarized in Table XVII-2, the Project is expected to generate a net increase of 3,067 daily vehicle trips. Therefore, the Project is required to perform a VMT analysis.

Project Traffic Generation

Traffic volumes generated by the Project during the weekday AM and PM peak hours, as well as on a daily basis were estimated using the following rates published in the Institute of Transportation Engineers' (ITE) Trip Generation Manual:

- Apartments: ITE Land Use Code 221 (Multifamily Housing [Mid-Rise]) trip generation average rates were used to forecast the traffic volumes expected to be generated by the residential apartment component of the Project.

- Condominiums: ITE Land Use Code 221 (Multifamily Housing [Mid-Rise]) trip generation average rates were used to forecast the traffic volumes expected to be generated by the residential condominium component of the Project.

- Condominiums: ITE Land Use Code 310 (Hotel) trip generation average rates were used to forecast the traffic volumes expected to be generated by the hotel component of the Project.

- Restaurant: ITE Land Use Code 930 (Fast Casual Restaurant) trip generation average rates were used to forecast the traffic volumes expected to be generated by the food hall and café uses contained within the Project's event and entertainment area.

Table XVII-2
Project Trip Generation

Land Use	Size	Daily Trip Ends Volumes	AM Peak-Hour Volumes			PM Peak-Hour Volumes		
			In	Out	Total	In	Out	Total
Project								
Apartments	118 du	536	10	34	44	28	18	43
Condominiums	11 du	50	1	3	4	2	2	4
Hotel	175 rooms	1,398	45	36	81	53	50	103
Restaurant	10,330 gsf	1,003	--	--	--	72	58	130
Retail	800 glsf	44	--	--	--	3	2	5
Bar	10,590 gsf	1,330	--	--	--	73	60	133
Event/Entertainment	20,630 gsf	740	--	--	--	41	33	74
Subtotal		5,101	56	73	129	272	223	495
Transit Trips								
Apartments (5%)		(27)	(1)	(2)	(3)	(1)	(1)	(2)
Condominiums (5%)		(3)	0	0	0	0	0	0
Hotel (5%)		(70)	(2)	(2)	(4)	(3)	(3)	(6)
Restaurant (5%)		(50)	0	0	0	(4)	(3)	(7)
Retail (5%)		(2)	0	0	0	0	0	0
Bar (5%)		(67)	0	0	0	(4)	(3)	(7)

Event/Entertainment (5%)		(37)	0	0	0	(2)	(4)	(4)
Subtotal		(256)	(3)	(4)	(7)	(14)	(12)	(26)
Walk-In Trips								
Hotel (15%)		(199)	(6)	(5)	(11)	(8)	(7)	(15)
Restaurant (15%)		(143)	0	0	0	(10)	(8)	(18)
Retail (15%)		(6)	0	0	0	0	0	0
Bar (15%)		(189)	0	0	0	(10)	(9)	(19)
Event/Entertainment (15%)		(105)	0	0	0	(6)	(5)	(11)
Subtotal		(642)	(6)	(5)	(11)	(15)	(29)	(63)
Internal Capture								
Restaurant (10%)		(81)	0	0	0	(6)	(5)	(11)
Retail (10%)		(4)	0	0	0	0	0	0
Bar (10%)		(107)	0	0	0	(6)	(5)	(11)
Event/Entertainment (10%)		(60)	0	0	0	(3)	(3)	(6)
Subtotal		(252)	0	0	0	(15)	(13)	(28)
Subtotal Project Driveway Trips		**3,951**	**47**	**59**	**111**	**209**	**169**	**378**
Existing Site								
Hotel	(137 rooms)	(1,095)	(35)	(28)	(63)	(41)	(40)	(81)
Existing Transit Trips								
Hotel (5%)		55	2	1	3	2	2	4
Subtotal Existing Driveway Trips		**(884)**	**(28)**	**(23)**	**(51)**	**(4033**	**(32)**	**(65)**
Net increase Driveway Trips		**3,067**	**19**	**41**	**60**	**176**	**137**	**313**

du = dwelling unit gsf = gross square feet glsf = gross leasable square feet

Source: LLG, 2024. Refer to Appendix I.

- Retail: ITE Land Use Code 822 (Strip Retail Plaza [40k]) trip generation average rates were used to forecast the traffic volumes expected to be generated by the retail space contained within the Project's event and entertainment area.
- Bar: ITE Land Use Code 975 (Drinking Place) trip generation average rates were used to forecast the traffic volumes expected to be generated by the 2nd floor lounge/bar and virtual sports suites uses contained within the Project's event and entertainment area.
- Event/Entertainment: ITE Land Use Code 435 (Multipurpose Recreational Facility) trip generation average rates were used to forecast the traffic volumes expected to be generated by the event/entertainment component of Project.

In addition to the trip generation forecasts for the Project (that are essentially an estimate of the number of vehicles that could be expected to enter and exit the Project Site access points), an adjustment was made to the trip generation forecast based on the Project Site's existing land use. The existing land use includes a hotel with 137 guestrooms. The trips associated with the existing use have been subtracted from the Project's trips to account for the existing environmental condition. ITE Land Use Code 310 (Hotel) trip generation average rates were used to estimate the trip reduction related to the existing use.

A forecast was also made of the transit trips that would be generated by the Project in lieu of trips by the private automobile. The Project Site is currently served by many local lines and regional/commuter lines via stops located within convenient walking distance along Century Boulevard, Hawthorne Boulevard, La Brea Avenue, and Prairie Avenue. The transit lines include Metro Local Lines 40, 117, 211/215, 212 and the Los Angeles County Department of Public Works' The Link – Lennox shuttle. A transit adjustment of five percent has been utilized.

Furthermore, a forecast was also made of the walk-in trips that would be generated by the Project in lieu of trips by the private automobile. The walk-in trip reduction accounts for walk-in patronage both from within the Project as well as other surrounding land uses, specifically the IBEC (subsequently renamed the Intuit Dome, is now operational and will be prior to the opening of the Project), SoFi Stadium/YouTube Theater, and other uses within the Hollywood Park Specific Plan site, as well as the Forum. A walk-in adjustment of 15 percent has been utilized due to the Project Site's proximity to major pedestrian attractors.

Lastly, an internal capture adjustment has been applied for the Project to account for synergistic effects of the planned land use mix. Internal capture trips are those trips made internal to the site between land uses in a mixed or multi-use development, land uses tend to interact, and thus attract a portion of each other's trip generation. An internal capture adjustment of 10 percent has been utilized to account for the interactions among the residential, hotel, and event/entertainment land uses provided within the Project Site.

As shown in Table XVII–2, the Project would generate 60 net new vehicle trips (19 inbound trips and 41 outbound trips) during the weekday AM peak hour. During the weekday PM peak hour, the Project would generate 313 net new vehicle trips (176 inbound trips and 137 outbound trips). Over a 24-hour period, the Project would generate 3,067 daily trips ends (approximately 1,534 inbound trips and 1,533 outbound trips) during a typical weekday.

Impact Criteria and Methodology

For development projects, a project will have a potential VMT impact if the project meets the following:

- For residential projects, the project would generate residential VMT per capita exceeding 15 percent below the existing residential VMT per capita for the Baseline Area in which the project is located, or greater than 9.66 residential VMT per capita.

- For office projects, the project would generate employment VMT per employee exceeding 15 percent below the existing employment VMT per employee for the Baseline Area in which the project is located, or greater than 14.46 employment VMT per employee.

- For event centers and regional serving retail projects, the project would result in a net increase in total VMT (citywide).

For other land use types (i.e., the hotel employee component of the Project), measure VMT impacts for the work trip element using the criteria for office projects above.

Summary of Project VMT Analysis

The evaluation of the potential transportation impacts due to the Project as measured through VMT is provided below.

Residential

The Project proposes 118 residential apartment dwelling units and 11 residential condominium dwelling units. It is expected that the residential units would be utilized by persons associated with sports teams, leagues, concert promoters, and others regularly visiting the nearby entertainment venues (e.g., SoFi Stadium, Intuit Dome, YouTube Theater, the Forum, etc.). Residents of the Project would occupy their units on a part-time basis. Further, the basis of their "commute to work" would generally be one mile or less. Notwithstanding, the Project's units were considered as traditional fully-occupied dwelling units for purposes of conservative VMT analysis.

The residential VMT per capita for the Project was estimated utilizing the City's VMT Calculator. The detailed City's VMT Calculator worksheet for the Project's residential component is contained in *Appendix C* of the TIA included in Appendix I. As shown, the estimated residential VMT per capita for the Project is 9.18, which is less than the City's significance threshold of 9.66 residential VMT per capita. Therefore, the residential component of the Project would have a less-than-significant VMT impact.

The City's VMT Calculator contains a menu of transportation demand management (TDM) strategies that may be implemented as either Project Design Features (PDF) or mitigation measures. The Project would implement the Promotions and Marketing TDM strategy (Strategy 4-N) within the City's VMT Calculator, with 100 percent of residents participating. Strategy 4-N is included in Section 3 (Project Description) as PDF-1. The Project would utilize promotional and marketing tools to educate and inform residents about alternative transportation options and the effects of their travel choices. Rather than two-way communication tools or tools that would encourage an individual to consider a different mode of travel at the time the trip is taken (i.e., smartphone application, daily email, etc.), this TDM strategy includes passive educational and promotional materials, such as posters, information boards, or a website with information that residents can choose to read at their own leisure. Materials would be placed in an area with the greatest amount of visibility for Project residents (e.g., lobby, mailroom, elevator, etc.).

As shown in *Appendix C*, the estimated residential VMT per capita for the Project with implementation of PDF-1 is 8.81, which is less than the City's significance threshold of 9.66 residential VMT per capita. Thus, implementation of PDF-1 would further reduce the residential VMT per capita expected to be generated by the Project, which is already shown to be at a less-than-significant level without PDF-1.

Hotel, Event, and Entertainment

The Project proposes a hotel component with 175 guestrooms and an event and entertainment area totaling 42,350 square feet of retail, restaurant, and related commercial uses. It is noted that an existing hotel on the Project Site providing 137 guestrooms would be removed to accommodate construction of the Project. It is expected that the hotel would be utilized by guests to fly into nearby LAX and then attend an event at one of the nearby venues located within one mile of the Project Site. The event and entertainment area of the Project is intended to serve as an ancillary use for residents and hotel guests at the Project, as well as to provide pre- and post-event dining and gathering opportunities for attendees of the nearby entertainment venues.

The employment VMT-per-employee expected to be generated by the Project was estimated utilizing the City's VMT Calculator. While the City's VMT Calculator does not allow for direct inputs for hotel uses, it does include direct inputs for office uses. General office employment VMT is similar to hotel and event/entertainment space employment VMT since in each instance, the employment VMT is the VMT generated by Home-Based Work trip attractions. While the employment trips to and from home may occur at different hours, the characteristics of these trips are similar (e.g., general office, hotel, and event/entertainment employees drive from home to work and back).

To utilize the office-equivalency use in the City's VMT Tool, an estimate of the number of hotel and event/entertainment employees at the Project is needed, which then can be converted to the approximate equivalent amount of office building floor area. The City utilizes a factor of 12 employees per 10 hotel guestrooms, which results in 210 employees. For the event and entertainment area, a factor of four employees per 1,000 square feet of floor area is utilized, which results in approximately 170 employees. In total, it is estimated that that Project would have 380 employees based on the employment factors accepted by the City. In order to calculate the daily commute trips, the total employment is multiplied by two, which results in 760 daily commute trips. The calculation for determining the office equivalent square footage is as follows:

760 trips / 10.84 trips *1,000 square feet = 70,111 square feet

Based on the City's accepted methodology, the employment generated by the Project's hotel and event and entertainment component would correlate to a 70,111 square-foot office use.

Based on the methodology described above, the employment VMT per employee expected to be generated by employees of the Project's hotel and event and entertainment component was estimated utilizing the City's VMT Calculator. The detailed City's VMT Calculator worksheet for the Project's hotel and event and entertainment component are contained in *Appendix C* of the TIA included in Appendix I.

As shown in *Appendix C*, the estimated employment VMT per employee for the Project's hotel and event and entertainment component (not including the effectiveness of PDF-1) is 15.28 employment VMT per employee. This exceeds the City's significance threshold of 14.46 employment VMT per employee. Thus, without mitigation, the VMT impact of the hotel and event and entertainment component of the Project would be significant. However, as discussed below, with implementation of Mitigation Measure TRAFFIC-1 the Project's VMT impact would be reduced to less than significant.

Mitigation Measures

To ensure that the Project's VMT impacts would be less than significant, the following mitigation measure is required:

TRAFFIC-1: The Project operator shall offer a minimum transit subsidy of $0.75 per day to a minimum of 30 percent of the Project's hotel and event and entertainment employees.

With implementation of Mitigation Measure TRAFFIC-1, the Project's employment VMT per employee is reduced to 14.39 employment VMT per employee and would fall below the City's threshold of 14.46 employment VMT per employee. Therefore, with implementation of the mitigation measure, the Project's hotel and event and entertainment component would have a less-than-significant employment VMT per employee impact.

In addition to implementing the Transit Subsidies TDM strategy as a mitigation measure, as stated previously, the Project would implement the Promotions and Marketing TDM strategy (Strategy 4-N) within the City's VMT Calculator, with 100 percent of employees participating, as PDF-1. The Project would utilize promotional and marketing tools to educate and inform employees and residents about alternative transportation options and the effects of their travel choices. Rather than two-way communication tools or tools that would encourage an individual to consider a different mode of travel at the time the trip is taken (i.e., smartphone application, daily email, etc.), this TDM strategy includes provision of passive educational and promotional materials, such as posters, information boards, or a website with information that employees and residents could choose to read at their leisure. Materials would be placed in an area with the greatest amount of visibility for Project employees and residents. As shown in *Appendix C* of the TIA included in Appendix I, with the Promotions and Marketing TDM strategy implemented as PDF-1 in addition to the Transit Subsidies TDM strategy implemented as Mitigation Measure TRAFFIC-1, the Project's employment VMT per employee remains at 14.39 employment VMT per employee, less than the City's threshold of 14.46 employment VMT per employee.

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

Less Than Significant Impact. Preliminary Project access plans were reviewed in light of commonly accepted traffic engineering design standards to ascertain whether any deficiencies are apparent in the site access plans which would be considered significant. The determination of impact significance is applied on a case-by-case basis, considering the following factors:

- The relative amount of pedestrian activity at project access points
- Design features/physical configurations that affect the visibility of pedestrians and bicyclists to drivers entering and exiting the site, and the visibility of cars to pedestrians and bicyclists
- The type of bicycle facilities the project driveway(s) crosses and the relative level of utilization
- The physical conditions of the site and surrounding area, such as curves, slopes, walks, landscaping or other barriers, that could result in vehicle/pedestrian, vehicle/bicycle, or vehicle/vehicle safety hazards
- The project location, or project-related changes to the public right-of-way, relative to proximity to the Pedestrian Routes to School program area
- Any other conditions, including the approximate location of incompatible uses that would substantially increase a transportation hazard

Qualitative Review of Site Access Points

The Project Site has frontage along Century Boulevard, Freeman Avenue, and 101st Street. Century Boulevard is designated by the City as a Major Arterial by the City with a posted speed limit of 40 miles per hour. Freeman Avenue is designated by the City as a Collector with an assumed speed limit of 25 miles per hour. 101st Street is designated by the City as a Local Street with an assumed speed limit of 25 miles per hour.

The Project would improve the pedestrian experience along these corridors, including at the Project Site access points, which would enhance connections to and from the numerous pedestrian destinations in the direct vicinity of the Project Site. The Project would improve the sidewalks along the Century Boulevard, Freeman Avenue, and 101st Street property frontages to enhance the pedestrian experience and ensure ADA compliance. Newly surfaced sidewalks would be provided along the Project Site's Century Boulevard, Freeman Avenue, and 101st Street frontages. Signalized crossings are provided within convenient walking distance to the Project Site along the Century Boulevard, La Brea Avenue, Hawthorne Boulevard, and Prairie Avenue corridors.

Bicycle facilities are not currently provided along Century Boulevard, Freeman Avenue, and 101st Street in the Project study area. While future bicycle facilities are currently not planned along these roadways, the Project would not preclude the City from installing bicycle facilities on these roadways, or any other roadway in the Project vicinity. In addition, bicycle parking would be provided consistent with IMC Section 12-42.1 and the standards of the Project's proposed PAD regulations.

The Project would remove the existing driveways along the south side of Century Boulevard and new driveways would not be installed. Removal of the Century Boulevard driveways would

eliminate potential vehicle/pedestrian conflicts at the existing site driveways, which would enhance the pedestrian experience along the corridor. As Project residents, guests, and visitors would travel on foot to the nearby pedestrian attractors such as the Intuit Dome (which will be operational prior to the opening of the Project), SoFi Stadium, YouTube Theater, and other uses within the Hollywood Park Specific Plan site, as well as the Forum, the pedestrian experience along the Century Boulevard corridor is of the utmost importance to the Project.

The Project would maintain and improve the existing Project Site access points along the west side of Freeman Avenue, which would be utilized for the Project's valet operations. Vehicles bound to the Project's valet area would access the valet drop-off/pick-up area by making a southbound right- turn from Freeman Avenue into the northerly Freeman Avenue Driveway. Vehicles would continue southbound in the valet drop-off/pick-up area and leave their vehicle with a valet attendant. The attendant would then park the vehicle in the on-site parking garage. Vehicles leaving the Project Site from the valet drop-off/pick-up area would exit via the outbound-only southerly Freeman Avenue Driveway via a left- or right-turn onto Freeman Avenue. It is noted that valet attendants would be able to access the parking garage internally from the valet drop-off/pick-up area and would not need to utilize local streets (i.e., Freeman Avenue and 101st Street) to park vehicles. The Project's valet drop-off/pick-up area has been designed to provide circulation internal to the Project Site to reduce conflicts with vehicles, pedestrians, and bicyclists along Freeman Avenue. Additionally, access to the Project's parking garage would be provided via one driveway along the north side of 101st Street.

Access to the Project's loading docks would be provided via a new driveway along the north side of 101st Street, east of the proposed driveway providing access to the Project's parking garage. The AutoTURN software package was utilized to demonstrate that delivery vehicles can successfully enter and exit the Project's loading space. Exhibits demonstrating the maneuvers of 23-foot delivery vehicles (DL-23) entering and exiting the Project's loading dock are contained within *Appendix A* of the TIA included in Appendix I. As shown in the exhibits contained within *Appendix A*, DL-23 vehicles can enter the Project's loading dock via a continuous westbound right-turn movement (i.e., three-point turns are not required). Similarly, DL-23 vehicles can exit the Project's loading dock via a continuous southbound left-turn movement. The sidewalk and driveway improvements would be designed to improve conditions for all modes of travel and reduce the potential for vehicle/pedestrian conflicts at the driveways. An excellent line of sight is provided for all modes of travel (motorists, pedestrians, and bicyclists) at the Project's proposed driveways.

The Project Site is located on flat terrain and the physical condition of the Project Site and the proposed entry/exit points would be improved in conjunction with the Project, therefore, the potential for vehicle/pedestrian, vehicle/bicycle, or vehicle/vehicle impacts would be reduced. The Project would not preclude the City from making future safety-related improvements along the roadways fronting the Project Site. Given the existing physical conditions of the Project Site, the planned reduction of curb cuts along Century Boulevard, and the proposed sidewalk improvements along the property's Century Boulevard, Freeman Avenue, and 101st Street frontages, no safety concerns related to geometric design are noted.

The driveways would not require the removal or relocation of existing passenger transit stops and would be designed and configured to avoid or minimize potential conflicts with transit services and pedestrian traffic. No security gates or other parking control features are proposed along the Project Site driveways in close proximity to the public right-of-way. The driveways and site access points would be designed to ensure adequate maneuvering by vehicles entering and exiting the Project Site. It is recommended that "No Parking" signs be installed along the Project's 101st Street frontage from the Freeman Avenue intersection to the residential parking access point to ensure that passenger and delivery vehicles entering and exiting the Project Site can do so safely. This would result in the loss of approximately eight on-street parking spaces.

Therefore, based on the above, the Project would not substantially increase hazards due to a geometric design feature or incompatible use, and impacts would be less than significant.

Site Distance Review of Proposed 101st Street Driveways

A sight distance review has been conducted to evaluate the adequacy of the sight distance provided at the two proposed driveways on 101st Street. The westerly 101st Street driveway would provide access to the Project's on-site parking garage related to the residential component. The easterly 101st Street driveway would provide access to the Project's loading dock. Specifically, the sight distance analysis has been prepared in order to determine the adequacy of motorists' line of sight departing the two driveways.

The sight distance analysis has been prepared in accordance with the California Department of Transportation (Caltrans) Highway Design Manual (HDM). 101st Street is designated as a Local Street by the City and the County. One through travel lane is provided in each direction on 101st Street within the Project study area. There is no speed limit posted on 101st Street within the Project study area, thus a prima facie speed limit of 25 miles per hour is assumed, consistent with California Vehicle Code Section 22352(b)(1). Per Table 201.1 of the HDM, a stopping sight distance of 150 feet in each direction should be provided.

Appendix D of the TIA included in Appendix I contains exhibits displaying the minimum required stopping sight distance at each of the 101st Street driveways. As illustrated in the exhibits contained in Appendix D, the front bumper of the vehicle was placed at the edge of the curb cut, with the driver set back approximately eight feet. The exhibits show that the removal of parking spaces along the north side of 101st Street would be required to provide the minimum stopping sight distance. In total, it is estimated that 12 street parking spaces would need to be removed in order to accommodate the proposed driveways.

Vehicle Trip Generation Forecast

The first step in the queuing analysis was to prepare a vehicle trip generation forecast for the Project so as to estimate the number of vehicles that may utilize the valet area during peak periods. The vehicle trip generation forecast for the Project during the weekday AM and PM peak hours is presented in Table XVII-2, which indicates that the Project's hotel and event and entertainment components are forecast to generate the following trips during the peak hours:

- 66 vehicle trips (37 inbound/29 outbound) during the weekday AM peak hour
- 330 vehicle trips (180 inbound/150 outbound) during the weekday PM peak hour

The Project's hotel and event and entertainment components are forecast to generate its highest number of vehicle trips during the PM peak hour. Thus, the forecast PM peak-hour trips were utilized in the vehicle queuing analysis.

Estimated Peak Vehicle Queue

A vehicle queuing analysis was prepared to evaluate the adequacy of the Project's on-site valet area. In preparing the queuing analysis, the 95th percentile vehicle queue was estimated using a Poisson distribution. The 95th percentile vehicle queue is typically used by traffic engineers to determine, for example, the required length of left-turn pockets at intersections. This design parameter is based on the expectation that the left-turn pocket would be able to accommodate vehicle queues in the left-turn lane 95 percent of the time during the peak hour. The Poisson distribution is used to estimate the rate of vehicle arrivals over the course of the peak hour. For example, 60 peak-hour left-turn vehicles would typically not arrive at the left-turn lane at a regular rate of one car per minute. In some minutes during the peak hour, two or three vehicles may arrive, while in other minutes, no vehicles would arrive. Accordingly, the Poisson distribution was used to estimate the variations in vehicle arrival rates over an analyzed peak hour, with the 95th percentile forecast used as the basis of design.

In addition to the rate of vehicle arrivals, vehicle queueing at the Project's valet area would be influenced by: 1) the number of valet attendants available to handle arriving and departing vehicles, and 2) the estimated service or dwell time of each vehicle while at the valet area. Accordingly, to estimate vehicle queuing based on the number of arriving vehicles, number of valet attendants, and average service/dwell time, an M/M/s queuing model[6] was used utilized. The M/M/s queuing model calculates average vehicle queuing during the analyzed peak hour, as well as peak queues during the PM peak hour at the 95th percentile confidence level.

The model requires the input of three parameters: vehicle arrival rate per hour, the number of servers (i.e., valet attendants), and average service rate per hour. For this analysis and utilizing the PM peak hour trip generation forecasts in Table XVII-2, the model inputs are based on a peak-hour arrival rate of 180 vehicles at the hotel drop-off area. As previously noted, departing vehicles related to the Project's hotel and event and entertainment components would retrieve their vehicle internal to the Project Site, and therefore would not contribute to vehicle queues in the valet drop-off area.

In utilizing the M/M/s model, a typical service/dwell time of one minute per vehicle was assumed. Using the forecast vehicle arrival rates, as well as average service/dwell time, the number of valet attendants was varied to produce a 95th percentile vehicle queue that can be accommodated onsite within the porte-cochere areas and accessway without causing vehicles to queue into the public right-of-way.

The M/M/s queuing calculations prepared for the Project's valet drop-off area are provided in *Appendix D* of the TIA included in Appendix I. As shown *Appendix D*, the expected average on-site queue during the weekday PM peak hour is approximately 3.09 vehicles. As further shown in the table provided in *Appendix D*, at the 95th percent confidence level (precisely, 96.48 percent as shown in *Appendix D*), the maximum on-site queue is calculated to be six vehicles. As previously noted, the valet drop-off area can accommodate seven queued vehicles. Furthermore, if necessary, the drop-off point can be moved further into the Project's parking garage to accommodate additional queuing capacity. Accordingly, Project-related trips are not expected to queue onto Freeman Avenue. Therefore, the planned on-site valet drop-off area can adequately accommodate the forecast peak queue of six vehicles during the weekday PM peak hour.

d) Would the project result in inadequate emergency access?

Less Than Significant Impact. The Project's proposed resident, guest, and patron vehicular ingress and egress is proposed to be provided from new driveways on Freeman Avenue and 101st Street. In addition, loading is proposed to be provided via a separate driveway, also on 101st Street. All ingress/egress associated with the Project would undergo review by the City and Los Angeles County Fire Department, and required to be designed and constructed in conformance to all applicable City and County standards to ensure that adequate emergency access is maintained for the Project Site and the surrounding area. Therefore, Project impacts related to emergency access would be less than significant.

Cumulative Impacts

According to the CEQA Guidelines, a project's cumulative impacts are based on an assessment of whether the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects. Based on the OPR Technical Advisory (page 6), the thresholds of significance recommended therein for VMT metrics are considered as "efficiency-based" thresholds. Further, the OPR Technical Advisory states "A project that falls below an efficiency-based threshold that is aligned with long-term goals and relevant plans has no cumulative impact distinct from the project impact. Accordingly, a finding of a less-than-significant project impact would imply a less than significant cumulative impact, and vice versa." Thus, as the Project is expected to result is a less than significant transportation impact based on the use of the VMT metrics, a less than significant cumulative transportation impact for the Project can be concluded.

XVIII. TRIBAL CULTURAL RESOURCES

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. 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	☐	☐	☐	☒
b. 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 Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☐	☐	☒

a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is 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)?

No Impact. As discussed in response to Checklist Question V a) (Cultural Resources – Historical Resources), a search of the California Office of Historic Preservation, California Historical Resources database indicated that none of the existing buildings located on or adjacent to the Project Site are listed in the National Register of Historic Places or the California Register of Historic Places. On August 4, 2022, the City sent letters to tribes historically known in the area. None of these recipients provided any information regarding the potential for tribal cultural resources to exist at or near the Project Site, and none requested consultation with the City. Thus, the Project would not cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is 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). Therefore, no impacts related to this issue would occur as a result of the Project.

b) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is listed or eligible for listing in the California Register of Historical Resources, or in 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 Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

No Impact. Approved by Governor Brown on September 25, 2014, Assembly Bill 52 (AB 52) establishes a formal consultation process for California Native American Tribes to identify potential significant impacts to tribal cultural resources, as defined in PRC Section 21074, as part of CEQA. PRC Section 21084.2 establishes that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. To help determine whether a project may have such an effect, PRC Section 21080.3.1 requires a lead agency to consult with any California Native American tribe that requests consultation and is traditionally and culturally affiliated with the geographic area of a proposed project. That consultation must take place prior to the release of a negative declaration, mitigated negative declaration, or environmental impact report for the project. As a result of AB 52, the following must take place: 1) prescribed notification and response timelines; 2) consultation on alternatives, resource identification, significance determinations, impact evaluation, and mitigation measures; and 3) documentation of all consultation efforts to support CEQA findings for the administrative record. Under AB 52, if a lead agency determines that a project may cause a substantial adverse change to a tribal cultural resource, the lead agency must consider measures to mitigate that impact. PRC Section 21074 provides a definition of a tribal cultural resource. In brief, in order to be considered a tribal cultural resource, a resource must be either: 1) listed or determined to be eligible for listing on the national, state, or local register of historic resources, or 2) one that the lead agency chooses in its discretion supported by substantial evidence to treat as a tribal cultural resource. In the latter instance, the lead agency must determine that the resource meets the criteria for listing in the state register of historic resources or as a city-designated cultural resource. In applying those criteria, a lead agency shall consider the value of the resource to the tribe. As specified in AB 52, lead agencies must provide notice to tribes that are traditionally and culturally affiliated with the geographic area of a proposed project if the tribe has submitted a written request to be notified. The tribe must respond to the lead agency within 30 days of receipt of the notification if it wishes to engage in consultation on the project, and the lead agency must begin the consultation process within 30 days of receiving the request for consultation.

On August 4, 2022, an notification letter was mailed to tribes historically known in the Project Site area, describing the Project and requesting any information regarding resources that may exist

on or near the Project Site. None of the tribes provided any information regarding the potential for tribal cultural resources to exist at or near the Project Site, and none requested consultation with the City.

As such, there is no substantial evidence that shows tribal cultural resources exist at the Project Site. Thus, the Project would not cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is listed or eligible for listing in the California Register of Historical Resources, or in 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 Section 5024.1. Therefore, no impacts related to this issue would occur as a result of the Project.

Cumulative Impacts

Impacts related to tribal cultural resources tend to be site-specific and are assessed on a site-by-site basis. The City would require the applicants of each of the related projects to assess, determine, and mitigate any potential impacts related to tribal cultural resources that could occur as a result of development, as necessary. As discussed previously, the Project would not result in any impacts to tribal cultural resources. As such, the Project would not contribute to any potential cumulative impacts related to tribal cultural resources. Therefore, cumulative impacts related to cultural resources would be less than significant.

XIX. UTILITIES AND SERVICE SYSTEMS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. 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?	☐	☐	☒	☐
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐
c. 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?	☐	☐	☒	☐
d. 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?	☐	☐	☒	☐
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☐	☒

a) Would the project require or result in relocation or the construction of new or expanded water, wastewater treatment, or storm water drainage, electrical power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Less Than Significant Impact. As discussed below, Project impacts related to these issues would be less than significant.

Water Facilities

Local water conveyance infrastructure in the vicinity of the Project Site is maintained and operated by Golden State Water Company. The Project Site is served by a 12-inch water line in Century Boulevard. As shown in Table XIX-1, the Project would consume a net increase of approximately 42,559 gallons of water per day (or 0.04 million gallons per day [mgd]). It should be noted that this amount does not take into account the effectiveness of water conservation measures required in accordance with the City's Green Building Code, which would likely reduce the Project's water consumption (and wastewater generation) shown in Table XIX-1.

Table XIX-1
Estimated Project Water Consumption and Wastewater Generation[1]

Land Uses	Size	Water Consumption/ Wastewater Generation Rate[2]	Total (gpd)[3]
Existing Uses			
Hotel	137 rooms	120 gpd/room	16,440
Proposed Uses			
Residential, Bachelor	18 units	75 gpd/unit	1,350
Residential, 1-Bedroom	36 units	110 gpd/unit	3,960
Residential, 2-Bedroom	75 units	150 gpd/unit	11,250
Hotel	175 rooms	120 gpd/unit	21,000
Restaurant	344 seats[4]	30 gpd//seat	10,320
Retail	800 sf	25 gpd/1,000 sf	20
Bar	706 seats[4]	15 gpd/seat	10,590
Event Space	20,630 sf	25 gpd/1,000 sf	509
		Subtotal	***58,999***
		Less Existing	*(16,440)*
		Net Increase	**42,559**

gpd = gallons per day *sf = square feet*

1 *Assumes wastewater generation is equal to water consumption.*
2 *Source: City of Los Angeles Bureau of Sanitation, Sewer Generation Factors, April 6, 2012.*
3 *Numbers have been rounded to the nearest 10.*
4 *Assumes 30 sf per seat.*

As part of the permitting process for the Project, the Project Applicant would be required to coordinate with the Golden State Water Company to determine if the existing water supply infrastructure maintains sufficient capacity to accommodate the Project's demand for water. If a deficiency or service problem is discovered during the permitting process, the Project Applicant would be required to fund any necessary upgrades to adequately serve the Project. Water main and related infrastructure upgrades would not be expected to create a significant impact to the physical environment because: (1) any disruption of service would be of a short-term nature; (2) replacement of the water mains would be within public and private rights-of-way; and (3) the existing infrastructure would be replaced with new infrastructure in areas that have already been significantly disturbed. For these reasons, the Project would not require or result in relocation or the construction of new or expanded water facilities, the construction or relocation of which could cause significant environmental effects. Therefore, Project impacts related to water facilities would be less than significant.

Cumulative Impacts

There are 6 related projects in the City that are located within 0.5 miles of the Project Site (refer to Table 1-1 in Section 1 [Introduction]). All of the related projects are located within an urbanized

area of the City and represent infill development, served by existing utilities, including water facilities. As with the Project, the related projects would likely require project- or site-specific infrastructure to connect to the existing infrastructure, but the related projects would not require new or expanded water facilities. Therefore, cumulative impacts related to water facilities would be less than significant.

Wastewater Treatment

Less Than Significant Impact. The Project Site is located within the service area of the Los Angeles County Sanitation Districts (LACSD). Wastewater generated within the City is conveyed to the Joint Water Pollution Control Plant (JWPCP) in the City of Carson via interceptor sewers. The JWPCP provides both primary and secondary treatment and has a total permitted capacity of 400 mgd. In December 2019, JWPCP treated 250 mgd and had an excess capacity of 150 mgd.[65] The maximum peak flow is 540 mgd. The Project would generate a net increase of approximately 42,559 gallons of wastewater per day (or 0.04 mgd) (refer to Table XIX-1). It should be noted that this amount does not take into account the effectiveness of water conservation measures required in accordance with the City's Green Building Code, which would likely reduce the Project's water consumption (and wastewater generation) shown in Table XIX-1. With a remaining daily capacity of 150 mgd, the JWPCP would have adequate capacity to serve the Project, as the Project's wastewater generation would only represent 0.02 percent of the JWPCP's available capacity. Therefore, Project impacts related to wastewater treatment would be less than significant.

Cumulative Impacts

Implementation of the related projects in concert with the Project could increase the need for wastewater treatment. Table XIX-2 shows that the cumulative development in the City could result in the need to treat approximately 559,063 gallons of water per day (or 0.55 mgd per day). It should be noted that this amount does not take into account the net decrease in wastewater generation (and water consumption) that would occur as a result of removal of existing uses for the related project or the effectiveness of water conservation measures required in accordance with the City's Green Building Code, both of which would likely substantially reduce the cumulative water consumption and wastewater generation shown in Table XIX-2. With a remaining treatment capacity of approximately 175 mgd, the HTP would have adequate capacity to accommodate the wastewater treatment requirements of cumulative development. No new or upgraded treatment facilities would be required. Therefore, the cumulative wastewater impacts related to water treatment would be less than significant.

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65 *Los Angeles County Sanitation District, Joint Water Pollution Control Plant (JWPCP), https://www.lacsd.org/services/wastewater-sewage/facilities/joint-water-pollution-control-plant, accessed April 2022.*

Storm Water Drainage

Less Than Significant Impact. As discussed in response to Checklist Question X(c)(iii) (Hydrology and Water Quality – Storm Drain Capacity), Project impacts related to storm drainage facilities would be less than significant. No mitigation measures are required.

Cumulative Impacts

Refer to the cumulative impact discussion provided in response to Checklist Topic X (Hydrology and Water Quality).

Table XIX-2
Estimated Cumulative Water Consumption and Wastewater Generation[1]

Land Uses	Size	Water Consumption/ Wastewater Generation Rate[2]	Total (gpd)
Multi-Family Residential	2,211 du[3]	150 gpd/du	331,650
Commercial	4,497,083 sf	50 gpd/1,000 sf	224,854
		Total Related Projects	***556,504***
		Plus Project	*42,559*
		Total	**599,063**

gpd = gallons per day *du = dwelling unit*

1 *Assumes wastewater generation equals water consumption.*
2 *Source: City of Los Angeles Bureau of Sanitation, Sewer Generation Factors, April 6, 2012. This rate does not account for the effectiveness of any current water conservation measures that are required in the City.*
3 *Assumes all units are 2-bedroom units.*

Electrical Power

Less Than Significant Impact. As discussed in response to Checklist Questions VII(a) and (b) (Energy), Project impact related to electric power facilities would be less than significant.

Cumulative Impacts

Refer to the cumulative impact discussion provided in response to Checklist Topic VII (Energy).

Natural Gas

Less Than Significant Impact. As discussed in response to Checklist Questions VII(a) and (b) (Energy), Project impact related to natural gas facilities would be less than significant.

Cumulative Impacts

Refer to the cumulative impact discussion provided in response to Checklist Topic VII (Energy).

Telecommunications

Less Than Significant Impact. In the Project Site area, existing telephone service is typically provided by AT&T, and existing cable television/internet is typically provided by Spectrum. The Project Site could be served by existing telecommunications facilities that are available in the Project Site area. The Project would require Project- and site-specific infrastructure to connect to the existing utilities, but the Project would not require new or expanded facilities. Therefore, Project impacts related to telecommunications facilities would be less than significant.

Cumulative Impacts

There are 6 related projects in the City (refer to Table 1 in Section 1 [Introduction]) within 0.5 miles of the Project Site. All of the related projects are located within an urbanized area of the City. All of the related projects represent infill development and are served by existing utilities, including telecommunications infrastructure. As with the Project, the related projects would likely require project- or site-specific infrastructure to connect to the existing infrastructure, but the related projects would not require new or expanded facilities. Therefore, cumulative impacts related to telecommunications infrastructure would be less than significant.

b) Would the project have significant water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

Less Than Significant Impact. Potable water supply to the City comes from the following two sources:

1. Imported surface water purchased from the West Basin Municipal Water District through the Metropolitan Water District of Southern California pipe connections; and
2. Local groundwater produced from the West Coast Groundwater Basin via City wells

The imported water is treated at Sanford M. Anderson Water Treatment Plant, and groundwater supplies are blended prior to entering the City's water distribution system. Golden State Water Company and Cal America Water also provide water to the City service population. According to the Inglewood 2020 Urban Water Management Plan (UWMP), the City can meet all normal year, single dry year, and multiple dry year water supply demands available through the Year 2045. With the inclusion of water supplies currently under development, potential water supply surpluses range from 5 percent to 110 percent of projected demands.

As shown in Table XIX-1, the Project would consume a net increase of approximately 42,559 gallons of water per day (or 0.04 mgd). Golden State Water Company has indicated that water service is available at the Project Site.[66] The estimated water demand of the Project is not expected to exceed available supplies. Adequate water supplies would be available to the Project, and new or expanded water supplies would not be required. Therefore, Project impacts on water supply would be less than significant.

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66 *Golden State Water Company, Joseph Zhoa, P.E., PhD., April 18,2022. Refer to Appendix J.*

Cumulative Impacts

Implementation of the related projects in concert with the Project could increase the need for wastewater treatment. Table XIX-2 shows that the cumulative development in the City could result in the need to treat approximately 599,063 gallons of water per day (or 0.55 mgd per day). It should be noted that this amount does not take into account the net decrease in wastewater generation (and water consumption) that would occur as a result of the removal of existing uses for the related project or the effectiveness of water conservation measures required in accordance with the City's Green Building Code, both of which would likely substantially reduce the cumulative water consumption and wastewater generation shown in Table XIX-2.

The City (through its 2020 UWMP) anticipates that its projected water supplies will meet demand through the year 2045. In terms of the City's overall water supply condition, any related project that is consistent with the City's General Plan has been taken into account in the planned growth of the water system. In addition, any related project that conforms to the demographic projections from SCAG's Regional Transportation Plan and is located in the service area is considered to have been included in the City's water supply planning efforts so that projected water supplies would meet projected demands. Similar to the Project, each related project would be required to comply with City and State water code and conservation programs for both water supply and infrastructure.

Related projects that propose changing the zoning or other characteristics beyond what is within the General Plan would be required to evaluate the change under CEQA review process. The CEQA analysis would compare the existing to the proposed uses and the ability of existing supplies and infrastructure to provide a sufficient level of water service. Future development projects within the service area of the City would be subject to the water conservation measures outlined in the City's Green Building Code, which would partially offset the cumulative demand for water. Expansion or modification of water service infrastructure to serve future growth in the City is undertaken as required in the normal process of providing water service. For these reasons, cumulative impacts related to water supply would be less than significant.

c) Would the project 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?

Less Than Significant Impact. Refer to response to Checklist Question XIX(a) (Utilities and Service Systems – Wastewater Treatment).

Cumulative Impacts

Refer to the cumulative impacts discussion included in response to Checklist Question XIX(a) (Utilities and Service Systems – Wastewater Treatment).

d) Would the project 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?

Less Than Significant Impact. The primary landfills in the County and the capacity of these landfills are shown in Table XIX-3. As shown, the landfills have an approximate available daily intake of 25,535 tons.

Table XIX-3
Landfill Capacity

Landfill Facility	Estimated Remaining Life (years)	Estimated Remaining Disposal Capacity (million tons)	Permitted Intake (tons/day)	Daily Disposal (tons/day)	Available Daily Intake (tons/day)
Antelope Valley	13	10.1	3,600	2,785	815
Azusa	NA	65.4	8,000	1,025	6,975
Burbank	110	2.3	240	125	115
Calabasas	14	4.0	3,500	955	2,545
Chiquita Canyon	27	54.4	12,000	6,114	5,886
Lancaster	81	9.8	3,000	395	2,605
Scholl Canyon	8	3.4	3,400	1,486	1,914
Sunshine Canyon	17	54.0	12,100	7,420	4,680
				Total	**25,535**

Source: County of Los Angeles, Countywide Integrated Waste Management Plan, 2020 Annual Report, October 2021.

As shown in Table XIX-4, the Project result in a net increase in daily solid waste generation of approximately 0.46 tons per day. The estimation of the Project's solid waste generation is conservative and does not account for the effectiveness of recycling efforts, which is mandatory in the City. With a remaining daily intake capacity of approximately 25,535 tons of solid waste per day, the landfills serving the County could accommodate the Project's daily solid waste generation. Thus, the Project would not require new or expanded landfills. Therefore, Project impacts related to solid waste would be less than significant.

Cumulative Impacts

Implementation of the Project and the related projects could increase the need for landfill capacity in the region. As shown in Table XIX-5, implementation of the cumulative development would result in an estimated solid waste generation of approximately 16.06 tons per day. It should be noted that this amount does not take into account the net decrease in solid waste generation that would occur as a result of removal of existing uses or the effectiveness of recycling measures

required in accordance with existing City's recycling regulations, both of which would likely substantially reduce the cumulative solid waste generation.

With a remaining daily capacity of approximately 25,535 tons of solid waste per day, the landfills serving the Project and related project would have adequate capacity to accommodate cumulative solid waste generation. Additionally, all development in the City is required to comply with City and state recycling regulations. Therefore, cumulative impacts related to solid waste generation would be less than significant.

Table XIX-4
Estimated Project Solid Waste Generation

Land Uses	Size	Solid Waste Generation Rate[1]	Total (tpd)
Existing Use			
Hotel	137 rooms	2 lbs/day/room	0.13
Proposed Uses			
Residential	129 units	4 lbs/day/unit	0.25
Hotel	175 rooms	2 lbs/day/room	0.17
Restaurant	10,330 sf	5 lbs/day/1,000 sf	0.02
Retail	800 sf	5 lbs/day/1,000 sf	0.002
Bar	10,590 sf	5 lbs/day/1,000 sf	0.02
Event Space		5 lbs/day/1,000 sf	0.13
		Subtotal	***0.59***
		Less Existing	*(0.13)*
		Net Increase	**0.46**

tpd = tons per day sf = square feet lbs = pounds

[1] *Source: CalRecycle, https://www2.calrecycle.ca.gov/wastecharacterization/general/rates.*

Table XIX-5
Estimated Cumulative Solid Waste Generation

Land Uses	Size	Solid Waste Generation Rate[1]	Total (tpd)
Multi-Family Residential	2,211 du	4 lbs/day/unit	4.4
Commercial	4,497,083 sf	5 lbs/day/1,000 sf	11.2
		Total Related Projects	***15.6***
		Plus Project	*0.46*
		Total	**16.06**

tpd = tons per day du = dwelling unit lbs = pounds sf = square feet

[1] *CalRecycle.*

e) Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

No Impact. The Project would be required to comply with the City's recycling requirements. No Project impacts related to this issue would occur.

Solid waste management in the state is primarily guided by the California Integrated Waste Management Act of 1989 (AB 939), which emphasizes resource conservation through the reduction, recycling, and reuse of solid waste. AB 939 establishes an integrated waste management hierarchy consisting of (in order of priority): 1) source reduction; 2) recycling and composting; and 3) environmentally-safe transformation and land disposal. In addition to AB 939, Senate Bill (SB) 1374 requires jurisdictions to divert and recycle demolition and construction waste materials.

In response to these state laws, the City has implemented measures for mandatory recycling, including Chapter 7, Article 7 (Construction and Demolition Recycling Program), which requires applicants of "covered projects" to prepare and implement a waste management plan for recycling of construction and demolition waste, and Commercial and Multi-Family Recycling requirements for any business that generates four cubic yards or more of waste per week and for multi-family communities with five or more units.[67] Additionally, the City subsidies the cost of compost bins for residents that are available through the City's waste hauler.

As with all development in the City, the Project would be required to comply with the City's recycling measures. Thus, the Project would comply with federal, state, and local management and reduction statutes and regulations related to solid waste. Therefore, no impacts related to this issue would occur as a result of the Project.

Cumulative Impacts

All development in the City is required to comply with the City's recycling requirements. No cumulative impacts related to this issue would occur.

[67] *"Covered project" means all new construction initiated by January 1, 2017 or later; non-residential remodeling, addition, and alteration projects; all demolition projects, grading projects that include land clearing debris, and generally all City-sponsored construction, demolition, and renovation projects.*

XX. WILDFIRE

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
b. 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?	☐	☐	☐	☒
c. 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?	☐	☐	☐	☒
d. 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?	☐	☐	☐	☒

a) Substantially impair an adopted emergency response plan or emergency evacuation plan??

b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or uncontrolled spread of a wildfire?

c) Requires 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?

d) 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?

No Impact. Checklist Questions XX(a) through XX(d) do not apply to the Project, because the Project Site is not located near or within a state responsibility area or lands classified as very high fire severity zones. The Project Site is located approximately 20 miles from the nearest state-

designated high-fire zone, which is in the Puente Hills east of the City.[68] Therefore, no impacts related to this issue would occur as a result of the Project.

Cumulative Impacts

None of the related projects are located near or within a state responsibility area or lands classified as very high fire severity zones. No cumulative impacts related to this issue would occur.

[68] *California Office of the State Fire Marshal, Fire Hazard Severity Zones in State Responsibility Area, https://osfm.fire.ca.gov/divisions/community-wildfire-preparedness-and-mitigation/wildfire-preparedness/fire-hazard-severity-zones/#explorefhsz, accessed on January 27, 2023.*

XXI. MANDATORY FINDINGS OF SIGNIFICANCE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐
b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☐	☐	☒	☐
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐

a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?

Less Than Significant With Incorporated. For the reasons stated in this Initial Study, the Project would not have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or reduce the number or restrict the range of a rare or endangered plant or animal. With implementation of Mitigation Measure ARCHEO-1, the Project would not have the potential to eliminate important examples of the major periods of California history or prehistory. No other mitigation measures are required.

b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

Less Than Significant Impact. For the reasons stated in this Initial Study, the Project would not result in any significant impacts would not have the potential to contribute to significant cumulative impacts. No mitigation measures are required.

c) Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?

Less Than Significant With Mitigation. As discussed in response to Checklist Question XIII a), with implementation of Mitigation Measure HAZARDS-1, the Project's potential airport hazard impact would be less than significant. Additionally, with implementation of Mitigation Measure NOISE-1, the Project's construction noise impact would be less than significant. Further, with implementation of Mitigation Measure TRAFFIC-1, the Project's VMT impact would be less than significant. For the reasons stated in the remaining portions of the IS/MND, the Project would not cause substantial adverse effects on human beings, either directly or indirectly. No other mitigation measures are required.

INITIAL STUDY

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