SCEA

Morningside Project

June 2025

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1.0 INTRODUCTION

1.1 Statutory Authority and Requirements

An application for the proposed Morningside Project (Project) has been submitted to the City of Inglewood Planning Division for discretionary review. The City of Inglewood (City), as Lead Agency, has determined that the Project is subject to the California Environmental Quality Act (CEQA), and that preparation of Sustainable Community Environmental Assessment (SCEA) is required.

This SCEA evaluates the potential environmental effects that could result from the construction, implementation, and operation of the Project. As part of this SCEA, an Initial Study has been prepared (refer to Section 5, Environmental Impact Analysis, of this SCEA) in accordance with CEQA (Public Resources Code [PRC] §21000 et seq.), the State CEQA Guidelines (Title 14, California Code of Regulations [CCR], §15000 et seq.).The City uses Appendix G of the State CEQA Guidelines as the thresholds of significance unless another threshold of significance is expressly identified in the document.

Based on the analysis provided within this SCEA, the City has concluded that the Project qualifies as a Transit Priority Project (TPP), is consistent with an adopted Sustainable Communities Strategy (SCS) that has been accepted by the California Air Resources Board (CARB) as meeting the State's greenhouse gas (GHG) reduction targets, and that the Project would not result in significant impacts on the environment. This SCEA is intended as an informational document, which is ultimately required to be considered and adopted by the decision-making body of the City in conjunction with approval of the Project.

1.2 Purpose

CEQA was enacted in 1970 with several basic purposes, including: (1) to inform governmental decision makers and the public about the potential 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 feasible alternatives or mitigation measures; and (4) to disclose to the public the reasons behind a project's approval even if significant environmental effects are anticipated.

Public Resources Code Section 21155.2(b)(1) requires that an Initial Study be prepared for each SCEA. 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 a qualifying project meets certain criteria described below and the Initial Study shows that any potential significant effects would be avoided or mitigated to a point where clearly no significant effects would occur through project mitigation measures, a SCEA may be prepared.

1.2.1 Senate Bill 375

The State of California adopted Senate Bill (SB) 375, also known as the "Sustainable Communities and Climate Protection Act of 2008," which outlines growth strategies that better integrate

regional land use and transportation planning and that help meet the State of California's GHG emissions reduction mandates. SB 375 requires the State's 18 metropolitan planning organizations to incorporate an SCS into the regional transportation plans to achieve their respective region's GHG emission reduction targets set by the CARB. Correspondingly, SB 375 provides various CEQA streamlining provisions for projects that are consistent with an adopted applicable SCS and meet certain other objective criteria. The SCEA is one of these streamlining tools.

The Southern California Association of Governments (SCAG) is the metropolitan planning organization for the County of Los Angeles (along with the Counties of Imperial, San Bernardino, Riverside, Orange, and Ventura). On September 3, 2020, SCAG's Regional Council adopted Resolution 20-624-1, which approved the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (2020-2045 RTP/SCS, also known as Connect SoCal) in its entirety. For the SCAG region, CARB has set GHG emissions reduction targets at 19 percent below 2005 per capita emissions levels by 2035. SCAG's resolution adopting the 2020-2045 RTP/SCS also determined that the SCS includes strategies to meet the requirements of SB 375 to achieve these GHG emission reduction goals and directed SCAG staff to submit the 2020-2045 RTP/SCS to CARB for review and certification in this regard. On October 30, 2020, pursuant to Executive Order No. G-20-239, CARB "accept[ed] the SCAG determination that its 2020 SCS would, when implemented, meet the emissions reduction target for automobiles and light trucks as established by CARB in 2018, specifically, a 19 percent per capita reduction by 2035 relative to 2005 levels."

On April 4, 2024, SCAG's Regional Council adopted the 2024-2050 RTP/SCS (also known as Connect SoCal 2024). Connect SoCal 2024 outlines a vision for a more resilient and equitable future, with investment, policies and strategies for achieving the region’s shared goals through 2050. The Plan elements that are necessary to bring this vision to fruition are organized within the pillars of Mobility, Communities, Environment and Economy. On May 7, 2025 the California Air Resources Board (CARB) accepted SCAG’s determination that the Connect SoCal 2024 meets the state’s GHG emission reduction targets. SB 375 allows the City, acting as Lead Agency, to prepare a SCEA as the environmental CEQA clearance for Transit Priority Projects (TPPs), as described below, that are consistent with the 2024-2050 RTP/SCS.

1.2.2 Purpose and Content of a SCEA

The purpose of a SCEA is to evaluate the environmental effects of a project in accordance with CEQA and PRC Sections 21155 and 21155.2. In addition, a SCEA must evaluate a project's consistency with SCAG's RTP/SCS and incorporate feasible mitigation measures, performance standards, and/or criteria from prior applicable EIRs into the proposed project.

The SCEA form of CEQA documentation was established by SB 375 to provide streamlined environmental review for certain TPPs. TPPs are residential or mixed-use residential projects that provide a minimum net density of 20 dwelling units per acre and are located within one-half mile of a major transit stop or high-quality transit corridor (Public Resources Code Section 21155(b)). The intent of the CEQA streamlining provisions is to reduce documentation and redundancy and to provide an incentive for TPPs that are consistent with a larger effort to reduce GHG emissions by integrating transportation and land use planning.

A SCEA is comparable to a Mitigated Negative Declaration (MND) in that the lead agency must find that all potentially significant impacts of a project required to be identified in the Initial Study have been identified, adequately analyzed, and mitigated to a less than significant level. A SCEA must also identify any cumulative impacts that have been adequately addressed and mitigated in a prior applicable certified EIR. Where the lead agency determines the impact has been adequately addressed and mitigated, the impact shall not be considered cumulatively considerable. Also, a SCEA is not required to reference, describe, or discuss growth-inducing impacts and project specific or cumulative impacts from cars and light duty truck trips on global warming or the regional transportation network.

A draft of the SCEA shall be circulated for a public comment period not less than 30 days, and the lead agency shall consider all comments received prior to acting on the SCEA. The lead agency's decision to review and approve a project with a SCEA shall be reviewed under the substantial evidence standard.

1.3 Organization of the SCEA

This document is organized into the following sections:

Section 1.0: Introduction provides a Project introduction and overview, describes the purpose and content of the SCEA and provides an overview of the CEQA process.

Section 2.0: Project Description details the Project's location, environmental setting, background and history, characteristics, discretionary actions, construction program, phasing, agreements, and required permits and approvals. This Section also identifies the intended uses of the SCEA, including a list of anticipated permits and other approvals.

Section 3.0: Lead Agency Determination and Overview of Potential Impacts provides the determination of the Project and an overview of potential impacts that may or may not result from Project implementation.

Section 4.0: SCEA Criteria and Consistency Analysis demonstrates the Project qualifies as a Transit Priority Project and is consistent with the Sustainable Communities Strategy.

Section 5.0: Evaluation of Environmental Impacts provides an analysis of environmental impacts identified in Appendix G of the State CEQA Guidelines.

Section 6.0 Incorporation of the 2020-45 RTP/SCS and 2024-2050 RTP/SCS. This section identifies all of the mitigation measures contained in the Mitigation Monitoring and Reporting Program (MMRP) for SCAG's 2020-2045 RTP/SCS and 2024-2050 RTP/SCS Program EIR and a discussion of the applicability of the mitigation measures to the project. A MMP is also included for the Project.

Appendices: Includes various documents, technical reports, and information used in preparation of the SCEA.

1.4 CEQA Process

Below is a general overview of the CEQA process. The City has prepared this SCEA to determine if the Project qualifies as a TPP, is consistent with the SCS, and if it may have a significant effect on the environment. This SCEA determined that the Project meets the criteria for a SCEA, is consistent with the SCS, and would not have a significant effect on the environment. A Notice of Completion and Availability (NOC/NOA) will be circulated to notify public agencies and the general public that a draft of the SCEA is available for review and comment for a period of at least 30 days. CEQA requires that the legislative body (i.e., City Council) or planning commission of the lead agency conduct a public hearing and consider all comments received prior to acting on the SCEA. The lead agency may then adopt the SCEA, provided it finds the following:

a. All potentially significant or significant effects required to be identified in the Initial Study have been identified and analyzed, and

b. With respect to each significant effect on the environment required to be identified in the Initial Study, either of the following apply:[1]

    i. Changes or alterations have been required in or incorporated into the project that avoid or mitigate the significant effects to a level of insignificance.

    ii. Those changes or alterations are within the responsibility and jurisdiction of another public agency and have been, or can and should be, adopted by that other agency.

[1] California Code, Public Resources Code - PRC § 21155.2

2.0 PROJECT DESCRIPTION

2.1 Project Overview

HAS INDW Property Owner, LLC is proposing to develop the Morningside Project (Project) on 22.87 acres of land (Project Site) (APN 4030-033-901 and 4030-033-903). The Project Site is located in the City of Inglewood, California (City) on portions of grass fields and former playing fields between the Morningside High School and Woodworth Elementary School campus and the Inglewood Unified School District (IUSD) - Child Development Center. The Project Site includes portions of the former Woodworth Elementary School campus, which is now vacated and is largely demolished.

The Project would include the development of 571 total residential units on the Project Site, including 403 row townhomes with one to four bedrooms and 168 interlocking townhomes with three to four bedrooms. Of those units, 10 percent of the housing units would be designated for Very Low Income affordable housing. Additionally, the Project would include various amenities to serve the residents, including two clubhouses (8,232 total square feet), two swimming pools, two pocket parks, a dog park, and common and private open space throughout the Project Site. The Project would also include 998 residential parking spaces in attached garages and 124 guest parking spaces provided along interior streets and within the clubhouse grounds in surface parking areas.

2.2 Project Location and Surrounding Uses

The Project Site is located south of the community of Morningside Park, in the southeastern portion of the City within Los Angeles County, California. As shown in **Figure 1, Regional Map,** the Project Site is located south of West 104th Street between Yukon Avenue and South 10th Avenue. The Project Site is served by a network of regional transportation facilities connecting to the larger metropolitan area. Primary regional access is provided by Interstate 105 (I-105), which runs east-west and is located approximately 0.9-mile south of the Project Site, by Interstate 405 (I-405), which runs north-south and is located approximately 1.8 miles west of the Project Site, and by Interstate 110 (I-110), which runs north-south and is located approximately 2.7 miles east of the Project Site. Local access to the Project Site and vicinity is provided by West Century Boulevard, Crenshaw Boulevard, 104th Street, 108th Street, Prairie Avenue, Yukon Avenue, and Lemoli Avenue.

The Project Site is located within an urban residential neighborhood comprised of single-family (one- and two-story) homes to the west and south, multi-family uses, and commercial uses including a Costco to the north, and educational facilities including Morningside High School to the west and Monroe Middle school to the southeast. Also outside of the Project Site, is the IUSD - Child Development Center located to the southeast. The IUSD - Child Development Center is planned to be rebuilt by IUSD at the southwest corner of 104th Street and 10th Avenue by 2026.

The Hollywood Park Specific Plan area, including SoFi Stadium, is located approximately 0.25-mile to the north of the Project Site. Additionally, the recently constructed Intuit Dome is located

0.5-mile to the northwest of the Project Site.

The Project Site is located approximately 2.5 miles east of the Los Angeles International Airport (LAX) and approximately 1.0 mile north of the Hawthorne Municipal Airport. Nearby transit access lines include Metro Line 117, which travels along Century Boulevard connecting Inglewood to LAX, Westchester, Vermont, Watts and Norwalk, and Metro Line 210, which travels along Crenshaw Boulevard, connecting Inglewood to the Redondo Beach Transit Center, Downtown LA, Mid-City and Hollywood. Other bus lines serving the Project Site near Yukon Avenue include the Los Angeles County Lennox Shuttle, providing service from Lenox, Inglewood, Centinela Hospital, County offices, parks, public schools, libraries, and shopping centers.

2.3 Site Background and Existing Site Conditions

The Project Site encompasses approximately 22.87 acres, including 17 acres that formerly comprised the eastern portion of the Morningside High School campus and approximately 5 acres that were part of the former Woodworth Elementary School campus, which is now vacant.

As shown in **Figure 2, Project Site,** the Project Site is currently developed with recreational facilities including tennis courts, basketball courts, baseball fields, and open recreational field space within the Morningside High School campus, and areas associated with the demolished Woodworth Elementary School campus. The Woodworth Elementary School campus was constructed in 1960, with the existing portable structures brought on the property between 1981 and 1989.[1] The campus was vacated after operations were merged with the Monroe Middle School in 2019. Structures associated with the Woodworth Elementary School campus were demolished in August 2024 by the Inglewood Unified School District (**Figure 3, Demolition**).

The *Morningside High School Site Upgrade and Woodworth Elementary School Demolition Project MND*, prepared by ESA, February 2023 evaluated the potential environmental impacts associated with improvements and partial demolition of the Morningside High School campus, demolition of the Woodworth Elementary School and demolition of the recreational facilities and fields associated with the Woodworth Elementary School.

2.4 Planning and Zoning

The Project Site's land use designation under the City's General Plan is Low-Density Residential (LDR).[2] The LDR designation allows for a range of 0-6 dwelling units per acre (du/ac).[3] The Project Site is zoned by the Inglewood Municipal Code (Municipal Code) as Residential Single Family (R-1).[4] According to Section 12-18 of the Municipal Code, these residential zones permit one-family dwellings, accessory private garages, detached one-story accessory buildings, and public parks.

The Project would include a request to amend the Project Site's General Plan land use

[1] Environmental Site Assessment Phase I, School Property APN 4030-033—901-903 and 904 3200 West 104th Street, 105000 Yukon Avenue South and 10711 S. 10th Avenue, prepared by California Environmental, May 2022.
[2] City of Inglewood. General Plan Land Use Element Map. Available: https://www.cityofinglewood.org/DocumentCenter/View/11160/GENERAL-PLAN-MAP-Pub-Sept-2023.
[3] City of Inglewood. Land Use Element of the General Plan, 2016, as amended.
[4] City of Inglewood. Zoning Map. Available: https://www.cityofinglewood.org/DocumentCenter/View/16969/ZONING-MAP-Pub-Sept-2023?bidId=.

designation from Low Density to Medium Density and to change its associated zoning from R-1 to R-3. The R-3 zones permits one-family dwellings, one or more one-family dwellings per lot, and multi-family dwellings. The maximum density permitted in the R-3 zone is 39.6 dwelling units per acre. The Medium Density land use designation permits 23-43 dwelling units per acre. The Project would be consistent with the density and land use designations of the R-3 zone.

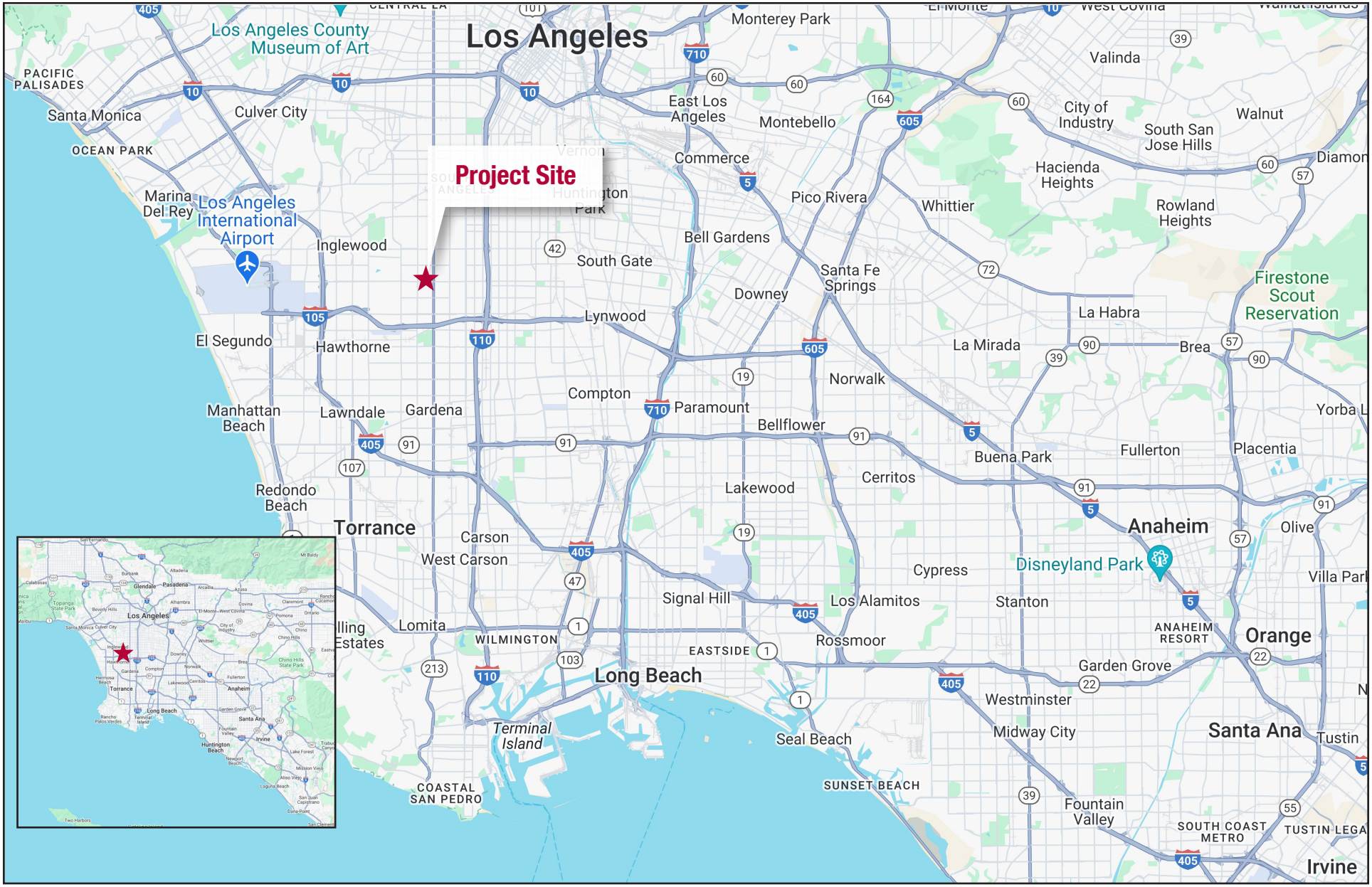
2.5 Proximity to Transit

The Project Site is located within one-half mile of a major transit stop, as well as two existing transit stops along a high-quality transit corridor.

A major transit stop is defined in PRC Section 21064.3 as a stop containing a rail or bus rapid transit station, a ferry terminal served by bus or rail transit, or the intersection of two or more major bus routes with headways of 20 minutes or less during the morning and afternoon peak commute hours. Furthermore, pursuant to PRC Section 21155(b), this definition also includes major transit stops that are included in the applicable regional transportation plan. A high-quality transit corridor is defined in PRC Section 21155(b) as "[a] corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours."

The closest noted existing transit stop is located on the southwest and northeast corners of the intersection of Crenshaw Boulevard at 104TH Street, approximately 0.2 miles east of the Project Site, which services Metro Line 210. Metro Line 210 operates between Hollywood/Vine Station and South Bay Galeria via mainly Crenshaw Boulevard with 10-minute headways on weekdays and 15-minute headways on weekends. It should be noted that Metro Line 210 also has existing transit stops on the southwest and northeast corners of the intersection of Crenshaw Boulevard at Century Boulevard, located approximately 0.4 miles northeast of the Project Site.

The other noted existing transit stop is located on the northwest and southeast corners of the intersection of Crenshaw Boulevard at Century Boulevard, approximately 0.4 miles northeast of the Project Site, and services Metro Line 117. Metro Line 117 operates between LAX and the City of Downey via Century Boulevard with 15-minute headways on weekdays.



SOURCE: Google Maps, 2024

N.T.S.

FIGURE 1: Regional Map

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SOURCE: Nearmap, 2024

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FIGURE 2: Project Site

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SOURCE: Nearmap, 2024

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FIGURE 3: Demoliton

INGLEWOOD MORNINGSIDE PROJECT

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2.6 Description of the Project

Project Overview

The Project would remove approximately 12,000 square feet (sf) of buildings associated with the former Woodworth Elementary School campus, field areas and would construct a new residential development. As shown in **Table 1: Project Development Summary**, the Project proposes construction of 571 townhome units, of which 10 percent would be affordable for Very Low-Income households. The overall density of the Project would be 24.97 dwelling units per acre. To serve residents and guests, the Project would provide approximately 375,622 sf of open space, including 20,799 sf of private open space and 354,823 sf of common open space. The private open space would be comprised of private balconies. The common open space would be comprised of landscaped common areas between buildings, a dog park, two pocket parks, and two club houses which would feature workout rooms, restrooms, flex space, recreational pools, open space, office area, and lounging areas. The height of each proposed home would be approximately 35 feet, not to exceed a height of 40 feet/3 stories. The two recreation clubhouse buildings would each be two stories; one would be 29 feet and the other 28 feet and 5 inches in height.

As shown on **Table 2: Summary Vehicular Spaces**, the Project would provide 1,122 vehicle parking spaces, including 998 resident parking spaces to be provided within enclosed garages attached to individual homes. Visitor parking (124 spaces) would be provided along interior streets and within the clubhouse grounds in surface parking areas. The Project would also include 66 bicycle spaces for visitors.

Table 1: Project Development Summary

Project Component	**Units/Square Feet**	**Total Square Feet**
Residential		
Plan 1 ROW Townhomes	144 units (1 Bedroom)	124,128 sf
Plan 2 ROW Townhomes	138 units (2 bedroom)	165,324 sf
Plan 3 ROW Townhomes	63 units (3 bedroom)	90,972 sf
Plan 4 ROW Townhomes	58 units (4 bedroom)	96,744 sf
Plan 5 Interlocking Townhomes	84 units (3 bedroom)	127,008 sf
Plan 6 Interlocking Townhomes	84 units (4 bedroom)	150,276 sf
Total	**571 units**	754,452 sf
Non-Residential		
Clubhouse Phase 1	4,205 sf	
Clubhouse Phase 2	4,027 sf	
Total Building Square Footage		762,684 sf

Open Space		
Common Open Space	621 sf/unit	354,823 sf
Private Open Space	36 sf/ unit	20,799 sf
Total Open Space	658 sf/unit	**375,622 sf**
Density	24.97 du/acre	
Source: Danielian Associates, August 2024.		

Table 2: Summary of Vehicular Spaces	
Parking Provided	
Resident: 2 Garage attached Spaces/Unit	998 parking spaces
Guest	124 total parking spaces (102 on street parking spaces) (22 clubhouse parking spaces)
Total	1,122 parking spaces
Ratio Parking Provided	1.96
Source: Danielian Associates, August 2024. Notes: 1. Because the site is located within one-quarter mile of 2 transit stops, both with 15-minute service intervals during peak travel periods, AB2097 is proposed to satisfy the parking requirements. 2. Majority of the units have 2-car enclosed garages. 3. 1-Bedroom units have 1-car enclosed garages. 4. Parking on the frontage of property along W 104th St. is not included in the total parking provided.	

Demolition components of the Project are shown in **Figure 3: Demolition. Figure 4: Site Plan** displays the Project components. Elevations and renderings of the Project are shown in **Figure 5: Elevations ROW Townhomes, Figure 6: Renderings ROW Townhomes, Figure 7: Elevations of Interlocking Townhomes, Figure 8: Renderings of Interlocking Townhomes, Figure 9: Clubhouse Phase I,** and **Figure 10: Clubhouse Phase II.**

Design and Architecture

The Project is designed to be a cohesive community that provides a diversity of residential uses in close proximity to transit, commercial, entertainment, school, and recreational uses. The layout of the Project is designed to achieve an integrated neighborhood feel and sense of place that includes shared open spaces including parks, recreational pools and clubhouses, and pedestrian pathways. Homes are designed with a modern architectural style that features flat roofs, varied massing and façade articulation, and a mixture of private and common open space elements throughout the Project area. Homes would feature a range of materials including stone veneer, wood siding, stucco and metal panels. The community recreation buildings would complement the proposed residential architecture and feature multi-use indoor and outdoor

facilities. Pools, barbecue areas, fitness centers, and meeting and gathering spaces are provided for convenient centralized access. Homes and community amenities are linked together through a system of pedestrian pathways.

Open Space and Landscaping

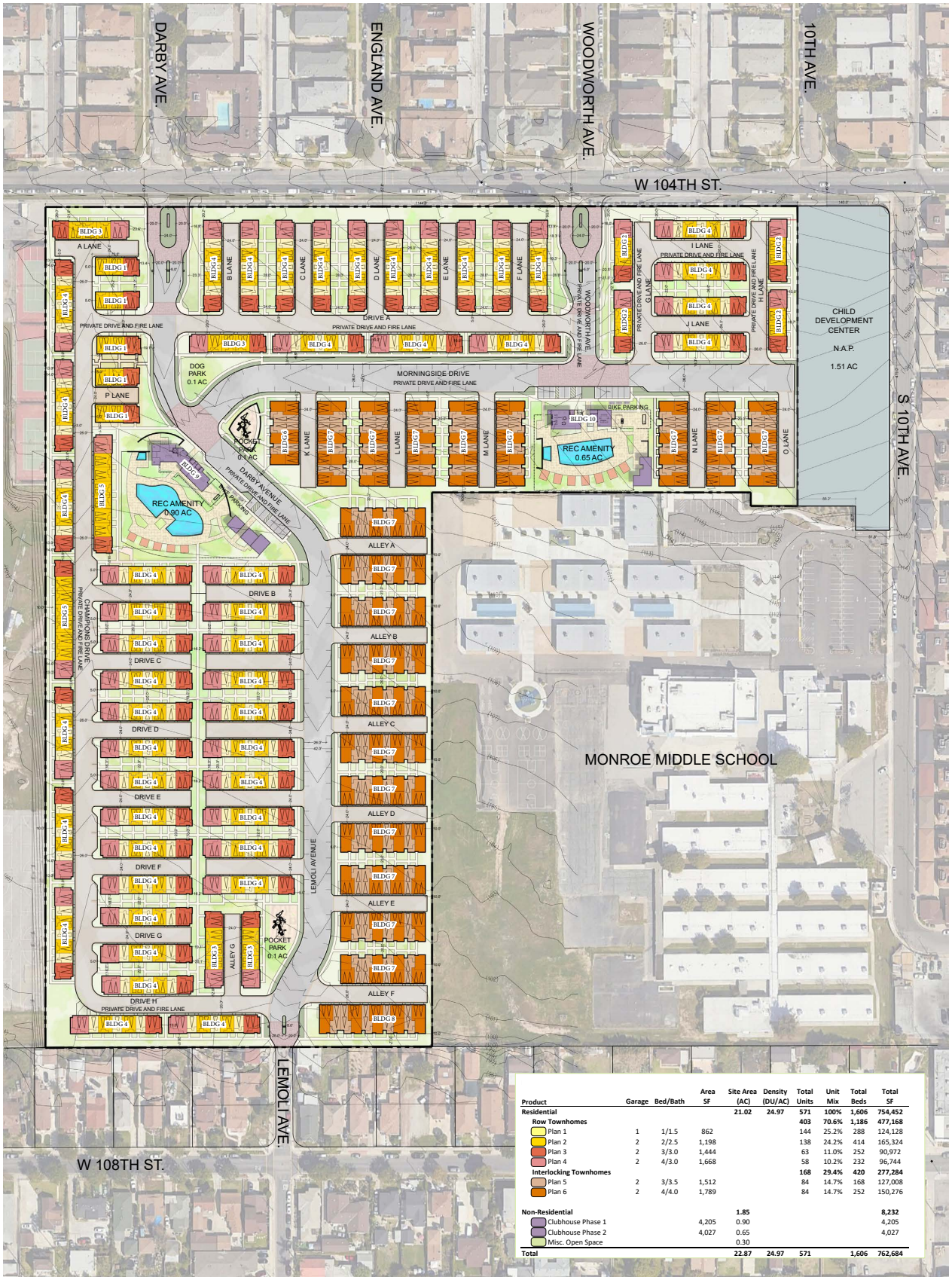
To serve residents and guests, the Project would provide approximately 375,622 sf of open space, including 20,799 sf of private open space and 354,823 sf of common open space. The common open space would include landscaped comment areas, landscaped areas between buildings, a dog park, two pocket parks, and two clubhouses featuring workout rooms, restrooms, flex space, recreational swimming pools, open space, office areas, and lounging areas. The dog and pocket parks would include seating areas, with the pocket parks also featuring playground equipment. Private open space would include front porches, patios, and balconies.

Landscaping throughout the Project Site would include a variety of drought tolerant and native trees, groundcover, shrubs, and vines that are designed to create inviting streetscapes and parks. The landscaping is intended to foster a walkable, pedestrian-oriented neighborhood (**Figure 11**: **Landscape Plan**).

Access, Circulation, and Parking

The Project would provide access for multiple modes of travel, including vehicles, pedestrians and cyclists. Vehicular ingress and egress for residents and visitors to the Project Site would be provided via two driveways along West 104th Street.

One entry would align with Darby Avenue where Darby Avenue would be extended to cross West 104th Street and continue south into the Project Site, and a second entry would align with Woodworth Avenue where Woodworth Avenue would be extended to cross West 104th Street into the Project Site. The entryways would be framed by landscaping and distinctive entry monuments and feature a turnaround for both vehicular and fire access. Access into the community would be controlled via vehicular gates that would be activated electronically for residents and would include a callbox for access for visitors and deliveries as well as a Knox Box for fire access. A third driveway would be for residential ingress and egress only and would be located at the south boundary of the Project Site, connecting to Lemoli Avenue. The driveways would be unsignalized.



Product	Garage	Bed/Bath	Area SF	Site Area (AC)	Density (DU/AC)	Total Units	Unit Mix	Total Beds	Total SF
Residential				**21.02**	**24.97**	**571**	**100%**	**1,606**	**754,452**
Row Townhomes						**403**	**70.6%**	**1,186**	**477,168**
Plan 1	1	1/1.5	862			144	25.2%	288	124,128
Plan 2	2	2/2.5	1,198			138	24.2%	414	165,324
Plan 3	2	3/3.0	1,444			63	11.0%	252	90,972
Plan 4	2	4/3.0	1,668			58	10.2%	232	96,744
Interlocking Townhomes						**168**	**29.4%**	**420**	**277,284**
Plan 5	2	3/3.5	1,512			84	14.7%	168	127,008
Plan 6	2	4/4.0	1,789			84	14.7%	252	150,276
Non-Residential				**1.85**					**8,232**
Clubhouse Phase 1			4,205	0.90					4,205
Clubhouse Phase 2			4,027	0.65					4,027
Misc. Open Space				0.30					
Total				**22.87**	**24.97**	**571**		**1,606**	**762,684**

SOURCE: Danielian Associates, 2024

N.T.S.

FIGURE 4: Site Plan

INGLEWOOD MORNINGSIDE PROJECT

Kimley»Horn



SOURCE: Danielian Associates, 2024

N.T.S.

FIGURE 5: Elevations ROW Townhomes

INGLEWOOD MORNINGSIDE PROJECT

Kimley»Horn



PERSPECTIVE - PASEO VIEW



PERSPECTIVE - STREET VIEW

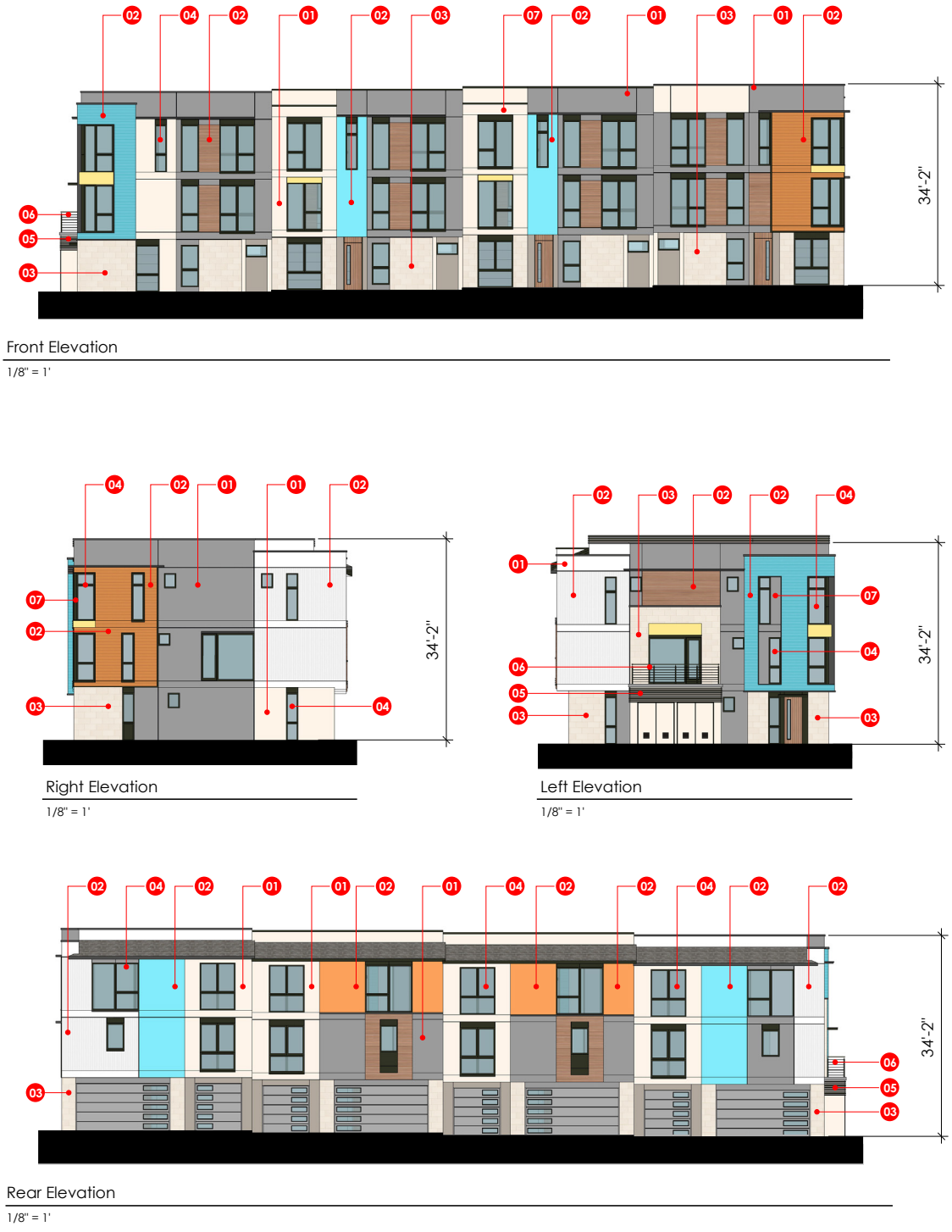
SOURCE: Danielian Associates, 2024

N.T.S.

FIGURE 6: Renderings ROW Townhomes

INGLEWOOD MORNINGSIDE PROJECT

Kimley»Horn



SOURCE: Danielian Associates, 2024

N.T.S.

FIGURE 7: Elevations of Interlocking Townhomes

INGLEWOOD MORNINGSIDE PROJECT

Kimley»Horn



PERSPECTIVE - PASEO VIEW



PERSPECTIVE - STREET VIEW

SOURCE: Danielian Associates, 2024

N.T.S.

FIGURE 8: Renderings of Interlocking Townhomes

INGLEWOOD MORNINGSIDE PROJECT

Kimley»Horn



SOURCE: Danielian Associates, 2024

N.T.S.

FIGURE 9: Clubhouse Phase I

INGLEWOOD MORNINGSIDE PROJECT

Kimley»Horn



SOURCE: Danielian Associates, 2024

N.T.S.

FIGURE 10: Clubhouse Phase II

INGLEWOOD MORNINGSIDE PROJECT

Kimley»Horn

The Project would include a private internal road system. Morningside Drive would serve the Project Site as its east/west roadway and as a fire lane. North and south private roads would include Champions Drive, Darby Avenue, Lemoli Avenue and Woodworth Avenue, which are also fire lanes. Champions Drive would extend along the entire western boundary of the Project Site. Within the Project Site, Darby Avenue would begin at the northern Project Site boundary, near the northwestern corner, then extend south beyond Morningside Drive to become Lemoli Avenue. Lemoli Avenue would then continue south to connect to the existing Lemoli Avenue south of the Project Site. Within the Project Site, Woodworth Avenue would begin at the northern Project Site boundary, near the northeastern corner, then extend south to end at Morningside Drive. Alleyways between homes would provide access for residents and the Fire Department.

Pedestrians and bicyclists would access the Project Site via new interior sidewalks and paths around the perimeter of the Project Site that would provide connections to each home and access to parks and clubhouse/amenity areas. Exterior access to the Project Site would be from a separate sidewalk path located near each vehicle driveway along West 104th Street and Lemoli Avenue. As shown on **Table 2,** the Project would provide 1,122 vehicle parking spaces, including 998 resident parking spaces provided within enclosed garages attached to individual homes and 124 visitor parking spaces provided along interior streets and outside the clubhouses. The Project would provide 66 visitor bicycle spaces in total which would be located at the two clubhouses.

Lighting and Signage

The Project would install various exterior lights. The exterior lighting would include downlights in the ground floor covered areas, as well as low-level landscape lighting and limited façade up-lighting to highlight key architectural features. Exterior lights would be wall- or ground-mounted and shielded away from adjacent land uses. Building security lighting would be used at all entry and exits and would remain on from dusk to dawn but would be designed to prevent light trespass onto adjacent properties. All exterior lighting would meet applicable City standards and be shielded or directed toward the areas to be illuminated.

Site Security

During construction, the Project Site would be secured with perimeter fencing. During operation, the Project would be fenced and entryways into the community via West 104th Street and Lemoli Avenue would be controlled via vehicular gates. The gates would be activated electronically for residents and would include a callbox for access for visitors and deliveries as well as a Knox Box for fire access. Access to each home would be provided via private driveways and alleys.

Community and recreational rooms would be open from 8:00 AM to 10:00 PM each day for residents and guests. Residents would have access to the clubroom and pool area via an electronic key fob. Security design measures for semi-public and private spaces, which may

include but not be limited to, the use of security cameras, and well-illuminated public and semi-public space designed with a minimum of dead space to eliminate areas of concealment and to locate building entrances in high-foot traffic areas.

Sustainability

The Project would comply with all mandatory measures under 2022 California Green Building Standards Code (CALGreen), Part 11, Title 24 CCR for equipment and systems efficiency.

The landscape plan will incorporate a variety of strategies for sustainability and water conservation based on state and local guidelines including compliance with the Model Water Efficient Landscape Ordinance (MWELO) and all additional local requirements. Plant species will be predominantly low and moderate water use specific to the local climate. Plants will be grouped in hydrozones based on similar water use demands and planting design will respond to specific site conditions.



SOURCE: Danielian Associates, 2024

N.T.S.

FIGURE 11: Landscape Plan

INGLEWOOD MORNINGSIDE PROJECT

Kimley»Horn

The irrigation system would include a variety of water conservation features including the use of a flow sensor at the point of connection that can detect possible leaks and shut the system down so system integrity can be ensured. The irrigation controller would incorporate Smart Water Application Technology (SWAT) that will include automatic run times based on local weather conditions and utilize a rain shut off device. Shrubs and ground cover would be irrigated with drip tubing which reduces evaporation and trees would receive supplemental water from high efficiency micro spray nozzles. The Project would also include solar panels on rooftops that would provide for at least 50 percent of the Project's energy demands in accordance with Title 24 requirements. All residential units will be Electric Vehicle (EV) capable and two on-site EV Charging stations in accordance with Title 24 requirements would be provided at each of the clubhouse buildings. The Project would provide 66 visitor bicycle spaces that would be located at the two clubhouses.

Construction of the Project

Development of the Project would require the export of up to 12,000 cubic yards of soil and hardscape materials and approximately 12,000 square feet of building materials. The Project would be constructed in six phases which includes site-wide activities as the first phase (preparation, grading, infrastructure improvements, and paving). Following the first phase Project Site, the Project would involve five phases of vertical construction involving building construction and architectural coating activities for five development phases. As below, overlap of vertical construction would occur. Site-wide construction activities are expected to begin in the 2nd quarter of 2025 and finish the 3rd quarter of 2026. Vertical construction is expected to begin in the 4th quarter of 2026 and finish in the 2nd quarter of 2029. The Project is expected to be operational in the 1st quarter of 2030.

Construction Phase	Start Date (month/year)	End Date (month/year)
Sitewide Improvements	May 2025	August 2026
Vertical Construction – Phase 1	September 2026	August 2027
Vertical Construction – Phase 2	January 2027	December 2027
Vertical Construction – Phase 3	June 2027	June 2028
Vertical Construction – Phase 4	January 2028	January 2029
Vertical Construction – Phase 5	April 2028	May 2029

Construction activities would be performed in accordance with all applicable state and federal laws and City Codes and policies governing building construction and activities. Construction is expected to occur between 7:00 a.m. and 8:00 p.m., Monday through Friday, and would comply with the City of Inglewood Municipal Code limits regarding construction activity (Municipal Code Section 5-41).

During construction, materials and equipment may be visible from West 104th Street, South 10th Avenue, and Yukon Avenue; however the Project Site would partially screen these areas with

construction fencing. Construction workers would park on the Project Site in specially designated areas. Although construction would primarily occur onsite, construction of the Project may require temporary offsite lane closures.

Project Approvals

Discretionary Approvals

The City of Inglewood has the principal responsibility for approving the Project. Approvals required for development of the Project include, but are not limited to, the following:

- A. General Plan Amendment pursuant to California Government Code Sections 65350 to 65362, to amend the Project Site's General Plan land use designation from Low Density to Medium Density, which allows 23 to 43 dwelling units per acre.

- B. Zone Change pursuant to Inglewood Municipal Code Chapter 12 Article 27, to change the zoning of the Project Site from the R-1 zone to R-3 zone, which permits 1 dwelling unit per 1,100 sf of lot area.

- D. Site Plan Review pursuant to Inglewood Municipal Code Section 12-39.50, to allow the construction of a complex of structures exceeding $20,000 in value.

3.0 LEAD AGENCY DETERMINATION AND OVERVIEW OF POTENTIAL IMPACTS

3.1 Environmental Factors Potentially Affected

The environmental factors checked below would be potentially affected by the Project. The impacts for each of these environmental factors would be less than significant with implementation of the mitigation measures included in this IS as indicated by the checklist on the following pages.

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

3.2 Lead Agency Determination

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 in the Project have been made by or agreed to by the Project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.	
I find that the proposed Project MAY have a significant effect on the environment and an ENVIRONMENTAL IMPACT REPORT is required.	
I find that the proposed Project MAY have a potentially significant or a 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 the 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 the Project is a qualified "transit priority project" that satisfies the requirements of Sections 21155 and 21155.2 of the Public Resources Code (PRC), and/or a qualified "residential or mixed use residential project" that satisfies the requirements of Section 21159.28(d) of the PRC, and although the project could have a potentially significant effect on the environment, there will not be a significant effect in this case, because the SUSTAINABLE COMMUNITIES ENVIRONMENTAL ASSESSMENT (SCEA) identifies measures that either avoid or mitigate to a level of insignificance all potentially significant or significant effects of the Project.	X

City of Inglewood

6/24/25

Bernard McCrumby, Jr.

Date

Planning Manager

4.0 SCEA CRITERIA AND CONSISTENCY ANALYSIS

4.1 Transit Priority Project Criteria

Senate Bill (SB) 375 provides CEQA streamlining benefits to qualifying Transit Priority Projects (TPPs). Section 21155(b) of the Public Resources Code defines a TPP for SCEA purposes as a project that meets the following three criteria:

1. Contains at least 50 percent residential use, based on total building square footage (and if the project contains between 26 and 50 percent of non-residential uses, a floor area ratio of not less than 0.75);
2. Provides a minimum net density of at least 20 dwelling units per acre; and
3. Is located within one-half mile of a "major transit stop" or "high-quality transit corridor" included in SCAG's RTP/SCS

Consistency with Criterion #1: Contains at least 50 percent residential use, based on total building square footage (and if the project contains between 26 and 50 percent of non-residential uses, a floor area ratio of not less than 0.75)

The Project is a residential development that would include the development of 571 total units, including 403 row townhomes with one to four bedrooms and 168 interlocking townhomes with three to four bedrooms. The Project does not contain non-residential uses. Thus, the Project would contain at least 50 percent residential use based on total building square footage and would be consistent with Criterion #1.

Consistency with Criterion #2: Provides a minimum net density of at least 20 units per acre.

The Project proposes 571 total residential units on approximately 22.87 acres. The density of the Project would be 24.97 du/acre. Thus, the Project would provide a minimum net density of at least 20 units per acre and would be consistent with Criterion #2.

Consistency with Criterion #3: Is within one-half mile of a major transit stop or high-quality transit corridor included in a regional transportation plan.

A major transit stop is defined in PRC Section 21064.3 as a stop containing a rail or bus rapid transit station, a ferry terminal served by bus or rail transit, or the intersection of two or more major bus routes with headways of 20 minutes or less during the morning and afternoon peak commute hours. Furthermore, pursuant to PRC Section 21155(b), this definition also includes major transit stops that are included in the applicable regional transportation plan. A high-quality transit corridor is defined in PRC Section 21155(b) as "[a] corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours."

The Project Site meets this definition, as it is located within one-half mile of a major transit stop, as well as two existing transit stops along a high-quality transit corridor.

The Project is located within a one-half mile of two existing transit stops along a high-quality transit corridor. One existing transit stop is located on the northwest and southeast corners of

the intersection of Crenshaw Boulevard at Century Boulevard, approximately 0.4 miles northeast of the Project Site. This intersection services Metro Line 117 and Metro Line 210. Metro Line 117 runs west and east with stops located on the northwest and southeast corners of the intersection. Metro Line 210 runs north and south with stops located on the northeast and southwest corners of the intersection. Metro Line 117 operates between LAX and the City of Downey via Century Boulevard with 15-minute headways on weekdays during peak commute periods. Metro Line 210 operates between Hollywood/Vine Station and South Bay Galeria via mainly Crenshaw Boulevard with 10-minute headways on weekdays and 15-minute headways on weekends during peak commute periods.

The Project is also with one-half mile of a high-quality transit corridor (Crenshaw Boulevard). The closest noted existing transit stop is located on the southwest and northeast corners of the intersection of Crenshaw Boulevard at 104th Street, approximately 0.2 miles east of the Project Site, which services Metro Line 210.

Therefore, the Project is consistent with Criterion #3 due to its proximity within one-half mile of a major transit stop and an existing transit stop along a high-quality transit corridor.

4.2 Consistency with a Sustainable Communities Strategy

SB 375 provides CEQA streamlining benefits to qualifying TPPs which demonstrate consistency with a Sustainable Communities Strategy (SCS), which, if implemented, would achieve the State's greenhouse gas (GHG) reduction targets.

On September 3, 2020, SCAG's Regional Council adopted Resolution 20-624-1, which approved the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (2020-2045 RTP/SCS, also known as Connect SoCal) in its entirety. For the SCAG region, CARB has set GHG emissions reduction targets at 19 percent below 2005 per capita emissions levels by 2035. SCAG's resolution adopting the 2020-2045 RTP/SCS also determined that the SCS includes strategies to meet the requirements of SB 375 to achieve these GHG emission reduction goals and directed SCAG staff to submit the 2020-2045 RTP/SCS to CARB for review and certification in this regard. On October 30, 2020, pursuant to Executive Order No. G-20-239, CARB "accept[ed] the SCAG determination that its 2020 SCS would, when implemented, meet the emissions reduction target for automobiles and light trucks as established by CARB in 2018, specifically, a 19 percent per capita reduction by 2035 relative to 2005 levels."

On April 4, 2024, SCAG's Regional Council adopted the 2024-2050 RTP/SCS (also known as Connect SoCal 2024). Connect SoCal 2024 outlines a vision for a more resilient and equitable future, with investment, policies and strategies for achieving the region’s shared goals through 2050. The Plan elements that are necessary to bring this vision to fruition are organized within the pillars of Mobility, Communities, Environment and Economy. On May 7, 2025 the California CARB accepted SCAG’s determination that the Connect SoCal 2024 meets the state’s GHG emission reduction targets.

SCAG's RTP/SCS presents strategies and measures that are consistent with local jurisdictions' land use policies and incorporates best practices for achieving the state-mandated reductions in GHG

emissions at the regional level through reduced per-capita vehicle miles traveled (VMT). It is important to note, however, that SCAG does not have a direct role in implementing the SCS through decisions about the type and location of development.

Both SCAG's 2020-2045 RTP/SCS and 2024-2050 RTP/SCS are considered in this discussion and throughout this SCEA.

4.2.1 Use Designation, Density, and Building Intensity

2020-2045 RTP/SCS

The 2020-2045 RTP/SCS incorporates center focused placemaking as a land use tool to create dynamic, connected built environments that support multimodal mobility, reduced reliance on single occupancy vehicles, and reduced GHG emissions. This approach supports attractive and functional places for residents of the region to live, work, and play, with priority placed on urban and suburban infill sites in existing/planned service areas.

These centers are typically human-scale, compact, and pedestrian oriented with a variety of housing types and affordability options. To facilitate focused placemaking, the 2020-2045 RTP/SCS identifies Priority Growth Areas (PGAs) across the SCAG region. PGAs are locations where many of the 2020-2045 RTP/SCS strategies can be fully realized. These PGAs include Job Centers, Transit Priority Areas (TPAs), High Quality Transit Areas (HQTAs), Neighborhood Mobility Areas (NMAs), Livable Corridors, and Spheres of Influence (SOIs).

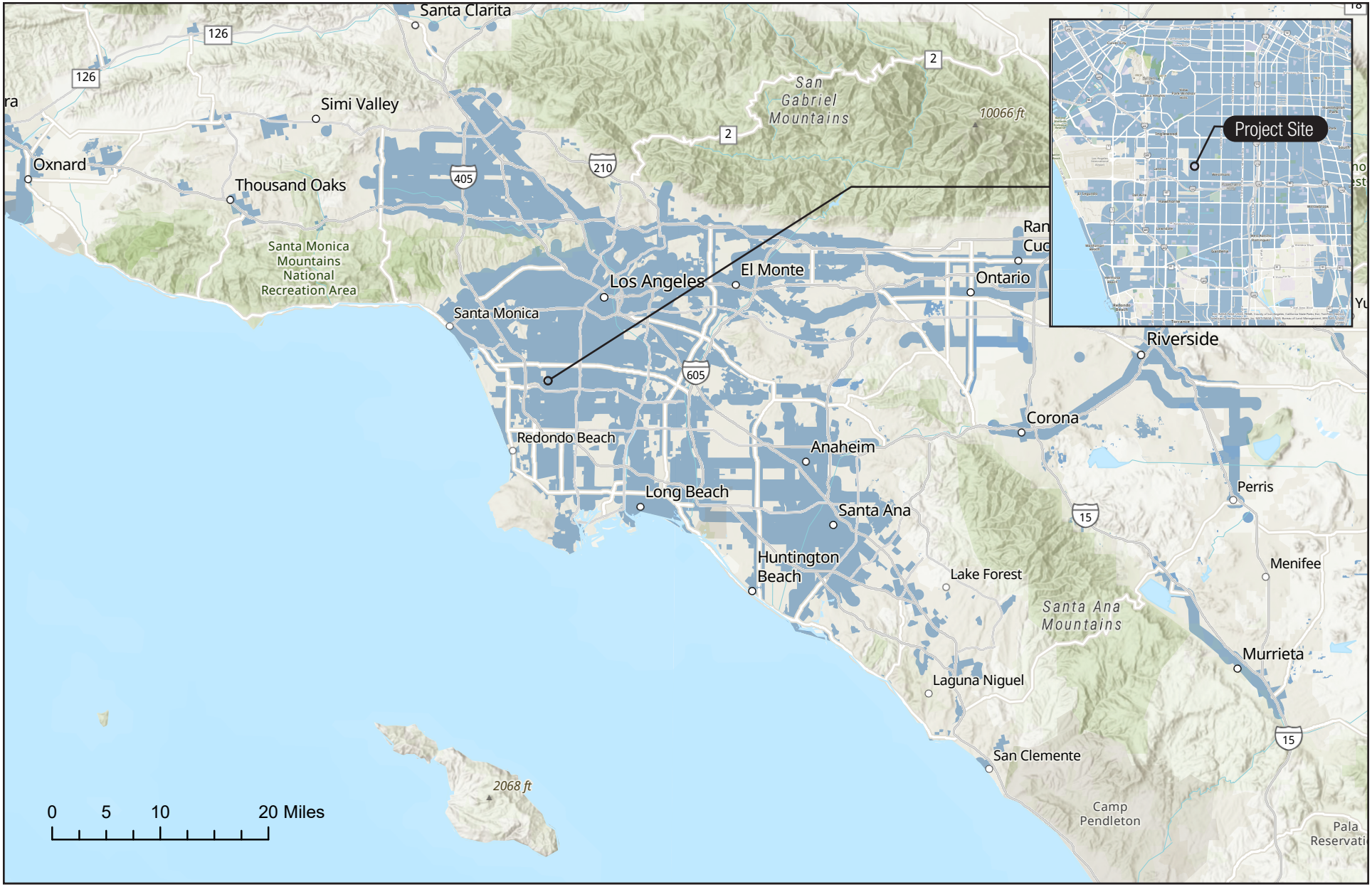
According to the 2020-2045 RTP/SCS, PGAs account for only 4 percent of the region's total land area, but implementation of SCAG's recommended growth strategies will help these areas accommodate 64 percent of forecasted household growth and 74 percent of forecasted employment growth between 2020 and 2045. The more compact form of regional development implemented through PGAs, if fully realized, can reduce travel distances, increase mobility options, improve access to workplaces, and conserve the regional resources areas. PGAs do not limit any particular development project from being built in any particular location and are intended to guide general growth patterns. In addition, while the 2020-2045 RTP/SCS does not require individual TPPs to be located within PGAs, the expectation is that most of the more intensive development in the region would be within one or more PGAs.

- Transit Priority Areas: TPAs are Priority Growth Areas that are within one half mile of existing or planned 'major' transit stops in the region. A 'major' transit stop is defined as a site containing an existing or planned rail or bus rapid transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods. TPAs are where people can live, work and play in higher density, compact communities with ready access to a multitude of safe and convenient transportation alternatives.
- High Quality Transit Areas: HQTAs are corridor-focused PGAs within one-half mile of an existing or planned fixed transit stop or bus transit corridor where buses operate at a frequency of at least every 15 minutes during peak commute hours. HQTAs

represent under 3 percent of the region's acreage but are projected to be home to over 51 percent of new households between 2016 and 2045. New developments within HQTAs should respond to the existing physical conditions of the surrounding area, preserving existing development patterns and neighborhood character while providing a balance of modal and housing choices.

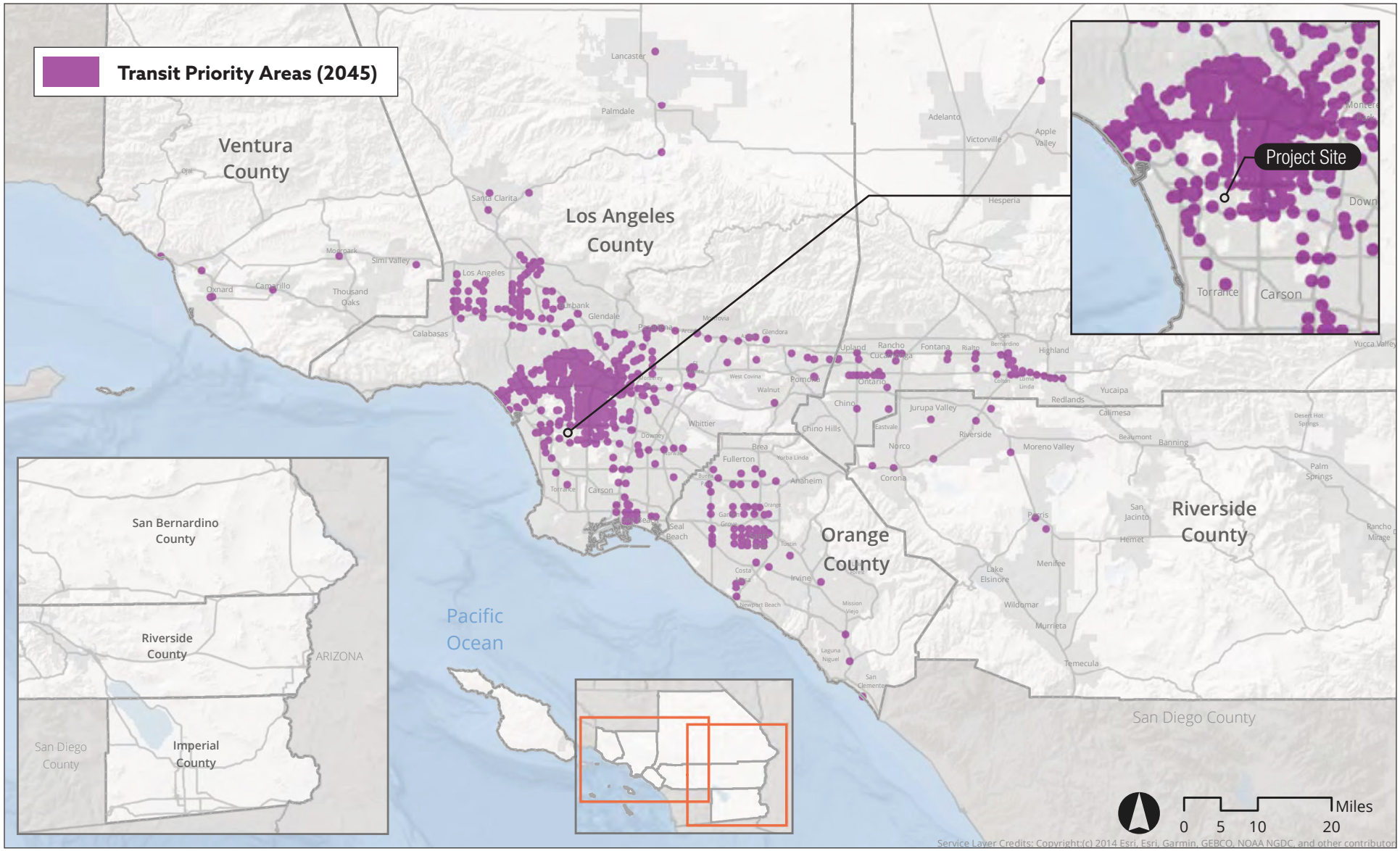
- Neighborhood Mobility Areas: NMAs are PGAs with robust residential to non-residential land use connections, high roadway intersection densities, and low-to-moderate traffic speeds, with a focus on creating, improving, restoring, and enhancing safe and convenient connections to a variety of land uses (e.g., schools, shopping, services, places of worship, parks, and greenways). Safer and shorter multimodal trips are encouraged to reduce the reliance on single occupancy vehicles. This is achieved in NMAs through increased density, mixed land uses, neighborhood design, enhanced destination accessibility, and reduced distance to transit.
- Livable Corridors: Livable Corridors strategy encourages increased density at nodes along key corridors. This strategy focuses on transit improvements, which include dedicated or semi-dedicated bus lanes, enhanced bus shelters, real-time travel information, and off-bus ticketing; active transportation improvements, which would support safe bicycling and walking; and land use policies, which includes developing mixed-use retail centers at key nodes and increasing neighborhood-oriented retail at intersections.
- Job Centers: Job Centers are where regional strategies that support economic prosperity can be deployed in catalytic ways. Job Centers have been identified in all six counties in the SCAG region and represent areas that have a significantly higher employment density than surrounding areas. Job Centers represent areas with local employment peaks rather than simply places with the most jobs. Identified Job Centers are present in over 60 percent of the region's cities and contain about one-third of Southern California's jobs - but only cover less than 1 percent of the region's land area. When growth is concentrated in Job Centers, the length of vehicle trips for residents can be reduced.

The PGAs are shown in Exhibit 3.4 through Exhibit 3.10 of the 2020-2045 RTP/SCS. As shown in **Figure 12** through **Figure 17,** the Project Site is located within the boundaries of a PGA, a HQTA, near a Livable Corridor, and an NMA.



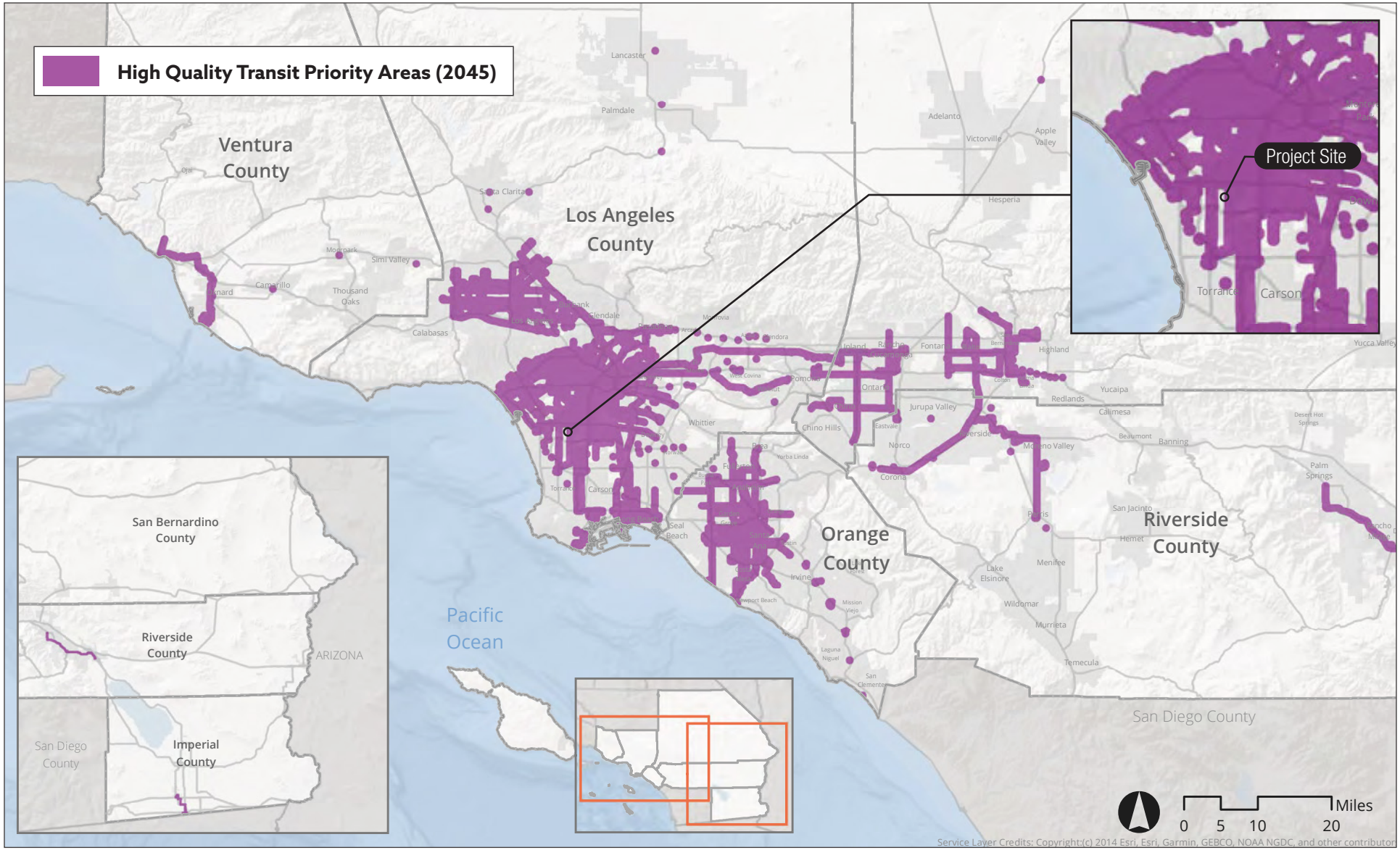
SOURCE: SCAG, 2022

Figure 12: Priority Growth Areas (PGA), SCAG Region - 2020-2045



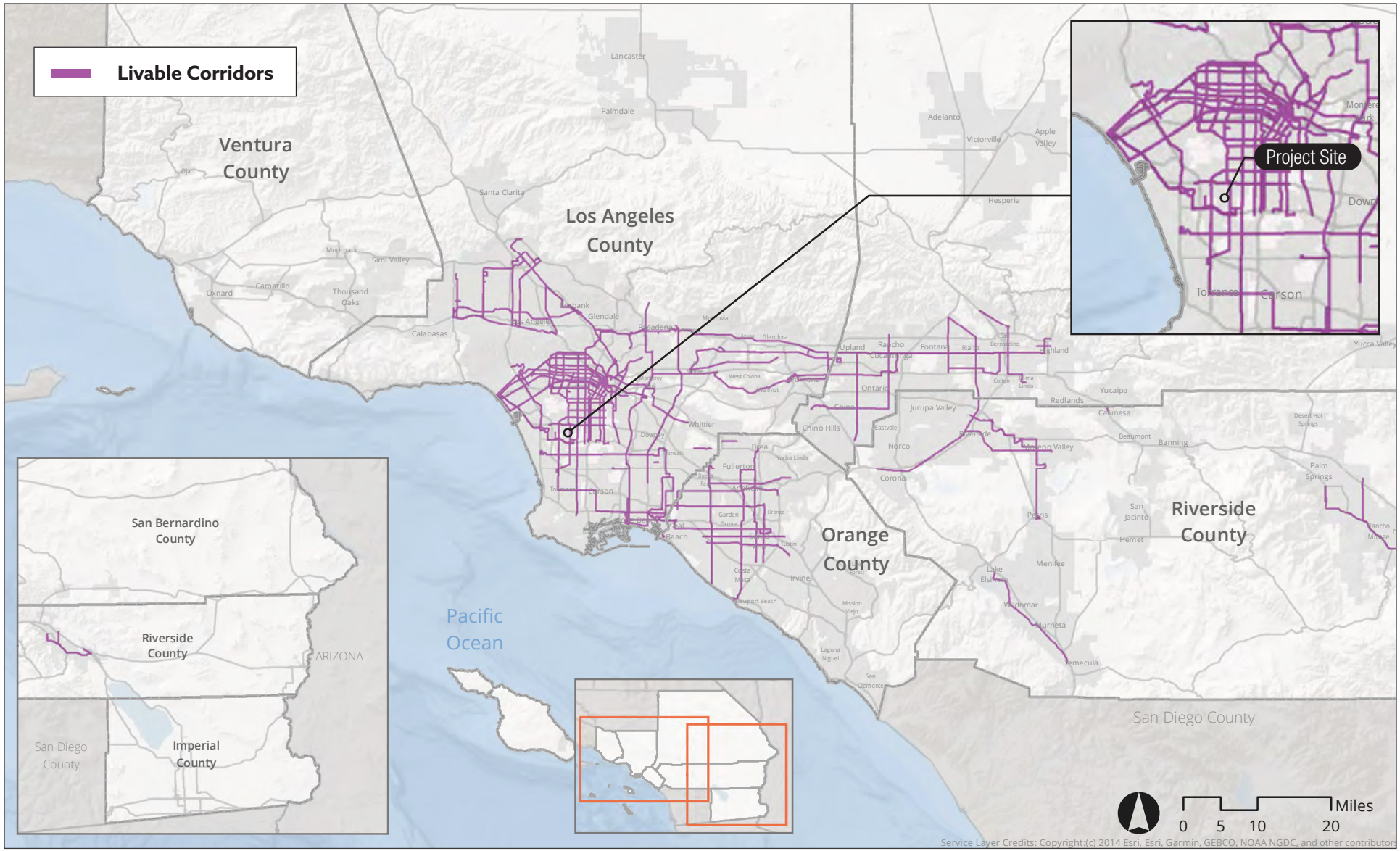
SOURCE: County Transportation Commissions, SCAG, 2019

Figure 13: Transit Priority Area Map, SCAG Region - 2020-2045



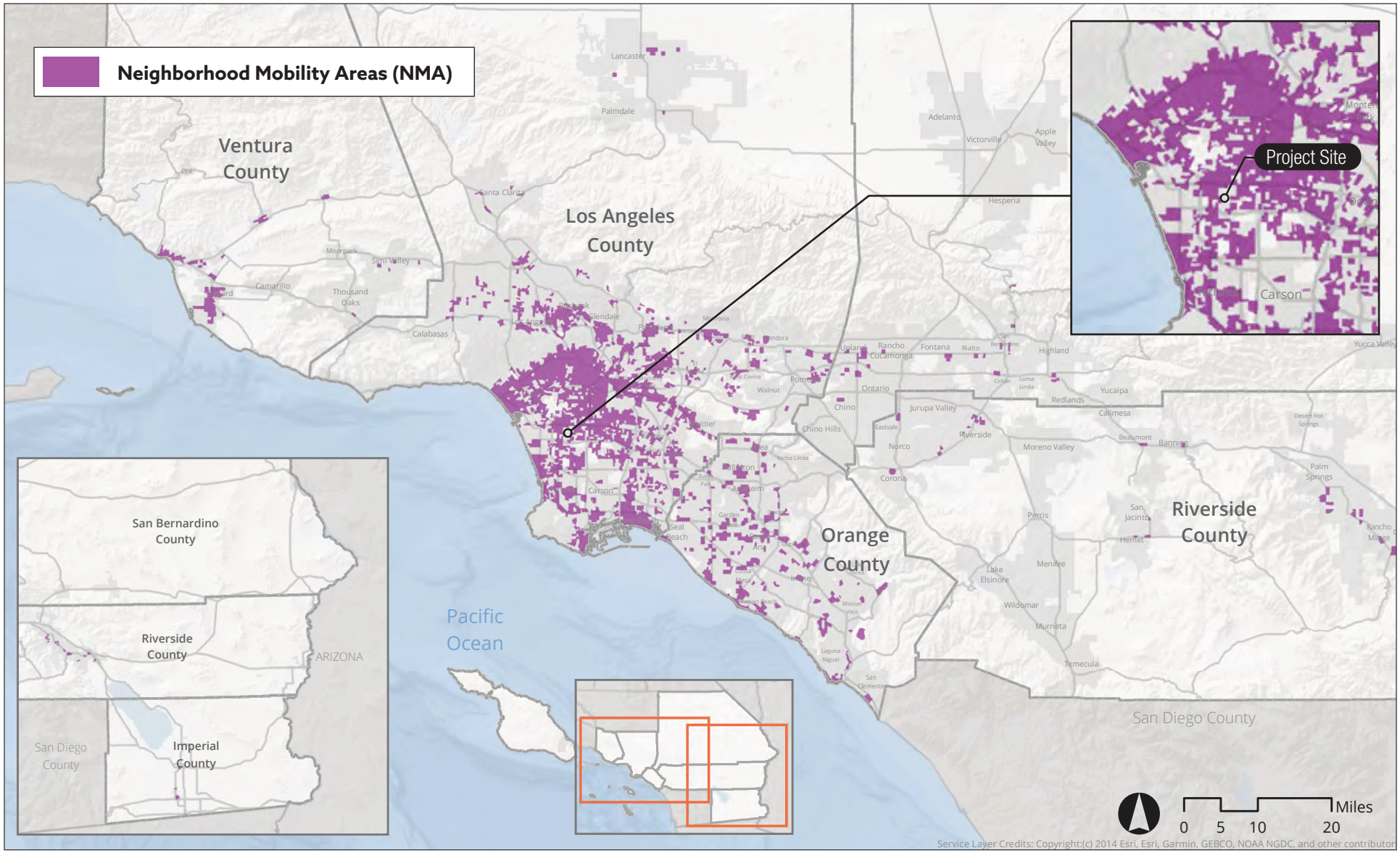
SOURCE: County Transportation Commissions, SCAG, 2019

Figure 14: High Quality Transit Areas (HQTA) Map, SCAG Region - 2020-2045



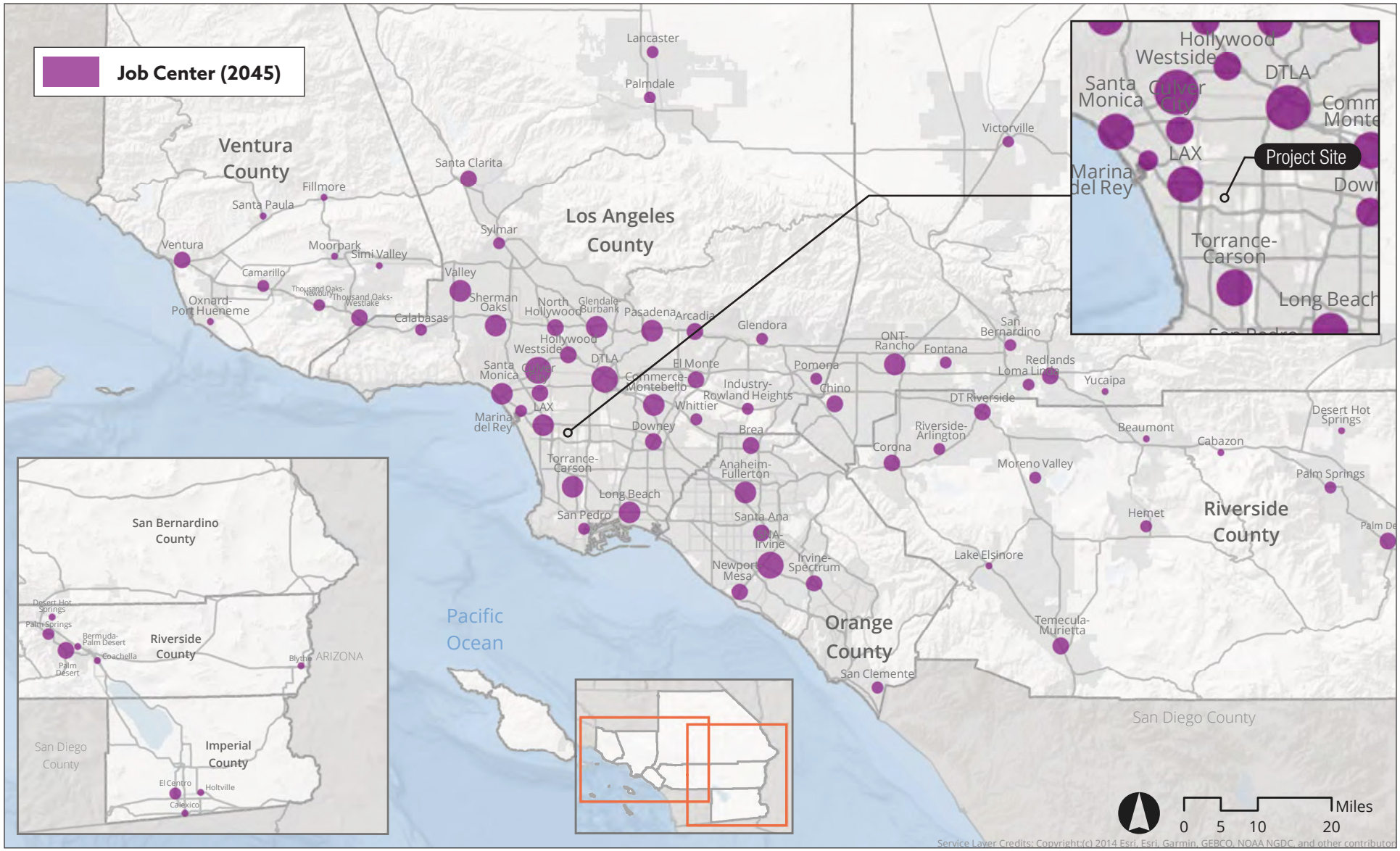
SOURCE: SCAG, 2019

Figure 15: Livable Corridors Map, SCAG Region - 2020-2045



SOURCE: SCAG, 2019

Figure 16: Neighborhood Mobility Areas Map, SCAG Region - 2020-2045



SOURCE: SCAG, 2019

Figure 17: Job Centers Map, SCAG Region - 2020-2045

The Project would include the development of 571 total residential units on the Project Site, including 403 row townhomes with one to four bedrooms and 168 interlocking townhomes with three to four bedrooms. Of those units, 10 percent of the housing units would be designated for Very Low Income affordable housing. The Project would significantly increase the housing supply in the Project area, as well as housing affordability in the PGAs in which the Project Site is located.

The Project Site is located near several bus lines. The Project is located within a one-half mile of two existing transit stops along a high-quality transit corridor. One existing transit stop is located on the northwest and southeast corners of the intersection of Crenshaw Boulevard at Century Boulevard, approximately 0.4 miles northeast of the Project Site. This intersection services Metro Line 117 and Metro Line 210. Metro Line 117 runs west and east with stops located on the northwest and southeast corners of the intersection. Metro Line 210 runs north and south with stops located on the northeast and southwest corners of the intersection. Metro Line 117 operates between LAX and the City of Downey via Century Boulevard with 15-minute headways on weekdays during peak commute periods. Metro Line 210 operates between Hollywood/Vine Station and South Bay Galeria via mainly Crenshaw Boulevard with 10-minute headways on weekdays and 15-minute headways on weekends during peak commute periods.

Overall, the nature of the Project, including the location, type of use, density, and building intensity, would be consistent with SCAG's land use strategies related to reducing dependence on automobile travel and thus, mobile-source GHG emissions, by encouraging development within PGAs. The Project would develop residential uses on an infill site within walking distance of multiple transit opportunities and existing sources of shopping, employment, and entertainment, the Project would leverage existing density and infrastructure to reduce the length of vehicle trips for residents and employees.

Table 3: Applicable Goals and Guiding Principles of SCAG 2020-2045 RTP/SCS

2020–2045 RTP/SCS Goals and Guiding Principles	Would the Project Be Consistent?
Goal 1: Encourage regional economic prosperity and global competitiveness	**No Conflict.** Although this goal applies at the regional level, the Project would not conflict with its implementation. The Project would construct residential uses near other residential, commercial, school, and entertainment uses in an existing urban area, supporting the regional economic prosperity and global competitiveness of Southern California by providing housing uses. The Project would also provide market rate and affordable housing.
Goal 2: Improve mobility, accessibility, reliability, and travel safety for people and goods	**Consistent.** SB 743 updates the way transportation impacts are evaluated in California for new development projects, with a focus on providing active transportation and reducing vehicle miles traveled. The Project would develop residential uses in a location that is well-served by existing transit infrastructure.

Table 3: Applicable Goals and Guiding Principles of SCAG 2020-2045 RTP/SCS	
2020–2045 RTP/SCS Goals and Guiding Principles	**Would the Project Be Consistent?**
	Additionally, pedestrians and bicyclists would be able to access the Project Site via new interior sidewalks and paths around the perimeter of the Project Site that would provide connections to each home and access to parks and clubhouse/amenity areas. The Project would also provide 66 bicycle spaces for visitors. As a result, the Project would provide residents and visitors with convenient access to public transit and opportunities for walking and biking. Furthermore, the Project Site is within walking distance of the existing residential, commercial, school and entertainment uses in the vicinity. Therefore, the location of the Project encourages mobility and accessibility for residents and visitors of the Project Site.
Goal 3: Enhance the preservation, security, and resilience of the regional transportation system	**No Conflict.** Although this goal applies at the regional level, the Project would not conflict with its implementation. The Project would provide residents and visitors with convenient access to public transit and opportunities for connectivity to other commercial uses in the vicinity.
Goal 4: Increase person and goods movement and travel choices within the transportation system	**No Conflict**. Although these goals apply at a regional level, the Project would be developed on a currently developed Project Site located in an existing urbanized area with an established network of roads and freeways that provides local and regional access, including to the Project Site. The Project Site is within close proximity to several transit options. Given the Project Site's location in proximity to transportation options, the Project would maximize mobility, accessibility, and overall productivity of the transportation system by providing various opportunities for the use of alternative modes of transportation. Therefore, the Project would not conflict with these goals.
Goal 5: Reduce greenhouse gas emissions and improve air quality	**No Conflict**. The Project is an infill development located in an area with a variety of transportation options. The Project includes various features including energy-efficient features, including solar panels, all residential units will be Electric Vehicle (EV) capable and two on-site EV Charging stations would be provided at each of the clubhouse

Table 3: Applicable Goals and Guiding Principles of SCAG 2020-2045 RTP/SCS	
2020–2045 RTP/SCS Goals and Guiding Principles	**Would the Project Be Consistent?**
	buildings. The Project would provide 66 visitor bicycle spaces that would be located at the two clubhouses. The landscape plan will incorporate a variety of strategies for sustainability and water conservation based on state and local guidelines including compliance with the Model Water Efficient Landscape Ordinance (MWELO) and all additional local requirements. All of these features would serve to reduce GHG emissions and improve air quality. Therefore, the Project would support this goal.
Goal 6: Support healthy and equitable communities	**No Conflict.** The Project would construct new market rate and affordable housing near a variety of transit options and near other residential, commercial and entertainments uses. The Project's proximity to a variety of transit would facilitate the use of alternative modes of transportation, which would reduce car trips and impacts to air quality. Therefore, the Project would support this goal.
Goal 7: Adapt to a changing climate and support an integrated regional development pattern and transportation network	**No Conflict.** The Project would include electric vehicle (EV) capable spaces and spaces equipped with EV chargers. The Project would also be in proximity to various public transportation systems. Therefore, the Project would support this goal.
Goal 8: Leverage new transportation technologies and data-driven solutions that results in more efficient travel	**Not Applicable.** This measure is directed towards public agencies and does not apply to individual projects.
Goal 9: Encourage development of diverse housing types in areas that are supported by multiple transportation options	**Consistent.** Development of the Project would include the construction of 571 townhomes that would include a variety of types and sizes. Of those units, 10 percent of the housing units would be designated for Very Low Income affordable housing. The Project would provide residents with convenient access to variety of transit opportunities.
Goal 10: Promote conservation of natural and agricultural lands and restoration of habitats	**Consistent.** The Project is an infill development that would not affect any natural or agricultural lands and would not affect the restoration of habitats. Therefore, the Project would support this goal.

Table 3: Applicable Goals and Guiding Principles of SCAG 2020-2045 RTP/SCS	
2020–2045 RTP/SCS Goals and Guiding Principles	**Would the Project Be Consistent?**
Guiding Principle 1: Base transportation investments on adopted regional performance indicators and MAP21/FAST Act regional targets	**Not Applicable.** This measure is directed towards public agencies and does not apply to individual projects.
Guiding Principle 2: Place high priority for transportation funding in the region on projects and programs that improve mobility, accessibility, reliability and safety, and that preserve the existing transportation system	**Not Applicable.** This measure is directed towards public agencies and does not apply to individual projects.
Guiding Principle 3: Assure that land use and growth strategies recognize local input, promote sustainable transportation options, and support equitable and adaptable communities	**Not Applicable.** This measure is directed towards public agencies and does not apply to individual projects.
Guiding Principle 4: Encourage RTP/SCS investments and strategies that collectively result in reduced non-recurrent congestion and demand for single occupancy vehicle use, by leveraging new transportation technologies and expanding travel choices.	**Not Applicable.** This measure is directed towards public agencies and does not apply to individual projects.
Guiding Principle 5: Encourage transportation investments that will result in improved air quality and public health, and reduced greenhouse gas emissions.	**Not Applicable.** This measure is directed towards public agencies and does not apply to individual projects.
Guiding Principle 6: Monitor progress on all aspects of the Plan, including the timely implementation of projects, programs, and strategies.	**Not Applicable.** This measure is directed towards public agencies and does not apply to individual projects.
Guiding Principle 7: Regionally, transportation investments should reflect best-known science regarding climate change vulnerability, in order to design for long term resilience.	**Not Applicable.** This measure is directed towards public agencies and does not apply to individual projects.
Source: SCAG, 2020–2045 RTP/SCS, https://scag.ca.gov/read-plan-adopted-final-connect-socal-2020. Accessed March 1, 2025.	

CONSISTENCY WITH 2020-2045 RTP/SCS STRATEGIES

Table 4: Consistency with 2020-2045 RTP/SCS Strategies	
Strategy	**Consistency Assessment**
Focus Growth Near Destinations & Mobility Options	
Emphasize land use patterns that facilitate multimodal access to work, educational and other destinations.	**Consistent.** The Project would consist of a residential development that would include market-rate and affordable residential units, and retail uses within a PGA. Consistent with the Project Site's location within a SCAG 2020-2045 RTP/SCS designated PGA and HQTA. Residents of the Project would have multimodal access (e.g., transit, walking, and bicycling) to and from their jobs, school, and other destinations.
Focus on a regional jobs/housing balance to reduce commute times and distances and expand job opportunities near transit and along center-focused main streets.	**Consistent.** The Project would contribute to a balance between jobs and housing in the region by providing 571 new market-rate and affordable units. The Project Site is in an urbanized area surrounded by other commercial, educational, entertainment and residential uses. The Project is located within a one-half mile of two existing transit stops along a high-quality transit corridor. One existing transit stop is located on the northwest and southeast corners of the intersection of Crenshaw Boulevard at Century Boulevard, approximately 0.4 miles northeast of the Project Site. This intersection services Metro Line 117 and Metro Line 210. Metro Line 117 runs west and east with stops located on the northwest and southeast corners of the intersection. Metro Line 210 runs north and south with stops located on the northeast and southwest corners of the intersection. Metro Line 117 operates between LAX and the City of Downey via Century Boulevard with 15-minute headways on weekdays during peak commute periods. Metro Line 210 operates between Hollywood/Vine Station and South Bay Galeria via mainly Crenshaw Boulevard with 10-minute headways on weekdays and 15-minute headways on weekends during peak commute periods. The Project is also with one-half mile of a high-quality transit corridor (Crenshaw Boulevard). The closest noted existing transit stop is located on the southwest and northeast corners of the intersection of Crenshaw Boulevard at 104th Street, approximately 0.2 miles east of the Project Site, which services Metro Line 210.
Plan for growth near transit investments and support implementation of first/last mile strategies.	**Consistent**. As discussed above, the Project Site is served by a variety of public transit options. Thus, the Project would provide for growth near transit investment.

Table 4: Consistency with 2020-2045 RTP/SCS Strategies	
Promote the redevelopment of underperforming retail developments and other outmoded nonresidential uses.	**Not Applicable.** This measure is directed towards new commercial uses.
Prioritize infill and redevelopment of underutilized land to accommodate new growth, increase amenities and connectivity in existing neighborhoods.	**Consistent.** The Project consists of an infill development of 571 units. The Project is adjacent to similar residential uses and would be designed to complement and enhance the surrounding area.
Encourage design and transportation options that reduce the reliance on and number of solo car trips (this could include mixed uses or locating and orienting close to existing destinations).	**Consistent.** As previously discussed, the Project would be located near transit, which would reduce reliance on automobile and solo car trips. Furthermore, the Project would increase the residential opportunities in proximity of existing residential and commercial areas, destinations, and other neighborhood services in an urbanized area.
Identify ways to "right size" parking requirements and promote alternative parking strategies (e.g., shared parking or smart parking).	**Consistent.** All of the Project's residential units will be EV capable and two on-site EV Charging stations in accordance with Title 24 requirements would be provided at each of the clubhouse buildings. The Project would provide 66 visitor bicycle spaces that would be located at the two clubhouses.
Promote Diverse Housing Choices	
Preserve and rehabilitate affordable housing and prevent displacement.	**Consistent.** The Project Site does not currently contain existing housing. Therefore, no displacement would be required. The Project would 571 new market-rate and affordable units. Therefore, the Project would be consistent with this strategy.
Identify funding opportunities for new workforce and affordable housing development.	**Not Applicable**. This measure is directed towards public agencies and does not apply to individual projects.
Create incentives and reduce regulatory barriers for building context-sensitive accessory dwelling units to increase housing supply.	**Not Applicable**. This measure is directed towards public agencies. Nevertheless, the Project would develop 571 units, which would increase housing supply in the City.
Provide support to local jurisdictions to streamline and lessen barriers to housing development that supports reduction of greenhouse gas emissions.	**Not Applicable**. This measure is directed towards public agencies and does not apply to individual projects.
Leverage Technology Innovations	
Promote low emission technologies such as neighborhood electric vehicles, shared rides hailing, car sharing, bike sharing and scooters by providing supportive and safe	**Consistent**. The Project would include EV capable spaces and spaces equipped with EV chargers.

Table 4: Consistency with 2020-2045 RTP/SCS Strategies	
infrastructure such as dedicated lanes, charging and parking/drop-off space.	
Improve access to services through technology—such as telework and telemedicine as well as other incentives such as a "mobility wallet," an app-based system for storing transit and other multi-modal payments.	**Not Applicable.** This measure is directed towards public agencies as a policy strategy and does not apply to individual projects.
Identify ways to incorporate "micro-power grids" in communities, for example solar energy, hydrogen fuel cell power storage and power generation.	**Not Applicable.** This measure is directed towards public agencies as a policy strategy and does not apply to individual projects.
Support Implementation of Sustainability Policies	
Pursue funding opportunities to support local sustainable development implementation projects that reduce greenhouse gas emissions.	**Consistent.** While this measure is directed towards public agencies, the Project would support its implementation as the Project would include a variety of energy- and water-efficiency measures and fixtures which would result in a reduction in GHG emissions.
Support statewide legislation that reduces barriers to new construction and that incentivizes development near transit corridors and stations.	**Not Applicable.** This measure is directed towards public agencies as a policy strategy and does not apply to individual projects.
Support local jurisdictions in the establishment of Enhanced Infrastructure Financing Districts (EIFDs), Community Revitalization and Investment Authorities (CRIAs), or other tax increment or value capture tools to finance sustainable infrastructure and development projects, including parks and open space.	**Not Applicable.** This measure is directed towards public agencies as a policy strategy and does not apply to individual projects.
Work with local jurisdictions/communities to identify opportunities and assess barriers to implement sustainability strategies.	**Not Applicable.** This measure is directed towards public agencies as a policy strategy and does not apply to individual projects.
Enhance partnerships with other planning organizations to promote resources and best practices in the SCAG region.	**Not Applicable**. This measure is directed towards public agencies as a policy strategy and does not apply to individual projects.
Continue to support long range planning efforts by local jurisdictions.	**Not Applicable.** This measure is directed towards public agencies as a policy strategy and does not apply to individual projects.
Provide educational opportunities to local decisions makers and staff on new tools, best practices and policies related to	**Not Applicable**. This measure is directed towards public agencies as a policy strategy and does not apply to individual projects.

Table 4: Consistency with 2020-2045 RTP/SCS Strategies	
implementing the Sustainable Communities Strategy.	
Promote a Green Region	
Support development of local climate adaptation and hazard mitigation plans, as well as project implementation that improves community resiliency to climate change and natural hazards.	**Not Applicable.** This measure is directed towards public agencies as a policy strategy and does not apply to individual projects.
Support local policies for renewable energy production, reduction of urban heat islands and carbon sequestration.	**Consistent.** While this measure is directed towards public agencies as a policy strategy and does not apply to individual projects, the Project would support its implementation by including landscaping to reduce the urban heat island effect. Therefore, the Project would be consistent with this strategy.
Integrate local food production into the regional landscape.	**Not Applicable.** This measure is directed towards public agencies as a policy strategy and does not apply to individual projects.
Promote more resource efficient development focused on conservation, recycling and reclamation.	**Consistent.** The Project is an infill development located in an urbanized area served by existing utilities and infrastructure. Therefore, the Project would not result in the loss of previously undeveloped land or land intended for conservation. Furthermore, the Project would be required to comply with the California Integrated Waste Management Act of 1989 (AB 939), which requires that at least 50 percent of waste produced is recycled, reduced, or composted and is included in BHMC Section 9-1-1001. During operation, the Project would be required to comply with CalRecycle's waste diversion rate target of 50 percent of the waste stream. The Project would also be subject to AB 1826, which would be subject to compliance with the CALGreen Code, State regulations, and City regulations requires businesses to provide separate recycling bins for organic waste.
Preserve, enhance and restore regional wildlife connectivity.	**Not Applicable**. This measure is directed towards public agencies as a policy strategy and does not apply to individual projects. Furthermore, the Project Site does not serve as a regional wildlife corridor.
Reduce consumption of resource areas, including agricultural land.	**Consistent**. The Project is an infill development located in an urbanized area and is not zoned for agricultural uses. No resource areas or agricultural lands would be impacted by the Project.
Identify ways to improve access to public park space.	**Consistent.** The Project would construct residential uses in an urbanized area of the City and would include various

Table 4: Consistency with 2020-2045 RTP/SCS Strategies	
	amenities to serve the residents, including two clubhouses (8,232 total square feet), two swimming pools, two pocket parks, a dog park, and common and private open space throughout the Project Site.
Source: SCAG, 2020–2045 RTP/SCS, https://scag.ca.gov/read-plan-adopted-final-connect-socal-2020. Accessed March 1, 2025.	

2024-2050 RTP/SCS

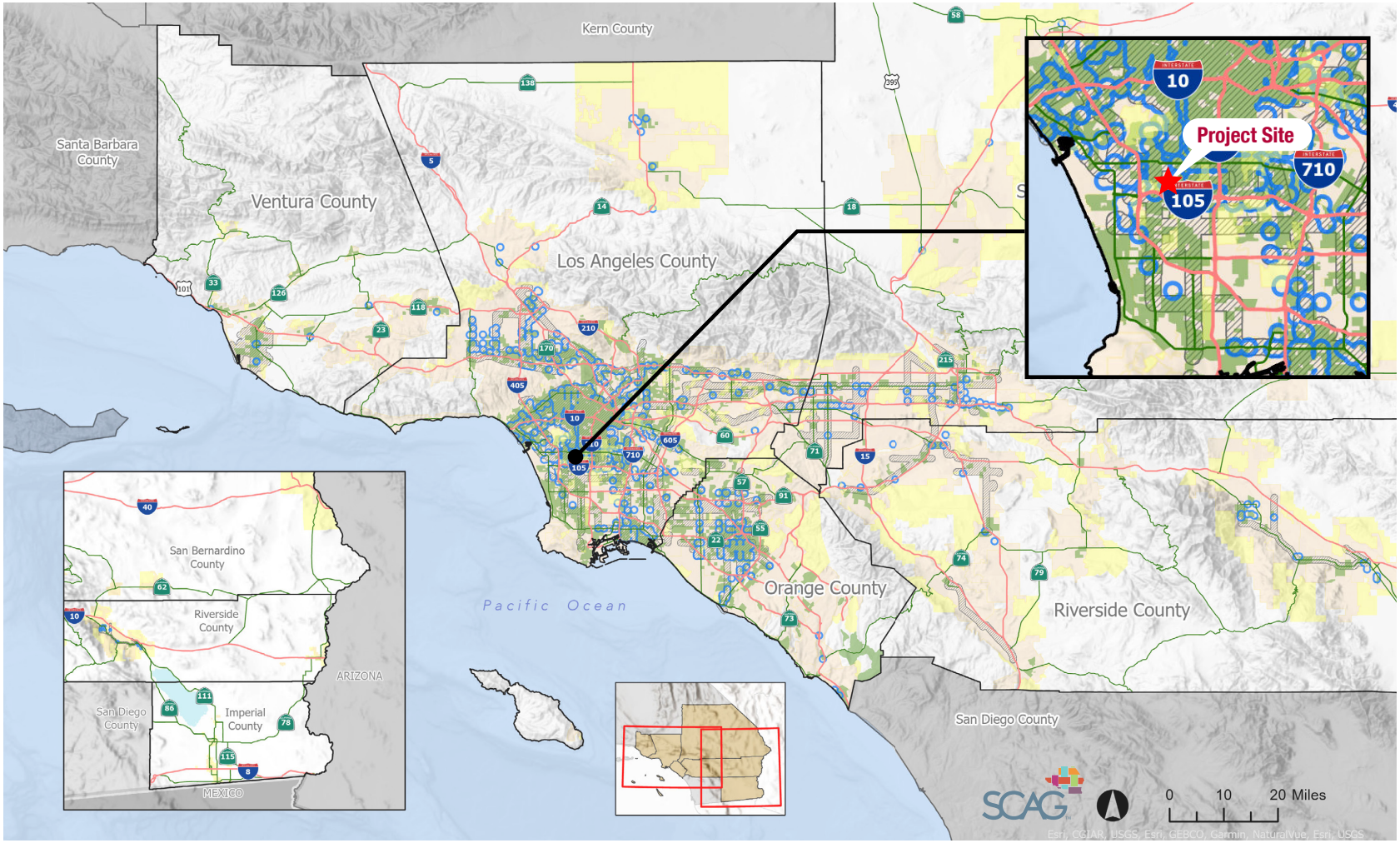
SCAG's 2024-2050 RTP/SCS introduces Priority Development Areas (PDAs), which are areas within the SCAG region where future growth can be located to help the region reach the 2024-2050 RTP/SCS goals. Generally, this means that people in these areas have access to multiple modes of transportation or that trip origins and destinations are closer together, allowing for shorter trips. PDAs are a technical tool used for different purposes, such as growth visioning, performance measurement or grant applications. However, as a general principle, development in overlapping PDAs indicates a greater alignment with the 2024-2050 RTP/SCS goals. PDAs include Neighborhood Mobility Areas (NMA)s, Transit Priority Areas (TPA)s, Livable Corridors, and Spheres of Influence (SOI)s (in unincorporated areas only).

PDAs follow the principles of center-focused placemaking, providing locations where many of the 2024- 2050 RTP/SCS strategies can be fully realized. According to the 2024-2050 RTP/SCS, PDAs account for only 8.2 percent of the region's total land area; however, implementation of SCAG's recommended growth strategies will help these areas accommodate 66 percent of forecasted household growth and 54 percent of forecasted employment growth between 2019 and 2050. The more compact form of regional development implemented through PDAs, if fully realized, can reduce travel distances, increase mobility options, improve access to workplaces, and conserve the regional resources areas. The PDAs are shown in Map 3.4 of the 2024-2050 RTP/SCS.

The Project's location relative to PDAs, including NMAs, TPAs, and Livable Corridors is shown in **Figure 18** through **Figure 21**. As shown in these figures, the Project Site is located within the boundaries of a TPA, NMA, and a Livable Corridor, as described below:

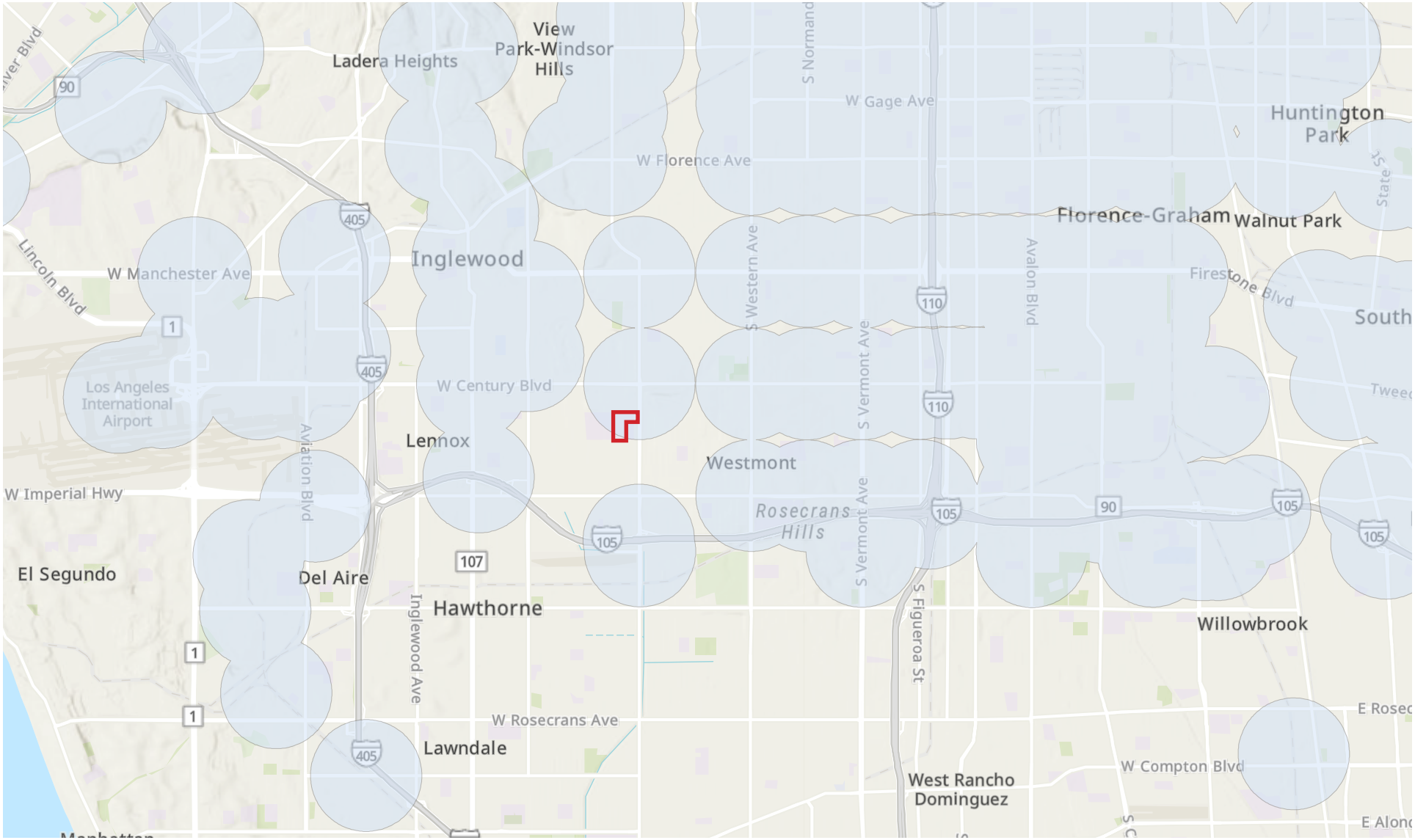
- **Transit Priority Areas**: TPAs are areas within 0.5 mile of existing or planned major transit stops in the region. A major transit stop is defined in state statute as a site containing an existing or planned rail or bus rapid transit station, a ferry terminal served by either bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 20 minutes or less during the morning and afternoon peak commute periods. TPAs are where people can live, work and play in higher-density, compact communities that are conducive to complete streets that facilitate access to high frequency transit with safe and comfortable walking and biking networks. The Project Site is located within a mapped TPA.
- **Neighborhood Mobility Areas**: NMAs include four elements that reflect potential to improve, restore and enhance safe and convenient connections to schools, hospitals, shopping, services, places of worship, parks, greenways and other destinations. The four elements of an NMA are: 1) intersection density, 2) low-speed streets, 3) land use diversity, and 4) accessibility to amenities within one mile using street network distances. The Project Site is located within a mapped NMA.
- **Livable Corridors:** Livable Corridors are areas where local jurisdictions can plan and zone for increased density at nodes along key corridors and redevelop single-story underperforming retail with well-designed, higher-density housing and employment centers. This strategy integrates transit improvements and certain active

transportation improvements to support safe bicycling and walking. The Project Site is located within a mapped Livable Corridor.



SOURCE: SCAG, 2023

Figure 18: Priority Development Areas, SCAG Region - 2024-2050



Transit Priority Areas (TPAs) in the SCAG Region for Plan Year 2050

Project Site

Figure 19: Transit Priority Area Map, SCAG Region - 2024-2050

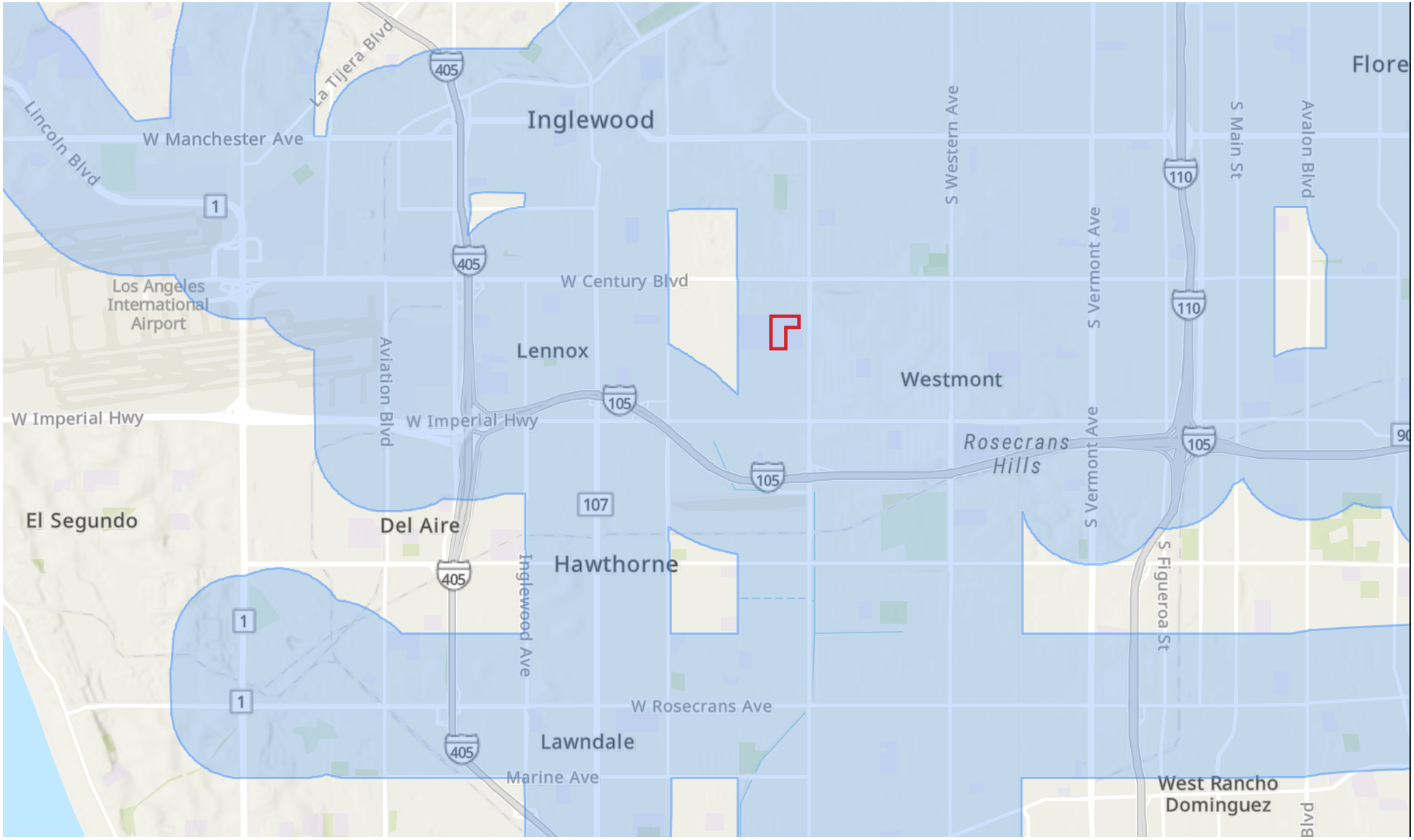
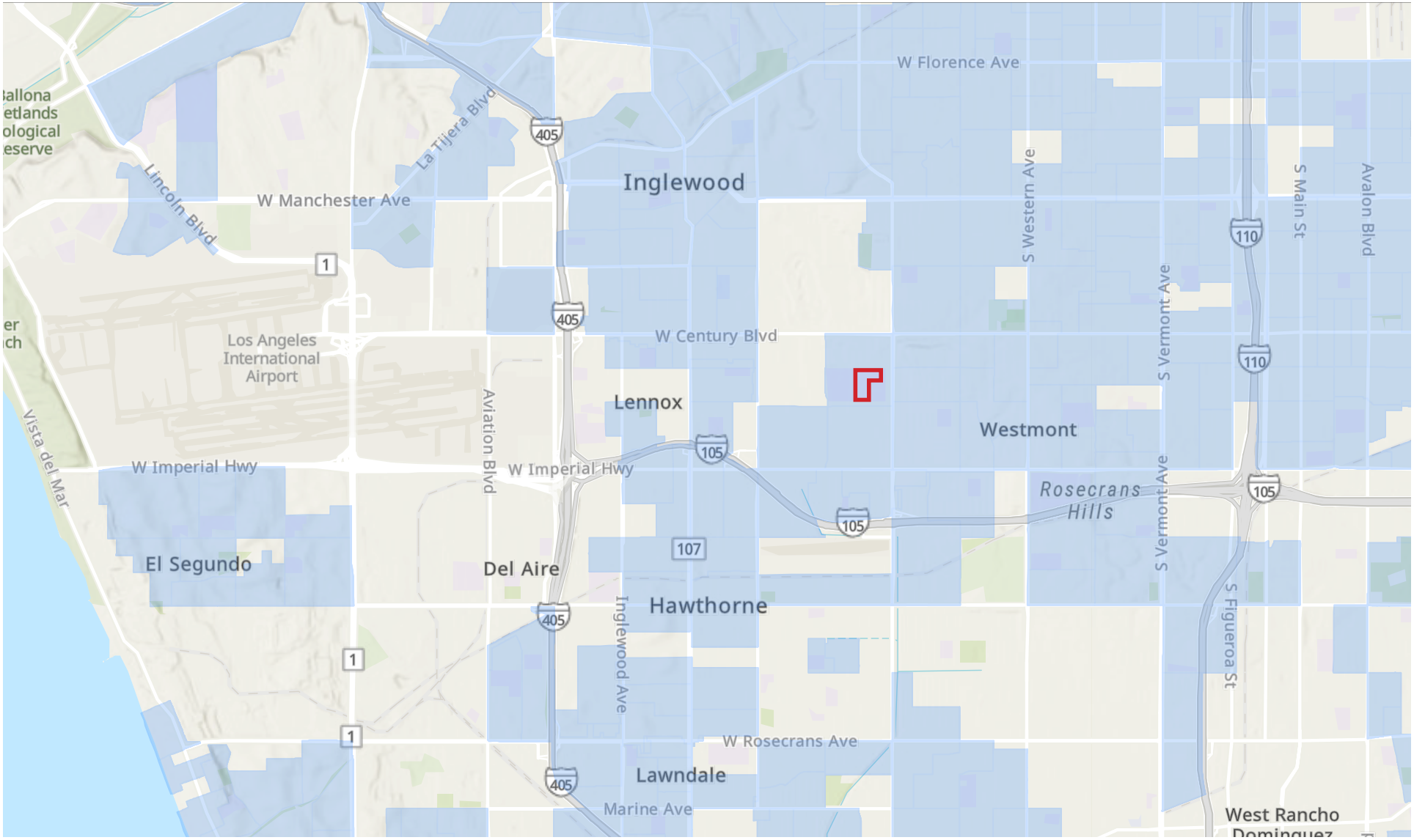


Figure 20: Livable Corridors Map, SCAG Region - 2024-2050



Neighborhood Mobility Areas (NMAs) in the SCAG Region for Plan Year 2050 Project Site

Figure 21: Neighborhood Mobility Areas Map, SCAG Region - 2024-2050

The Project's location, scale, and mixture of land uses would be consistent with its designation within these three PDAs, which, in turn, indicates consistency with the use designations, density, and buildings intensity of the RTP/SCS. As previously discussed, the Project Site is located in an urbanized area of the City.

The Project would include the development of 571 total residential units on the Project Site, including 403 row townhomes with one to four bedrooms and 168 interlocking townhomes with three to four bedrooms. Of those units, 10 percent of the housing units would be designated for Very Low Income affordable housing. Additionally, the Project would include various amenities to serve the residents, including two clubhouses (8,232 total square feet), two swimming pools, two pocket parks, a dog park, and common and private open space throughout the Project Site. The Project would be designed to be of a high-quality architectural style that would include ample open space and trees and would be designed to complement the surrounding neighborhood.

The Project Site is located near a variety of transit options. The closest noted existing transit stop is located on the southwest and northeast corners of the intersection of Crenshaw Boulevard at 104th Street, approximately 0.2 miles east of the Project Site, which services Metro Line 210. Metro Line 210 operates between Hollywood/Vine Station and South Bay Galeria via mainly Crenshaw Boulevard with 10-minute headways on weekdays and 15-minute headways on weekends. Metro Line 210 also has existing transit stops on the southwest and northeast corners of the intersection of Crenshaw Boulevard at Century Boulevard, located approximately 0.4 miles northeast of the Project Site.

Thus, the residential development of the Project in an existing residential area near transit would provide opportunities for Project residents and visitors to have safer and shorter multimodal trips, thereby reducing dependency on automobile travel and single occupancy trips and thus, reducing GHG emissions.

Overall, the nature of the Project, including the location, density, and building intensity, would be consistent with SCAG's land use strategies related to reducing dependence on automobile travel and thus, mobile-source GHG emissions, by encouraging development within PDAs. Furthermore, the Project would be consistent with the intent of the specific PDAs in which it is located (i.e., TPA, NMA, and Livable Corridor). As such, the Project would be consistent with the 2024-2050 RTP/SCS's goals, policies and benefits for land use, density, and intensity of development.

Chapter 3, The Plan, of the 2024-2050 RTP/SCS outlines goals and subgoals that are intended to help the SCAG region achieve a healthy, prosperous, accessible, and connected region for a more resilient and equitable future. As outlined in **Table 5**, the Project would be consistent with applicable goals and subgoals of the 2024-2050 RTP/SCS.

The Project would support the 2024–2050 RTP/SCS goals to maximize the productivity of the region’s transportation system, support new housing growth including affordable housing, include sustainability design features within the Project and provide for less vehicle miles traveled as the Project would be located on an urban infill site in close proximity to transit and

nearby services. The Project would encourage pedestrian circulation at the street level through new landscaping and trees, and separate pedestrian and vehicle entrances into the Project Site. The Project would also provide bicycle spaces. All residential units will be EV capable and two on-site EV charging stations would be provided at each of the clubhouse buildings. The Project would include solar panels which would generate power to meet 50 percent of the Project's energy demand. The Project also would incorporate a variety of strategies for sustainability and water conservation. Plant species will be predominantly low and moderate water use specific to the local climate. The irrigation system would include a variety of water conservation features including the incorporation of automatically adjusted run times based on local weather conditions. In addition, the Project would encourage pedestrian circulation at the street level through new landscaping and trees, and separate pedestrian and vehicle entrances into the Project Site. The Project is located within the boundaries of a TPA, NMA, and a Livable Corridor, as described above, is consistent the 2024-2050 RTP/SCS and the following section will indicate that the Project would not result in significant impacts on the environment.

Table 5: Applicable Goals of SCAG 2024-2050 RTP/SCS

2024–2050 RTP/SCS Goals	**Would the Project Be Consistent?**
Mobility: Build and maintain an integrated multimodal transportation network.	
Support investments that are well-maintained and operated, coordinated, resilient and result in improved safety, improved air quality and minimized greenhouse gas emissions	**Consistent.** Although this goal applies at the regional level, the Project would not conflict with its implementation. As discussed above, the Project would be constructed in accordance with Title 24 of the California Building Standards Code – Energy Efficiency Standards as well as the appliance energy efficiency standards in Title 20 of the California Code of Regulations. Further, the Project would be constructed according to the 2022 CALGreen standards, which includes water conserving plumbing fixtures and fittings, electric heat pump technology. Furthermore, all residential units will be EV capable and two on-site EV Charging stations would be provided at each of the clubhouse buildings. In addition, the Project would include solar panels which would generate power to meet 50 percent of the Project's energy demand.
Ensure that reliable, accessible, affordable, and appealing travel options are readily available, while striving to enhance equity in the offerings in high-need communities	**Consistent.** Although this goal applies at the regional level, the Project would not conflict with its implementation. The Project would be developed in an existing urbanized area with an established network of roads and freeways that provides local and regional access to the Project Site. The Project would provide new market rate and affordable housing within close proximity to several transit

Table 5: Applicable Goals of SCAG 2024-2050 RTP/SCS	
2024–2050 RTP/SCS Goals	**Would the Project Be Consistent?**
	options, would include bicycle parking, and is in walkable distance to jobs and services.
Support planning for people of all ages, abilities, and backgrounds	**Consistent.** Although this goal applies at the regional level, the Project would not conflict with its implementation. The Project would include new market rate and affordable townhome units.
Communities: Develop, connect, and sustain communities that are livable and thriving	
Create human-centered communities in urban, suburban and rural settings to increase mobility options and reduce travel distances	**Consistent.** The Project would be located in a residential neighborhood in an infill setting, close to transit and in walking distance, to jobs, schools, residences, entertainment and commercial areas. The Project Site is within close proximity to several transit options. Nearby transit access lines include Metro Line 117, which travels along Century Boulevard connecting Inglewood to LAX, Westchester, Vermont, Watts and Norwalk, and Metro Line 210, which travel along Crenshaw Boulevard, connecting Inglewood to the Redondo Beach Transit Center, Downtown LA, Mid-City and Hollywood. Other bus lines serving the Project Site near Yukon Boulevard include the Los Angeles County Lennox Shuttle, providing service from Lenox, Inglewood, Centinela Hospital, County offices, parks, public schools, libraries, and shopping centers.
Produce and preserve diverse housing types in an effort to improve affordability, accessibility and opportunities for all households	**Consistent.** The Project would include the development of 571 total residential units on an infill site in an urbanized area well-served by transit. 10 percent of the housing units would be designated for Very Low Income households.
Environment: Create a healthy region for the people of today and tomorrow	
Develop communities that are resilient and can mitigate, adapt to and respond to chronic and acute stresses and disruptions, such as climate change.	**Consistent.** The Project would assist in reducing impacts to climate change by locating new housing in an urban environment near transit, reducing single-occupant vehicle trips. Furthermore, the Project would reduce energy use by including solar panels which would generate power to meet 50 percent of the Project's energy demand and EV Charging stations.

Table 5: Applicable Goals of SCAG 2024-2050 RTP/SCS	
2024–2050 RTP/SCS Goals	**Would the Project Be Consistent?**
Integrate the region's development pattern and transportation network to improve air quality, reduce greenhouse gas emissions and enable more sustainable use of energy and water	**Consistent.** The Project would promote non-auto travel and reduce single-occupant vehicle trips by being located in a transit-rich area, providing bicycle parking, and improving the pedestrian environment. The Project would be constructed in accordance with Title 24 of the California Building Standards Code – Energy Efficiency Standards as well as the appliance energy efficiency standards in Title 20 of the California Code of Regulations. Further, the Project would be constructed according to the 2022 CALGreen standards. All residential units will be EV capable and two on-site EV Charging stations would be provided at each of the clubhouse buildings. The Project would include solar panels, which would generate power to meet 50 percent of the Project's energy demand. The Project would incorporate a variety of strategies for sustainability and water conservation. Plant species will be predominantly low and moderate water use specific to the local climate. The irrigation system would include a variety of water conservation features to automatically adjust run times based on local weather conditions.
Conserve the region's resources	**Consistent.** The Project is an infill development, surrounded by urban land uses. It is not located on land designated for agricultural uses, natural resources, or conservation. As mentioned above, the Project would incorporate a variety of strategies for energy and water conservation.
Economy: Support a sustainable, efficient and productive regional economic environment that provides opportunities for all residents.	
Improve access to jobs and educational resources.	**Consistent.** The Project Site is located in an existing urbanized area with an established network of roads and freeways that provides local and regional access to the Project Site. The Project Site is also within close proximity to transit that would provide residents easy access to jobs and services. In addition, the Project Site is located adjacent to residential, commercial and entertainment uses that would provide future employment opportunities.
Advance a resilient and efficient goods movement system that supports the economic	**Consistent.** Although this goal applies at the regional level, the Project would not conflict with its implementation. As discussed above, the Project

Table 5: Applicable Goals of SCAG 2024-2050 RTP/SCS	
2024–2050 RTP/SCS Goals	**Would the Project Be Consistent?**
vitality of the region, attainment of clean air and quality of life for our communities	would promote clean air and non-auto travel by being located in a transit-rich area, providing EV parking, bicycle parking, and improving the pedestrian environment. The Project would include solar panels, which would generate power to meet 50 percent of the Project's energy demand. The Project would incorporate a variety of strategies for sustainability and water conservation. The Project will contribute toward, and facilitate, the City's long-term housing needs.
Source: SCAG, 2024–2050 RTP/SCS, https://scag.ca.gov/connect-socal. Accessed August 8, 2024.	

5.0 EVALUATION OF ENVIRONMENTAL IMPACTS

The following environmental analysis is patterned after CEQA Guidelines Appendix G**.** An explanation is provided for all responses except "No Impact" responses, which are supported by the cited information sources. The responses consider the whole action involved with the proposed Project: on- and off-site, Project- and cumulative-level, direct and indirect, and short-term construction and long-term operational. The explanation of each issue also identifies the significance criteria or threshold, if any, used to evaluate each question, and the mitigation identified, if any, to avoid or reduce the impact to less than significant. To each question, there are four possible responses:

- **No Impact.** The Project would not have any measurable environmental impact.
- **Less Than Significant Impact.** The Project would have the potential to impact the environment, although this impact would be below established thresholds that are considered to be significant.
- **Less Than Significant With Mitigation Incorporated.** The Project would have the potential to generate impacts above established thresholds, which may be considered as a significant effect on the environment, although mitigation measures or changes to the Project's physical or operational characteristics will reduce these impacts to a less than significant level.
- **Potentially Significant Impact.** The Project could have impacts above established thresholds, which may be considered significant, and therefore additional analysis is required to identify mitigation. A determination that there is a potential for significant effects indicates the need to more fully analyze the Project's impacts and identify mitigation.

5.1 Aesthetics

Environmental Issue	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?				X
b) Substantially damage scenic resources, including, but not limited to trees, rock outcroppings, and historic buildings within a State Scenic Highway?				X
c) If in a non-urbanized area, 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?			X	
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?			X	

Impact Analysis

SB 743 [PRC Section 21099(d)] sets forth guidelines for evaluating project transportation impacts under CEQA, as follows: "Aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment." PRC Section 21099(a) defines a "transit priority area" (TPA) as an area within 0.5 mile of a "major transit stop that is existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program or applicable regional transportation plan." PRC Section 21064.3 defines "major transit stop" as "a site containing any of the following: (a) [a]n existing rail or bus rapid transit station, (b) [a} ferry terminal served by either a bus or rail transit service, or (c) [t]he intersection of two or more major bus routes with a frequency of service interval of 20 minutes or less during the morning and afternoon peak commute periods."

5.1a Would the project have a substantial adverse effect on a scenic vista?

No Impact. According to the City of Inglewood General Plan Open Space Element (1995), the City is a fully developed and urbanized community. There are no designated or otherwise identified scenic vistas within the City or within the vicinity of the Project Site. Although the Project's residential and open space uses would be visible to the public from the public right-of-way along West 104th Street, South 10th Avenue, and Yukon Avenue, the Project would not change the current views to or from any scenic vistas, as none are present within the vicinity of the Project Site. As a result, the Project would not have a substantial adverse effect on a scenic vista. No impacts to scenic vistas would occur, and no mitigation measures would be required.

5.1b Would the project substantially damage scenic resources, including but not limited to trees, rock outcroppings, and historic buildings within a State Scenic Highway?

No Impact. There are no State-designated scenic highways in the City.[1] According to the California Department of Transportation (Caltrans) Scenic Highways Mapping Program, the closest scenic byway is the Arroyo Seco Historic Parkway Scenic Byway (I-110) located northeast of the Project Site, north of downtown Los Angeles and south of I-210 in Pasadena. The Project Site is more than seven miles from this portion of I-110. An eligible scenic highway which includes a portion of Lincoln Boulevard (State Route 187) between Venice Boulevard and Ozone Street is located almost eight miles northwest of the Project Site. Therefore, the Project would not damage scenic resources within a State scenic highway. No impacts would occur, and no mitigation measures would be required.

5.1c If in a non-urbanized area, would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If 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 in an urbanized area of the City; therefore, the applicable threshold with respect to the Project is whether the Project is consistent with applicable zoning and other regulations governing scenic quality.

City of Inglewood Land Use Element

The City's Land Use Element (adopted 1980, last amended 2016) identifies various goals and policies that indirectly address the City's aesthetic objectives. The Land Use Element includes the following applicable goals:

Goal 1: Promote Inglewood's image and identity as an independent community within the Los Angeles metropolitan area.

Open Space Element

The Open Space Element sets forth Citywide policies for current and future recreation needs of the community for park land and recreation facilities. It is also a plan for the conservation or creation of open spaces to mitigate the effects of increasing urbanization of Inglewood. The following policy is relevant to the proposed Project in this section:

Policy 1: The City of Inglewood and its redevelopment agency, in reviewing and approving development plans, shall require the provision of landscaped plazas and gardens when possible, and the provision of landscaping within building setbacks and parking lots.

[1] California Department of Transportation, California State Scenic Highway System Map, 2019, https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aacaa. Accessed on August 6, 2024.

City of Inglewood Design and Development Standards and Guidelines

The City's Design and Development Standards and Guidelines, (adopted 1979) provide design guidance for the improvement of property in the City. As noted in the document, the guidelines or standards do not replace or supersede requirements contained in the City's Municipal code.

Objectives:

- To maximize freedom, creativity and innovation in the architecture, landscape design and graphics of each individual project within the framework of constraints imposed by the community's need to control development for the health, safety and general welfare of its citizens.
- To promote a visually attractive, safe and well planned community through the use of sound design techniques.
- To protect citizens from unsafe or unsightly conditions.
- To minimize potential nuisances to the uses surrounding the new development.

  To preserve and maximize the image, character and visual quality which is making Inglewood an attractive place to live and work.

Municipal Code

Chapter 12, Planning and Zoning identifies zoning districts and land use classifications, land use regulations, development standards, and environmental standards. The Zoning Ordinance is intended to protect and promote the public's health, safety, and general welfare, and to implement the policies of the comprehensive General Plan.

Chapter 12, Planning and Zoning, Article 18.1. Site Plan Review. The site plan review process established in Chapter 12, Article 18.1 of the City of Inglewood Municipal Code is applicable to most new development within the City. The site plan review procedure has been established to permit City review and consideration of on-site and off-site vehicular and pedestrian circulation, emergency accessibility, site layout and building orientation, architectural design and neighborhood compatibility, landscaping and related site improvements, parking accommodations, signs and other applicable design considerations, based on the individual needs and circumstances of each proposed development project, in addition to satisfying the intent and policies of each project site's respective zone.

Project Consistency

The Project would be consistent with the scenic standards and regulations contained in the City's General Plan, Design and Development Standards and Guidelines and Municipal Code. Pursuant to Inglewood Municipal Code Section 12-39.50, the Project would undergo Site Plan Review to ensure that the Project meets City requirements for site layout and building orientation, architectural design, neighborhood compatibility, landscaping, parking accommodations, signs and other applicable design considerations.

Construction of the Project would include the presence of a construction staging area and construction fencing as well as the use of heavy machinery including, but not limited to, large trucks, bulldozers, excavators and a crane. Despite the temporary visual impacts of construction, the Project would provide a positive new visual element to the community that would feature substantial open space and landscaping. The new homes and clubhouses would be designed with a modern architectural style that features flat roofs, varied massing and façade articulation, and would feature a range of materials including stone veneer, wood siding, stucco and metal panels. Homes and community amenities would be linked together through a system of green belts and pedestrian pathways.

Landscaping throughout the Project Site would include a variety of drought tolerant and native trees, groundcover, shrubs, and vines that are designed to create inviting streetscapes and parks and foster a walkable pedestrian-oriented neighborhood. The Project will plant approximately 300 trees, featuring a diverse range of species, and incorporate them into various locations of the Project.

Overall, the Project would not conflict with applicable zoning and other regulations governing scenic quality. Therefore, impacts would be less than significant, and no mitigation measures are required.

5.1d Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Less Than Significant Impact. Existing outdoor lighting at and near the Project Site is associated with existing residential, commercial, and school uses, street lighting and vehicles. New light sources introduced by the Project may increase ambient nighttime illumination levels.

Construction

While Project construction would occur during daytime hours, there is a potential that construction could require the use of artificial lighting, particularly during the winter season when daylight is no longer sufficient earlier in the day. To the extent that artificial light sources are required for construction, such use would be temporary and would cease upon completion of Project construction.

Daytime glare could potentially occur during construction activities if reflective construction materials are positioned in highly visible locations where the reflection of sunlight could occur. However, any glare would be highly transitory and short-term, given the movement of construction equipment and materials within the construction area, and the temporary nature of construction activities. In addition, large, flat surfaces that generate substantial glare are typically not an element of construction activities.

Based on the above, light and glare associated with Project construction activities would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area. Therefore, impacts related to light and glare during construction would be less than significant.

Operation

The Project Site is located adjacent to West 104th Street, South 10th Avenue, and Yukon Avenue. Under existing conditions, the Project area contains cars and streetlights that emit light and glare during the day and night consistent with suburban residential neighborhoods. In addition, the Project Site currently includes exterior security lighting. The Project would introduce new sources of light and glare that are typically associated with residential and amenity buildings, including interior, security, and wayfinding lighting sources. However, all Project lighting would comply with current energy standards and codes, while providing efficient and effective on-site lighting. Nighttime security lighting for the Project would be provided to illuminate entrances, and internal roadways and walkways. However, all exterior lights would be wall- or ground-mounted and shielded away from adjacent land uses and security lighting would be designed to prevent light trespass onto adjacent properties.

The Project would include appropriate levels of interior and exterior lighting for security, parking, and architectural highlighting. Outdoor lighting would be designed and installed with shielding, such that lighting would be directed and focused on the Project.

Regarding glare, daytime glare can result from sunlight reflecting from a shiny surface that would interfere with the performance of an off-site activity, such as the operation of a motor vehicle. Reflective surfaces can be associated with window glass and polished surfaces, such as metallic trim. No sources of substantial glare are anticipated with implementation of the Project. Exterior building materials of the homes and clubhouses would use various non-reflective material would not include polished metals.

Based on the above, the Project would not create a new source of substantial light or glare that would adversely affect day or nighttime views in the area. Therefore, impacts would be less than significant, and no mitigation measures would be required.

Cumulative Impacts

As listed in **Appendix Q: Related Projects List** and Map **Related Projects**, the City identified 20 related projects within an approximately 0.5-mile radius of the Project Site and Project Site intersections. With the exception of the IUSD - Child Development Center currently located to the southeast and which would be rebuilt at the southwest corner of 104th Street and 10th Avenue by 2026, all of the related projects are at a distance that they would not share the same viewshed would not have a potential to combine with the Project to create a cumulative aesthetics impact. Although moving to a new location, the new IUSD - Child Development Center would be of a similar massing and scale as exists under current conditions, as such, the moving of Child Development Center would not have a potential to combine with the Project to create a cumulative aesthetics impact. The Project would not hinder any scenic vistas from the Child Development Center as no scenic vistas or resources are available from the Project Site and the Project would not result in any cumulative impacts related to scenic vistas. Similar to the Project, the related projects would be reviewed on a case-by-case basis by the City to comply with Municipal Code requirements regarding building heights, setbacks, massing, and lighting or, for those projects that require discretionary actions, to undergo site-specific review regarding building density and design, glare and light. Lastly, the incremental effects of the Project are not

significant when viewed in connection with the impacts of the related projects. For all these reasons, cumulative aesthetics impacts would be less than significant.

5.2 Agricultural and Forestry Resources

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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. 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?				X
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?				X
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))?				X
d) Result in the loss of forest land or conversion of forest land to non-forest use?				X
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?				X

Impact Analysis

5.2a Would the project 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 Project Site is located within a highly urbanized area in the City on portions of on the grass fields and former playing fields between the Morningside High School and Woodworth Elementary School campus and the IUSD - Child Development Center.

No agricultural uses or related farmland operations are present within the Project Site or surrounding area. The Project Site is not located on designated Prime Farmland, Unique Farmland, or Farmland of Statewide Importance as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program.[2] The urban character of the Project Site would be

[2] California Department of Conservation (DOC), California Important Farmland Finder, 2022, https://maps.conservation.ca.gov/dlrp/ciff/. Accessed on May 22, 2024.

consistent with the Farmland Mapping and Monitoring Program's definition of "Urban and Built-Up Land," which does not constitute farmland. Therefore, the Project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural uses. There would be no impact, and no mitigation measures would be required.

5.2b Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?

No Impact. The Project Site currently has a General Plan land use designation of Low Density Residential and a zoning designation of Residential Single Family (R-1). The Project would request the approvals for a General Plan Amendment from Low Density to Medium Density and a Zone Change from R-1 to Residential Multiple Family (R-3). None of these land use or zoning designations permit agricultural use. Therefore, the Project Site is not currently zoned for agricultural uses and would not be rezoned to permit agricultural uses. Additionally, according to the California Department of Conservation, there are no Williamson Act contracts located within or in the vicinity of the Project Site.[3] Therefore, the Project would not conflict with existing zoning for agricultural use or a Williamson Act contract. There would be no impact, and no mitigation measures would be required.

5.2c Would the project 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 located within an urbanized area and does not contain any forest land or timberland. The Project Site's current General Plan land use designation is Low Density, and its current zoning designation is R-1. The Project would request the approvals for a General Plan Amendment from Low Density to Medium Density and a Zone Change from R-1 to R-3. None of these land use or zoning designations permit uses for forest land or timberland. Thus, the Project would not conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production. Therefore, there would be no impact, and no mitigation measures would be required.

5.2d Would the project result in the loss of forest land or conversion of forest land to non-forest use?

No Impact. The Project Site does not contain forest land and would not result in the conversion of forest land to non-forest uses or timber land to non-timber uses. Therefore, there would be no impact, and no mitigation measures would be required.

[3] DOC, California Williamson Act Enrollment Finder, 2022, https://maps.conservation.ca.gov/dlrp/WilliamsonAct/. Accessed on May 22, 2024.

5.2e Would the project 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. As noted above, construction and operation of the Project would have no impact on agriculture or forest resources. Accordingly, the Project would not result in the conversion of farmland to non-agricultural uses or forest land to non-forest uses. There would be no impact, and no mitigation measures would be required.

Cumulative Impacts

No agricultural or forest uses exist within the Project Site or its vicinity. Therefore, the Project would not convert agricultural or forestry resources to other uses. In addition, the Project Site is not designated or zoned for agricultural or forestry use, nor are the Project Site and adjacent parcels subject to Williamson Act contracts. Furthermore, none of the related projects proposes converting agricultural or forestry resources to other uses. Therefore, the Project would not contribute to cumulative agriculture and forestry resources impacts, and no cumulative impact would occur.

5.3 Air Quality

This Section is based on the Air Quality Assessment, prepared by Kimley-Horn, June 2025, and Health Risk Assessment, prepared by Kimley-Horn, February 2025, which are included in their entirety as **Appendix A: Air Quality Assessment** and **Appendix B: Health Risk Assessment**, respectively.

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?			X	
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?			X	
c) Expose sensitive receptors to substantial pollutant concentrations?		X		
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?			X	

Impact Analysis

5.3a Would the project conflict with or obstruct implementation of the applicable air quality plan?

Less Than Significant Impact. As part of its enforcement responsibilities, the U.S. Environmental Protection Agency (U.S. EPA) requires each state with nonattainment areas to prepare and submit a State Implementation Plan (SIP) that demonstrates the means to attain the federal standards. The SIP must integrate federal, state, and local plan components and regulations to identify specific measures to reduce pollution in nonattainment areas, using a combination of performance standards and market-based programs. Similarly, under State law, the California Clean Air Act (CCAA) requires an air quality attainment plan to be prepared for areas designated as nonattainment regarding the State and federal ambient air quality standards. Air quality attainment plans outline emissions limits and control measures to achieve and maintain these standards by the earliest practical date.

The Project Site is located within the South Coast Air Basin (SCAB), which is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). The SCAQMD is required, pursuant to the Federal Clean Air Act (FCAA), to reduce emissions of criteria pollutants for which the SCAB is in nonattainment. To reduce such emissions, the SCAQMD adopted the 2016 and 2022 Air Quality Management Plans (AQMPs; herein referred to as "AQMPs"). The AQMPs establish a program of rules and regulations directed at reducing air pollutant emissions and

achieving State and national air quality standards. The AQMPs are a regional and multi-agency effort including the SCAQMD, the California Air Resources Board (CARB), the Southern California Association of Government (SCAG), and the U.S. EPA. The AQMPs pollutant control strategies are based on the latest scientific and technical information and planning assumptions, including SCAG's Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS), updated emission inventory methodologies for various source categories, and SCAG's latest growth forecasts. SCAG's latest growth forecasts were defined in consultation with local governments and with reference to local general plans. The Project is subject to the SCAQMD's AQMPs.

Criteria for determining consistency with the AQMP are defined by the following indicators:

- **Consistency Criterion No. 1**: The Project will not result in an increase in the frequency or severity of existing air quality violations, or cause or contribute to new violations, or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMPs.
- **Consistency Criterion No. 2**: The Project will not exceed the assumptions in the AQMPs or increments based on the years of the Project build-out phase.

Criterion No. 1

According to the SCAQMD's CEQA Air Quality Handbook, the purpose of the consistency finding is to determine if a project is inconsistent with the assumptions and objectives of the regional air quality plans, and thus if it would interfere with the region's ability to comply with California Ambient Air Quality Standards (CAAQS) and National Ambient Air Quality Standards (NAAQS).

The violations to which Consistency Criterion No. 1 refers are violations of CAAQS and NAAQS. As discussed below, the Project would not exceed the construction or operational standards of either CAAQS or NAAQS. Therefore, the Project would not cause or contribute to an existing air quality violation under either CAAQS or NAAQS. Thus, the Project would be consistent with the first criterion.

Criterion No. 2

Consistency with Air Quality Management Plan

The AQMP contains air pollutant reduction strategies based on SCAG's latest growth forecasts, and SCAG's growth forecasts were defined in consultation with local governments and with reference to local general plans. The 2022 AQMP contains air pollution reduction strategies based on the 2020-2045 RTP/SCS. The population, housing, and employment forecasts, which are adopted by SCAG's Regional Council, are based on the local plans and policies applicable to the specific area; these are used by SCAG in all phases of implementation and review. The Project Site's land use designation under the City's General Plan is Low-Density Residential (LDR). The LDR designation allows for a range of 1-6 dwelling units per acre (du/ac). The Project Site is zoned by the Municipal Code as Residential Single Family (R-1). According to Section 12-18 of the Municipal Code, these residential zones permit one-family dwellings, accessory private garages, detached one-story accessory buildings, and public parks. The Project would include a request to

amend the Project Site's General Plan land use designation from Low Density to Medium Density. The Medium Density land use designation allows 7-22 dwelling units per acre. The Project would also request to change its associated zoning from R-1 to R-3 (Multiple-Family Zone). The R-3 zone permits multiple-unit dwellings as well as any use permitted in the R-1 and R-2 zones including one or more one-family dwellings per lot, places of worship, group homes not exceeding 6 residents, daycares or nursery schools, and convalescent homes.

The Project proposes to develop 571 residential townhome units. Growth forecasts prepared by SCAG contained in the 2020-2045 RTP/SCS indicate that the number of households within the City will increase from 37,500 households in 2016 to 47,700 households in 2045, an increase of 10,200 households.[4] Growth forecasts prepared by SCAG contained in the 2024-2050 RTP/SCS indicate that the number of households within the City will increase from 37,500 in 2019 to 61,600 in 2050, an increase of 24,100 households. The Project would include 571 units, which represents 5.6 and 2.4 percent of the anticipated increase for the City by 2045 and 2050, respectively. The housing growth attributed to the Project would be within local and regional population projections under the 2020-2045 RTP/SCS and 2024-2050 RTP/SCS. Thus, the Project would also be consistent with the AQMP under the second criterion.

Consistency with City of Inglewood General Plan

The General Plan Environmental Justice Element sets forward goals and policies related to ensuring environmental justice in the City, particularly for disadvantaged communities. In adopting the Environmental Justice Element, the City has made a significant step forward in ensuring that decisions related to land use and development are made in an equitable manner and take into consideration the health and well-being of the City's most vulnerable populations.

The Project involves the development of new market rate and affordable residential units located adjacent to several transit stops, reducing sprawl and encouraging the use of alternative transportation consistent with the EJ-2.4 and EJ-2.8 policies. Moreover, the Project would include open space, new landscaping and trees, separate pedestrian and vehicle entrances into the Project Site, consistent with policy EJ-2.4. While policies EJ-2.9 and EJ-2.10 are under the City's purview, nevertheless the Project would be consistent with these policies as the Project would be consistent with the SCAQMD's AQMP as discussed above. As discussed in the Greenhouse Gas Emissions Assessment prepared for the Project (**Appendix H**), the Project would be consistent with the City Climate Action Plan. Per EJ policy EJ-2.12, as discussed in the Noise and Vibration Assessment prepared for the Project (**Appendix K**), construction impacts related to noise would be less than significant and impacts related to construction dust would be less than significant. The Project would be subject to SCAQMD Rule 403, which requires daily watering of exposed soils and limitation of speeds on unpaved surfaces. Regarding EJ-2.17 and EJ-2.18, as discussed herein, the Project would not exceed applicable criteria pollutant thresholds. As discussed in the Health Risk Assessment prepared for this Project (**Appendix B**), Project construction would not result in significant cancer risk at neighboring school or residential uses. As such, the Project

[4] Southern California Association of Governments, Connect SoCal (2020–2045 RTP/SCS), Demographics and Growth Forecast adopted September 2020, https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal_demographics-and-growth-forecast.pdf? 1606001579, accessed September 2024

would be consistent with the applicable goals outlined in the City's General Plan Environmental Justice Element.

Based on the above, the Project would not conflict with or obstruct implementation of the SCAQMD's AQMP or the City's General Plan Environmental Justice Element. Therefore, impacts would be less than significant, and no mitigation measures would be required.

5.3b 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 indicated above, the Project Site is in the SCAB. State and federal air quality standards are exceeded in many parts of the Basin for ozone (O_3) and fine particulate matter ($PM_{2.5}$), including those monitoring stations nearest to the Project Site, and the Basin is designated a State and federal nonattainment area for those pollutants. The Basin is also designated as a State nonattainment area for coarse particulate matter (PM_{10}). The Project would contribute to local and regional air pollutant emissions during construction and operation.

The air quality impact analysis considers construction and operational impacts associated with the Project. Emissions were modeled using the California Emissions Estimator Model version 2022.1 (CalEEMod). CalEEMod is a Statewide land use emissions computer model designed to quantify potential criteria pollutant emissions associated with both construction and operations from a variety of land use projects. Air quality impacts were assessed according to methodologies recommended by CARB and the SCAQMD.

Construction Emissions

Construction associated with the Project would generate short-term emissions of criteria air pollutants. The criteria pollutants of primary concern within the Project area include ozone (O_3)-precursor pollutants (i.e., reactive organic gases [ROG] and nitrogen oxide [NO_X]) and PM_{10} and $PM_{2.5}$ as the SCAB is currently in nonattainment for these pollutants. Construction-generated emissions are short term and of temporary duration, lasting only as long as construction activities occur, but would be considered a significant air quality impact if the volume of pollutants generated exceeds the SCAQMD's thresholds of significance.

Construction results in the temporary generation of emissions resulting from site grading, road paving, motor vehicle exhaust associated with construction equipment and worker trips, and the movement of construction equipment, especially on unpaved surfaces. Emissions of airborne particulate matter are largely dependent on the amount of ground disturbance associated with site preparation activities as well as weather conditions and the appropriate application of water.

The duration of construction activities associated with the Project is estimated to last approximately four years and six months. Construction-generated emissions associated with the Project were calculated using CalEEMod, which is designed to model emissions for land use development projects, based on typical construction requirements. Demolition of the majority of existing structures would be performed by the IUSD prior to Project construction activities and has been analyzed in the Morningside High School Site Upgrade and Woodworth Elementary

School Demolition Project Initial Study/Mitigated Negative Declaration (February 2023). The Project would include the demolition of approximately 12,000 square feet of existing structures. Project construction includes sitewide vegetation and natural material removal (site preparation), grading, infrastructure improvements, and paving. Construction of proposed residential uses would occur over five development phases and include building construction and architectural coating. See Appendix A of the Air Quality Assessment prepared for the Project (**Appendix A**) for more information regarding the construction assumptions used in this analysis. Predicted maximum daily unmitigated construction-generated emissions for the Project are summarized in **Table 6: Unmitigated Construction-Related Emissions**.

Fugitive dust emissions may have a substantial, temporary impact on local air quality. In addition, fugitive dust may be a nuisance to those living and working in the Project vicinity. Uncontrolled dust from construction can become a nuisance and potential health hazard to those living and working nearby. SCAQMD Rules 402 (Nuisance) and 403 Fugitive Dust (prohibition of nuisances, watering of inactive and perimeter areas, track out requirements, etc.) are applicable to the Project and were applied in CalEEMod to minimize fugitive dust emissions. **Table 6** shows that unmitigated construction emissions during each phase would not exceed the SCAQMD thresholds. Impacts would be less than significant even without mitigation.

Table 6: Unmitigated Construction-Related Emissions

Construction Year	Pollutant (Maximum Pounds per Day)[1, 2,3]					
	Reactive Organic Gases (ROG)	Nitrogen Oxide (NO_x)	Carbon Monoxide (CO)	Sulfur Dioxide (SO_2)	Coarse Particulate Matter (PM_{10})	Fine Particulate Matter ($PM_{2.5}$)
Entire Site						
Demolition	1.41	13.39	14.08	0.02	1.11	0.60
Site Preparation	3.39	31.72	31.39	0.05	9.26	5.25
Grading	3.31	32.71	30.72	0.08	5.79	2.84
Infrastructure	2.93	14.72	40.53	0.04	6.36	1.81
Paving	0.91	7.18	10.91	0.01	0.52	0.34
Phase 1						
Building Construction	1.30	10.46	17.05	0.03	1.26	0.56
Architectural Coating	10.85	0.87	1.86	<0.01	0.18	0.05
Phase 2						
Building Construction	1.46	10.48	20.17	0.03	2.00	0.71
Architectural Coating	20.20	0.93	2.31	<0.01	0.32	0.09
Phase 3						
Building Construction	1.41	10.36	19.36	0.03	1.82	0.66
Architectural Coating	18.28	0.89	2.28	<0.01	0.28	0.08
Phase 4						

Table 6: Unmitigated Construction-Related Emissions						
	Pollutant (Maximum Pounds per Day)[1, 2,3]					
Construction Year	**Reactive Organic Gases (ROG)**	**Nitrogen Oxide (NO_x)**	**Carbon Monoxide (CO)**	**Sulfur Dioxide (SO_2)**	**Coarse Particulate Matter (PM_{10})**	**Fine Particulate Matter ($PM_{2.5}$)**
Building Construction	1.29	9.69	17.98	0.03	1.54	0.57
Architectural Coating	15.67	0.87	1.94	<0.01	0.24	0.07
Phase 5						
Building Construction	1.25	9.66	14.54	0.02	0.99	0.43
Architectural Coating	9.19	0.83	1.63	<0.01	0.14	0.04
Overlapping Phases						
Phase 1 Construction + Coating 2027	12.10	10.85	18.59	0.03	1.39	0.58
Phase 1 Construction + Coating + Phase 2 Construction 2027	13.56	21.33	38.76	0.05	3.40	1.28
Phase 2 Construction + Coating 2027	21.66	11.41	22.48	0.03	2.32	0.80
Phase 2 Construction + Coating + Phase 3 Construction 2027	23.06	21.77	41.84	0.06	4.14	1.46
Phase 3 Construction + Coating 2028	19.63	10.71	21.25	0.03	2.06	0.71
Phase 3 Construction + Coating + Phase 4 Construction 2028	20.92	20.40	39.24	0.05	3.60	1.28
Phase 4 Construction + Coating 2028	16.97	10.56	19.92	0.03	1.78	0.64
Phase 4 Construction + Coating + Phase 5 Construction	18.12	19.42	33.10	0.05	2.71	1.02
Maximum Emissions						
2025	3.39	32.71	38.38	0.08	9.26	5.25
2026	2.64	13.84	40.53	0.04	6.30	1.77
2027	23.06	21.77	41.84	0.06	4.14	1.46
2028	20.92	20.40	39.24	0.05	3.60	1.28
2029	18.12	19.42	33.10	0.05	2.71	1.02
SCAQMD Threshold	*75*	*100*	*550*	*150*	*55*	*150*
Exceed SCAQMD Threshold?	**No**	**No**	**No**	**No**	**No**	**No**

Table 6: Unmitigated Construction-Related Emissions						
	Pollutant (Maximum Pounds per Day)[1, 2,3]					
Construction Year	Reactive Organic Gases (ROG)	Nitrogen Oxide (NO_x)	Carbon Monoxide (CO)	Sulfur Dioxide (SO_2)	Coarse Particulate Matter (PM_{10})	Fine Particulate Matter ($PM_{2.5}$)
Notes: 1. Totals may not add up due to rounding. 2. SCAQMD Rule 403 Fugitive Dust applied. The Rule 403 reduction/credits include the following: properly maintain mobile and other construction equipment; replace ground cover in disturbed areas quickly; water exposed surfaces three times daily; cover stock piles with tarps; water all haul roads twice daily; and limit speeds on unpaved roads to 15 miles per hour. Reductions percentages from the SCAQMD CEQA Handbook (Tables XI-A through XI-E) were applied. Refer to **Appendix A** for Model Data Outputs. 3. Emissions presented herein are unmitigated. As shown below, MM AQ-2 is required to mitigate carcinogenic risks. Therefore, regional criteria pollutant emissions would be even lower than shown in this table.						
Source: CalEEMod version 2022.1. Refer to **Appendix A** for model outputs.						

With implementation of SCAQMD Rule 402, and 403, the proposed Project's construction would not significantly worsen ambient air quality, create additional violations of federal and state standards, or delay the Basin's goal for meeting attainment standards. In addition, consistent with Project Design Feature (PDF) AQ-1, prior to the start of demolition activities, an SCAQMD contact number for complaints related to air quality would be posted at the site. Construction of the Project would not result in a cumulatively considerable net increase of any criteria pollutant for which the region is in nonattainment.

PDF AQ-1 Prior to the issuance of demolition permits, signage containing the complaint number of SCAQMD will be installed.

Operational Emissions

The Project's operational emissions would be associated with area sources (e.g., landscape maintenance equipment, architectural coatings, off-road equipment, etc.), energy sources, and mobile sources (i.e., motor vehicle use). Primary sources of operational criteria pollutants are from area sources and motor vehicle use. Long-term operational emissions attributable to the Project are summarized in **Table 7: Project Operational Emissions**. The operational emissions sources are described below.

- **Area Source Emissions.** Area source emissions would be generated due to on-site equipment, architectural coating, and landscaping that were previously not present on the site.
- **Energy Source Emissions.** Energy source emissions would be generated due to electricity and natural gas usage associated with the Project. Primary uses of electricity and natural gas by the Project would be for space heating and cooling, water heating, ventilation, lighting, appliances, electronics, and cooking.
- **Mobile Source.** Mobile sources are emissions from motor vehicles, including tailpipe and evaporative emissions. Depending upon the pollutant being discussed, the potential air quality impact may be of either regional or local concern. For example, ROG, NO_X, PM_{10}, and $PM_{2.5}$ are all pollutants of regional concern. NO_X and ROG react with sunlight to form

O_3, known as photochemical smog. Additionally, wind currents readily transport PM_{10} and $PM_{2.5}$. However, CO tends to be a localized pollutant, dispersing rapidly at the source.

- Project-generated vehicle emissions are based on the trip generation within the Project's Trip Generation and incorporated into CalEEMod as recommended by the SCAQMD. Per the Traffic Study for the Project (see **Appendix L-1**) of this IS, the Project would generate a total of 4,111 daily trips.

As shown in **Table 7,** Project operational emissions would not exceed SCAQMD daily thresholds. Therefore, impacts would be less than significant without mitigation.

Table 7: Project Operational Emissions

Source	Pollutant (Maximum Pounds per Day)[1, 2]					
	Reactive Organic Gases (ROG)	Nitrogen Oxide (NO_x)	Carbon Monoxide (CO)	Sulfur Dioxide (SO_2)	Coarse Particulate Matter (PM_{10})	Fine Particulate Matter ($PM_{2.5}$)
Phase 1						
Mobile Emissions	1.94	1.69	18.45	0.05	4.38	1.13
Area Source Emissions	5.05	1.73	28.50	0.07	2.51	2.42
Energy Emissions	0.06	1.00	0.64	0.01	0.08	0.08
Phase 1 Total	7.04	4.43	47.59	0.13	6.97	3.63
Phase 2						
Mobile Emissions	3.66	3.13	34.81	0.09	8.61	2.22
Area Source Emissions	9.69	3.40	55.61	0.15	4.92	4.76
Energy Emissions	0.06	0.98	0.42	0.01	0.08	0.08
Phase 2 Total	13.41	7.51	90.84	0.24	13.60	7.06
Phase 3						
Mobile Emissions	3.25	2.78	30.92	0.08	7.64	1.97
Area Source Emissions	8.57	2.23	49.05	0.12	4.31	4.16
Energy Emissions	0.05	0.87	0.37	0.01	0.07	0.07
Phase 3 Total	11.88	5.88	80.34	0.21	12.02	6.21
Phase 4						
Mobile Emissions	2.55	2.15	24.38	0.06	6.25	1.61
Area Source Emissions	7.21	2.47	40.59	0.11	3.58	3.46
Energy Emissions	0.08	1.37	0.85	0.01	0.11	0.11
Phase 4 Total	9.83	5.99	65.82	0.18	9.94	5.18
Phase 5						

Table 7: Project Operational Emissions						
Source	**Pollutant (Maximum Pounds per Day)[1, 2]**					
	Reactive Organic Gases (ROG)	**Nitrogen Oxide (NO_x)**	**Carbon Monoxide (CO)**	**Sulfur Dioxide (SO_2)**	**Coarse Particulate Matter (PM_{10})**	**Fine Particulate Matter ($PM_{2.5}$)**
Mobile Emissions	1.48	1.25	14.17	0.04	3.63	0.94
Area Source Emissions	4.21	1.44	23.49	0.06	2.08	2.01
Energy Emissions	0.02	0.41	0.18	<0.01	0.03	0.03
Phase 5 Total	5.71	3.10	37.83	0.10	5.75	2.98
Buildout						
Mobile Emissions	12.88	11.00	122.74	0.32	30.52	7.88
Area Source Emissions	34.72	11.27	197.24	0.51	17.38	16.81
Energy Emissions	0.27	4.63	2.45	0.03	0.37	0.37
Total Project Emissions	47.87	26.90	322.42	0.86	48.27	25.06
SCAQMD Threshold	*55*	*55*	*550*	*150*	*150*	*55*
Exceeds Threshold?	**No**	**No**	**No**	**No**	**No**	**No**

Notes:
1 Totals may not add up due to rounding.
2 Emissions presented herein are unmitigated. As shown below, is required to mitigate localized PM_{10} and $PM_{2.5}$ emissions. Therefore, regional criteria pollutant emissions would be even lower than shown in this table.
Source: CalEEMod version 2022.1. Refer to Appendix A of **Appendix A** for model outputs.

Overlapping Construction and Operational Emissions

The Project would be developed in five phases. As each development phase is occupied, there is the potential for an overlap of operational and construction emissions. Neither the SCAQMD's CEQA Air Quality Handbook, Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning, or Air Quality Significance Thresholds imply or explicitly recommend combining emissions from distinct construction and operational activities into a single lump sum emissions total. Rather, each of these documents discusses potential sources, mitigation measures, and thresholds of significance for construction and operational emissions separately. Nonetheless, the potential overlapping of operational activities with ongoing construction activities have been compared to SCAQMD daily operational thresholds. As shown in **Table 8: Potential Overlap of Construction and Operational Activities,** overlap of construction and operational emissions would not exceed operational thresholds.

Table 8: Potential Overlap of Construction and Operational Activities						
Source	**Pollutant (Maximum Pounds per Day)[1]**					
	Reactive Organic Gases (ROG)	**Nitrogen Oxide (NO_x)**	**Carbon Monoxide (CO)**	**Sulfur Dioxide (SO_2)**	**Coarse Particulate Matter (PM_{10})**	**Fine Particulate Matter ($PM_{2.5}$)**
Overlap 1						
Phase 1 Operations	7.04	4.43	47.59	0.13	6.97	3.63
Phase 2 Building Construction	0.76	3.91	22.06	0.03	1.74	0.47
Phase 2 Architectural Coating	20.11	0.75	2.14	<0.01	0.31	0.07
Phase 3 Building Construction	0.71	3.78	21.25	0.03	1.55	0.43
Total Overlap	**28.61**	**12.87**	**93.04**	**0.18**	**10.57**	**4.61**
SCAQMD Regional Operational Threshold	*55*	*55*	*550*	*150*	*150*	*55*
Exceeds Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Overlap 2						
Phase 1 Operations	7.04	4.43	47.59	0.13	6.97	3.63
Phase 2 Operations	13.41	7.51	90.84	0.24	13.60	7.06
Phase 3 Building Construction	0.69	3.71	20.86	0.03	1.55	0.43
Phase 3 Architectural Coating	18.19	0.73	2.12	<0.01	0.27	0.07
Phase 4 Building Construction	0.63	3.58	19.87	0.03	1.31	0.37
Total Overlap	39.96	19.96	181.28	0.42	23.71	11.55
SCAQMD Regional Operational Threshold	*55*	*55*	*550*	*150*	*150*	*55*
Exceeds Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Overlap 3						
Phase 1 Operations	7.04	4.43	47.59	0.13	6.97	3.63
Phase 2 Operations	13.41	7.51	90.84	0.24	13.60	7.06
Phase 3 Operations	11.88	5.88	80.34	0.21	12.02	6.21
Phase 4 Building Construction	0.63	3.58	19.87	0.03	1.31	0.37

Phase 4 Architectural Coating	15.58	0.71	1.79	<0.01	0.23	0.06
Phase 5 Building Construction	0.51	4.95	16.16	0.02	0.77	0.24
Total Overlap	49.05	27.06	256.58	0.63	34.91	17.56
SCAQMD Regional Operational Threshold	*55*	*55*	*550*	*150*	*150*	*55*
Exceeds Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Overlap 4						
Phase 1 Operations	7.04	4.43	47.59	0.13	6.97	3.63
Phase 2 Operations	13.41	7.51	90.84	0.24	13.60	7.06
Phase 3 Operations	11.88	5.88	80.34	0.21	12.02	6.21
Phase 4 Operations	9.83	5.99	65.82	0.18	9.94	5.18
Phase 5 Building Construction	0.50	4.91	15.97	0.02	0.77	0.24
Phase 5 Architectural Coating	9.11	0.68	1.48	<0.01	0.13	0.03
Total Overlap	**51.76**	**29.39**	**302.04**	**0.78**	**43.43**	**22.34**
SCAQMD Threshold	*55*	*55*	*550*	*150*	*150*	*55*
Exceeds Threshold?	**No**	**No**	**No**	**No**	**No**	**No**

Notes:
1. Totals may not add up due to rounding.
Source: CalEEMod version 2022.1. Refer to **Appendix A: Air Quality Monitoring Data** for model outputs.

Cumulative Construction Emissions

The SCAB is designated nonattainment for O_3, PM_{10}, and $PM_{2.5}$ for State standards and nonattainment for O_3 and $PM_{2.5}$ for national standards. Appendix D of the SCAQMD White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution (2003) notes that projects that result in emissions that do not exceed the project-specific SCAQMD regional thresholds of significance should result in a less than significant impact on a cumulative basis unless there is other pertinent information to the contrary. The mass-based regional significance thresholds published by the SCAQMD are designed to ensure compliance with both NAAQS and CAAQS and are based on an inventory of projected emissions in the SCAB. Therefore, if a project is estimated to result in emissions that do not exceed the thresholds, the project's contribution to the cumulative impact on air quality in the SCAB would not be cumulatively considerable. As shown in **Table 6**, project construction-related emissions by themselves would not exceed the SCAQMD significance thresholds for criteria pollutants. Therefore, Project construction 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.

The SCAQMD has developed strategies to reduce criteria pollutant emissions outlined in the AQMP pursuant to the FCAA mandates. The analysis assumed fugitive dust controls would be utilized during construction, including frequent water applications. SCAQMD rules, mandates, and compliance with adopted AQMP emissions control measures would also be imposed on construction projects throughout the SCAB, which would include related projects. Compliance with SCAQMD rules and regulations would further reduce the Project construction-related impacts. Therefore, Project-related construction emissions, combined with those from other projects in the area, would not substantially deteriorate local air quality. Construction emissions associated with the Project would not result in a cumulatively considerable contribution to significant cumulative air quality impacts.

Cumulative Operational Impacts

The SCAQMD has not established separate significance thresholds for cumulative operational emissions. The nature of air emissions is largely a cumulative impact. As a result, no single project is sufficient in size to, by itself, result in nonattainment of ambient air quality standards. Instead, individual project emissions contribute to existing cumulatively significant adverse air quality impacts. The SCAQMD developed the operational thresholds of significance based on the level above which individual project emissions would result in a cumulatively considerable contribution to the SCAB's existing air quality conditions. Therefore, a project that exceeds the SCAQMD operational thresholds would also be a cumulatively considerable contribution to a significant cumulative impact.

Project operational emissions would not exceed SCAQMD thresholds. As a result, operational emissions associated with the Project would not result in a cumulatively considerable contribution to significant cumulative air quality impacts. Additionally, adherence to SCAQMD rules and regulations would alleviate potential impacts related to cumulative conditions on a project-by-project basis. Project operations would not contribute a cumulatively considerable net increase of any nonattainment criteria pollutant.

Based on the above, the 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, impacts would be less than significant, and no mitigation measures would be required.

5.3c Would the Project expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact with Mitigation Incorporated. Sensitive populations are more susceptible to the effects of air pollution than the general population. Sensitive receptors that are in proximity to localized sources of toxics are of particular concern. Land uses considered

sensitive receptors include residences, schools, playgrounds, childcare centers, long-term health care facilities, rehabilitation centers, convalescent centers, and retirement homes.

Localized Construction Significance Analysis

The nearest sensitive receptors are the residences and schools located adjacent to the Project Site. To identify impacts to sensitive receptors, the SCAQMD recommends addressing Localized Significance Thresholds (LSTs) for construction. LSTs were developed in response to SCAQMD Governing Boards' Environmental Justice Enhancement Initiative (I-4) and are based on the ambient concentrations of each pollutant for each source receptor area and distance to the nearest sensitive receptor. LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the state or federal ambient air quality standard (the more stringent of the two). The SCAQMD provided the Final Localized Significance Threshold Methodology (dated June 2003 [revised 2008]) for guidance. The LST methodology assists lead agencies in analyzing localized impacts associated with Project-specific emissions.

CalEEMod calculates construction emissions based on the number of equipment hours and the maximum daily soil disturbance activity possible for each piece of equipment. The appropriate source receptor area (SRA) for the localized significance thresholds is the Southwest Coastal LA County Monitoring Area (SRA 3) since this area includes the Project. LSTs apply to CO, nitrogen dioxide (NO_2), PM_{10}, and $PM_{2.5}$. The SCAQMD produced look-up tables for projects that disturb areas less than or equal to 5 acres in size. Project construction is anticipated to disturb a maximum of 3.5 acres in a single day based on construction equipment hours and maximum daily soil disturbance for site preparation and grading activities for the entire site. Development Phases 1 through 5 include vertical construction (building construction and architectural coating) only and does not include ground disturbance such as grading. However, although Phases 1 through 5 would not result in ground disturbance, localized emissions have been evaluated. Phases 1 through 4 would result in a maximum of 1.5 acres of disturbance and Phase 5 would result in a maximum of 0.5 acres (rounded up to 1 acre to interpolate thresholds). As the Final Localized Significance Threshold Methodology provides thresholds for projects disturbing 1-, 2-, and 5-acres in size and the thresholds increase with size of the site, the LSTs for a 4-acre threshold were interpolated and utilized for this analysis.

The SCAQMD's methodology states that "off-site mobile emissions from the Project should not be included in the emissions compared to LSTs." Therefore, only emissions included in the CalEEMod "on-site" emissions outputs were considered. The nearest sensitive receptors are schools and single-family residences adjacent to the Project Site. LST thresholds are provided for distances to sensitive receptors of 25, 50, 100, 200, and 500 meters. As discussed in Section 4.1 of the Air Quality Assessment prepared for the Project (**Appendix A**), projects with boundaries located closer than 25 meters to the nearest receptor should use the LSTs for receptors located at 25 meters. Therefore, LSTs for 25 meters were utilized in this analysis. **Table 9: Localized Significance of Construction Emissions**, shows the results of localized emissions during construction. This table represents the worst-case scenario and is based on peak earthwork volumes anticipated. As shown, localized Project construction emissions would not exceed SCAQMD thresholds, and thus sensitive receptors would not to be exposed to substantial

pollutant concentrations. Impacts would therefore be less than significant. No mitigation is required.

Table 9: Localized Significance of Construction Emissions				
	Pollutant (Maximum Pounds per Day)[1, 2]			
Construction Activity	Nitrogen Oxide (NO_x)	Carbon Monoxide (CO)	Coarse Particulate Matter (PM_{10})	Fine Particulate Matter ($PM_{2.5}$)
Entire Site				
Demolition	12.8	13.2	0.9	0.5
Site Preparation	31.6	30.2	9.0	5.2
Grading	29.7	28.3	4.8	2.6
Infrastructure	10.4	13.0	0.4	**0.4**
Paving	7.1	9.9	0.3	0.3
Maximum Emissions	31.6	30.2	9.0	5.2
SCAQMD Localized Screening Threshold (adjusted for 3.5 acres at 25 meters	164	1,382	12	7
Exceed SCAQMD Threshold?	No	No	No	No
Phase 1 - 4				
Phase 1 Building Construction	9.9	13.0	0.4	0.3
Phase 1 Architectural Coating	0.8	1.1	<0.1	<0.1
Phase 2 Building Construction	9.4	12.9	0.3	0.3
Phase 2 Architectural Coating	0.8	1.1	<0.1	<0.1
Phase 3 Building Construction	9.4	12.9	0.3	0.3
Phase 3 Architectural Coating	0.8	1.1	<0.1	<0.1
Phase 4 Building Construction	8.9	12.9	0.3	0.3
Phase 4 Architectural Coating	0.8	1.1	<0.1	<0.1
Maximum Emissions	9.9	13.0	0.4	0.3
SCAQMD Localized Screening Threshold (adjusted for 1.5 acres at 25 meters	111	816	7	4
Exceed SCAQMD Threshold?	No	No	No	No
Phase 5				
Building Construction	9.2	11.7	0.3	0.3
Architectural Coating	0.8	1.1	<0.1	<0.1
Maximum Emissions	9.2	11.7	0.3	0.3
SCAQMD Localized Screening Threshold (adjusted for 1.0 acres at 25 meters	91	664	5	3
Exceed SCAQMD Threshold?	No	No	No	No

Table 9: Localized Significance of Construction Emissions				
	Pollutant (Maximum Pounds per Day)[1, 2]			
Construction Activity	Nitrogen Oxide (NO_x)	Carbon Monoxide (CO)	Coarse Particulate Matter (PM_{10})	Fine Particulate Matter ($PM_{2.5}$)
Overlapping Emissions				
Phase 1 Construction + Coating 2027	10.2	14.1	0.4	0.3
Phase 1 Construction + Coating + Phase 2 Construction 2027	19.6	27.0	0.7	0.6
Phase 2 Construction + Coating 2027	10.2	14.1	0.4	0.3
Phase 2 Construction + Coating + Phase 3 Construction 2027	19.6	27.0	0.7	0.6
Phase 3 Construction + Coating 2028	9.7	14.1	0.3	0.3
Phase 3 Construction + Coating + Phase 4 Construction 2028	18.7	27.0	0.6	0.6
Phase 4 Construction + Coating 2028	9.7	14.1	0.3	0.3
Phase 4 Construction + Coating + Phase 5 Construction	18.3	25.6	0.5	0.5
Maximum emissions	**19.6**	**27.0**	**0.7**	**0.6**
SCAQMD Localized Screening Threshold (adjusted for 3.0 acres at 25 meters)[3]	*150*	*1,243*	*10*	*6*
Exceed SCAQMD Threshold?	**No**	**No**	**No**	**No**

1 Totals may not add up due to rounding.
2 Emissions presented herein are unmitigated. As shown below, MM AQ-2 is required to mitigate carcinogenic risks. Therefore, regional criteria pollutant emissions would be even lower than shown in this table.
3 Threshold for overlapping emissions assumed to be 3 acres.
Source: CalEEMod version 2022.1. Refer to Appendix A: Air Quality Modeling Data for model outputs.

Localized Operational Significance Analysis

According to the SCAQMD LST methodology, LSTs would apply to the operational phase of a project only if it includes stationary sources or attracts mobile sources that may spend long periods queuing and idling at the site (e.g., warehouse or transfer facilities). Although the Project consists of residential uses that would not include such queuing or idling, the operational phase LST assumes that approximately two percent of mobile emissions would occur onsite (approximately 0.25 miles of on-site travel equates to two percent of the assumed 10.4-mile trip rate). As the nearest receptor is located adjacent to the Project Site, LSTs for 25 meters for SRA 3 were used in this analysis. Although the Project Site is 22.87 acres, the 5-acre LST threshold was conservatively used because the LSTs increase with the size of the site. The 5-acre LSTs have been compared to each individual operational phase of the Project.

Table 10: Localized Significance of Operational Emissions, shows that daily emissions of these pollutants during operation of each individual development phase would not result in significant

concentrations of pollutants at nearby sensitive receptors. However, at full buildout, localized emissions of PM_{10} and $PM_{2.5}$ would exceed screening LST thresholds. Mitigation Measure AQ-1 prohibits the installation of wood-burning and natural gas fireplaces. With implementation of MM AQ-1, localized operational emissions at full Project buildout would not exceed applicable thresholds. Therefore, significant impacts would not occur concerning LSTs during operational activities because sensitive receptors would not to be exposed to substantial pollutant concentrations.

Table 10: Localized Significance of Operational Emissions

Activity	Pollutant (Maximum Pounds per Day)			
	Nitrogen Oxide (NO_x)	**Carbon Monoxide (CO)**	**Coarse Particulate Matter (PM_{10})**	**Fine Particulate Matter ($PM_{2.5}$)**
Unmitigated On-Site Emissions[1]				
Phase 1	2.77	29.50	2.67	2.52
Phase 2	4.44	56.72	5.17	4.88
Phase 3	3.15	50.04	4.53	4.27
Phase 4	3.88	41.93	3.91	3.60
Phase 5	1.87	23.95	2.18	2.06
Project Buildout	16.12	202.14	18.36	17.34
Maximum Daily Emissions	16.12	202.14	18.36	17.34
SCAQMD Localized Screening Threshold (5 acres at 25 meters)[2]	*197*	*1,796*	*15*	*8*
Exceed SCAQMD Threshold?	**No**	**No**	**Yes**	**Yes**
Mitigated On-Site Emissions[3]				
Project Buildout	**5.16**	**37.69**	**1.00**	**0.54**
SCAQMD Localized Screening Threshold (5 acres at 25 meters)[2]	*197*	*1,796*	*15*	*8*
Exceed SCAQMD Threshold?	**No**	**No**	**No**	**No**

1. Includes area, energy, and two percent of mobile emissions. Approximately two percent of mobile emissions would occur onsite (approximately 0.25 miles of on-site travel equates to two percent of the assumed 10.4-mile trip rate).
2. SRA Zone 3 – Southwest Coastal LA County; 5-acre area, 25 meters to receptor.
3. MM AQ-1 prohibits the installation of woodburning and natural gas fireplaces.
Source: CalEEMod version 2022.1. Refer to **Appendix A** for model outputs.

MM AQ-1 The installation of wood-burning and natural gas fireplaces shall be prohibited. The purpose of this measure is to limit emissions of ROG, CO, particulate matter, and visible emissions from wood-burning and natural gas devices used for supplemental heat, or ambiance and does not apply to natural gas HVAC equipment. This prohibition shall be noted on the deed and/or lease agreements for future property owners/tenants to comply with.

Criteria Pollutant Health Impacts

On December 24, 2018, the California Supreme Court issued an opinion identifying the need to provide sufficient information connecting a project's air emissions to health impacts or explain why such information could not be ascertained (*Sierra Club v. County of Fresno* [Friant Ranch, L.P.] [2018] Cal.5th, Case No. S219783). The SCAQMD has set its CEQA significance thresholds based on the FCAA, which defines a major stationary source (in extreme O_3 nonattainment areas such as the SCAB) as emitting 10 tons per year. The thresholds correlate with the trigger levels for the federal New Source Review (NSR) Program and SCAQMD Rule 1303 for new or modified sources. The purpose of the NSR program is to protect public health and the environment. The NSR Program was created by the FCAA to ensure that stationary sources of air pollution are constructed or modified in a manner that is consistent with attainment of health-based NAAQS. The NAAQS establish the levels of air quality necessary, with an adequate margin of safety, to protect the public health. Therefore, projects that do not exceed the SCAQMD's LSTs and mass emissions thresholds would not violate any air quality standards or contribute substantially to an existing or projected air quality violation and would thus have no criteria pollutant health impacts.

As previously discussed, Project emissions would be less than significant and would not exceed SCAQMD thresholds. Localized effects of on-site Project emissions on nearby receptors were also found to be less than significant. The LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable State or national ambient air quality standard. The LSTs were developed by the SCAQMD based on the ambient concentrations of that pollutant for each SRA and distance to the nearest sensitive receptor. The ambient air quality standards establish the levels of air quality necessary, with an adequate margin of safety, to protect public health, including protecting the health of sensitive populations.

Carbon Monoxide Hotspots

An analysis of CO "hot spots" determines whether the change in the level of service of an intersection resulting from the Project would have the potential to result in exceedances of the CAAQS or NAAQS.[5] It has long been recognized that CO exceedances are caused by vehicular emissions, primarily when vehicles are idling at intersections. Vehicle emissions standards have become increasingly stringent in the last 20 years. Currently, the CO standard in California is a maximum of 3.4 grams per mile for passenger cars (requirements for certain vehicles are more stringent). With the turnover of older vehicles, introduction of cleaner fuels, and implementation of control technology on industrial facilities, CO concentrations have steadily declined. Accordingly, with the steadily decreasing CO emissions from vehicles, even very busy intersections do not result in exceedances of the CO standard.

The SCAB was redesignated as attainment for CO in 2007 and is no longer addressed in the SCAQMD's AQMP. The 2003 AQMP is the most recent version that addresses CO concentrations.

[5] University of California, Davis Institute of Transportation Studies, *Transportation Project-Level Carbon Monoxide Protocol,* Revised December 1997

As part of the SCAQMD CO Hotspot Analysis, the Wilshire Boulevard/Veteran Avenue intersection, one of the most congested intersections in southern California with an average daily traffic (ADT) volume of approximately 100,000 vehicles per day, was modeled for CO concentrations. This modeling effort identified a CO concentration high of 4.6 parts per million (ppm), which is well below the 35-ppm national standard. The Project considered herein would not produce the volume of traffic required to generate a CO hot spot in the context of SCAQMD's CO Hotspot Analysis. As CO hotspots were not experienced at the Wilshire Boulevard/Veteran Avenue intersection even as it accommodates 100,000 vehicles daily, it can be reasonably inferred that CO hotspots would not be experienced at any intersections in the vicinity of the Project Site resulting from the 4,111 additional vehicle trips attributable to the Project. Therefore, impacts would be less than significant.

Toxic Air Contaminants

Carcinogenic Risk

Construction-related activities would result in Project-generated diesel particulate matter (DPM) emissions from off-road, heavy-duty diesel equipment exhaust for Project Site preparation (e.g., clearing, grading); paving; application of architectural coatings; on-road truck travel; and other miscellaneous activities. For construction activity, DPM is the primary toxic air contaminant of concern. On-road diesel-powered haul trucks traveling to and from the construction area to deliver materials and equipment are less of a concern because they would not stay on the Site for long durations. Diesel exhaust from on-Site construction equipment poses a health risk to nearby sensitive receptors.

Table 11: Carcinogenic Risk Assessment shows the health risk for the construction of the Project. Based on Office of Environmental Health Hazard Assessment (OEHHA) Risk Assessment Guidelines, the exposure duration for an off-site resident is 4 years (equal to Project construction duration), beginning with the third trimester for residential uses. As each development phase is completed and occupied, on-site receptors would be exposed to construction emissions from continued development. Risk for on-site receptors were calculated beginning in the third trimester and based on the duration of construction activities from on-going development of the Project. The analysis calculates risk based on exposure to DPM concentrations during the entire construction exposure duration.

As shown in **Table 11**, the unmitigated carcinogenic risk at off-site residential and worker receptors would be 32.29 and 6.83 in one million, respectively. Additionally, the unmitigated construction risk at school receptors would be 8.73 in one million. Therefore, the maximum unmitigated construction cancer risk at the off-site residential receptors would exceed the SCAQMD threshold of 10 in one million. In addition, unmitigated carcinogenic risk at on-site Phase 1 receptors would be 30.31 in one million, exceeding the SCAQMD threshold of 10 in one million. While both diesel on-road (trucks) and off-road (heavy-duty construction equipment) vehicles contribute to the overall cancer risk, a majority of the risk is attributable to off-road vehicles. The Project would implement **Mitigation Measure (MM) AQ-2** to reduce cancer risk. **MM AQ-2** requires the use of construction equipment that would meet CARB Tier 4 Final

emissions standards or similarly effective equipment in order to reduce diesel exhaust construction emissions. Implementation of **MM AQ-2** would reduce Project carcinogenic risk at off- and on-site receptors to below the SCAQMD's 10 in one million threshold. Therefore, the Project's cancer risk would not exceed the SCAQMD's 10 in one million threshold and impacts associated with carcinogenic risk would be less than significant with mitigation.

Table 11: Carcinogenic Risk Assessment

Exposure Scenario	Cancer Risk (Risk per Million)[1]	Significance Threshold (Risk per Million)	Exceeds Significance Threshold?
Unmitigated			
Residential Receptors	32.29	10	Yes
Worker Receptor	6.83	10	No
Student Receptor	8.73	10	No
Onsite Phase 1 Receptor	30.31	10	Yes
Onsite Phase 2 Receptor	6.90	10	No
Onsite Phase 3 Receptor	0.62	10	No
Onsite Phase 4 Receptor	0.81	10	No
Mitigated			
Residential Receptors	6.35	10	No
Worker Receptor	1.49	10	No
Student Receptor	1.61	10	No
Onsite Phase 1 Receptor	6.95	10	No
Onsite Phase 2 Receptor	1.69	10	No
Onsite Phase 3 Receptor	0.15	10	No
Onsite Phase 4 Receptor	0.21	10	No

1. The reported annual pollutant concentration is at the closest maximally exposed individual receptor (MEIR) to the Project Site.

Source: Refer to Appendix A of **Appendix A**.

As described above, worst-case construction risk levels based on the EPA Regulatory Model (AERMOD) dispersion model and conservative assumptions would be below the SCAQMD's thresholds for construction with **MM AQ-2**. Therefore, carcinogenic risk levels would be less than significant with implementation of the identified mitigation measure.

Non-Carcinogenic Hazard

The significance thresholds for toxic air contaminant (TAC) exposure (for purposes of this report, DPM) also require an evaluation of non-cancer risk stated in terms of a hazard index. Non-cancer chronic impacts, referred to as "chronic hazard", are calculated by dividing the annual average concentration by the reference chronic exposure level (REL) for that substance. The REL is defined

as the concentration at which no adverse non-cancer health effects are anticipated. RELs are designed to protect sensitive individuals within the population. According to OEHHA, the REL for DPM is 5 and the target organ is the respiratory system.

Chronic non-carcinogenic impacts are shown in **Table 12: Chronic Hazard Assessment**. A chronic hazard index of 1.0 is considered individually significant. The hazard index is calculated by dividing the chronic exposure by the reference exposure level. The chronic hazard was calculated based on the annual average concentration at the maximally exposed individual receptor for residential, worker, and student. It should be noted that there is no acute REL for DPM and acute health risk cannot be calculated. **Table 12** shows that the non-carcinogenic hazards associated with unmitigated and mitigated scenarios would not exceed the acceptable limits of 1.0.

Table 12: Chronic Hazard Assessment

Exposure Scenario	Annual Concentration (µg/m^3)[1]	Chronic Hazard
Unmitigated		
Residential Receptors	0.099	0.020
Worker Receptor	0.0001	0.00001
Student Receptor	0.164	0.033
Onsite Phase 1 Receptor	0.144	0.029
Onsite Phase 2 Receptor	0.043	0.009
Onsite Phase 3 Receptor	0.007	0.001
Onsite Phase 4 Receptor	0.070	0.014
Mitigated		
Residential Receptors	0.020	0.004
Worker Receptor	0.0001	0.00001
Student Receptor	0.036	0.007
Onsite Phase 1 Receptor	0.033	0.007
Onsite Phase 2 Receptor	0.010	0.002
Onsite Phase 3 Receptor	0.002	0.0003
Onsite Phase 4 Receptor	0.019	0.004
SCAQMD Threshold	*N/A*	*1.0*
Threshold Exceeded?	**N/A**	**No**

1. The reported pollutant concentration is at the closest receptor (MEIR).

Source: Refer to Appendix A of **Appendix A.**

Based on the above, the Project would not expose sensitive receptors to substantial pollutant concentrations. With implementation of **MM AQ-2**, impacts would be reduced to a less-than-significant level.

Mitigation Measures

MM AQ-2 **Off-Road Diesel-Powered Construction Equipment**. All off-road diesel-powered construction equipment greater than 25 horsepower must meet California Air Resources Board Tier 4 Final off-road emissions standards. Requirements for Tier 4 Final equipment will be included in applicable bid documents and successful contractor(s) must demonstrate the ability to supply such equipment. A copy of each unit's Best Available Control Technology (BACT) documentation (certified tier specification or model year specification), and CARB or SCAQMD operating permit (if applicable) will be provided to the City upon request.

5.3d 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 SCAQMD CEQA Air Quality Handbook identifies certain land uses as sources of odors. These land uses include agriculture (farming and livestock), wastewater treatment plants, food processing plants, chemical plants, composting facilities, refineries, landfills, dairies, and fiberglass molding. The Project would not include any of the land uses that have been identified by the SCAQMD as odor sources.

During construction-related activities, some odors (not substantial pollutant concentrations) that may be detected are those typical of construction vehicles (e.g., diesel exhaust from grading and construction equipment). These odors are a temporary short-term impact that is typical of construction projects and that would disperse rapidly. Furthermore, odors that could be generated by construction activities are required to follow SCAQMD Rule 402 (Nuisance) to prevent odor nuisances on sensitive land uses. The Project would not include any of the land uses that have been identified by the SCAQMD as odor sources. Therefore, the Project would not create objectionable odors. Therefore, impacts would be less than significant, and no mitigation measures would be required.

Cumulative Impacts

The cumulative setting for air quality includes the City of Inglewood and the SCAB. The SCAB is designated as a nonattainment area for State standards of O_3, PM_{10}, and $PM_{2.5}$. The SCAB is designated as a nonattainment area for federal standards of O_3 and $PM_{2.5}$, attainment (maintenance)[6] for national PM_{10} standards, and is designated as unclassified or attainment for all other pollutants. Cumulative growth in population and vehicle use could inhibit efforts to improve regional air quality and attain the ambient air quality standards.

The SCAQMD's approach to assessing cumulative impacts is based on the AQMP forecasts of attainment of ambient air quality standards in accordance with requirements of the FCAA and CCAA. As discussed above, the proposed Project would be consistent with the AQMP, which is intended to bring SCAB into attainment for all criteria pollutants. Since the Project's estimated construction and operational emissions would not exceed the applicable SCAQMD daily

[6] The area is under a PM10 Maintenance Plan.

significance thresholds that are designed to assist the region in attaining both NAAQS and CAAQS, cumulative impacts would be less than significant.

5.4 Biological Resources

This Section is based on the *Tree Evaluation Report* (Dillon Reynolds - ISA Certified WE-9690A-The Landscape Center., August 26, 2024), which is included in its entirety as **Appendix C: Tree Evaluation Report**.

Environmental Issue	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 Game or U.S. Fish and Wildlife Service?			X	
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 Game or U.S. Fish and Wildlife Service?				X
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?				X
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?			X	
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?			X	
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?				X

Impact Analysis

5.4a Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

Less Than Significant Impact. The Project Site is developed with recreational facilities within the Morningside High School campus and vacant school buildings within the vacant Woodworth Elementary School campus. There are undeveloped areas adjacent to the existing recreational facilities comprised of non-native grass, trees and ruderal vegetation. The Project Site is in an urbanized area of the City and is surrounded by residential, commercial, and school uses. Ornamental vegetation including 70 trees occurring within the Project Site may provide suitable nesting habitat for migratory birds and raptors protected under the Federal Migratory Bird Treaty Act (MBTA) and the California Fish and Game Code, which prohibit the take or destruction of migratory birds and raptors, their nests, and/or their eggs.

Construction of the Project would include removal and replacement of 70 on-site trees. In addition, construction activities may result in noise and vibration that could indirectly impact nesting birds within the Project Site.

The Applicant and construction contractor(s) would be required to comply with federal law and the MBTA regardless of timing. In compliance with federal law, a nesting bird survey would be performed by a qualified biologist within 72 hours of any construction activities including ground disturbance, tree removal or vegetation trimming during the nesting season. If active nests are identified during the survey, the qualified biologist will establish appropriate measures to avoid impacts on active nests, which may include a buffer around designated nests or other avoidance measures. The biologist will continue to monitor the nest throughout the duration of the construction activities within the vicinity of the nest, and the measures will remain in place until nesting season has completed and it has been determined the young have fledged or the nest has been abandoned. Compliance with the laws will be effective in mitigating any increased effects during breeding season.

It should be noted that the removed trees would be replaced per City of Inglewood Municipal Code and its stipulated requirements, and the Project will plant approximately 300 trees featuring a diverse range of species. Therefore, operation of the Project would provide increased bird habitat compared to existing conditions.

Due to the Project's location in a highly developed urban area, the are no likely candidate, sensitive, or special-status species. With compliance with applicable laws and regulations the Project would not have a substantial adverse effect on any nesting birds. Impacts would be less than significant, and no mitigation measures would be required.

5.4b Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

No Impact. Vegetation within the Project Site is comprised of non-native grass for athletic field use and ornamental landscaping. There is no wetland or riparian habitat or other sensitive natural community on or adjacent to the Project Site.[7,8] Therefore, the Project would not have a substantial adverse effect on any riparian habitat or other sensitive natural communities. Therefore, there would be no impacts to riparian habitat or sensitive natural communities, and no mitigation measures would be required.

5.4c Would the project 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. According to the United States Fish and Wildlife Service (USFWS) National Wetlands Inventory, no riparian habitats or wetlands are present on or adjacent to the Project Site.[9] The Project is not near any state identified waters or coastal resource area.[10,11] Therefore, the Project would not have a substantial adverse effect on State or federally protected wetlands. There would be no impact, and no mitigation measures would be required.

5.4d 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 fully developed and surrounded by urban development; therefore, it is not part of an established wildlife corridor.[12] Project development would occur within the Project Site and would not impact the movement of any native wildlife species. Furthermore, no water bodies that could serve as a habitat for fish exist on the Project Site or in the vicinity of the Project Site.

The existing on-site trees that would be removed during construction of the Project could potentially provide nesting or nursery sites for migratory birds. However, the Project would comply with the MBTA. Tree removal activities would take place outside of the nesting season (February 15- September 15), to the extent feasible. To the extent that vegetation removal

[7] California Department of Fish and Wildlife. California Regional Conservation Plan. August 2015. Available: https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=68626&inline, accessed: August 9,2024.

[8] U.S. Fish and Wildlife Service, National Wetlands Inventory.www.fws.gov/wetlands/Data/Mapper.html, accessed: August 17, 2024.

[9] United States Fish and Wildlife Service, National Wetlands Inventory, 2021, https://fwsprimary.wim.usgs.gov/wetlands/apps/wetlands-mapper/. Accessed August 9, 2024.

[10] County of Los Angeles General Plan EIR, https://planning.lacounty.gov/wp-content/uploads/2022/11/gp_2035_deir.pdf .Accessed August 28, 2024.

[11] State Water Resources Control Board. https://gispublic.waterboards.ca.gov/portal/apps/webappviewer/index.html?id=e2def63ccef54eedbee4ad726ab1552c .Accessed August 28, 2024.

[12] California Department of Fish and Wildlife, BIOS Viewer, https://apps.wildlife.ca.gov/bios6/?bookmark=648. Accessed August 9, 2024.

activities must occur during the nesting season, a biological monitor would be present during the removal activities to ensure that no active nests would be impacted. If active nests are found, a 300-foot buffer (500 feet for raptors) would be established until the fledglings have left the nest. Through compliance with the MBTA, the Project would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites. Impacts would be less than significant, and no mitigation measures would be required.

5.4e Would the project conflict with local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Less Than Significant Impact. A significant impact could occur if a project were inconsistent with local regulations pertaining to biological resources, such as the City's Tree Preservation Regulations contained in Section 12-110 through 12-127 of the City's Municipal Code. As noted in the Tree Evaluation Report, the City's Tree Preservation Regulations protects trees having a minimum trunk diameter of eight inches measured fifty-four inches above the ground, street trees or other required trees such as those required as a condition of approval, use permit, or other zoning requirement; and all memorial trees dedicated by an entity recognized by the City, and all specimen trees that define a neighborhood or community. In addition, the City's Tree Preservation Regulations include 13 specific tree species that have reached a minimum of four inches diameter trunk size.[13]

Based on the Arborist Report, a total of 70 trees were identified within Project Site and would require removal. Of the 70 trees, 33 trees have a minimum trunk diameter of eight inches and fall under the City Protected Tree Ordinance regulations. The trees will be replaced per the City's Municipal Code Section 12-113. Including replacement trees, the Project would plant approximately 300 trees, featuring a diverse range of species, and incorporate them into various locations of the Project. The removal and placement of new and replacement trees would be subject to the review and approval of the City. Thus, the Project would not conflict with the City's Protected Tree Ordinance or any other local policy or ordinance protecting biological resources. Impacts would be less than significant, and no mitigation measures would be required.

5.4f 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 located in an urbanized area of the City. There is no adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan that includes the Project Site.[14,15] Therefore, the

[13] Includes: 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 lobata; 12. Interior Live Oak Quercus wislizenii; 13. California Bay Umbellularia californica

[14] CDFW, NCCP Plan Summaries, 2023, https://wildlife.ca.gov/conservation/planning/nccp/plans. Accessed August 27, 2024.

[15] Data Basin, Habitat Conservation Plan (HCP), California, https://databasin.org/maps/new/#datasets=c116dd0d32df408cb44ece185d98731c. Accessed August 27, 2024.

Project would not result in conflicts 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 would occur, and no mitigation measures would be required.

Cumulative Impacts

The Project Site is located in a highly urbanized area. The Project would not conflict with the provisions of a habitat conservation plan, Natural Community Conservation Plan or other such plan. The Project would remove protected trees per the City's Tree Preservation Regulations on the Project Site. However, the Project would be subject to the provisions of the City's Tree Preservation Regulations and would provide replacement trees. The Project would plant approximately 300 trees, featuring a diverse range of species, and incorporate them into various locations of the Project. The removal and placement of new and replacement trees would be subject to the review and approval of the City.

In addition, as with the Project, the related projects would be required to comply with the City's Tree Preservation Ordinance, the MBTA, and other applicable biological resources regulations, as well as with CEQA for those projects subject to CEQA review. Furthermore, to the extent that the related projects could result in significant impacts to biological resources, they would be required to implement mitigation to reduce or avoid the impacts. Thus, as the Project would not result in significant impacts to biological resources, the Project would not contribute considerably to cumulative biological resources impacts. As such, cumulative biological resources impacts would be less than significant.

5.5 Cultural Resources

This Section is based on the Archaeological Resources Assessment (ARA), prepared by Kimley-Horn, July 2024, and tribal consultations pursuant to AB 52, which are included in their entirety in **Appendix D: Archaeological Resources Assessment**.

Environmental Issue	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 Section 15064.5?			X	
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?		X		
c) Disturb any human remains, including those interred outside of dedicated cemeteries?		X		

Impact Analysis

5.5a Would the project cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?

Less Than Significant Impact. The Project Site is located on portions of Morningside High School, on the grass fields and former playing fields between the Morningside High School and Woodworth-Monroe TK-8 Academy and IUSD - Child Development Center. The *Morningside High School Site Upgrade and Woodworth Elementary School Demolition Project MND*, prepared by ESA, February 2023 was prepared to evaluate the potential environmental impacts associated with improvements and partial demolition of the Morningside High School campus, demolition of the Woodworth Elementary School and demolition of the recreational facilities and fields between the Morningside High School campus and Woodworth Elementary School.

The recreational facilities and fields and Woodworth Elementary School are part of the current Project Site evaluated in this IS.

The *Morningside High School Site Upgrade and Woodworth Elementary School Demolition Project MND* concluded the Woodworth Elementary School campus is ineligible for listing in the CRHR and demolition of the Woodworth Elementary School would not constitute a significant impact. The Morningside High School campus was identified as potentially eligible for listing as a historic district under the National Register. The MND incorporated mitigation measures to be implemented by the IUSD to reduce direct impacts related to demolition Morningside High School and campus to less than significant.

The prior MND also identified three potential historical resources within a 0.5-mile radius of the Project Site, including: 10701 S. 10th Avenue, Los Angeles County Fire Department City of Inglewood Fire Station 170; 3620 102nd Street, Aku Aku Polynesian; and 3921 and 3947 W. 104th

Street, Lockhaven Christian School. The prior MND concluded that these resources would not have views of the evaluated Project Site nor would they be physically impacted.

An updated cultural resources records search was conducted for this Project, (**Appendix D**)and the SCCIC identified a single historic-age wooden utility pole (P-19-190076) located 0.3-mile north of the Project Site. P-19-190076 and the three resources identified in the prior MND would not have views of the current Project Site nor would they be physically impacted by the Project.

The prior MND incorporated mitigation measures to be implemented by the IUSD to reduce direct impacts related to demolition of portions of the Morningside High School and campus to less than significant. The prior MND sufficiently addressed direct impacts as a result of demolition of the recreational facilities and fields and Woodworth Elementary School that are part of the current Project Site. As such, the proposed Project would not cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5. Impacts would be less than significant, and no mitigation measures would be required.

5.5b 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. As discussed in the ARA prepared for the Project, the archaeological sensitivity of the Project area is low. It may have contained moderate sensitivity prior to historic and modern development given the proximity to Centinela Springs, the Pacific Coast, and natural resources associated with the marine environment that were important for Native American communities to thrive. Though, in its current condition, the Project area has a low potential for surface or subsurface archaeological resources due to the level of previous development spanning only 70 years within the Project area boundaries. Excavation for the proposed Project will reach a maximum depth of 12 feet. While the proposed Project has potential to reach undisturbed soil, sediments consist solely of late Pleistocene alluvium. Given the age of the geologic deposits, archaeological resources are unlikely to be present subsurface. There are no Holocene-age (e.g., era of human occupation) deposits located in the Project area.

Therefore, for the reasons expounded above, the archaeological sensitivity of the Project area is low. Nevertheless, ground-disturbing activities have the potential to reveal buried deposits not observed on the surface during previous surveys. To mitigate such impacts, the Project would be required to implement **MM CUL-1**, **MM CUL-2**, **MM TCR-1**, and **MM TCR-2** which set forth procedures for the retention of a qualified archaeologist, a Native American monitor representing the Gabrieleno Band of Mission Indians – Kizh Nation, and inadvertent discovery of archaeological resources, respectively. Implementation of **MM CUL-1**, **MM CUL-2, MM TCR-1,** and **MM TCR-2** would reduce Project impacts to archaeological resources to a less than significant level.

Mitigation Measures

MM CUL-1 **Retention of a Qualified Archaeologist**: Prior to start of ground-disturbing activities, a Qualified Archaeologist (defined as meeting the Secretary of the Interior's Professional Qualification Standards for archaeology) shall be retained

to prepare cultural resources sensitivity training for construction personnel. The Qualified Archaeologist, or their designee, shall instruct all onsite construction personnel on the types of archaeological resources that may be encountered and the procedures to follow in the event of an inadvertent discovery of archaeological resources or human remains. The Applicant shall ensure that construction personnel are made available for and attend the training and retain documentation demonstrating attendance.

MM CUL-2 **Inadvertent Discovery of Cultural Resources**: In the event that any subsurface cultural resources are encountered at the project site during construction or the course of any ground disturbance activities, all such activities shall halt immediately within 50 feet. The applicant shall notify the City and consult with a Secretary of Interior qualified archaeologist who shall evaluate the find in accordance with Federal, State, and local guidelines, including those set forth in the California Public Resources Code Section 21083.2 and shall determine the necessary findings as to the origin and disposition to assess the significance of the find. If any find is determined to be significant, appropriate avoidance measures recommended by the consultant and approved by the City must be followed unless avoidance is determined to be unnecessary or infeasible by the City. If avoidance is unnecessary or infeasible, other appropriate measures (e.g., data recovery, excavation) shall be instituted. For any resources of Native American origin, the City shall also contact the Tribes that elected to consult on the Project to identify its potential as a Tribal Cultural Resource (TCR). Should the resource, in consultation between the City and Tribe(s), be determined a TCR, the City shall also consult with Tribes regarding avoidance or other measures recommended by the consultant. All identified cultural resources will be recorded on appropriate California Department of Parks and Recreation (DPR) 523 series forms and evaluated for significance. All records will be submitted to the City of Inglewood, Consulting Tribe(s), and South Central Coastal Information Center (SCCIC).

5.5c Would the project disturb any human remains, including those interred outside of dedicated cemeteries?

Less Than Significant Impact With Mitigation Incorporated. Given the Project Site has been subject to extensive disruption, the potential to disturb or impact any human remains is unlikely. However, there is always a possibility that human remains could be interred beneath the Project Site.

If human remains are found, those remains would require proper treatment in accordance with applicable laws. PRC Section 5097, *et seq*., and California Health and Safety Code (HSC) Sections 7050.5-7055 describe the general provisions regarding human remains, including the requirements if any human remains are accidentally discovered during excavation of a site. Adherence with **MM CUL-3 and MM TCR-3** would ensure the proper treatment of human remains should they be encountered. Therefore, with regard to the disturbance of human remains, the Project would result in a less than significant impact with mitigation incorporated.

Mitigation Measures

MM CUL-3 **Inadvertent Discovery of Human Remains**: In the event that human skeletal remains are encountered at the project site during construction or the course of any ground disturbance activities, all such activities shall halt immediately within 100 feet, pursuant to State Health and Safety Code Section 7050.5 which requires that no further ground disturbance shall occur until the County Coroner has made the necessary findings as to the origin and disposition pursuant to California Public Resources Code Section 5097.98. Additionally, the following procedures shall be followed:

Contact the County Coroner:

1104 N. Mission Road

Los Angeles, CA 90033

(323) 343-0512 (8 a.m. to 5 p.m. Monday through Friday) or

(323) 343-0714 (After Hours, Saturday, Sunday, and Holidays)

If the remains are determined to be of Native American descent, the Coroner has 24 hours to notify the Native American Heritage Commission (NAHC). The NAHC will immediately notify the person they believe to be the Most Likely Descendent (MLD) of the ancestral remains.

The MLD has 48 hours to make recommendations to the owner, or representative, for the treatment or disposition, with proper dignity, of the human remains and grave goods. If the owner does not accept the descendant's recommendations, the owner or the descendent may request mediation by the NAHC.

Cumulative Impacts

As discussed above, the Project would have less than significant indirect impacts on historical resources on the Project Site. While the Project would introduce a new visual element to the Project area, it would not affect the setting of any of the identified historical resources.

Any related project sites that contain historical resources would be required to comply with existing regulations and/or safeguard measures as appropriate for that project, including required compliance with CEQA's provisions regarding historical resources. Therefore, the Project would not make a cumulatively considerable contribution to any potential cumulative impacts, and cumulative impacts to historic resources would be less than significant. With regard to cultural resources, as it relates to archaeological resources and human remains, the Project would be required to comply with existing regulatory requirements, **MM CUL-1** through **MM CUL-3,** and **MM TCR-1** through **MM TCR-2** that would ensure impacts related to archaeological resources and human remains would be less than significant. Furthermore, related projects would be required to comply with existing regulatory requirements. Therefore, the Project would not make a cumulatively considerable contribution to any potential cumulative impacts, and

cumulative impacts to archaeological resources and human remains would be less than significant.

5.6 Energy

This Section is based on the Energy Assessment, prepared by Kimley-Horn in February 2025, which is included in its entirety in **Appendix E: Energy Assessment**.

Environmental Issue	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?			X	
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?			X	

Impact Analysis

5.6a Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Less Than Significant Impact. This section analyzes impacts on energy resources due to construction and operation of the Project. Project construction would consume energy primarily from on- and off-road vehicle fuel consumption in the form of diesel, gasoline, and electricity from water conveyance for dust control. Project operations would consume energy in the form of electricity for lighting and water conveyance, and natural gas for heating and cooling of new buildings and recreational facilities.

Construction Energy Consumption

The Project is anticipated to be constructed in six phases: site-wide horizontal construction (including site preparation, grading, infrastructure improvements, and paving) and five phases of townhome construction. Construction activity is anticipated to occur over a duration of approximately 4.5 years, beginning in May 2025. The energy associated with Project construction includes electricity use associated with water utilized for dust control, diesel fuel from on-road hauling trips, vendor trips, and off-road construction diesel equipment, as well as gasoline fuel from on-road worker commute trips. Because construction activities typically do not require natural gas, it is not included in the following discussion. There are no aspects of the Project that would foreseeably result in the inefficient, wasteful, or unnecessary use of energy during construction activities. The methodology for each category is discussed below. Quantifications of construction energy are indicated for the Project below; see **Table 13: Energy Use During Construction**.

Table 13: Energy Use During Construction			
Project Source	**Total Construction Energy**	**Los Angeles County Annual Energy[1, 2]**	**Percentage Increase Countywide**
Electricity Use		**kWh**	
Water Use[3]	5,496	68,484,956,280	0.00001%
Diesel Use		**Gallons**	
On-Road Construction Trips[4]	48,500	532,570,627	0.0091%
Off-Road Construction Equipment[5]	191,501		0.0360%
Construction Diesel Total	240,001		0.0451%
Gasoline Use		**Gallons**	
On-Road Construction Trips	129,348	3,536,229,368	0.0037%

Notes:
1. County total energy values from California Energy Commission energy reports available through ecdms.energy.ca.gov.
2. Total annual county fuel per EMFAC 2021 model of projected operational fuel usage in 2025 – first year of construction.
3. Construction water use based on acres disturbed per day per construction sequencing and estimated water use per acre.
4. On-road mobile fuel source based on vehicle miles traveled (VMT) from CalEEMod and fleet-average fuel consumption in gallons per mile from EMission FACtor (EMFAC) version 2021 in Los Angeles County for 2025.
5. Construction fuel use was calculated based on CalEEEMod emissions outputs and conversion ratios from the Climate Registry.

Source: Refer to energy calculations in **Appendix E.**

Electricity Use

Water for Construction Dust Control. Electricity use associated with water use for construction dust control is calculated based on total water use and the energy intensity for supply, distribution, and treatment of water. The Project Site is located within the service area of Southern California Edison (SCE). The total number of gallons of water used is calculated based on acreage disturbed during grading and site preparation, as well as the daily watering rate per acre disturbed.

- The total acres disturbed are calculated using the methodology described in Chapter 4.2 of Appendix C of the CalEEMod User's Guide.
- The water application rate of 3,020 gallons per acre per day is from the Air and Waste Management Association's Air Pollution Engineering Manual (1992).

The energy intensity value is based on the CalEEMod default energy intensity per gallon of water. As summarized in **Table 13**, the total electricity demand associated with water use for the Project construction dust control would be approximately 5,496 kilowatt-hours (kWh) over the duration of construction. As indicated in **Table 13**, Project construction electricity would represent approximately 0.00001 percent of the current electricity use in Los Angeles County. SCE's total energy sales are projected to be 111,670 gigawatt-hours (GWh) (111,670,000,000.00 kWh) of electricity in 2025 (the first year of Project construction).[16] The Project's construction-related net annual electricity consumption of 0.0055 GWh (2,356 kWh) would represent less than one percent of SCE's projected sales. Therefore, it is anticipated that SCE's existing and planned

[16] California Energy Commission, *CED 2022 LSE and BA planning Forecast Tables,* https://www.energy.ca.gov/data-reports/reports/integrated-energy-policy-report/2022-integrated-energy-policy-report-update-2

electricity capacity and electricity supplies would be sufficient to serve the Project's temporary construction electricity demand and impacts would be less than significant.

Diesel Use

On-Road Diesel Construction Trips. The diesel fuel associated with on-road construction mobile trips is calculated based on vehicle miles traveled (VMT) from vehicle trips (i.e., worker, vendor, and hauling), the CalEEMod default diesel fleet percentage, and vehicle fuel efficiency in miles per gallon (MPG). VMT for the entire construction period is calculated based on the number of trips multiplied by the trip lengths for each phase shown in CalEEMod. Construction fuel was calculated based on CalEEMod emissions outputs and conversion ratios from the Climate Registry. Total diesel fuel consumption associated with on-road construction trips for the Project would be approximately 48,500 gallons.

Off-Road Diesel Construction Equipment. Similarly, the construction diesel fuel associated with the off-road construction equipment that is calculated based on CalEEMod emissions outputs and conversion ratios from the Climate Registry. The total diesel fuel associated with the Project off-road construction equipment is approximately 191,501 gallons. Combined diesel usage from on-road and off-road construction sources is 240,001 gallons.

Gasoline Use

On-Road Gasoline Construction Trips. The gasoline fuel associated with on-road construction mobile trips is calculated based on VMT from vehicle trips (i.e., worker, vendor, and hauling), the CalEEMod default gasoline fleet percentage, and vehicle fuel efficiency in MPG using the same methodology as the construction on-road trip diesel fuel calculation discussed above. The total gasoline fuel associated with Project on-road construction trips would be approximately 129,348 gallons.

Los Angeles County annual gasoline fuel use in 2025 is anticipated to be 3,536,229,368 gallons and diesel use would be approximately 532,570,627 gallons.[17] Total Project construction gasoline fuel would represent approximately 0.0037 percent of annual gasoline used in the County, and total Project construction diesel fuel would also represent 0.0451 percent of annual diesel used in the County. The total Project's construction fuel use is relatively low compared to annual County use.

Transportation fuels (gasoline and diesel) are produced from crude oil, which can be domestic or imported from various regions around the world. Based on current proven reserves, current crude oil production would be sufficient to meet demand until 2050. As such, it is expected that existing and planned transportation fuel supplies would be sufficient to serve the Project's temporary construction demand.

Furthermore, there are no unusual characteristics that would necessitate the use of construction equipment that would be less energy-efficient than at comparable construction sites in the region or state. In addition, some energy conservation would occur during construction through

[17] Total annual county fuel per EMFAC 2021 model of projected operational fuel usage in 2025 – first year of construction

compliance with State requirements that equipment not in use for more than five minutes be turned off. Project construction equipment would also be required to comply with the latest EPA and CARB engine emissions standards. These engines use highly efficient combustion engines to minimize unnecessary fuel use.

The Project would have construction activities that would use energy, primarily in the form of diesel fuel (e.g., mobile construction equipment, generator powering hand tools) and electricity (e.g., for water conveyance). Contractors would be required to monitor air quality emissions of construction activities using applicable regulatory guidance such as from SCAQMD CEQA Guidelines. Additionally, construction is subject to and would comply with applicable California regulations (e.g., California Code of Regulations, Title 13, Sections 2449 and 2485), which reduce diesel PM and criteria pollutant emissions from in-use off-road diesel-fueled vehicles and limit the idling of heavy-duty construction equipment to no more than five minutes. This requirement indirectly relates to construction energy conservation because when air pollutant emissions are reduced from monitoring and the efficient use of equipment and materials, energy use is reduced. There are no aspects of the Project that would foreseeably result in the inefficient, wasteful, or unnecessary use of energy resources during construction activities.

Due to increasing transportation costs and fuel prices, contractors and owners have a strong financial incentive to avoid wasteful, inefficient, and unnecessary use of energy during construction. There is growing recognition among developers and retailers that sustainable construction is not prohibitively expensive and that there is a significant cost-savings potential in green building practices.[18] Substantial reduction in energy inputs for construction materials can be achieved by selecting building materials composed of recycled materials that require substantially less energy to produce than non-recycled materials. The Project-related incremental increase in the use of energy bound in construction materials such as asphalt, steel, concrete, pipes, and manufactured or processed materials (e.g., lumber and gas) would not substantially increase demand for energy compared to overall local and regional demand for construction materials. It is reasonable to assume that production of building materials such as concrete, steel, etc., would employ all reasonable energy conservation practices in the interest of minimizing the costs of business.

As described above, the Project's fuel consumption and energy usage from the entire construction period would constitute less than one percent of total consumption in the County. It should be noted that CEQA Guidelines Appendix G and Appendix F criteria require an assessment of the Project's effects on local and regional energy supplies and on the requirements for additional capacity. A less than one percent increase in temporary demand is not anticipated to trigger the need for additional capacity. Project construction would have a nominal effect on local and regional energy supplies. Additionally, use of construction fuel would be temporary and would cease once the Project is fully developed. As such, Project construction would have a nominal effect on local and regional energy supplies.

[18] Construct Estimates, *Sustainable Building: How Green Practices Affect Construction Costs*, August 21, 2024. https://constructestimates.com/sustainable-construction-costs-roi/

As stated above, there are no unusual characteristics that necessitate the use of construction equipment that would be less energy-efficient than at comparable construction sites in the region or state. Therefore, potential impacts are considered less than significant.

Operational Energy Consumption

The energy consumption associated with Project operations would occur from building energy (electricity and natural gas) use, water use, and transportation-related fuel use. Annual energy use during Project operations is shown in **Table 14: Project Annual Energy Use During Operations**. It is noted that the Project's unmitigated energy consumption estimates provided in **Table 14** do not include consideration of roof-top solar that would offset electrical demand from SCE, use of high efficiency lighting, or the use of efficient irrigation systems to provide a conservative impact analysis.

Table 14: Project Annual Energy Use During Operations

Source	Project Annual Operational Energy Consumption	Los Angeles County Annual Energy Consumption[1,2]	Percentage Increase Countywide
Electricity Use[3]	**kWh**		
Electricity Demand	2,701,093	-	-
Water Electricity	149,378	-	-
Total Electricity (Building Electricity Demand + Water Conveyance Electricity)	2,850,472	68,484,956,280	0.0042%
Natural Gas Use	**Therms**		
Area[3]	180,544	2,820,285,935	0.0064%
Diesel Use	**Gallons**		
Mobile[4]	3,756	528,535,000	0.00071%
Gasoline Use	**Gallons**		
Mobile[4]	592,035	3,171,276,372	0.01867%

Notes:
1. County total energy values from California Energy Commission energy reports available through ecdms.energy.ca.gov.
2. Total annual county fuel per EMFAC 2021 model of projected operational fuel usage in 2030 – Project buildout.
3. The electricity, natural gas, and water usage are based on Project-specific estimates and CalEEMod defaults.
4. Calculated based on the mobile source fuel based on VMT and fleet-average fuel consumption (in gallons per mile) from EMFAC2021 for operational year 2030.

Source: Refer to energy calculations in **Appendix E.**

Electricity

The electricity use during the Project is based on CalEEMod defaults. The Project would use approximately 2,850,472 kWh of electricity per year. The electricity associated with operational water use is estimated based on the annual water use and the energy intensity factor in the CalEEMod default energy intensity per gallon of water for Los Angeles County. Project area water use is based on the CalEEMod default rates. The Project would use approximately 22 million gallons of water annually which would require approximately 149,378 kWh per year for conveyance and treatment, which is 6 percent of the total Project electricity demand.

Unmitigated Project electricity consumption would constitute approximately 0.0042 percent of countywide electricity use.[19] The Project's electricity consumption represents less than one percent of consumption within the County. Project operations would not substantially affect existing energy or fuel supplies or resources. The Project would comply with applicable energy standards and new capacity would not be required. In addition, the Project would include rooftop solar to offset the amount of electricity needed from SCE's grid. Impacts would be less than significant.

Natural Gas

The methodology used to calculate the natural gas use associated with Project operation is based on CalEEMod default rates. Californians used 11,711 million therms of natural gas in 2022 and Los Angeles County used 2,820 million terms 2022.[20] The Project's operational natural gas use would constitute 0.0015 percent of natural gas use in the State and 0.0064 percent in the County. The Project's natural gas consumption represents less than one percent of consumption within the County. Project operations would not substantially affect existing energy or fuel supplies or resources. The Project would comply with applicable energy standards and new capacity would not be required. Impacts would be less than significant.

Petroleum Fuel

The gasoline and diesel fuel use associated with on-road vehicular trips is calculated based on total VMT calculated for the analyses within the Project's Air Quality Assessment conducted for this Project (**Appendix A**) and average fuel efficiency from the CARB Emissions Factor (EMFAC) 2021 computer model. The EMFAC fuel efficiency data incorporates the Pavley Clean Car Standards and the Advanced Clean Cars Program. As summarized in **Table 14**, the total gasoline and diesel fuel associated with on-road trips would be approximately 592,035 gallons per year and 3,756 gallons per year, respectively.

Los Angeles County's annual gasoline fuel use in 2030 is anticipated to be 3,171,276,372 gallons and diesel fuel use is anticipated to be 528,535,000 gallons. Expected Project operational gasoline and diesel consumption would represent approximately 0.01867 percent of gasoline use and 0.00071 of diesel use in the County. Transportation fuels (gasoline and diesel) are produced from crude oil, which can be domestic or imported from various regions around the world.

The Project's fuel consumption represents less than one percent of consumption within the County. Project operations would not substantially affect existing energy or fuel supplies or resources. The Project would comply with applicable energy standards and new capacity would not be required. Impacts would be less than significant.

5.6b Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

As discussed above, California's Energy Efficiency Standards (Title 24) for Residential and Non-Residential Buildings create uniform building codes to reduce California's energy use and provide

[19] County total energy values from California Energy Commission energy reports available through ecdms.energy.ca.gov
[20] County total energy values from California Energy Commission energy reports available through ecdms.energy.ca.gov

energy efficiency standards for residential and non-residential buildings. These standards are incorporated within the California Building Code and are expected to substantially reduce the growth in electricity and natural gas use. 2022 Title 24 standards for new residential and nonresidential buildings focus on encouraging electric heat pump technology and use, promoting electric-ready buildings to incentivize owners to use cleaner electric heating, cooking, and vehicle charging, and expanding solar photovoltaic (PV) systems and battery storage systems to reduce reliance on fossil fuel power plants. The Project would include rooftop solar to offset the amount of electricity needed from SCE's grid and incorporate all required Title 24 measures.

Regarding water energy conservation, the Project would incorporate a variety of strategies for sustainability and water conservation based on state and local guidelines including compliance with the Model Water Efficient Landscape Ordnance (MWELO) and all additional local requirements. Plant species will be predominantly low and moderate water use specific to the local climate. Plants will be grouped in hydrozones based on similar water use demands and planting design with respond to specific site conditions. The irrigation system would include a variety of water conservation features including the use of a flow sensor at the point of connection that can detect possible leaks and shut the system down so system integrity can be ensured. The irrigation controller will incorporate Smart Water Application Technology (SWAT) that will allow it to automatically adjust run times based on local weather conditions. The controller would also utilize a rain shut off device. Shrubs and ground cover will be irrigated with drip tubing which reduces evaporation and eliminates wasteful overspray and trees will receive supplemental water from high efficiency micro spray nozzles. The combination of these factors will ensure a sustainable landscape in the community that maximizes the use of limited water resources.

It should also be noted that SCE is subject to California's Renewables Portfolio Standard (RPS). The RPS requires investor-owned utilities, electric service providers, and community choice aggregators to increase total procurement from eligible renewable energy resources to achieve a 60 percent target by December 31, 2030. Senate Bill (SB) 100 also established a further goal to have an electric grid that is entirely powered by clean energy by 2045. The Project would be consistent with the strategies of the City's Energy and Climate Action Plan (ECAP) (Strategy 2: Increase Energy Efficiency, Strategy 3: Support Renewable Energy Generation, Strategy 4: Improve Transportation Options: Strategy 5: Reduce Consumption and Waste, and Strategy 6: Adapt to the Potential Impacts of Climate Change). The Project would be an infill development located near transit, and nearby residential, commercial, entertainment and service uses. The Project would be constructed in accordance with Title 24 of the California Building Standards Code – Energy Efficiency Standards as well as the appliance energy efficiency standards in Title 20 of the California Code of Regulations. All residential units will be EV capable and two on-site EV Charging stations would be provided at each of the clubhouse buildings. The Project would include solar panels, which would generate power to meet approximately 50 percent of the Project's energy demand and would incorporate a variety of strategies for sustainability and water conservation.

The Project's energy consumption would constitute less than one percent of the corresponding energy consumption projections within the County. Project operations would not substantially affect existing energy or fuel supplies or resources. All Project buildings will comply with energy and fuel efficiency laws and regulations; thus, Project operation would not be wasteful, inefficient, or unnecessary. Therefore, the Project would result in a less than significant environmental impact in this regard.

Based on the above impact analysis, the Project would not result in potentially significant environmental impacts as the Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Therefore, impacts would be less than significant, and no mitigation measures would be required.

Cumulative Impacts

Potential cumulative impacts to energy would result if the proposed Project, in combination with past, present, and future projects, would result in the wasteful, inefficient, or unnecessary use of energy. This could result from development that would not incorporate sufficient building energy efficiency features, would not achieve building energy efficiency standards, or would result in the unnecessary use of energy during construction and/or operation.

The cumulative projects within the areas serviced by the energy service providers are included in this analysis. Projects that include development of large buildings or other structures that would have the potential to consume energy in an inefficient manner would have the potential to contribute to a cumulative impact.

SCE will review the Project's estimated electricity consumption in order to ensure that the estimated power requirement would be part of the total load growth forecast for their service area and accounted for in the planned growth of the power system if the electricity demand was to increase past what the PV panels can provide. It should be noted that SCE and SoCalGas consider planned development for their service areas and are in and of themselves providing for cumulative growth. Therefore, it is likely that cumulative growth associated with the related projects is already accounted for in the planning of future electricity and natural gas supplies to cover projected demand.

SCE and SoCalGas have policies, programs, and projects in place to provide continued, adequate energy to their users, including the proposed Project. Substantial reductions to the cumulative demand for energy can result from an increased reliance on renewable energy systems (as required by the State's Renewable Portfolio Standards) and the construction of energy-efficient buildings. Cumulative projects would be subject to applicable Title 24 and CALGreen requirements similar to the Project, which includes energy efficiency standards to minimize the wasteful and inefficient use of energy.

Furthermore, transportation fuels (gasoline and diesel) are produced from crude oil, which can be domestic or imported from various regions around the world. Based on current proven reserves, current crude oil production would be sufficient to meet worldwide consumption demand until 2050. As such, it is expected that existing and planned transportation fuel supplies would be sufficient to serve the Project's construction and operational demand. New capacity or

supplies of energy resources would not be required. Additionally, the Project would be subject to compliance with all federal, state, and local requirements for energy efficiency. State regulations, including the Low Carbon Fuel Standard, Pavley Clean Car Standards, and Low Emission Vehicle Program, would serve to reduce the transportation fuel demand of cumulative projects.

As discussed above, the Project would increase overall electricity and natural gas demand but would not require additional facilities other than local connections to, or undergrounding of, existing facilities in the Project vicinity. Therefore, the proposed Project's incremental demand for electricity and natural gas facilities would not be cumulatively considerable. Thus, the Project would not contribute to a cumulative impact to the wasteful, unnecessary, or inefficient use of energy. A less than significant cumulative impact would occur.

The Project would also be required to comply with all the same applicable federal, state, and local measures aimed at reducing fossil fuel consumption and the conservation of energy. The anticipated Project impacts, in conjunction with cumulative development in the vicinity, would increase urbanization and result in increased energy use. Potential land use impacts are site-specific and require evaluation on a case-by-case basis for related projects. As noted above, the Project would not result in significant impacts to state or local plans for renewable energy or energy efficiency. Therefore, the Project and cumulative projects would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. A less than significant cumulative impact would occur.

5.7 Geology and Soils

This Section is based on the Geotechnical Engineering Exploration, prepared by Irvine Geotechnical Inc., June 8, 2022, and Paleontological Resources Assessment, prepared by Kimley-Horn, August 26, 2024, which are included in their entirety in **Appendix F: Geotechnical Engineering Exploration** and **Appendix G: Paleontological Resources Assessment**, respectively.

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
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.			X	
ii) Strong seismic ground shaking?			X	
iii) Seismic-related ground failure, including liquefaction?				X
iv) Landslides?				X
b) Result in substantial soil erosion or the loss of topsoil?			X	
c) 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?				X
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?			X	
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?				X
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?		X		

Impact Analysis

5.7ai Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, or death involving the 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.

Less Than Significant Impact. The Alquist-Priolo Earthquake Fault Zoning Act was passed in 1972 to mitigate the hazard of surface faulting to structures for human occupancy. According to the Geotechnical Engineering Exploration prepared for this Project, there are no identified Alquist-Priolo Earthquake Fault Zones that traverse the Project Site.[21] The northeastern corner of the Project Site is located more than 150 feet southwest of the western edge of the Inglewood Fault Zone, a designated Alquist-Priolo Fault Zone. At the closest point, the trace (intersection of a fault with the ground surface) of the fault is more than 600 feet from the Project Site. Therefore, and as concluded in the Geotechnical Engineering Exploration, the potential for surface fault rupture at the Project Site is considered low, and the Project would not cause potential substantial adverse effects involving rupture of a known earthquake fault.

Furthermore, the design of the proposed homes, clubhouses and associated amenities would be designed pursuant to the most recent California Building Code (CBC), City Building Code, and would incorporate engineering design recommendations in the Geotechnical Engineering Exploration. Therefore, the Project would not cause potential substantial adverse effects involving the rupture of a known earthquake fault. Impacts from fault rupture would be less than significant, and no mitigation measures would be required.

5.7aii Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, or death involving strong seismic ground shaking?

Less Than Significant Impact. The Project Site is within the Southern California region, a seismically active area, with several active and potentially active faults mapped, including the Inglewood Fault Zone described above and thus is exposed to potential risk involving strong seismic ground shaking. The Project would be subject to compliance with the most recent CBC and City Building Code, which are intended to minimize potential risk involving seismic ground shaking. The Project would also be required to adhere to engineering design recommendations presented in the Geotechnical Engineering Exploration. Therefore, following compliance with the established regulatory framework such as the most recent CBC and City Building Code and recommendations provided by the Geotechnical Engineering Exploration, the Project would not cause potential substantial adverse effects involving strong seismic ground shaking. Impacts would be less than significant, and no mitigation measures would be required.

[21] Irvine Geotechnical, Inc., Geotechnical Engineering Exploration, June 2022. Appendix F.

5.7aiii Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, or death involving seismic-related ground failure, including liquefaction?

No Impact. According to the Geotechnical Engineering Exploration, the Project Site is not within an area potentially susceptible to liquefaction. Furthermore, groundwater was not encountered in exploratory borings during exploration conducted for the Project Site to the maximum depth of 30 feet below ground surface(bgs). Therefore, due to the presence of over-consolidated earth materials at the Project Site and deep groundwater levels, the potential for liquefaction at the Project Site is low, and the Project would not cause potential adverse effects involving seismic-related ground failure, including liquefaction. There would be no impact, and no mitigation measures would be required.

5.7aiv Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, or death involving landslides?

No Impact. Landslides are mass movements of the ground that include rock falls, relatively shallow slumping and sliding of soil, and deeper rotational or transitional movement of soil or rock. According to the Geotechnical Engineering Exploration, the Project Site is not located in an area mapped as potentially susceptible to seismically-induced landslides. Furthermore, based on topographic conditions of the Project Site, which is graded and relatively flat the potential for seismically-induced landslides to impact the Project Site is very low, and the Project would not cause substantial adverse effects involving landslides. There would be no impact, and no mitigation measures would be required.

5.7b Would the project result in substantial soil erosion or the loss of topsoil?

Less Than Significant Impact. The Project Site is located on relatively level ground, which would reduce the likelihood of soil erosion. However, earthmoving activities associated with proposed demolition and construction activities have the potential to result in soil erosion or the loss of topsoil. Development of the Project would be subject to local and State regulations for erosion control and grading during construction. For example, the Project would be required to comply with the Construction General Permit (CGP) issued by the State Water Resources Control Board (SWRCB), effective September 1st, 2023, which regulates construction activities to minimize water pollution, including sediment risk from construction activities to receiving waters. Project development would be subject to the National Pollution Discharge Elimination System (NPDES) program, including the development and implementation of a Stormwater Pollution Prevention Plan (SWPPP). The Project's construction contractor would be required to prepare and implement a SWPPP and associated best management practices (BMPs) in compliance with the CGP during grading and construction activities. Typical construction BMPs include, but are not limited to, watering soil, soil cover of inactive areas, gravel bags, and fiber rolls.

Additionally, after Project completion, the Project Site would be developed with 571 townhomes with associated parking and hardscape and landscape improvements. All landscaped areas would be required to comply with the provisions of Municipal Code Section 10-208, Low Impact Development Requirements for New Development and Redevelopment. Implementation of the

BMPs and LID standards would help ensure that soil erosion would not occur during the Project's operation phase. BMP implementation would be ensured through the City's building plan check and development review process.

For the reasons listed above, the Project would not result in substantial soil erosion or the loss of topsoil. Impacts would be less than significant, and no mitigation measures would be required.

5.7c 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. The Project Site would not be subject to seismically-induced liquefaction or landslides.

For lateral spreading to occur, the liquefiable zone must be continuous, unconstrained laterally, and free to move along gently sloping ground toward an unconfined area. Since liquefaction is not considered a hazard at the Project Site (see Response 4.7a.iii), earthquake-induced lateral spreading is also not considered a hazard at the Project site. Therefore, there would be no impacts associated with lateral spreading.

Ground surface subsidence generally results from the extraction of fluids or gas from the subsurface, which can result in a gradual lowering of the ground level. The Project Site is not mapped in an area of subsidence by the U.S. Geological Survey.[22] Due to the absence of groundwater in the exploratory borings during exploration of the Project Site, the Project would not involve any dewatering activities that could cause ground subsidence on the Project Site. The Project is not anticipated to involve inadvertent activities related to gas extraction.

Regarding collapsible soils, the results of the testing of soil samples conducted for the Geotechnical Engineering Exploration indicate that on-site bearing soils consist of over-consolidated alluvium, which was encountered at depths of one to six feet within the Project Site. Consolidation testing of the alluvium show the risk of hydro-consolidation and ground settlement due to soil saturation from infiltration is low to negligible. The Geotechnical Engineering Exploration recommended that the fill and disturbed native soils be removed and recompacted to create a compacted fill cap for support of foundations, slabs, and pavements. The Project would be required to comply with the design recommendations of the Geotechnical Engineering Exploration as part of Project approval. No impact would occur with respect to collapsible soils.

For the reasons substantiated above, Project development would not cause substantial on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse arising from unstable soils. No impact would occur, and no mitigation measures would be required.

[22] United States Geological Survey, Areas of Land Subsidence in California, https://ca.water.usgs.gov/land_subsidence/california-subsidence-areas.html. Accessed May 28, 2024.

5.7d Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risk to life or property?

Less Than Significant Impact. Expansive soils are typically associated with fine-grained clayey soils that have the potential to shrink and swell with repeated changes in the moisture content. According to the Geotechnical Engineering Exploration prepared for the Project Site, Consolidation testing of the alluvium show the risk of hydro-consolidation and ground settlement due to soil saturation from infiltration is low. The Geotechnical Engineering Exploration recommended that the fill and disturbed native soils be removed and recompacted to create a compacted fill cap for support of the Project's foundations, slabs, and pavements and Project construction would comply with those recommendations. Additionally, the Project would be designed and constructed in accordance with relevant Federal, State, and City regulations. The City would verify compliance with the Geotechnical Engineering Exploration recommendations through the Project's Building Permit process. Therefore, following compliance with pertinent regulations and Geotechnical Engineering Exploration recommendations, the Project would not create substantial risk involving expansive soils. Impacts would be less than significant, and no mitigation measures would be required.

5.7e Would the project 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?

No Impact. The Project would construct sewer laterals that would connect to existing sewer lines in surrounding roadways. The Project does not propose to use septic tanks or alternative wastewater disposal systems. Therefore, no impact would occur in this regard, and no mitigation measures would be required.

5.7f Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less Than Significant Impact with Mitigation Incorporated. As part of the Paleontological Resources Assessment prepared for the Project, paleontological record searches were conducted for the Project Site and its vicinity through the Los Angeles County Natural History Museum (LACNHM) and the Western Science Center (WSC). Results were provided by the LACNHM on December 24th, 2023, and by WSC on December 22nd, 2023. No paleontological resources were identified within the Project area as a part of the Paleontological Resources Assessment. However, the age and composition of soils and sediments across the Project area, combined with the knowledge of paleontological resources identified within similar sediment deposits in California, indicate a moderate to high sensitivity for paleontological resources.

Therefore, excavation for the Project has potential to encounter sediments with paleontological resources. The paleontological repositories also indicated that any resources in the Project area would be scientifically significant. As such, in order to mitigate potential impacts to paleontological resources, the Project would incorporate **MM GEO-1** through **MM GEO-4**, which address procedures regarding the unanticipated discovery of paleontological resources during ground-disturbing activities. Therefore, following compliance with **MM GEO-1** through **GEO-4**,

the Project's potential impacts to paleontological resources would be reduced to a less than significant level.

Mitigation Measures

MM GEO-1 **Retention of Qualified Paleontologist.** The Applicant shall retain a paleontologist who meets the Society of Vertebrate Paleontology's (SVP, 2010) definition for qualified professional paleontologist (Qualified Paleontologist) to carry out all mitigation related to paleontological resources. Prior to the start of ground-disturbing activities, the Qualified Paleontologist or their designee shall conduct construction worker paleontological resources sensitivity training for all construction personnel. Construction personnel shall be informed on how to identify the types of paleontological resources that may be encountered, the proper procedures to be enacted in the event of an inadvertent discovery of paleontological resources, and safety precautions to be taken when working with paleontological monitors. The Applicant shall ensure that construction personnel are made available for and attend the training and retain documentation demonstrating attendance.

MM GEO-2 **Paleontological Monitoring.** Paleontological Monitoring. Paleontological monitoring shall be conducted during ground-disturbing activities below 10 feet in Quaternary alluvium. Monitoring shall be conducted by a qualified paleontological monitor (SVP, 2010) working under the direct supervision of the Qualified Paleontologist. Monitoring shall consist of visually inspecting fresh exposures of rock for larger fossil remains and, where appropriate, collecting sediment samples to wet or dry screen to test promising horizons for smaller fossil remains. If the Qualified Paleontologist determines that full-time monitoring is no longer warranted, based on the specific geologic conditions at the surface or at depth, the Qualified Paleontologist may recommend that monitoring be reduced to periodic spot-checking or cease entirely.

MM GEO-3 **Paleontological Resource Discovery.** If a potential fossil is found, the paleontological monitor shall be allowed to temporarily divert or redirect grading and excavation activities in the area of the exposed fossil to facilitate evaluation of the discovery. An appropriate buffer area shall be established around the find where construction activities shall not be allowed to continue. Work shall be allowed to continue outside of the buffer area. At the monitor's discretion, and to reduce any construction delay, the grading and excavation contractor shall assist in removing rock/sediment samples for initial processing and evaluation. If a fossil is determined to be significant, the Qualified Paleontologist shall implement a paleontological salvage program to remove the resources from their location, following the guidelines of the SVP (2010). Any fossils encountered and recovered shall be prepared to the point of identification, catalogued, and curated at a public, non-profit institution with a research interest in the material and with

retrievable storage, such as the Natural History Museum of Los Angeles County, if such an institution agrees to accept the fossils. If no institution accepts the fossil collection, they shall be donated to a local school in the area for educational purposes. Accompanying notes, maps, and photographs shall also be filed at the repository and/or school.

If construction personnel discover any potential fossils during construction while the paleontological monitor is not present, regardless of the depth of work or location, work at the discovery location shall cease in a 50-foot radius of the discovery until the Qualified Paleontologist has assessed the discovery and recommended and implemented appropriate treatment as described earlier in this measure.

MM GEO-4 **Monitoring Report.** Monitoring Report. At the conclusion of paleontological monitoring and prior to the release of the grading bond, the Qualified Paleontologist shall prepare a report summarizing the results of the monitoring and salvage efforts, the methodology used in these efforts, as well as a description of the fossils collected and their significance. The report shall be submitted to the District, the Natural History Museum of Los Angeles County, and representatives of other appropriate or concerned agencies to signify the satisfactory completion of the project and required mitigation measures.

Cumulative Impacts

Due to their site-specific nature, geology and soils impacts are typically assessed on a project-by-project basis or for a particular localized area. As discussed above, the Project's impacts to geology and soils would be less than significant. As with the Project, the related projects would address site-specific geologic hazards through the implementation of site-specific geotechnical recommendations and/or mitigation measures. Cumulative development would expose a greater number of people to seismic hazards. However, as with the Project, the related projects would be subject to local, State, and federal regulations and standards for seismic safety. Project impacts to geology and soils would be less than significant. Therefore, the Project would not make a cumulatively considerable contribution to any potential cumulative impacts, and cumulative impacts to geology and soils would be less than significant.

With regard to paleontological resources, the Project would be required to comply with existing regulatory requirements and **MM GEO-1** through **GEO-4,** ensuring impacts related to paleontological resources would be less than significant. Furthermore, related projects would be required to comply with existing regulatory requirements. Therefore, the Project would not make a cumulatively considerable contribution to any potential cumulative impacts, and cumulative impacts to paleontological resources would be less than significant.

5.8 Greenhouse Gas Emissions

This Section is based on the Greenhouse Gas Analysis (Kimley-Horn, March 2025), which is included in its entirety in **Appendix H: Greenhouse Gas Analysis Assessment**.

Environmental Issue	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?			X	
b) Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?			X	

Impact Analysis

5.8a Would the Project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

5.8b Would the Project conflict with applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Less than Significant Impact. Certain gases in the earth's atmosphere classified as greenhouse gases (GHGs), play a critical role in determining the earth's surface temperature. Solar radiation enters the earth's atmosphere from space. A portion of the radiation is absorbed by the earth's surface and a smaller portion of this radiation is reflected back toward space. This absorbed radiation is then emitted from the earth as low-frequency infrared radiation. The frequencies at which the earth emits radiation are proportional to temperature. Because the earth has a much lower temperature than the sun, it emits lower-frequency radiation. Most solar radiation passes through GHGs; however, infrared radiation is absorbed by these gases. As a result, radiation that otherwise would have escaped back into space is instead "trapped," resulting in a warming of the atmosphere. This phenomenon, known as the greenhouse effect, is responsible for maintaining a habitable climate on earth.

The primary GHGs contributing to the greenhouse effect are carbon dioxide (CO_2), methane (CH_4), and nitrous oxide (N_2O). Fluorinated gases also make up a small fraction of the GHGs that contribute to climate change. Examples of fluorinated gases include chlorofluorocarbons (CFCs), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulfur hexafluoride (SF_6), and nitrogen trifluoride (NF_3); however, it is noted that these gases are not associated with typical land use development. Human-caused emissions of GHGs exceeding natural ambient concentrations are believed to be responsible for intensifying the greenhouse effect and leading to a trend of unnatural warming of the Earth's climate, known as global climate change or global warming.

GHGs are global pollutants, unlike criteria air pollutants and toxic air contaminants (TACs), which are pollutants of regional and local concern. Whereas pollutants with localized air quality effects have relatively short atmospheric lifetimes (about one day), GHGs have long atmospheric

lifetimes (one to several thousand years). GHGs persist in the atmosphere for long enough time periods to be dispersed around the globe. Although the exact lifetime of a GHG molecule is dependent on multiple variables and cannot be pinpointed, more CO_2 is emitted into the atmosphere than is sequestered by ocean uptake, vegetation, or other forms of carbon sequestration. Of the total annual human-caused CO_2 emissions, approximately 55 percent is sequestered through ocean and land uptakes every year, averaged over the last 50 years, whereas the remaining 45 percent of human-caused CO_2 emissions remains stored in the atmosphere.[23]

Neither IUSD, nor the City of Inglewood, have adopted a threshold of significance for GHG emissions that would be applicable to the Project. The SCAQMD does not currently have an adopted bright line quantitative threshold to measure GHG impacts for non-industrial projects. However, SCAQMD identified, but did not formally adopt, a screening criterion of 3,000 MT CO_2e per year for mixed-use projects under Tier 3, Option 1, of their proposed 2010 guidance, and 3,000 MT CO_2e per year for all non-industrial projects under Tier 3, Option 2. If a land use project is below this screening criterion, then it is presumed to have a less-than-significant GHG impact.

Per CEQA Guidelines Section 15064(h)(3), a project's incremental contribution to a cumulative impact can be found not to be cumulatively considerable if the project would comply with an approved plan or mitigation program that provides specific requirements that would avoid or substantially lessen the cumulative problem within the geographic area of the project. To qualify, such plans or programs must be specified in law or adopted by the public agency with jurisdiction over the affected resources through a public review process to implement, interpret, or make specific the law enforced or administered by the public agency. CEQA Guidelines Section 15183.5(b) allows a lead agency to make a finding of less than significant for GHG emissions if a project complies with adopted programs and/or other regulatory schemes to reduce GHG emissions. The City's ECAP is considered a qualified plan.

In the absence of an adopted numeric threshold by the SCAQMD applicable to the Project,[24] the significance of the proposed project's GHG emissions is evaluated herein consistent with CEQA Guidelines Section 15064.4(b) by considering whether the proposed project complies with applicable regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions. For land use development projects in the City, such as the Project, the most directly applicable adopted regulatory plan to reduce GHG emissions is the City's ECAP, which is designed to achieve GHG reductions from land uses in the City as required by the state's long-term climate goals. This analysis also considers consistency with state GHG reduction goals as articulated in SB 32, AB 1279, the 2022 Scoping Plan, and the SCAG 2024-2050 RTP/SCS.

The significance of the proposed Project's GHG emissions is evaluated consistent with CEQA Guidelines Section 15064.4(b) by considering whether the proposed Project complies with applicable regulations or requirements adopted to implement a statewide, regional, or local plan

[23] Intergovernmental Panel on Climate Change, *Carbon and Other Biogeochemical Cycles. In: Climate Change 2013: The Physical Science Basis*, *Contribution of Working Group I to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change*, 2013. https://www.ipcc.ch/site/assets/uploads/2018/02/WG1AR5_all_final.pdf.

[24] SCAQMD's interim threshold of 3,000 MTCO_2e has not been adopted.

for the reduction or mitigation of greenhouse gas emissions. The following discussion demonstrates the Project's consistency with applicable GHG reduction plans including the ECAP, the General Plan Environmental Justice Element, the RTP/SCS, or the 2022 Scoping Plan.

Consistency with Applicable Building Code Standards

The Project would be subject to compliance with all building codes in effect at the time of construction, which would include energy conservation measures mandated by Title 24 of the California Building Standards Code – Energy Efficiency Standards. The Project's operational emissions reflect energy consumption based on the 2019 Title 24 Part 6 (Building Energy Efficiency Standards).[25] The standards require updated thermal envelope standards (preventing heat transfer from the interior to exterior and vice versa), residential and nonresidential ventilation requirements, and nonresidential lighting requirements that would cut residential energy use by more than 50 percent (with solar) and nonresidential energy use by 30 percent. The standards also encourage demand responsive technologies including battery storage and heat pump water heaters and improve the building's thermal envelope through high performance attics, walls and windows to improve comfort and energy savings.[26] As noted above, the 2022 Energy Code became effective on January 1, 2023 and strengthens ventilation standards, includes new electric heat pump requirements, promotes electric-ready requirements for new homes (including the addition of circuitry for electric appliances, battery storage panels, and dedicated infrastructure), and expands solar photovoltaic and battery storage standards. The Project would be required to comply with the 2022 Energy Code.[27]

The Project would also comply with the appliance energy efficiency standards in Title 20 of the California Code of Regulations. The Title 20 standards include minimum levels of operating efficiency, and other cost-effective measures, to promote the use of energy- and water-efficient appliances. The Project would be constructed according to the 2022 CALGreen standards, which includes water conserving plumbing fixtures and fittings, electric heat pump technology, electric-ready requirements when natural gas is installed, and strengthening ventilation standards.

At the State and global level, improvements in technology, policy, and social behavior can also influence and reduce operational emissions generated by a project. The State is currently on a pathway to achieving the Renewable Portfolio Standards goal of 60 percent renewables[28] by 2030 per SB 100 and 100 percent clean electricity by 2045 per AB 1279. Despite these goals, the majority of the Project's emissions would still be from mobile and energy sources. Future mobile source emissions are greatly dependent on changes in vehicle technology, fuels, and social

[25] The most resent version of CalEEMod incorporates 2019 Title 24 Standards. The Project would be subject to the most recent standards at the time of construction and operational emissions related to energy consumption would likely be lower than what is discussed herein.

[26] California Energy Commission, *2019 Building Energy Efficiency Standards*, 2018. Available at: https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2019-building-energy-efficiency.

[27] California Energy Commission, *2022 Building Energy Efficiency Standards*, 2022. Available at: https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2022-building-energy-efficiency.

[28] The Renewable Portfolio Standard requires that California's electricity portfolio consist of at least 60 percent renewable energy.

behavior, which can be influenced by policies to varying degrees. This is assumed to also be applicable to the Project vehicle fleet, absent data that may suggest otherwise.

The Project would be consistent with the 2024-2050 RTP/SCS's goals, policies and benefits for land use, density, and intensity of development. The Project is located within a transit priority area, consistent with SCAG's 2024-2050 RTP/SCS. Pursuant to CEQA Guidelines Section 15183.5(c), the Project is not required to analyze GHG emissions from cars and light duty trucks. However, this analysis conservatively includes all mobile emissions. The majority of annual Project construction and operational emissions (approximately 71 percent) would occur from mobile sources. CARB is directly responsible for regulating mobile and transportation source emissions in the State. Regarding the first parameter, California addresses emissions control technology through a variety of legislative and regulatory schemes, including the State's Low Carbon Fuel Standard (LCFS) (Executive Order S-01-07), a regulatory program designed to encourage the use of cleaner low-carbon transportation fuels in California, encourage the production of those fuels, and therefore, reduce GHG emissions and decrease petroleum dependence in the transportation sector. The regulatory standards are expressed in terms of the "carbon intensity" of gasoline and diesel fuel and their substitutes.

Under the LCFS, different types of fuels are evaluated to determine their "life cycle emissions" which include the emissions associated with producing, transporting, and using the fuels. Each fuel is then given a carbon intensity score and compared against a declining carbon intensity benchmark for each year. Providers of transportation fuels must demonstrate that the mix of fuels they supply for use in California meets these declining benchmarks for each annual compliance period. In 2018, CARB approved amendments to the LCFS, which strengthened the carbon intensity benchmarks through 2030 to ensure that they are in-line with California's 2030 GHG emission reduction target enacted through SB 32. This ensures that the transportation sector is meeting its obligations to achieve California's GHG reduction targets. The State is also implementing legislation and regulations to address the second parameter affecting transportation related GHG emissions by controlling for VMT. Examples of this include SB 375, which links land use and transportation funding and provides one incentive for regions to achieve reductions in VMT, and SB 743, which discourages VMT increases for passenger car trips above a region-specific benchmark. As such, the City of Inglewood has limited regulatory control over emissions control technology and therefore limited ability to control or mitigate emissions associated with mobile source emissions associated with this Project.

Consistency with the 2022 CARB Scoping Plan

The 2022 Scoping Plan sets a path to achieve targets for carbon neutrality and reduce anthropogenic GHG emissions by 85 percent below 1990 levels by 2045 in accordance with AB 1279. The transportation, electricity, and industrial sectors are the largest GHG contributors in the State. The 2022 Scoping Plan intends to achieve the AB 1279 targets primarily through zero-emission transportation (e.g., electrifying cars, buses, trains, and trucks). Additional GHG reductions are achieved through decarbonizing the electricity and industrial sectors. The Project would be required to comply with applicable current and future regulatory requirements promulgated through the 2022 Scoping Plan.

Statewide strategies to reduce GHG emissions in the latest 2022 Scoping Plan include implementing SB 100, which would achieve 100 percent clean electricity by 2045; achieving 100 percent zero emission vehicle sales in 2035 through Advanced Clean Cars II; and implementing the Advanced Clean Fleets regulation to deploy zero-electric vehicle buses and trucks. Additional transportation policies include the Off-Road Zero-Emission Targeted Manufacturer rule, Clean Off-Road Fleet Recognition Program, In-use Off-Road Diesel-Fueled Fleets Regulation, Off-Road Zero-Emission Targeted Manufacturer rule, Clean Off-Road Fleet Recognition Program, and Amendments to the In-use Off-Road Diesel-Fueled Fleets Regulation. The 2022 Scoping Plan would continue to implement SB 375. Project GHGs would be further reduced through the Cap-and-Trade Program carbon pricing and SB 905. SB 905 requires CARB to create the Carbon Capture, Removal, Utilization, and Storage Program to evaluate, demonstrate, and regulate carbon dioxide removal projects and technology.

The 2022 Scoping Plan states that local CAPs that address the State's largest sources of emissions and prioritize transportation electrification, VMT reduction, and building decarbonization, contribute to the alignment between local climate action and the State's climate goals. Project contributions to climate goals in relation to the largest sources of emissions is discussed further below:

- **Transportation Electrification**. The Project includes the construction of townhomes with attached garages. Pursuant to 2022 CalGreen mandatory measures for 1- and 2-family dwellings/townhomes with attached private garages, the Project would install a listed raceway to accommodate a dedicated 208-240-volt branch circuit for each dwelling unit. The raceway would originate at the main service or subpanel and terminate in an enclosure in close proximity to the proposed location of an EV charger.

- **VMT Reduction**. The 2022 Scoping Plan includes the strategies to increase access to public transit by increasing density of development near transit. The Project is located in a transit priority area and would increase residential density near transit options. The Project Site is located within one-half mile of a major transit stop, as well as two existing transit stops along a high-quality transit corridor.

- **Building Decarbonization**. Building decarbonization refers to emissions reduction strategies including maximizing energy efficiency, use of low- and zero-carbon electricity, demand flexibility, energy storage, use of very low- or no-GWP refrigerants, and eliminating fuel combustion by electrifying appliances and equipment.[29] While the Project is proposed to include the use of natural gas, the Project would include the installation of solar energy generation to be at least 50 percent of the Project's energy demand.

As discussed above, the Project is consistent with the ECAP. Further, the Project's GHG emissions associated with energy and mobile sources (approximately 93 percent) would be further reduced by the 2022 Scoping Plan measures described above. As discussed above, the City has limited

[29] California Air Resources Board, 2022 Scoping Plan for Achieving Carbon Neutrality, Appendix F – Building Decarbonization, 2022

control over vehicle emissions, however, Citywide and Project emissions would decline in the future due to implementation of Statewide measures discussed above, as well as cleaner technology and fleet turnover. The Project would not impede the State's progress towards carbon neutrality by 2045 under the 2022 Scoping Plan.

Consistency with the SCAG RTP/SCS

On April 4, 2024, SCAG's Regional Council adopted Connect SoCal (*2024 - 2050 Regional Transportation Plan/Sustainable Communities Strategy* [2024 RTP/SCS]). This analysis also discusses the Project's consistency with the previously adopted Connect SoCal (*2020 – 2045 Regional Transportation Plan/Sustainable Communities Strategy* [2020 RTP/SCS]) which was adopted on September 3, 2020. The RTP/SCS is a long-range visioning plan that balances future mobility and housing needs with economic, environmental, and public health goals. The RTP/SCS embodies a collective vision for the region's future and is developed with input from local governments, county transportation commissions, tribal governments, nonprofit organizations, businesses, and local stakeholders in the counties of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura. Under Senate Bill (SB) 375, SCAG's 2024 RTP/SCS establishes GHG emissions goals to reduce GHG emissions in the region by eight percent from 2005 levels by 2020 and 19 percent below 2005 levels by 2035.[30] SCAG's 2020 RTP/SCS establishes GHG emissions goals for automobiles and light-duty trucks for 2020 and 2035 as well as an overall GHG target for the Project region consistent with both the target date of AB 32 and the post-2020 GHG reduction goals of Executive Orders 5-03-05 and B-30-15.

SCAG plays a critical role in project selection, programming, and administration of federal funds available to the region. The RTP/SCS invests $751.7 billion in the transportation system, primarily in operations and maintenance, to ensure the continued performance of the entire current transportation network. Implementation of the 2024-2050 RTP/SCS would add 181,200 new miles of transit revenue service, 4,000 new miles of bike lanes and 869 new miles to the Regional Express Lane Network. Strategic investments in infrastructure and transportation would improve access to employment centers and stimulate regional economic growth and opportunity in historically underserved areas. Connect SoCal is an important planning document for the region, allowing public agencies to implement transportation projects in a coordinated manner while qualifying for federal and state funding. Connect SoCal also supports local jurisdictions in making informed land use planning and housing development decisions that promote the key goals of the plan to reduce VMT and GHG emissions.

The Project would include the development of 571 new townhomes which would include 10 percent of the units designated for Very Low-Income households, in line with the RTP/SCS' goal of producing diverse housing types to improve affordability, accessibility, and opportunities. Additionally, the Project involves the development of residential uses located adjacent to several transit stops, reducing sprawl and encouraging the use of alternative transportation consistent with the goals of the 2024-2050 RTP/SCS.

[30] Southern California Association of Governments, Connect SoCal (2024 – 2050 Regional Transportation Plan/Sustainable Communities Strategy), 2024

The 2024 and 2020 RTP/SCS plans account for operations and maintenance costs to ensure reliability, longevity, and cost effectiveness of the existing transportation system. The 2024 and 2020 RTP/SCS plans are also supported by a combination of transportation and land use strategies that help the region achieve state GHG emissions reduction goals, Federal Clean Air Act (FCAA) air quality requirements, increased housing production, improved equity and resilience, the preservation of natural lands, improvement of public health, increased transportation safety, support for the region's vital goods movement industries and more efficient use of resources. The majority of GHG emissions associated with new development consists of mobile sources, and therefore project comparison to the RTP/SCS is an appropriate indicator of whether the project would inhibit the post-2020 GHG reduction goals promulgated by the state. The Project's consistency with the 2024 and 2020 RTP/SCS goals is analyzed in detail in **Table 18: Applicable Goals of SCAG 2024-2050 RTP/SCS and 2020-2045 RTP/SCS,** below, the Project would be consistent with the regional strategies outlined in the 2024–2050 RTP/SCS and 2020-2045 RTP/SCS.

Consistency with the City of Inglewood General Plan Environmental Justice Element

The General Plan Environmental Justice Element sets forward goals and policies related to ensuring environmental justice in the City, particularly for disadvantaged communities. In adopting the Environmental Justice Element, the City has made a significant step forward in ensuring that decisions related to land use and development are made in an equitable manner and take into consideration the health and well-being of the City's most vulnerable populations.

The Project involves the development of new market rate and affordable residential development located adjacent to several transit stops, reducing sprawl and encouraging the use of alternative transportation consistent with the EJ-2.4 and EJ-2.8 goals. Moreover, the Project would include open space, new landscaping and trees, separate pedestrian and vehicle entrances into the Project Site, consistent with goal EJ-2.4. As discussed above, the Project would be consistent with the ECAP, furthering the City's EJ-2.10 goal of implementing the ECAP to reduce greenhouse gas emissions. As such, the Project would be consistent with the applicable goals outlined in Environmental Justice Element.

Consistency with the City of Inglewood Energy and Climate Action Plan

The City's ECAP presents strategies for reducing energy consumption and GHG emissions and promoting energy conservation and environmental initiatives. In order to determine consistency with the ECAP, the City of Inglewood has developed Climate-Ready Development Standards to aid in measuring the value of certain design and construction measures incorporated into proposed development projects toward emission reduction goals. The Development Standards are subdivided into those that are applicable to single family residential (SFR), multi-family residential (MFR), commercial (COM), and multi-use (MU) developments, as well as applicable by project scale (e.g., for projects greater than 5 acres). Each standard is assigned a point value, ranging from one to six, and projects that yield at least 20 points are deemed consistent with the ECAP and are not required to conduct further GHG study, apply custom mitigations, or pay an in-lieu fee.

The Project would incorporate several of the ECAP measures that would result in reduced GHG emissions including the following. The Project would be constructed in accordance with Title 24 of the California Building Standards Code – Energy Efficiency Standards as well as the appliance energy efficiency standards in Title 20 of the California Code of Regulations. All residential units will be EV capable and two on-site EV Charging stations would be provided at each of the clubhouse buildings. The Project would include solar panels which would generate power to meet at least 50 percent of the Project's energy demand. The Project would incorporate a variety of strategies for sustainability and water conservation. Plant species will be predominantly low and moderate water use specific to the local climate. The irrigation system would include a variety of water conservation features including the incorporation of Smart Water Application Technology (SWAT) that will allow it to automatically adjust run times based on local weather conditions (see Table 3 in **Appendix H: Greenhouse Gas Emissions Assessment**).

As described above, consistency with the ECAP is determined by incorporating design and construction measures for the purpose of emissions reduction. Projects that yield at least 20 points are deemed consistent with the ECAP and are not required to conduct further GHG study.

As demonstrated in **Appendix H**, the Project would yield over 20 total points and would therefore be consistent with the ECAP, and further GHG study is not required. Project GHG emissions have nonetheless been quantified for informational and disclosure purposes. Projects that are consistent with an adopted CAP may be found to cause a less than significant impact under CEQA (CEQA Guidelines § 15064(h)(3)) and are considered to support and not conflict with an applicable plan, policy, or regulation of an agency adopted for the purpose of reducing GHG emissions.

Furthermore, the Project would be consistent with the strategies of the ECAP (Strategy 2: Increase Energy Efficiency, Strategy 3: Support Renewable Energy Generation, Strategy 4: Improve Transportation Options: Strategy 5: Reduce Consumption and Waste, and Strategy 6: Adapt to the Potential Impacts of Climate Change). The Project would be an infill development located near transit, and near residential, commercial, entertainment and service uses.

Project GHG emission impacts on the environment are therefore considered less than significant. Additionally, because the Project is consistent with the ECAP, the Project would not conflict with an applicable plan, policy, or regulation of an agency developed for the purpose of reducing GHG emissions.

Quantification of Project Emissions

As discussed above, the significance of the proposed Project's GHG emissions is evaluated consistent with CEQA Guidelines Section 15064.4(b) by considering whether the proposed Project complies with applicable regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions. The most directly applicable adopted regulatory plan to reduce GHG emissions is the City's ECAP, which is designed to achieve GHG reductions from land uses in the City as required by the state's long-term climate goals.

Notwithstanding the above, for informational purposes, the analysis also calculates the amount of GHG emissions that would be attributable to the Project using air quality models. The primary purpose of quantifying the Project GHG emissions is to satisfy CEQA Guidelines Section 15064.4(a), which calls for a good-faith effort to describe and calculate emissions. The estimated emissions inventory is also used to determine if there would be a reduction in the Project's incremental contribution of GHG emissions as a result of compliance with regulations and requirements adopted to implement plans for the reduction or mitigation of GHG emissions.

Construction-Related Greenhouse Gas Emissions

The Project would result in direct emissions of GHGs from construction. The approximate quantity of annual GHG emissions generated by construction equipment utilized to build the Project is depicted in **Table 15: Construction-Related Greenhouse Gas Emissions.**

Table 15: Construction-Related Greenhouse Gas Emissions	
Category	**$MTCO_2e$**
Construction (2025)	661

Table 15: Construction-Related Greenhouse Gas Emissions	
Category	**$MTCO_2e$**
Construction (2026)	749
Construction (2027)	1,100
Construction (2028)	955
Construction (2029)	121
Total Construction Emissions[1, 2]	**3,585**
30-Year Amortized Construction	*120*

Source: CalEEMod version 2022.1. Refer to **Appendix H** for model outputs.
1. Totals may not add up due to rounding.
2. Emission totals include construction emissions by year modeled for the Entire Site and Phases 1 through 5.

As shown, the Project would result in the generation of approximately 3,585 $MTCO_2e$ over the course of construction. Construction GHG emissions are typically summed and amortized over a 30-year period, then added to the operational emissions.[31] The amortized Project construction emissions would be 120 $MTCO_2e$ per year. Once construction is complete, the generation of these GHG emissions would cease.

Long-Term Operational Greenhouse Gas Emissions

Operational or long-term emissions occur over the life of the Project. GHG emissions would result from direct emissions such as Project generated vehicular traffic, on-site combustion of natural gas, and operation of any landscaping equipment. Operational GHG emissions would also result from indirect sources, such as off-site generation of electrical power, the energy required to convey water to, and wastewater from the Project, the emissions associated with solid waste generated from the Project, and any fugitive refrigerants from air conditioning or refrigerators.

Total GHG emissions associated with the Project are summarized in **Table 16: Project Greenhouse Gas Emissions**. As shown in **Table 16**, the Project would generate approximately 7,391 $MTCO_2e$ annually from both amortized construction and operations. As discussed above, the Project would be consistent with applicable plans, policies, and regulations related to GHG reduction planning and would be consistent with the Inglewood ECAP and impacts would be less than significant.

Table 1: Project Greenhouse Gas Emissions	
Emissions Source	**$MTCO_2e$ per Year[1]**
Construction Amortized Over 30 Years	120
Area Source	179

[31] The 30-year amortization period is based on the standard assumption of the South Coast Air Quality Management District (South Coast Air Quality Management District, *Minutes for the GHG CEQA Significance Threshold Stakeholder Working Group #13,* August 26, 2009).

Table 1: Project Greenhouse Gas Emissions	
Emissions Source	**$MTCO_2e$ per Year[1]**
Energy	1,615
Mobile	5,252
Waste	159
Water and Wastewater	66
Refrigerants	1
Total Project Emissions[1]	**7,391**
1. Total values are from CalEEMod and may not add up due to rounding.	
Source: CalEEMod version 2022.1. Refer to **Appendix H** for model outputs.	

Cumulative Impacts

Cumulative Setting

Climate change is a global problem. GHGs are global pollutants, unlike criteria air pollutants and TACs, which are pollutants of regional and local concern. Whereas pollutants with localized air quality effects have relatively short atmospheric lifetimes (about one day), GHGs have much longer atmospheric lifetimes of one year to several thousand years that allow them to be dispersed around the globe.

Cumulative Impacts

It is generally the case that an individual Project of this size and nature is of insufficient magnitude by itself to influence climate change or result in a substantial contribution to the global GHG inventory.[32] GHG impacts are recognized as cumulative impacts; there are no non-cumulative GHG emission impacts from a climate change perspective. The additive effect of Project-related GHGs would not result in a reasonably foreseeable cumulatively considerable contribution to GHG impacts. In addition, the Project as well as other cumulative related projects would also be subject to all applicable regulatory requirements, which would further reduce GHG emissions. As discussed above, the Project would not conflict with any applicable GHG reduction plans including the ECAP, the General Plan Environmental Justice Element, the RTP/SCS, or the 2022 Scoping Plan. Therefore, the Project's incremental effects would not create a cumulatively significant contribution of GHG emissions.

[32] *Cleveland National Forest Foundation v. San Diego Assn. of Governments* (2017) 3 Cal.5th 497, 512.

5.9 Hazards and Hazardous Materials

This Section is based on the Phase I Environmental Site Assessment (Phase I ESA), prepared by California Environmental Geologists and Engineers Inc., May 2022, which is included in its entirety in **Appendix I: Phase I Environmental Site Assessment**.

Environmental Issue	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?			X	
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?			X	
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?			X	
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 it create a significant hazard to the public or the environment?			X	
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?		X		
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?		X		
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?			X	

Impact Analysis

5.9a 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.

Construction

Typical of many construction projects, construction of the Project would involve the temporary use of hazardous substances in the form of paint, adhesives, surface coatings and other finishing materials, and cleaning agents, fuels, and oils. Truck trips to deliver hazardous materials are expected to reach the Project Site via I-105, I-405, West 104th Street, South 10th Avenue, and possibly other local streets such as Crenshaw Boulevard or West Century Boulevard which connect the Project Site to nearby highways.

All potentially hazardous materials used on the Project Site during construction would be contained, stored, and used in accordance with manufacturer's instructions and handled in compliance with applicable standards and regulations, including, but not limited to the Resource Conservation and Recovery Act, the California Hazardous Waste Control Law, federal and State Occupational Safety and Health Acts (OSHA), SCAQMD rules, and permits and associated conditions issued by the City's Building Safety Division. In accordance with federal and State law, the Project would be required to disclose hazardous materials handled at reportable amounts. Therefore, impacts related to the routine transport, use, or disposal of hazardous materials during construction would be less than significant, and no mitigation measures would be required.

Operation

Operation of the Project would involve the use and storage of small quantities of potentially hazardous materials in the form of common hazardous substances typical of those used in residential developments, including paints, solvents, custodial products (e.g., cleaning supplies), pesticides and other landscaping supplies.

The use of these materials would be in small quantities and in accordance with the manufacturers' instructions for use, storage, and disposal of such products. Moreover, as with Project construction, all hazardous materials used on the Project Site during operation would be used, stored, and disposed of in accordance with manufacturer's standards and all applicable federal, State, and local requirements, such as the California Hazardous Waste Control Law, federal and State OSHA, the Emergency Planning and Community Right-to-Know Act (Superfund Amendments and Reauthorization Act, Title III), and Safe Drinking Water and Toxic Enforcement Act, and Uniform Fire Code. Therefore, with compliance with manufacturer's standards and all applicable local, State, and federal laws and regulations relating to environmental protection and the management of hazardous materials, operation of the Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.

For the reasons substantiated above, impacts related to the routine transport, use, or disposal of hazardous materials during operations would be less than significant, and no mitigation measures would be required.

5.9b Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Less Than Significant Impact.

Construction

Project construction would require digging and excavation that could result in the accidental release of hazardous materials. According to the Phase I ESA conducted for the Project Site, no recognized environmental conditions (RECs), historical RECs (HRECs), or controlled RECs (CRECs) were identified on-site.

However, according to the Phase I ESA, due to the age of the existing vacant school buildings on-site (constructed in 1960), there is a potential for asbestos-containing materials (ACMs) and lead-based paint (LBP) to be present on-site. Additionally, suspect ACM was observed in the form of floor tiles and ceiling tiles in the existing vacant school buildings on-site, and paint coating of the structures appeared in fair condition at the time of the site reconnaissance conducted for the Project Site. Therefore, in compliance with existing federal and State OSHA standards, comprehensive asbestos and lead surveys would be completed prior to demolition of the 12,000 square feet of remaining buildings onsite to determine the presence, condition, friability and likely future condition of suspect or confirmed ACM or LBP. All suspect materials would be handled as ACM and/or containing LBP according to local, State, and federal regulations until the results of sampling and analysis indicate the material is a non-ACM and does not contain LBP. Therefore, the Project would not exacerbate environmental hazards related to risk of upset or accident conditions associated with the exposure of ACMs or LBP to the public or environment. Impacts during construction would be less than significant, and no mitigation measures would be required.

Operation

As previously discussed, the use of minor amounts of hazardous materials during operation of the Project would be limited to those similar to any other residential development. Such hazardous materials typical of residential developments are not considered environmental concerns. Moreover, the use of such materials would be subject to compliance with existing regulations, standards, and guidelines established by the federal, State, and local agencies related to storage, use, and disposal of hazardous materials. As such, 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, impacts during operation would be less than significant.

For the reasons substantiated above, the Project would not create a significant hazard to the public or environment through reasonably foreseeable upset and accident conditions involving

the release of hazardous materials into the environment. Impacts would be less than significant, and no mitigation measures would be required.

5.9c 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?

Less Than Significant Impact. Schools within one quarter mile of the Project Site include Morningside High School, IUSD Child Development Center and Woodworth-Monroe TK-8 Academy. All potentially hazardous materials used on the Project Site during Project construction and operations would be contained, stored, and used in accordance with manufacturer's instructions and handled in compliance with applicable federal and State standards and regulations. As discussed in Response 4.9a and 4.9b, construction of the Project would involve the temporary use of hazardous substances in the form of paint, adhesives, surface coatings and other finishing materials, and cleaning agents, fuels, and oils typically used in construction.

Operation of the Project would use minor amounts of hazardous materials and would be limited to those similar to any other residential urban development (cleaning solutions, pool chemicals, pesticides, fertilizers and other landscaping supplies).

However, all such substances and materials would be used, stored, and disposed of in accordance with applicable laws and regulations and manufacturers' instructions and are not expected to cause risk to the public or nearby schools. In addition, all construction work would be performed consistent with applicable federal and State OSHA requirements to ensure the safety and well-being of construction workers. Thus, with compliance with applicable laws, regulations, and manufacturers' instructions, 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. Impacts during Project construction and operation would be less than significant, and no mitigation measures would be required.

5.9d 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?

Less Than Significant Impact. Government Code Section 65962.5 refers to the Hazardous Waste and Substances Site List, commonly known as the Cortese List, maintained by the California Department of Toxic Substances Control (DTSC). The Cortese list contains hazardous waste and substance sites including public drinking water wells with detectable levels of contamination, sites with known underground storage tanks having a reportable release, solid waste disposal facilities from which there is a known migration, hazardous substance sites selected for remedial action, historic Cortese sites, and sites with known toxic material identified through the abandoned site assessment program.

According to the Phase I ESA, several environmental risk sites were found to exist, including off-site, cross-gradient portions of Morningside High School and Woodworth-Monroe TK-8 Academy (formerly Monroe Middle School). Morningside High School outside of the Project Site boundary was listed on numerous environmental databases for automotive maintenance supplies and waste (oil, coolant, anti-freeze, etc.) generated in the existing auto repair shop on the northwest portion of Morningside High School outside of the Project Site. The facility did not receive any noted violations in 2017 or 2020.

Morningside High School was also listed for generating small quantities of asbestos-containing waste from 2008 and 2018, likely associated with renovation activities on the Morningside High School buildings during that time period.

Woodworth-Monroe TK-8 Academy was listed in 2006 for generating inorganic solid waste that was likely associated with renovation activities that occurred during that time period. There are no records of a release from these off-site, cross-gradient facilities. According to the Phase I ESA, none of these listings are an environmental concern for the Project Site because no recorded violations or previous leaks or spills have been documented at any of the listings in the vicinity of the Project Site. Other nearby listed sites are also unlikely to impact the Project Site due to their distance from the Project Site and their cross-gradient locations.

Therefore, the Project Site is not located on a Cortese List site that would result in a significant hazard to the environment. Impacts would be less than significant and no mitigation measures are required.

5.9e 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 Impact with Mitigation Incorporated. The Project Site is located approximately 1.0-mile north of the Hawthorne Municipal Airport and approximately 2.5 miles east of the Los Angeles International Airport (LAX).

The Project Site is not located within the Airport Influence Area for the Hawthorne Municipal Airport. However, the northwestern corner of the Project Site falls within the Airport Influence Area and 65 db CNEL noise exposure contour for LAX. According to the Los Angeles County Airport Land Use Plan, residential uses within the 65 dBA noise contour shall review noise insulation needs.[33] While a portion of the housing within the Project Site is within the noise contours, any new housing that is built within the LAX Influence Area would be required to comply with the City's development standards and regulations to reduce the impact of aircraft noise impacts on

[33] Los Angeles County Airport Land Use Plan, Prepared by the County of Los Angeles Department of Regional Planning, December 19, 1991, Revised December 1, 2004.

the residences. New housing must be properly insulated to meet Title 24 requirements and Inglewood Municipal Code requirements requiring a 45 dB interior noise standard.

Federal Aviation Administration (FAA) 14 CFR Part 77.9 requires that all structures exceeding 200 feet above ground level (AGL) be submitted to the FAA so that an aeronautical study can be conducted. The FAA's objective in conducting aeronautical studies is to ensure that proposed structures do not have an effect on the safety of air navigation and the efficient utilization of navigable airspace by aircraft. The Project would not construct any buildings or structures to a height that would interfere with or obstruct any local airport operations. The height of each proposed residence would be approximately 35 feet, not to exceed a height of 40 feet/3 stories. The two recreation clubhouse buildings would each be two stories; one would be 29 feet and the other 28 feet and 5 inches in height. Any construction cranes would be less than 80 feet in height and would not be subject to 14 CFR Part 77.9 because they do not exceed 200 feet.[34]

In addition, the Inglewood 2021-2029 Housing Element implements a Residential Sound Insulation Program, which includes sound insulation utilizing grant funds from the Federal Aviation Administration and Los Angeles World Airports. **MM NOISE-3** requires the verification that all internal living spaces achieve a 45 dBA noise level as well as meet exterior standards in the Municipal Code. With implementation of **MM NOISE-3**, the Project would not result in excessive noise for people residing within the Project Site. Nearby residential, schools, and other noise sensitive land uses near the Project area would also be subject to exterior noise standards contained in the Municipal Code. Therefore, the Project would not result in a safety hazard or excessive noise for people residing or working in the project area. Impacts would be less than significant with mitigation incorporated.

5.9f Would the project impair implementation of or physically interfere with an emergency response plan or emergency evacuation plan?

Less Than Significant Impact with Mitigation. The Project Site is located in an established urban area that is well-served by an existing roadway network. The County of Los Angeles has an adopted Operational Area Emergency Response Plan (2023)[35] which focuses on emergencies requiring multi-agency and/or multi-jurisdictional responses. The City of Inglewood Office of Emergency Services (OES), coordinates with local agencies and neighboring jurisdictions, as well as regional and state agencies, to prepare for, respond to, and recover from emergencies and disasters. The OES is responsible for maintaining and updating the City of Inglewood Emergency Plan, which serves as a guide to ensure optimum flexibility during emergencies.

According to the City of Inglewood Safety Element adopted in 2022, Century Boulevard and Yukon Avenue, are identified as local evacuation routes. Development of the Project would not infringe on those streets and would not interfere with the City's emergency evacuation plan.

[34] D & D Engineering, Inc. August 2024.
[35] https://ceo.lacounty.gov/wp-content/uploads/2023/11/County-of-Los-Angeles-OAEOP-2023-Final-for-Website.pdf

Furthermore, as discussed in **Section 5.18, Transportation**, as part of the Project, a detailed Construction Management Plan, included as **MM TRAF-2**, would be implemented to minimize construction impacts for vehicles, bicyclists, and pedestrians.

The Construction Management Plan would include measures such as off-site truck staging; scheduling deliveries and pick-ups of construction materials during non-peak travel periods; a worksite traffic control plan; and use of flag persons to reroute traffic around any closures to ensure that access would remain unobstructed for land uses in proximity to the Project Site. Implementation of the Construction Management Plan would ensure that vehicle and emergency vehicle access would be maintained throughout the course of construction activities.

With regards to operation, emergency vehicle access to the Project Site would be provided via West 104th Street and Lemoli Avenue. The Project would not result in roadway improvements or induced traffic that would physically interfere with local evacuation routes nor would it impair implementation of an evacuation plan. Furthermore, the Project would be designed according to applicable fire code standards and would provide adequate circulation and access to facilitate emergency response.

During an unanticipated disaster event, City and County agencies (i.e., Police and Fire Departments) would implement operational protocols, as well as plans and programs, on a case by-case basis to facilitate emergency evacuations and/or response, which would consider traffic conditions at the time of the emergency. In such instances, traffic would be routed along the City's disaster routes, as determined appropriate, by the applicable responding City agencies. Compliance with existing regulations would ensure that implementation of the Project would not impair or physically interfere with an adopted emergency response plan or with an emergency evacuation plan. Impacts related to emergency response plans and emergency evacuation plans would be less than significant, and no mitigation measures would be required.

5.9g Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

Less Than Significant Impact. The Project Site is in a fully urbanized area and it is not adjacent to any wildland. Additionally, according to the California Department of Forestry and Fire Protection (CAL FIRE), the Project Site is not within a State Responsibility Area or a very high fire hazard severity zone (VHFHSZ); see **Section 5.20: Wildfire**. Therefore, the Project would not expose people or structures to a significant risk involving wildland fires. Impacts would be less than significant, and no mitigation measures would be required.

Cumulative Impacts

Like the Project, many of the related projects would use, handle, store, and/or transport hazardous materials or require demolition of structures containing such materials. Such related projects would be required to use, store, remove and/or transport all potentially hazardous materials in accordance with the manufacturers' instructions and handle materials in accordance

with federal, State, and local health and safety standards and regulations. Compliance with existing standards and regulations would ensure that the related projects would not result in significant impacts to the public or the environment through the routine transport, storage, use, or handling of hazardous materials, and that their development would not result in the release of existing hazardous materials. Some of the related projects may be on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. However, each related project would be required to comply with existing federal, State, and local regulations related to hazardous materials sites, including cleanup sites, and hazardous materials generators.

Some of the related projects include the use of hazardous materials within 0.25-mile of a school. However, cumulative projects would be subject to environmental review to evaluate potential impacts from hazardous materials releases within 0.25-mile of a school, thereby reducing impacts to less than significant.

Some of the related projects are located within two miles of Hawthorne Municipal Airport and LAX and/or within their Airport Influence Areas. However, related projects would be subject to environmental review to evaluate potential impacts from safety hazards and excessive noise, thereby reducing impacts to less than significant.

Some of the related projects may involve temporary construction encroachments into adjacent sidewalks or roadways. However, any changes to access and building configurations would comply with applicable fire code requirements for emergency evacuation, including proper emergency exits for patrons, employees, and potential residents. All access and circulation plans would be subject to review and approval by the Los Angeles County Fire Department (LACFD) and would be developed to meet City standards for emergency access. The related projects would be developed within the existing urban grid and would not require alterations to emergency access routes and would not contribute to cumulative effects in concert with the Project.

Related projects are all located in highly urbanized areas, would not contain wildland features, and are not located adjacent to any wildland areas. Therefore, development of cumulative projects would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires.

5.10 Hydrology and Water Quality

This Section is based on the Low Impact Development Report (LID Report), prepared by D&D Engineering, Inc. (D&D), November 1, 2023, Hydrology Report, prepared by D&D, November 1, 2023, and Water Supply Assessment (WSA), prepared by Todd Groundwater, November 2024, which are included in their entirety in **Appendix J-1: Low Impact Development Report, Appendix J-2: Hydrology Report,** and **Appendix N: Water Supply Assessment.**

Environmental Issue	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 groundwater quality?			X	
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the projects may impede sustainable groundwater management of the basin?			X	
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.			X	
(ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;			X	
(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			X	
iv) Impede or redirect flood flows?				X
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?				X
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?			X	

Impact Analysis

5.10a Would the project violate water quality or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?

Less Than Significant Impact.

Construction

The Project's construction-related activities would include demolition, excavation, grading, and trenching, which would displace soils and temporarily increase the potential for soils to be subject to wind and water erosion and may allow eroded soils and other pollutants to enter the storm drain system.

The Project would be required to obtain and comply with the Construction General Permit from the State Water Resources Control Board (SWRCB). Stormwater best management practices (BMPs) would be implemented to limit erosion, minimize sedimentation, and control stormwater runoff water quality during construction activities. The Project would disturb more than 1 acre of soil, and therefore, would require the preparation of a Storm Water Pollution Prevention Plan (SWPPP) as part of the Construction General Permit requirements. Construction BMPs included in the SWPPP would include, but are not limited to, erosion control measures, sediment control measures, and hazardous materials, storage, disposal, and spill measures. Compliance under the Construction General Permit and SWPPP would ensure that construction activities would not degrade the surface water quality of receiving waters to levels that would be below the standards that are considered acceptable by the Los Angeles Regional Water Quality Control Board (LARWQCB) or other regulatory agencies. Therefore, water quality and waste discharge impacts from Project demolition, grading, and construction activities would be less than significant.

Operation

Operation-related activities of the Project would generate pollutants that could adversely affect the water quality of downstream receiving waters if effective measures are not used to keep pollutants out of and remove pollutants from urban runoff. Requirements for waste discharges to stormwater from operation of developed land uses within the coastal watersheds of Los Angeles and Ventura Counties are regulated as part of the Regional Phase I Municipal Separate Storm Sewer System NPDES Permit (MS4 Permit), Order NO. R4-2021-0105, issued by the Los Angeles Regional Water Quality Control Board (LARWQCB) in 2021. Los Angeles County has an LID Ordinance that requires development projects to incorporate properly designed, technically appropriate BMPs and other LID strategies to lessen the adverse impacts of stormwater runoff, minimize pollutant loadings, and minimize erosion and other hydrologic impacts from development projects. Los Angeles County also has a LID Standards Manual on developing water quality management plans for projects and selecting stormwater control and source control BMPs in addition to other LID strategies. To meet the local MS4 Permit and LID requirements consistent with the County's LID Ordinance and LID Standards Manual, stormwater management strategies would be implemented throughout the Project Site.

As detailed in the LID Report prepared for the Project (**Appendix J-1**), the Project would implement a combination of raised and surface-level biofiltration stormwater planters and underground detention basins to accommodate the 85th percentile, 24-hour storm, as required by the County's LID Standards Manual. Additionally, Project operation itself would not result in discharges that would cause regulatory standards to be violated in the Los Angeles River Watershed. Therefore, water quality and waste discharge impacts from Project operation would be less than significant.

For the reasons expounded above, the Project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality. Therefore, Project impacts with regard to these would be less than significant, and no mitigation measures would be required.

5.10b 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?

Less Than Significant Impact. The City of Inglewood, the water retailer for the Project Site, provides water supply across most of the City. Approximately 31 percent of the City's water supply is from groundwater. Water is provided in the remaining areas by Golden State Water Company and California American Water Company. The City's water supply includes potable groundwater and imported water, and non-potable recycled water. Groundwater is pumped from City-owned wells and imported water is purchased from the West Basin Municipal Water District (WBMWD) through Metropolitan Water District of Southern California (MWD). The City also purchases recycled water from WBMWD, which is used for landscape irrigation at City parks, cemeteries, and schools and other non-potable purposes.

Groundwater is pumped from the West Coast Basin (Basin), which encompasses approximately 160 square miles of the southwestern Los Angeles Coastal Plain Basin. The Basin receives inflow from artificial recharge projects, subsurface flow from the Central Basin, and percolation from rainfall. The California Department of Water Resources (DWR) estimates the storage capacity for the Basin to be 6.5 million acre-feet (AF).

Groundwater extraction by pumping wells is the primary means of groundwater discharge from the basin. DWR has estimated groundwater pumping for urban use in the Basin at 51,673 acre-feet per year (AFY).

In 1961, the Basin was adjudicated to prevent over pumping (which caused seawater intrusion) and to restore groundwater levels. The West Coast Basin Judgment limits the amount of groundwater each party can extract annually from the Basin, and these limits are monitored by DWR, the Court-appointed Watermaster. As part of the adjudication, the Central and West Basin Water Replenishment District (WRD) was created to manage, regulate, and replenish the Central and West Coast Basins. The 1961 adjudication was modified in 2014 to form the West Basin Water Rights Panel to help ensure compliance with the Amended Judgment. In 2018, an additional judgment modified the agreement to add a process for users not in the original judgment to have an extraction exemption. The City has an Allowed Pumping Allocation (APA) of 4,449.89 AFY from the Basin and carry over rights per the Judgment. The City operates and maintains four groundwater well sites and has plans to develop a new well in 2025. The City owns two additional wells that are inactive.[36]

[36] Todd Groundwater, Water Supply Assessment, August 2024. Appendix N of this IS.

Construction

Regarding Project construction, no water supply wells are located within or in the vicinity of the Project Site. Additionally, as stated earlier, groundwater was not encountered in any of the exploratory borings performed on-site to the maximum depth of 30 feet bgs, and dewatering is not anticipated for the Project. Furthermore, water used for construction activities, such as cleaning, dust suppression, concrete mixing, would be short-term and minimal. Based on the relatively short-term and minimal construction-related water needs, and the diversified sources of the City's water supplies, construction-related water use would not substantially lower groundwater levels in the Basin.

Operation

For long-term operation of the Project, in accordance with the West Coast Basin Judgment, the City's groundwater production is capped at its APA. Any groundwater from the adjudicated Basin that is provided by the City to the Project would come from the City's annual cap, which is subject to the management and oversight of the Watermaster. Therefore, operational water demands associated with the Project would not impede management of groundwater supply. Furthermore, no water supply wells are located within or in the vicinity of the Project Site. The Project would not include the construction of any water supply wells, nor would the Project impact any existing water supply wells. The Project Site is also not within a groundwater recharge area or facility, nor does it represent a source of groundwater recharge. Therefore, the Project would not substantially decrease groundwater supplies, nor would it interfere substantially with groundwater recharge such that the Project would impede the basins' sustainable groundwater management. Impacts would be less than significant, and no mitigation measures would be required.

5.10c Would the project substantially alter the existing drainage pattern of the site or area, including through the alterations of the course of 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?

Less Than Significant Impact. See response to Response 4.10a, above. The construction contractor would be responsible for preparation and implementation of a SWPPP in compliance with LARWQCB's GCP. This includes maintenance of BMPs during the life of the Project and submittal of the annual reports.

Upon Project development, the Project would include LID BMPs in the form of new raised and surface-level biofiltration stormwater planters and underground detention basins that would accommodate an 85th percentile, 24-hour storm, consistent with the requirements of the MS4 Permit and LID Standards Manual. Compliance with existing regulations and BMPs developed to minimize erosion and siltation would reduce this impact to a less than significant level. Project infrastructure would connect to existing off-site storm drain infrastructure, and no upgrades or expansion of such off-site facilities would occur with Project implementation.

Standard BMPs designed to prevent erosion during and after construction, as well as the introduction of pervious land uses in the Project Site, would slow stormwater runoff velocities

and allow sediment to settle out of the water, and the proposed drainage of the Project Site would capture trash and debris and restrict flow of debris into the storm drain system. Water runoff would be minimized to the extent possible, and the Project would comply with the requirements of the MS4 Permit. The Project would be designed to meet local, State, and federal water quality standards and to ensure that stormwater flows do not result in substantial erosion or siltation.

Therefore, post-development runoff would be adequately handled by the Project's drainage system and would not exceed the capacity of existing or planned stormwater drainage systems or substantially alter the existing drainage pattern of the Project Site or area in a manner that would result in substantial erosion or siltation on- or off-site. Therefore, impacts would be less than significant, and no mitigation measures would be required.

(ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

Less Than Significant Impact. See response to Response 4.10c.i, above. The Project Site is currently developed with recreational facilities including courts and recreational field space within the Morningside High School campus and vacant school buildings from the Woodworth Elementary School campus. As part of Project development, runoff from the Project Site would be collected in new raised and surface-level biofiltration stormwater planters and three underground detention basins, which would be designed to accommodate an 85th percentile, 24-hour storm. Stormwater runoff from the Project Site would be discharged to the existing Project 4402 stormwater line along Lemoli Avenue near 108th Street and DDI #8 stormwater line near the intersection of 108th Street and Yukon Avenue. The Hydrology Report includes an analysis of the 50-year frequency design storm event for the proposed detention basins; in **Table 17: Detention Basin Hydrology Summary**.

Table 17: Detention Basin Hydrology Summary

Detention Basin	Detention Basin Size (cf)	50-Year Peak Inflow (cfs)	50-Year Peak Outflow (cfs)	Destination	Allowable Peak Flow (cfs)
A	8,200	18.00	12.86	Basin B	-
B	18,900	18.32	11.65	Project 4402	12.6
C	8,570	16.40	11.83	DDI #8	13.3

Cf = cubic feet, cfs = cubic feet per second
Source: D&D Engineering, Inc., Hydrology Report, 2024.

Based on the results of **Table 17**, the post-detention 50-year peak outflows from the Project Site would be within each destination's allowable peak flow limit, and implementation of the Project would mitigate the 50-year storm runoff to within the allowable limits per the Los Angeles County Department of Public Works (LACDPW). Accordingly, the Project would not result in on- or off-site flooding. Therefore, post-development runoff would not substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site. Impacts would be less than significant, and no mitigation measures would be required.

(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

Less Than Significant Impact. As described above in Responses 4.10a and 4.10c.i, the Project would not 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. Project impacts on the capacity of stormwater drainage systems and on polluted runoff would be less than significant.

(iv) Impede or redirect flood flows?

No Impact. According to the Federal Emergency Management Agency (FEMA), the Project Site is located within Zone X, which is defined as an area of minimal flood hazard and outside of the 0.2 percent (500-year) annual chance floodplain.[37] Additionally, there are no dams located within or in the vicinity of the Project Site, and the Project Site is not within a dam inundation area.[38] Therefore, the Project would not impede or redirect flood flows. There would be no impact, and no mitigation measures would be required.

5.10d In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

No Impact. As noted in Response 4.10c.iv, the Project Site is in an area of minimal flood hazard. The Project Site is located approximately 6.4 miles inland from the Pacific Ocean and is therefore not at risk of tsunami.[39] The nearest enclosed body of water is Rivers Lake located approximately 0.6-mile northwest of the Project Site and would not pose a flood hazard to the Project Site due to a seiche. Based on the reasons above, the Project would not risk release of pollutants due to floods, tsunami, or seiche. Therefore, impacts would be less than significant, and no mitigation measures would be required.

5.10e Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Less Than Significant Impact. The Project Site is within the jurisdiction of the LARWQCB Basin Plan, which identifies beneficial uses for surface water and groundwater and establishes water quality objectives to attain those beneficial uses, together known as water quality standards. The Project would not degrade water quality in a manner that would interfere with the beneficial uses of local surface water as established by the Basin Plan. As substantiated in Response 4.10a, implementation of construction and post-construction BMPs as required by the County and City would reduce pollutants in stormwater runoff; therefore, the Project would not violate any water

[37] Federal Emergency Management Agency, FEMA Flood Map Service Center: Search by Address, https://msc.fema.gov/portal/search?AddressQuery=3200%20W%20104th%20St%2C%20Inglewood%2C%20CA%2090303. Accessed May 31, 2024.
[38] California Department of Water Resources, Dam Breach Inundation Map Web Publisher, https://fmds.water.ca.gov/webgis/?appid=dam_prototype_v2. Accessed May 31, 2024.
[39] CGS, CGS Information Warehouse: Tsunami Hazard Area Map, https://maps.conservation.ca.gov/cgs/informationwarehouse/ts_evacuation/. Accessed May 31, 2024.

quality standards and therefore would not obstruct the implementation of the LARWQCB Basin Plan.

Furthermore, as described in Response 4.10b, the Project Site is within the adjudicated West Coast Basin, and the West Coast Basin Judgment serves the same purpose as a groundwater management plan. Since the Project would be served by the City, which is in turn allocated a sustainable allotment of groundwater (i.e., APA), the Project would not conflict with the Judgment. Therefore, for the reasons stated above, the Project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. Impacts would be less than significant, and no mitigation measures would be required.

Cumulative Impacts

In accordance with City and County requirements, the Project and related projects would be required to implement BMPs to manage stormwater runoff in accordance with LID guidelines. The Project Site is located in a highly urbanized area, and it is anticipated that future development projects in this highly urbanized area would not be likely to cause substantial changes in regional water quality. As noted above, the Project does not have an adverse impact on water quality and would in fact improve the quality of on-site flows due to the implementation of new LID BMPs on-site. It is likewise anticipated that related projects would also be subject to LID requirements. The Project, combined with related projects, would comply with all applicable laws, rules and regulations, so cumulative impacts to surface and groundwater quality would be less than significant.

The Project, in conjunction with forecasted growth in the region, could cumulatively increase groundwater demand. However, as noted above, no water supply wells, spreading grounds, or injection wells are located within or in the vicinity of the Project Site and the Project would not have an adverse impact on groundwater levels.

While the Project would increase the amount of impervious surface area, the Project would implement a combination of raised and surface-level biofiltration stormwater planters and underground detention basins to accommodate the 85th percentile, 24-hour storm, as required by the County's LID Standards Manual and due the Project is not anticipated to have a negative impact on groundwater recharge. While any calculation of the extent to which related projects would increase or decrease surface imperviousness that might affect groundwater hydrology would be speculative, the development of such projects would be subject to review and approval pursuant to all applicable regulatory requirements, including any required mitigation of potential groundwater hydrology impacts. In addition, the Project and related projects are located in a highly urbanized area so any potential reduction or increase in groundwater would be minimal in the context of the regional groundwater basin. Therefore, cumulative impacts to groundwater hydrology would be less than significant.

The Project is not proposed in a floodplain, would not impede or redirect flood flows, and would not be subject to inundation by 100-year flood flows, seiches or tsunamis. Therefore, the Project would not contribute considerably to cumulative hydrology and water quality impacts, and cumulative hydrology and water quality impacts would be less than significant.

5.11 Land Use and Planning

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Physically divide an established community?				X
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?			X	

Impact Analysis

5.11a Would the project physically divide an established community?

No Impact. The Project Site is developed with existing recreational facilities and vacant school buildings. Although established residential neighborhoods lie to the north, south, east, and west of the Project Site, Project development would not physically divide these neighborhoods. Rather, by placing a new residential development within an established residential community, the Project would be a continuation of residential uses and would not divide existing neighborhoods. Furthermore, the Project would be designed to be of a high-quality architectural style that would include ample open space and trees and would be designed to complement the surrounding neighborhood. Access to the existing residential neighborhoods would not be impeded or cut off as a result of Project development. Therefore, the Project would not physically divide an established community. There would be no impact, and no mitigation measures would be required.

5.11b 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. The discussion evaluates whether implementation of the proposed Project would conflict with an applicable land use plan, policy, or regulation to such an extent that it would constitute a significant impact. The criterion for determining significance with respect to land use plans considers conflicts with plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect. This criterion recognizes that an inconsistency with an individual plan, policy, or regulation does not necessarily equate to a significant impact on the environment.

SCAG 2024-2050 RTP/SCS

On September 30, 2008, SB 375 was passed[40] to help achieve AB 32 goals related to the reduction of GHGs 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 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 (MPOs) to prepare an SCS within the RTP that guides growth while taking into account the transportation, housing, environmental, and economic needs of the region.

On September 3, 2020, SCAG's Regional Council adopted Resolution 20-624-1, which approved the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (2020-2045 RTP/SCS, also known as Connect SoCal) in its entirety. For the SCAG region, CARB has set GHG emissions reduction targets at 19 percent below 2005 per capita emissions levels by 2035. SCAG's resolution adopting the 2020-2045 RTP/SCS also determined that the SCS includes strategies to meet the requirements of SB 375 to achieve these GHG emission reduction goals and directed SCAG staff to submit the 2020-2045 RTP/SCS to CARB for review and certification in this regard. On October 30, 2020, pursuant to Executive Order No. G-20-239, CARB "accept[ed] the SCAG determination that its 2020 SCS would, when implemented, meet the emissions reduction target for automobiles and light trucks as established by CARB in 2018, specifically, a 19 percent per capita reduction by 2035 relative to 2005 levels."

On April 4, 2024, SCAG's Regional Council adopted the 2024-2050 RTP/SCS (also known as Connect SoCal 2024). Connect SoCal 2024 outlines a vision for a more resilient and equitable future, with investment, policies and strategies for achieving the region's shared goals through 2050. The Plan elements that are necessary to bring this vision to fruition are organized within the pillars of Mobility, Communities, Environment and Economy. On May 7, 2025 the California CARB accepted SCAG's determination that the Connect SoCal 2024 meets the state's GHG emission reduction targets.

SCAG's RTP/SCS presents strategies and measures that are consistent with local jurisdictions' land use policies and incorporates best practices for achieving the state-mandated reductions in GHG emissions at the regional level through reduced per-capita vehicle miles traveled (VMT). It is important to note, however, that SCAG does not have a direct role in implementing the SCS through decisions about the type and location of development.

An analysis of the Project's consistency with these documents are provided in **Table 18: Applicable Goals of SCAG 2024–2050 RTP/SCS** and **2020-2045 RTP/SCS**.

As detailed in **Table 18,** the Project would support the goals of the 2024–2050 RTP/SCS and 2020-2045 RTP/SCS adopted for the purpose of avoiding or mitigating an environmental effect. The Project would support the these goals to maximize the productivity of the region's transportation

[40] California Legislative Information, Senate Bill No. 375, https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=200720080SB375. Accessed August 8, 2024.

system, support new housing growth including affordable housing, include sustainability design features within the Project and provide for less vehicle miles traveled as the Project would be located on an urban infill site in close proximity to transit and nearby services. All residential units will be EV capable and two on-site EV charging stations would be provided at each of the clubhouse buildings. The Project would include solar panels which would generate power to meet 50 percent of the Project's energy demand. The Project also would incorporate a variety of strategies for sustainability and water conservation. Plant species will be predominantly low and moderate water use specific to the local climate. The irrigation system would include a variety of water conservation features including the incorporation of automatically adjusted run times based on local weather conditions. In addition, the Project would encourage pedestrian circulation at the street level through new landscaping and trees, and separate pedestrian and vehicle entrances into the Project Site.

Table 18: Applicable Goals of SCAG 2024-2050 RTP/SCS and 2020-2045 RTP/SCS	
RTP/SCS Goals	**Would the Project Be Consistent?**
2024-2050 RTP/SCS Consistency[1]	
Mobility: Build and maintain an integrated multimodal transportation network.	
Support investments that are well-maintained and operated, coordinated, resilient and result in improved safety, improved air quality and minimized greenhouse gas emissions	**Consistent.** Although this goal applies at the regional level, the Project would not conflict with its implementation. As discussed above, the Project would be constructed in accordance with Title 24 of the California Building Standards Code – Energy Efficiency Standards as well as the appliance energy efficiency standards in Title 20 of the California Code of Regulations. Further, the Project would be constructed according to the 2022 CALGreen standards, which includes water conserving plumbing fixtures and fittings, electric heat pump technology. Furthermore, all residential units will be EV capable and two on-site EV Charging stations would be provided at each of the clubhouse building. In addition, the Project would include solar panels which would generate power to meet 50 percent of the Project's energy demand.
Ensure that reliable, accessible, affordable, and appealing travel options are readily available, while striving to enhance equity in the offerings in high-need communities	**Consistent.** Although this goal applies at the regional level, the Project would not conflict with its implementation. The Project would be developed in an existing urbanized area with an established network of roads and freeways that provides local and regional access to the Project Site. The Project would provide new market rate and affordable housing within close proximity to several transit

Table 18: Applicable Goals of SCAG 2024-2050 RTP/SCS and 2020-2045 RTP/SCS	
RTP/SCS Goals	**Would the Project Be Consistent?**
	options, would include bicycle parking, and is in walkable distance to jobs and services.
Support planning for people of all ages, abilities, and backgrounds	**Consistent.** Although this goal applies at the regional level, the Project would not conflict with its implementation. The Project would include new market rate and affordable townhome units.
Communities: Develop, connect, and sustain communities that are livable and thriving	
Create human-centered communities in urban, suburban and rural settings to increase mobility options and reduce travel distances	**Consistent.** The Project would be located in a residential neighborhood in an infill setting, close to transit and in walking distance, to jobs, schools, residences, entertainment and commercial areas. The Project Site is within close proximity to several transit options. Nearby transit access lines include Metro Line 117, which travels along Century Boulevard connecting Inglewood to LAX, Westchester, Vermont, Watts and Norwalk, and Metro Line 210, which travel along Crenshaw Boulevard, connecting Inglewood to the Redondo Beach Transit Center, Downtown LA, Mid-City and Hollywood. Other bus lines serving the Project Site near Yukon Avenue include the Los Angeles County Lennox Shuttle, providing service from Lenox, Inglewood, Centinela Hospital, County offices, parks, public schools, libraries, and shopping centers.
Produce and preserve diverse housing types in an effort to improve affordability, accessibility and opportunities for all households	**Consistent.** The Project would include the development of 571 total residential units on an infill site in an urbanized area well-served by transit. 10 percent of the housing units would be designated for Very Low Income households.
Environment: Create a healthy region for the people of today and tomorrow	
Develop communities that are resilient and can mitigate, adapt to and respond to chronic and acute stresses and disruptions, such as climate change.	**Consistent.** The Project would assist in reducing impacts to climate change by locating new housing in an urban environment near transit, reducing single-occupant vehicle trips. Furthermore, the Project would reduce energy use by including solar panels which would generate power to meet 50 percent of the Project's energy demand and EV Charging stations.

Table 18: Applicable Goals of SCAG 2024-2050 RTP/SCS and 2020-2045 RTP/SCS	
RTP/SCS Goals	**Would the Project Be Consistent?**
Integrate the region's development pattern and transportation network to improve air quality, reduce greenhouse gas emissions and enable more sustainable use of energy and water	**Consistent.** The Project would promote non-auto travel and reduce single-occupant vehicle trips by being located in a transit-rich area, providing bicycle parking, and improving the pedestrian environment. The Project would be constructed in accordance with Title 24 of the California Building Standards Code – Energy Efficiency Standards as well as the appliance energy efficiency standards in Title 20 of the California Code of Regulations. Further, the Project would be constructed according to the 2022 CALGreen standards. All residential units will be EV capable and two on-site EV Charging stations would be provided at each of the clubhouse buildings. The Project would include solar panels, which would generate power to meet 50 percent of the Project's energy demand. The Project would incorporate a variety of strategies for sustainability and water conservation. Plant species will be predominantly low and moderate water use specific to the local climate. The irrigation system would include a variety of water conservation features to automatically adjust run times based on local weather conditions.
Conserve the region's resources	**Consistent.** The Project is an infill development, surrounded by urban land uses. It is not located on land designated for agricultural uses, natural resources, or conservation. As mentioned above, the Project would incorporate a variety of strategies for energy and water conservation.
Economy: Support a sustainable, efficient and productive regional economic environment that provides opportunities for all residents.	
Improve access to jobs and educational resources.	**Consistent.** The Project Site is located in an existing urbanized area with an established network of roads and freeways that provides local and regional access to the Project Site. The Project Site is also within close proximity to transit that would provide residents easy access to jobs and services. In addition, the Project Site is located adjacent to residential, commercial and entertainment uses that would provide future employment opportunities.
Advance a resilient and efficient goods movement system that supports the economic	**Consistent.** Although this goal applies at the regional level, the Project would not conflict with its implementation. As discussed above, the Project

Table 18: Applicable Goals of SCAG 2024-2050 RTP/SCS and 2020-2045 RTP/SCS	
RTP/SCS Goals	**Would the Project Be Consistent?**
vitality of the region, attainment of clean air and quality of life for our communities	would promote clean air and non-auto travel by being located in a transit-rich area, providing EV parking, bicycle parking, and improving the pedestrian environment. The Project would include solar panels, which would generate power to meet 50 percent of the Project's energy demand. The Project would incorporate a variety of strategies for sustainability and water conservation. The Project will contribute toward, and facilitate, the City's long-term housing needs.
2020-2045 RTP/SCS Consistency[3]	
Goal 1: Encourage regional economic prosperity and global competitiveness	**Consistent.** Although this goal applies at the regional level, the Project would not conflict with its implementation. The Project would construct residential uses near other residential, commercial, school, and entertainment uses in an existing urban area, supporting the regional economic prosperity and global competitiveness of Southern California by providing housing uses. The Project would also provide market rate and affordable housing.
Goal 2: Improve mobility, accessibility, reliability, and travel safety for people and goods	**Consistent.** SB 743 updates the way transportation impacts are evaluated in California for new development projects, with a focus on providing active transportation and reducing vehicle miles traveled. The Project would develop residential uses in a location that is well-served by existing transit infrastructure. Additionally, pedestrians and bicyclists would be able to access the Project Site via new interior sidewalks and paths around the perimeter of the Project Site that would provide connections to each home and access to parks and clubhouse/amenity areas. The Project would also provide 66 bicycle spaces for visitors. As a result, the Project would provide residents and visitors with convenient access to public transit and opportunities for walking and biking. Furthermore, the Project Site is within walking distance of the existing residential, commercial, school and entertainment uses in the vicinity. Therefore, the location of the Project encourages mobility and accessibility for residents and visitors of the Project Site.

Table 18: Applicable Goals of SCAG 2024-2050 RTP/SCS and 2020-2045 RTP/SCS	
RTP/SCS Goals	**Would the Project Be Consistent?**
Goal 3: Enhance the preservation, security, and resilience of the regional transportation system	**Consistent.** Although this goal applies at the regional level, the Project would not conflict with its implementation. The Project would provide residents and visitors with convenient access to public transit and opportunities for connectivity to other commercial uses in the vicinity.
Goal 4: Increase person and goods movement and travel choices within the transportation system	**Consistent.** Although these goals apply at a regional level, the Project would be developed on a currently developed Project Site located in an existing urbanized area with an established network of roads and freeways that provides local and regional access, including to the Project Site. The Project Site is within close proximity to several transit options. Given the Project Site's location in proximity to transportation options, the Project would maximize mobility, accessibility, and overall productivity of the transportation system by providing various opportunities for the use of alternative modes of transportation. Therefore, the Project would not conflict with these goals.
Goal 5: Reduce greenhouse gas emissions and improve air quality	**Consistent.** The Project is an infill development located in an area with a variety of transportation options. The Project includes various features including energy-efficient features, including solar panels, all residential units will be Electric Vehicle (EV) capable and two on-site EV Charging stations would be provided at each of the clubhouse buildings. The Project would provide 66 visitor bicycle spaces that would be located at the two clubhouses. The landscape plan will incorporate a variety of strategies for sustainability and water conservation based on state and local guidelines including compliance with the Model Water Efficient Landscape Ordinance (MWELO) and all additional local requirements. All of these features would serve to reduce GHG emissions and improve air quality. Therefore, the Project would support this goal.
Goal 6: Support healthy and equitable communities	**Consistent.** The Project would construct new market rate and affordable housing near a variety of transit options and near other residential, commercial and entertainments uses. The Project's proximity to a

Table 18: Applicable Goals of SCAG 2024-2050 RTP/SCS and 2020-2045 RTP/SCS	
RTP/SCS Goals	**Would the Project Be Consistent?**
	variety of transit would facilitate the use of alternative modes of transportation, which would reduce car trips and impacts to air quality. Therefore, the Project would support this goal**.**
Goal 7: Adapt to a changing climate and support an integrated regional development pattern and transportation network	**Consistent.** The Project would include electric vehicle (EV) capable spaces and spaces equipped with EV chargers. The Project would also be in proximity to various public transportation systems. Therefore, the Project would support this goal.
Goal 8: Leverage new transportation technologies and data-driven solutions that results in more efficient travel	**Not Applicable.** This measure is directed towards public agencies and does not apply to individual projects.
Goal 9: Encourage development of diverse housing types in areas that are supported by multiple transportation options	**Consistent.** Development of the Project would include the construction of 571 townhomes that would include a variety of types and sizes. Of those units, 10 percent of the housing units would be designated for Very Low Income affordable housing. The Project would provide residents with convenient access to variety of transit opportunities.
Source: 1. Southern California Association of Governments, Connect SoCal (2024 – 2050 Regional Transportation Plan/Sustainable Communities Strategy), 2024. 2. Sierra Club v. County of Fresno (Dec. 24, 2018) 6 Cal.5th 502. 3. Southern California Association of Governments, Connect SoCal (2020 - 2045 Regional Transportation Plan/Sustainable Communities Strategy), 2020.	

City of Inglewood General Plan Land Use Element

The General Plan Land Use Element (1980, amended 1986, 2009, 2016) sets forth goals and policies to guide day-to-day land use policies and to meet the existing and future needs and desires of the community. The Project would include a request to amend the Project Site's General Plan land use designation from Low Density to Medium Density and to change its associated zoning from R-1 to R-3. The R-3 zones permits one-family dwellings, one or more one-family dwellings per lot, and multi-family dwellings. The Project would be consistent with the density and land use designations of the R-3 zone. With approval of this request, the Project would not conflict with the General Plan Land Use Element.

The Land Use Element encourages infill development and new market rate and affordable housing in the community. As shown in **Table 19: Project Consistency with General Plan Land Use Element**, the Project would support and would be generally consistent with the Land Use Element. Operation of the Project would not conflict with any of the applicable goals and policies included in the City's Land Use Element adopted for the purpose of avoiding or mitigating an environmental effect and, thus, would not result in a significant impact.

Table 2: Project Consistency with General Plan Land Use Element	
Goal/Policy	**Would the Project Be Consistent?**
General	
Provide for the orderly development and redevelopment of the City while preserving a measure of diversity among its parts. Allocate land in the City to satisfy the multiple needs of residents but recognize that land is a scarce resource to be conserved rather than wasted.	**Consistent.** The Project is an infill development in an urban area that is near transit that would contribute toward the City's long-term housing needs. The Project would provide a modern new development and associated landscaping within the City's existing urban fabric, creating architectural diversity among the City's older and newer housing stock. The Project would provide new housing, including affordable housing, near existing services, transit and infrastructure would contribute to the orderly development of new housing in the City. New landscaping and trees would encourage pedestrian circulation at the street level.
Maximize the use and conservation of existing housing stock and neighborhoods and also facilitate development of new housing to meet community needs.	**Consistent.** The Project does not involve demolition of any existing housing. The Project would provide new market rate and affordable housing uses on an infill site to help meeting the housing needs in the City.
Residential	
Promote the maintenance, rehabilitation, and modernization of the City's housing stock.	**Consistent.** The Project provide new housing that would feature a modern architectural style that features flat roofs, varied massing and façade articulation, and would blend with the existing community and modernize the City's housing stock.
Encourage the preservation of Inglewood's fair share of housing for low and moderate income persons.	**Consistent**. The Project would include the development of 571 total residential units including 403 row townhomes with one to four bedrooms and 168 interlocking townhomes with three to four bedrooms. 10 percent of the housing units would be designated for Very Low Income affordable housing.
Promote residential development which will attract middle and upper income families who can afford the high cost of recycled development.	**Consistent.** The Project would provide a mix of both new market rate and new affordable housing in a variety of sizes and types for different families and household types.
Source: City of Inglewood, General Plan Land Use Element, 2016, https://www.cityofinglewood.org/DocumentCenter/View/132/Land-Use-Element-1980-Amended-1986-2009-2016. Accessed August 8, 2024.	

Environmental Justice Element

The City's Environmental Justice Element (2020) focuses on issues of equity when planning for future growth and development in the City, highlighting two environmental justice factors-pollution burden and population characteristics. As shown in **Table 20: Project Consistency with Environmental Justice Element**, the Project would support and be consistent with the Environmental Justice Element

Table 20: Project Consistency with Environmental Justice Element	
Objective/Policy	**Would the Project Be Consistent?**
Goal: The community's exposure to pollution in the environment is minimized through sound planning and public decision making.	
General Environmental Health	
EJ-2.4 Create land use patterns and public amenities that encourage people to walk, bicycle and use public transit.	**Consistent.** The Project would develop a residential development on an urban infill site located near public multiple transportation options, near jobs, and would provide pedestrian infrastructure and bicycle stalls to incentivize increased walking and bicycling.
EJ-2.8 Encourage new development to reduce vehicle miles traveled to reduce pollutant emissions.	**Consistent.** The Project would include characteristics and design features that encourage alternative modes of transportation and reduce VMT. The Project Site is surrounded by supportive residential, commercial, school and entertainment uses and is located near transit, reducing reliance on automobiles and VMT, and minimizing associated air pollutant emissions.
Residential Uses and Other Sensitive Receptors	
EJ-2.17 Require that proposals for new sensitive land uses minimize exposure to unhealthful air and other toxins through setbacks, barriers and other measures.	**Consistent.** As discussed herein, the Project would not exceed applicable criteria pollutant thresholds. As discussed in the Health Risk Assessment prepared for this Project (**Appendix B**), Project construction would not result in significant cancer risk at neighboring school or residential uses.
EJ-2.18 Work with the Inglewood Unified School District to minimize environmental hazards in and around educational facilities	**Consistent.** Operation of the Project would use minor amounts of hazardous materials and would be limited to those similar to any other residential urban development (cleaning solutions, pool chemicals, pesticides, fertilizers and other landscaping supplies). However, all such substances and materials would be used, stored, and disposed of in accordance with applicable laws and regulations and manufacturers' instructions and are not expected to cause risk to the public or nearby schools. In addition, as mentioned above, the Project would not exceed applicable air criteria pollutant thresholds and Project construction would not result in significant cancer risk at neighboring school or residential uses.
Goal: A community that promotes physical activity and opportunities for active living	
EJ-3.1 Support walking and bicycling by encouraging Complete Streets (bike lanes, traffic-calming measures, sidewalks separated from the roadway with tree planted landscaping), where feasible in the right-of-way, particularly in neighborhoods, Downtown, in transit-oriented districts	**Consistent.** The Project would encourage pedestrian circulation at the street level through new landscaping and trees, separate pedestrian and vehicle entrances into the Project Site. The Project would include bicycle racks for visitors at the clubhouses.

Table 20: Project Consistency with Environmental Justice Element	
Objective/Policy	**Would the Project Be Consistent?**
EJ-3.6 Provide safe, interesting and convenient environments for pedestrians and bicyclists, including inviting and adequately lit streetscapes, networks of trails, paths and parks and open spaces located near residences, to encourage regular exercise and reduce vehicular emissions	**Consistent.** Movement and access for pedestrians and bicyclists would be provided within the Project Site via new interior sidewalks and paths. These pathways would provide connections to each home and access to parks and clubhouse/amenity areas. These paths and sidewalks would be well lit for safety and would be surrounded by new landscaping and trees.
EJ-3.7 Encourage new specific plans and development projects be designed to promote pedestrian movement through direct, safe, and pleasant routes that connect destinations inside and outside the plan or project area	**Consistent.** Exterior pedestrian access to the Project Site would be from a separate sidewalk path located near each vehicle driveway along West 104th Street and Lemoli Avenue. These exterior linkages would provide access to nearby residential, commercial, educational and entertainment uses in the surrounding neighborhoods.
Goal: A City with safe and sanitary housing conditions and affordable housing options	
Housing Conditions	
EJ-5.2 Ensure new residential building and site design provides good moisture control through proper site drainage, roof drainage, natural ventilation (and mechanical where necessary), and sound plumbing systems.	**Consistent.** The Project would be a high quality new residential development which would include proper site and roof drainage and plumbing systems.
Housing Affordability and Displacement	
EJ-5.11 Promote equitable transit-oriented development that includes both affordable and market rate housing.	**Consistent**. The Project would provide a mix of both new market rate and new affordable housing. The Project is located near a variety of transit opportunities, specifically the Project is within one-half mile of a major transit stop, as well as two existing transit stops along a high-quality transit corridor.
EJ-5.12 Support the development of housing to meet the needs of large households.	**Consistent.** The Project would provide a mix of both new market rate and new affordable housing in a variety of sizes and types for different families and household types. Specifically, the Project would include the development of 571 total residential units including 403 row townhomes with one to four bedrooms and 168 interlocking townhomes with three to four bedrooms meeting the needs of large households.
Source: City Inglewood Environmental Justice Element, 2020.	

Housing Element

The City of Inglewood's 2021-2029 Housing Element is a blueprint for how the City can promote better, more secure and affordable housing in keeping with the City's General Plan and legal requirements from the State of California, including the City's Regional Housing Needs Allocation (RHNA) allocation of 7,439 new dwelling units that must be planned for over the next eight years. The City's RHNA goal includes 1,813 Very Low Income units, 955 Low Income units, 1,112 Moderate Income units and 3,559 Above Moderate Income units.

As shown in **Table 21: Project Consistency with the Housing Element**, the Project would be consistent with the Housing Element.

Table 21: Project Consistency with the Housing Element

Goal/Policy	Would the Project Be Consistent?
Goal 1: Diverse housing solutions with affordable options for all income groups minimizing displacement of low-income households.	**Consistent**. The Project would not displace any existing housing. The Project would provide new market rate and affordable housing opportunities in the City. Specifically, the Project would include the development of 571 new residential units with 10 percent of the housing units designated for Very Low Income households. The Project would include a variety of townhomes styles and sizes to meet the different needs of household types in the City.
Policy 1.1 Promote new context-sensitive housing throughout the City where appropriate.	**Consistent**. The Project would provide new housing in a suitable urban context. The Project is an urban infill development near existing residential uses and services including commercial uses, schools, services and entertainment uses. Furthermore, the Project is located within an established network of roads and freeways that provides local and regional access to the Project Site. The Project Site is within close proximity to several transit options, would include bicycle parking, and is in walkable distance to jobs and services.
Policy 1.4. Encourage the distribution of affordable housing throughout the City.	**Consistent**. While it is under the City's purview to approve the location of housing in the City, the Project would include a mixture of market rate and affordable housing on the Project Site.
Policy 1.5. Encourage the construction of mixed income housing developments that provide housing for a variety of income levels such as extremely low income up through and including market rate.	**Consistent.** The Project would provide new market rate and affordable housing. Specifically, the Project would include the development of 571 new residential units with 10 percent of the housing units designated for Very Low Income households.
Policy 1.7. Vigorously promote new housing development opportunities in identified transit oriented development areas.	**Consistent.** Although the Project is not located within the City's TOD planning areas, the Project is located near transit including Metro Line 117, Metro Line 210, and Los Angeles County Lennox Shuttle. The Project is located within one of SCAG's identified High Quality Transit Corridor areas. (SCAG RTP/SCS 2050).

Table 21: Project Consistency with the Housing Element	
Goal/Policy	**Would the Project Be Consistent?**
Goal 2: Stable and safe neighborhoods where housing is protected, rehabilitated, and modernized.	**Consistent**. The Project would not displace any existing housing or neighborhood. The Project would provide new modern market rate and affordable housing that would blend with the existing residential neighborhood. The Project would include a variety of townhomes styles and sizes to meet the different needs of household types in the City.
Source: City of Inglewood, 2021-2029 Housing Element, https://www.cityofinglewood.org/DocumentCenter/View/19659/2021-2029-Housing-Element-2023. Accessed August 8, 2024.	

Zoning

The Project Site is currently zoned Residential Single Family (R-1). As part of the Project approval, the Project would be rezoned from R-1 to Residential Multiple Family (R-3). According to Section 12-21 of the Municipal Code, the R-3 zone permits one-family dwellings, one or more one-family dwellings per lot, and multi-family dwellings. The Project would be subject to compliance with development standards outlined in Section 12-21 of the Municipal Code, which would be verified through the City's plan check review process.

Parking Requirements

AB 2097 specifies that a qualifying site must be within a half mile of "public transit", which is in turn defined within that section as a Major Transit Stop as the term is defined in Public Resources Code section 21155. Section 21155 then states that all parcels of the site must have no more than 25 percent of their area farther than one-half mile from the stop, but then states that Major Transit Stop is fully defined in Public Resources Code section 21064.3. In turn, Section 20164.3 lists three options for what can qualify as a Major Transit Stop: (a) an existing rail or bus rapid transit station; (b) a ferry terminal served by either a bus or rail transit service; or (c) the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.)

Pursuant to AB 2097, the Project is located within one-half mile of a major transit stop, as well as two existing intersecting transit stops along a high-quality transit corridor and therefore qualifies for a Parking Reduction.

Upon the City's approval of the proposed site plans, Zone Change and Parking Reduction, the Project would be consistent with the R-3 zone. The SCEA evaluates the potential physical impacts associated with these actions and approvals. Therefore, the Project would be consistent with the zoning of the Project Site, and no land use conflict related to zoning consistency would occur.

Overall, the Project would not conflict with any land use plan, policy, or regulation applicable to the Project Site. There would be no impact, and no mitigation measures would be required.

Cumulative Impacts

Upon the City's approval of the proposed General Plan Amendment and Zone Change, the Project would be substantially consistent with applicable land use plans, policies and regulations and would result in less than significant land use and planning impacts. Specifically, the Project would not physically divide an established community, and would not cause a significant environmental impact due to a conflict with a land use plan, policy or regulation adopted for the purpose of avoiding or mitigating an environmental effect. As with the Project, the related projects would be reviewed on a case-by-case basis to ensure consistency with existing land use policies and regulations. Where inconsistencies occur for the related projects, it is anticipated that appropriate actions would be undertaken to ensure that land use impacts would be less than significant. Thus, cumulative land use impacts would be less than significant.

5.12 Mineral Resources

Environmental Issue	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?				X
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?				X

Impact Analysis

5.12a 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 in an urbanized area of the City and is developed with recreational uses and vacant school buildings. According to the California Geological Survey, the Project Site is not located in Mineral Resource Zone (MRZ) 2, which is defined as a MRZ where adequate information indicates that significant mineral deposits are present or a likelihood of their presence and development should be controlled.[41] As noted in the Phase I ESA, there are three oil wells located within 2,000 feet of the Project Site. However, all three wells are listed as dry wells that are plugged, and none are within the boundaries of the Project Site. Additionally, according to the California Department of Conservation's Mines Online database, there are no mines within the vicinity of the Project Site.[42] As the Project Site does not contain any known oil wells and has not been used for mineral extraction and does not include any oil or mineral extraction uses, the Project would not result in the loss of availability of known mineral resources. Therefore, there would be no impact, and no mitigation measures would be required.

5.12b 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 zoned for residential uses, and not for mineral extraction. As mentioned above in Response 4.12a, the Project Site is not within a mineral producing area (i.e., MRZ 2), as classified by the California Geologic Survey.[43] Furthermore, no mineral extraction operations currently occur on the Project Site. Therefore, the Project would not result in the loss of availability of a locally important mineral resource recovery site delineated on a local general

[41] California Department of Conservation (DOC). 2010. CGS Information Warehouse Mineral Land Classification Portal, Update of Mineral Land Classification for Portland Cement Concrete- Grade Aggregate in the San Gabriel Valley Production-Consumption Region, Los Angeles County, California. Available at: https://maps.conservation.ca.gov/cgs/informationwarehouse/mlc/.

[42] DOC, Mines Online, https://maps.conservation.ca.gov/mol/index.html. Accessed May 28, 2024.

[43] California Department of Conservation (DOC). 2010. CGS Information Warehouse Mineral Land Classification Portal, Update of Mineral Land Classification for Portland Cement Concrete- Grade Aggregate in the San Gabriel Valley Production-Consumption Region, Los Angeles County, California. Available at: https://maps.conservation.ca.gov/cgs/informationwarehouse/mlc/.

plan, specific plan, or other land use plan. No impact would occur, and no mitigation measures would be required.

Cumulative Impacts

The Project Site is not located within locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan. Furthermore, 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. Furthermore, no mineral resources or active extraction operations for such resources occur in the Project Site vicinity. Therefore, the Project would not contribute considerably to cumulative mineral resources impacts, and cumulative mineral resources impacts would be less than significant.

5.13 Noise

This Section is based on the Noise and Vibration Assessment, prepared by Kimley-Horn in June 2025), which is included in its entirety in **Appendix K: Noise and Vibration Assessment.**

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Generate 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?		X		
b) Generate of excessive ground borne vibration or groundborne noise levels?		X		
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?		X		

Background

Sound and Environmental Noise

Acoustics is the science of sound. Sound can be described as the mechanical energy of a vibrating object transmitted by pressure waves through a medium (e.g., air) to human (or animal) ear. If the pressure variations occur frequently enough (at least 20 times per second), they can be heard and are called sound. The number of pressure variations per second is called the frequency of sound and is expressed as cycles per second, or hertz (Hz).

Noise is defined as loud, unexpected, or annoying sound. The fundamental model consists of a noise source, a receptor, and the propagation path between the two. The loudness of the noise source, obstructions, or atmospheric factors affecting the propagation path, determine the perceived sound level and noise characteristics at the receptor. Acoustics deal primarily with the propagation and control of sound. A typical noise environment consists of ambient noise that is the sum of many distant and indistinguishable noise sources. Superimposed on this ambient noise is the sound from individual local sources. These sources can vary from an occasional aircraft or train passing by to continuous noise from traffic on a major highway. Perceptions of sound and noise are highly subjective from person to person.

Measuring sound directly in terms of pressure would require a large range of numbers. To avoid this, the decibel (dB) scale was devised. The dB scale uses the hearing threshold of 20 micro-pascals (µPa) as a point of reference, defined as 0 dB. Other sound pressures are then compared to this reference pressure, and the logarithm is taken to keep the numbers in a practical range.

The dB scale allows a million-fold increase in pressure to be expressed as 120 dB, and changes in levels correspond closely to human perception of relative loudness

Human Response to Noise

The human response to environmental noise is subjective and varies considerably from individual to individual. Noise in the community has often been cited as a health problem, not in terms of actual physiological damage, such as hearing impairment, but in terms of inhibiting general well-being and contributing to undue stress and annoyance. The health effects of noise in the community arise from interference with human activities, including sleep, speech, recreation, and tasks that demand concentration or coordination. Hearing loss can occur at the highest noise intensity levels.

Noise environments and consequences of human activities are usually well represented by median noise levels during the day or night or over a 24-hour period. Environmental noise levels are generally considered low when the Community Equivalent Noise Level (CNEL) is below 60 dBA, moderate in the 60 to 70 A-weighted sound level (dBA) range, and high above 70 dBA. Examples of low daytime levels are isolated, natural settings with noise levels as low as 20 dBA and quiet, suburban, residential streets with noise levels around 40 dBA. Noise levels above 45 dBA at night can disrupt sleep. Examples of moderate-level noise environments are urban residential or semi-commercial areas (typically 55 to 60 dBA) and commercial locations (typically 60 dBA). People may consider louder environments adverse, but most will accept the higher levels associated with noisier urban residential or residential-commercial areas (60 to 75 dBA) or dense urban or industrial areas (65 to 80 dBA). Regarding increases in dBA, the following relationships should be noted:[44]

- Except in carefully controlled laboratory experiments, a 1-dBA change cannot be perceived by humans.
- Outside of the laboratory, a 3-dBA change is considered a just-perceivable difference.
- A minimum 5-dBA change is required before any noticeable change in community response would be expected. A 5-dBA increase is typically considered substantial.
- A 10-dBA change is subjectively heard as an approximate doubling in loudness and would almost certainly cause an adverse change in community response.

Effects of Noise on People

Hearing Loss. While physical damage to the ear from an intense noise impulse is rare, a degradation of auditory acuity can occur even within an environment with standard community noise levels including traffic and mechanical equipment noise. Hearing loss occurs mainly due to chronic exposure to excessive noise but may be due to a single event such as an explosion. Natural hearing loss associated with aging may also be accelerated from chronic exposure to loud noise. The Occupational Safety and Health Administration has a noise exposure standard for

[44] Compiled from California Department of Transportation, *Technical Noise Supplement to the Traffic Noise Analysis Protocol*, September 2013, and FHWA, *Noise Fundamentals,* 2017

workers that is set at the noise threshold where hearing loss may occur from long-term exposures. The maximum allowable level is 90 dBA averaging over 8 hours. If the noise is above 90 dBA, the allowable exposure time is correspondingly shorter.

Annoyance. Attitude surveys are used for measuring the annoyance felt in a community for noises intruding into homes or affecting outdoor activity areas. In these surveys, it was determined that causes for annoyance include interference with speech, radio and television, house vibrations, and interference with sleep and rest. The day-night noise level (L_{dn}) as a measure of noise has been found to provide a valid correlation of noise level and the percentage of people annoyed. People have been asked to judge the annoyance caused by aircraft noise and ground transportation noise. There continues to be disagreement about the relative annoyance of these different sources. A noise level of about 55 dBA L_{dn} is the threshold at which a substantial percentage of people begin to report annoyance.

Ground-Borne Vibration

Sources of ground-borne vibrations include natural phenomena (earthquakes, volcanic eruptions, sea waves, landslides, etc.) or man-made causes (explosions, machinery, traffic, trains, construction equipment, etc.). Vibration sources may be continuous (e.g., factory machinery) or transient (e.g., explosions or heavy equipment used during construction). Ground vibration consists of rapidly fluctuating motions or waves with an average motion of zero. Several different methods are typically used to quantify vibration amplitude. One is vibration decibels (VdB) (the vibration velocity level in decibel scale). Other methods are the peak particle velocity (PPV) and the root mean square (RMS) velocity. The PPV is defined as the maximum instantaneous positive or negative peak of the vibration wave and expressed in terms of inches-per-second (in/sec). The RMS velocity is defined as the average of the squared amplitude of the signal and is expressed in terms of VdB. The PPV and RMS vibration velocity amplitudes are used to evaluate human response to vibration.

Table 22: Human Reaction and Damage to Buildings for Continuous or Frequent Intermittent Vibrations, displays the reactions of people and the effects on buildings produced by continuous vibration levels. The human annoyance levels shown in the table should be interpreted with care since vibration may be found to be annoying at much lower levels than those listed, depending on the level of activity or the sensitivity of the individual. To sensitive individuals, vibrations approaching the threshold of perception can be annoying. Low-level vibrations frequently cause irritating secondary vibrations, such as a slight rattling of windows, doors, or stacked dishes. The rattling sound can give rise to exaggerated vibration complaints, even though there is very little risk of actual structural damage. Where ground-borne vibration approaches perceptible levels, this rattling phenomenon may also be produced by loud airborne environmental noise (sound waves travel through the air, not groundborne) causing induced vibration in exterior doors and windows.

Ground vibration can be a concern in instances where buildings shake, and substantial rumblings occur. However, it is unusual for vibration from typical urban sources such as buses and heavy trucks to be perceptible. Common sources for ground-borne vibration are planes, trains, and construction activities such as earth-moving, which requires the use of heavy-duty earth moving

equipment. For the purposes of this analysis, a PPV descriptor with units of inches per second (in/sec) was used to evaluate construction-generated vibration for building damage and human complaints.

Table 22: Human Reaction and Damage to Buildings for Continuous or Frequent Intermittent Vibrations

Maximum PPV (in/sec)	Caltrans Vibration Annoyance Potential Criteria[1]	Caltrans Vibration Damage Potential Threshold Criteria[1]	FTA Vibration Damage Criteria[2]
0.008	--	Extremely fragile historic buildings, ruins, ancient monuments	--
0.08	Readily Perceptible	--	--
0.1	Begins to Annoy	Fragile buildings	--
0.12	--	--	Buildings extremely susceptible to vibration damage
0.2	Annoying	--	Non-engineered timber and masonry buildings
0.25	--	Historic and some old buildings	--
0.3	--	Older residential structures	Engineered concrete and masonry
0.4	Unpleasant	--	--
0.5	--	New residential structures, Modern industrial/commercial buildings	Reinforced-concrete, steel or timber (no plaster)

Source: California Department of Transportation, Transportation and Construction Vibration Guidance Manual, 2020 and Federal Transit Administration, Transit Noise and Vibration Assessment Manual, 2018.
1. Caltrans criteria is compiled from various criteria presented in the Transportation and Construction Vibration Guidance Manual.
2. The FTA recommends use of the criteria presented during environmental impact assessment to identify issues to be addressed through engineering.

Ground-Borne Noise

Ground-borne noise specifically refers to the rumbling noise emanating from the motion of building room surfaces due to the vibration of floors and walls; it is perceptible only inside buildings. The relationship between ground-borne vibration and ground-borne noise depends on the frequency content of the vibration and the acoustical absorption characteristics of the receiving room. For typical buildings, ground-borne vibration that causes low frequency noise (i.e., the vibration spectrum peak is less than 30 Hz) results in a ground-borne noise level that is approximately 50 decibels lower than the vibration velocity level in decibel scale (VdB). For ground-borne vibration that causes mid-frequency noise (i.e., the vibration spectrum peak is between 30 and 60 Hz), the ground-borne noise level will be approximately 35 dB lower than the VdB. For ground-borne vibration that cause high-frequency noise (i.e., the vibration spectrum peak is greater than 60 Hz), the ground-borne noise level will be approximately 20 dB lower than the VdB. The FTA provides ground-borne noise threshold of 43 dBA for infrequent vibration events in Category 2 buildings such as residences and buildings where people normally sleep. For

frequent and occasional vibratory events, the FTA established ground-borne noise thresholds of 35 dBA and 38 dBA, respectively.

Regulatory Setting

Federal

Federal Transit Administration Noise and Vibration Guidance

The FTA has published the Transit Noise and Vibration Impact Assessment Manual (FTA Transit Noise and Vibration Manual) to provide guidance on procedures for assessing impacts at different stages of transit project development. The report covers both construction and operational noise impacts and describes a range of measures for controlling excessive noise and vibration. In general, the primary concern regarding vibration relates to potential physical damage from construction. The guidance document establishes criteria for evaluating the potential for damage to various structural categories from vibration.

State of California

California Government Code

California Government Code Section 65302(f) mandates that the legislative body of each county and city adopt a noise element as part of its comprehensive general plan. The local noise element must recognize the land use compatibility guidelines established by the State Department of Health Services. The guidelines rank noise land use compatibility in terms of "normally acceptable", "conditionally acceptable", "normally unacceptable", and "clearly unacceptable" noise levels for various land use types. Under these guidelines, single-family homes are located in "normally acceptable" exterior noise environments up to 60 CNEL and in "conditionally acceptable" exterior noise environments up to 70 CNEL. Multiple-family residential uses are located in "normally acceptable" exterior noise environments up to 65 CNEL and in "conditionally acceptable" exterior noise environments up to 70 CNEL. Schools, libraries, and churches are located in "normally acceptable" exterior noise environments up to 70 CNEL, as are office buildings and business, commercial, and professional uses.

Assembly Bill 1307

On September 7, 2023, Governor Newsom signed AB 1307, which added section 21085 to the Public Resources Code to read, in pertinent part, "for residential projects, the effects of noise generated by project occupants and their guests on human beings is not a significant effect on the environment."

Local

City of Inglewood General Plan

The Noise Element of the Inglewood General Plan (Noise Element) guides the control of noise to protect residents, workers, and visitors from potentially adverse noise impacts. Its primary goal is to regulate long-term noise impacts to preserve acceptable noise environments for all types of

land uses. With regard to long-term noise impacts, the Noise Element contains stated goals, policies, and implementation programs for noise control.

Goal 1: Provide for the reduction of noise where the noise environment represents a threat to the public health and welfare.

Goal 2: Reduce noise impacts in degraded areas.
Goal 3: Protect and maintain those areas having acceptable noise environments.

Goal 4: Provide sufficient information concerning the community noise level so that noise can be objectively considered in land use planning decisions.

City of Inglewood 2021-2029 Housing Element

The City of Inglewood 2021-2029 Housing Element (September 29, 2023) provides a blueprint for how the City can promote better, more secure and affordable housing in keeping with the City's General Plan and Regional Housing Needs Allocation (RHNA). The Housing Element addresses ambient noise conditions within the City, which is located within the LAX Influence Area.[45] Any new housing located within the LAX Influence Area, including the Project, would be required to comply with all development standards and regulations to reduce the impact of aircraft noise and achieve an interior noise level of 45 dB. Utilizing grant funds from the Federal Aviation Administration and Los Angeles World Airports, the City continues to rehabilitate and retrofit existing housing uses within the LAX Influence Area, as shown on the 2020 Noise Exposure Contour Map.

City of Inglewood Municipal Code

The City has adopted regulations to control noise levels within the community. The City's Municipal Code establishes standards for ambient sound. These standards regulate intrusive noises that may be harmful to community members. Chapter 5 (Offenses, Miscellaneous) Article 2 (Noise Regulations) lists the standard for noise levels within the community. Section 5-27, Base Ambient Noise Levels, of the Municipal Code includes assumed base ambient noise levels for residential, commercial, and industrial land use zones. Any measured noise levels exceeding the assumed base ambient noise levels (see **Table 23: Base Ambient Noise Level**) shall be employed as the base ambient noise level. Maximum exterior and interior residential noise levels pursuant to Section 5-30 Maximum Residential Noise Levels of the Municipal Code are listed in **Table 24: Maximum Residential Noise Levels**.

Table 23: Base Ambient Noise Level

Decibels	Time	Land Use Zone
45 dB(A)	10:00 p.m. – 7:00 a.m.	Residential
55 dB(A)	7:00 a.m. – 10:00 p.m.	Residential
65 dB(A)	Anytime	Commercial and uses not specified
75 dB(A)	Anytime	industrial

Source: City of Inglewood Municipal Code Section 5-27, Base Ambient Noise Level

[45] Los Angeles County Department of Regional Planning, Los Angeles County Airport Land Use Commission, https://case.planning.lacounty.gov/aluc/airports#anc-apm

Table 24: Maximum Residential Noise Levels	
Maximum Duration Period	**Maximum Duration Period**
Exterior Noise Levels	
Base Ambient Noise Level (BANL)	30 minutes in any hour
5 dBA above BANL	15 minutes in any hour
10 dBA above BANL	5 minutes in any hour
15 dBA above BANL	1 minute in any hour
20 dBA above BANL	Not Permitted
Interior Noise Levels	
BANL	5 minutes in any hour
5 dBA above BANL	1 minute in any hour
10 dBA above BANL	Not Permitted
Source: City of Inglewood Municipal Code Section 5-30, Maximum Residential Noise Levels.	

Other applicable sections of the Municipal Code are listed below:

Pursuant to Sections 5-29: Excessive Noise Unlawful and 5-30: Maximum Residential Noise Level, 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 properties.

Pursuant to Section 5-34, Radios, Televisions and Stereos, Noise Regulated, the operation of any radio, television set, musical instrument, phonograph, stereophonic equipment, jukebox, or other machine or device for producing, reproduction, or amplifying sound is prohibited when audible at a distance of 50 feet or more from the source of the sound and/or when audible within any other residence.

Pursuant to Section 5-39, Machinery, Equipment, Fans and Air-Conditioning, Noise Regulated, the operation of any machinery, equipment, device, pump, fan, compressor, air-conditioning apparatus, or similar mechanical device that results in a 5 dBA increase in the base ambient noise level at the property line shall be prohibited.

Pursuant to Section 5-41, Construction of Buildings and Projects, Noise Regulated, the operation of equipment or performance of any outdoor construction or repair work on buildings, structures, or projects between the hours of 8:00 p.m. and 7:00 a.m. in a manner that a reasonable person is caused discomfort or annoyance is prohibited unless a permit has been obtained for such work.

Pursuant to Section 5-43: Motor Driven Vehicles, Noise Regulated, the operation of any motor driven vehicle that, 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 is prohibited.

Existing Conditions

Existing Noise Sources

The Project Site is currently impacted by various noise sources. Mobile sources of noise, including traffic along 104th Street, Crenshaw Boulevard, and Yukon Avenue are the most common and prominent existing sources of noise in the Project Site area. Other noticeable existing sources of noise on and near the Project Site include aircraft noise and noise from existing nearby residential and school uses, and other urban-related activities (e.g., idling cars/trucks, pedestrians, car radios and music playing, dogs barking, etc.).

Noise Measurements

To quantify existing ambient noise levels in the Project Site area, Kimley-Horn conducted four short-term (15-minute) measurements on September 15, 2023; see **Appendix K** for additional details regarding how the ambient noise measurements were taken. The noise measurement sites were selected to be representative of the existing ambient noise levels at the noise-sensitive uses immediately adjacent to the Project Site. The 15-minute daytime measurements were taken between 10:27 a.m. and 12:37 p.m. Measurements of the equivalent noise level (L_{eq}) are considered representative of the noise levels throughout the day. The average noise levels measured at each location are listed in **Table 25: Existing Noise Measurement Locations and Measurements**. and shown on **Figure 22: Noise Measurement Locations**.

Table 25: Existing Noise Measurement Locations and Measurements

Site	Location	Measurement Period	Duration	Daytime Average L_{eq} (dBA)
ST-1	Monroe Middle School Parking Lot, 10th Avenue	10:27 a.m.	15 min	64.2
ST-2	Northwest corner of Woodworth-Monroe property, 104th Street	10:58 a.m.	15 min	62.5
ST-3	Southern Project property line at terminus of South Lemoli Avenue	11:27 a.m.	15 min	64.4
ST-4	Southwest corner of Morningside High School Parking Lot, Yukon Avenue	11:59 a.m.	15 min	66.4

Source: Noise measurements taken by Kimley-Horn and Associates, September 15, 2023. See **Appendix K** for noise measurement results.



SOURCE: Nearmap, 2024

N.T.S.

Figure 22: Noise Measurement Locations

INGLEWOOD MORNINGSIDE PROJECT

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Sensitive Receptors

Noise exposure standards and guidelines for various types of land uses reflect the varying noise sensitivities associated with each of these uses. Sensitive noise receptors are defined as residences, schools, hospitals, libraries, and parks.[46] Sensitive receptors near the Project Site are shown in **Table 26: Sensitive Receptors.**

Table 26: Sensitive Receptors

Receptor	Distance and Direction from the Project[1]
Monroe Middle School - *Represented by Noise Measurement ST-1*	Adjacent to the east
Morningside High School[2] *Represented by Noise Measurement ST-4*	Adjacent to the west
Single-Family Residential *Represented by Noise Measurement ST-3*	Adjacent to the south
Single-Family Residential *Represented by Noise Measurement ST-2*	30 feet north
Single-Family Residential *Represented by Noise Measurement ST-1*	745 feet east
Single-Family Residential *Represented by Noise Measurement ST-4*	1,300 feet west
Future Child Development Center – *Represented by Noise Measurement ST-1*	Adjacent to the east

Source: Google Earth, 2024.

1. Distance measured from Project Site property line to receptor property line.
2. Note that the IUSD announced the closure of Morningside High School by the end of the 2024-2025 school year.

[46] City of Inglewood, General Plan Noise Element, 1987

Impact Analysis

5.13a 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 Impact with Mitigation Incorporated.

Construction

On-Site Construction Noise

The City of Inglewood has not adopted a numerical threshold that identifies what a substantial increase would be for construction. For purposes of this analysis, the criteria from the FTA Transit Noise and Vibration Manual are used to establish significance thresholds. The FTA provides reasonable criteria for assessing construction noise impacts based on the potential for adverse community reaction. For residential uses, the daytime noise threshold is 80 dBA L_{eq} averaged over 8 hours L_{eq} (8-hr); and the nighttime noise threshold is 70 dBA L_{eq} (8-hr).[47] As the FTA does not include a recommended threshold for schools, this analysis applies the residential threshold to adjacent school uses. In compliance with the City's Municipal Code, it is assumed that construction would not occur during the noise-sensitive nighttime hours.

Construction noise typically occurs intermittently and varies depending on the nature or phase of construction (e.g., land clearing, grading, excavation). Noise generated by construction equipment, including earth movers and material handlers, can reach high levels that can affect noise-sensitive uses near the Project construction site. Construction activities for the Project would include site preparation, grading, excavation, paving, building construction, and architectural coating.

Construction noise was calculated accounting for each piece of equipment's usage factor, or the fraction of time that the equipment would be in use at full power over a specific period of time. Other primary sources of acoustical disturbance may include random incidents, which would last less than one minute (such as dropping of materials or the hydraulic movement of machinery lifts). Construction noise was predicted at the nearest noise-sensitive receptors utilizing the FHWA's Roadway Construction Noise Model (RCNM). When calculating construction noise, the loudest piece of equipment is conservatively assumed to operate at the property line nearest to the studied receptor while all other equipment anticipated for each individual construction phase is assumed to operate at staggering distances throughout the construction area. This methodology accounts for equipment operating throughout the Project Site and not at a fixed location for extended periods of time. Therefore, the distance used in the RCNM model was measured from the property line of the Project Site to the nearest receptor property line (or 25 feet for adjacent school receptor classrooms) for the loudest piece of equipment with all other equipment staggered throughout the construction area.

[47] Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual*, September 2018

Table 27: Project Construction Noise Levels shows the estimated maximum exterior construction noise levels at the nearest receptors to the Project Site. The FHWA has published guidance on construction measurement, prediction, and mitigation which includes the level of reduction from RCNM reference noise levels that can be achieved through the use of muffler systems.[48] The Project would include **project design feature (PDF) PDF NOISE-1**, which includes the installation and proper maintenance of noise shielding and muffling devices consistent with manufacturers' standards. The FHWA indicates that muffler systems can reduce noise levels by 10 dBA or more. Accounting for a reduction of up to 10 dBA provided by **PDF NOISE-1**, construction noise levels would still exceed FTA standards to the west, east, and south. Implementation of mitigation would thus be required.

Project Design Feature

PDF NOISE-1: Noise Shielding and Muffling. Power construction equipment (including combustion engines), fixed or mobile, will be equipped with noise shielding and muffling devices consistent with manufacturers' standards or the Best Available Control Technology. All equipment will be properly maintained, and the Applicant or Owner will require any construction contractor to keep documentation on-site during any earthwork or construction activities demonstrating that the equipment has been maintained in accordance with manufacturer's specifications.

As shown in **Table 27**, construction noise levels with implementation of PDF NOISE-1 would exceed FTA's standard of 80 dBA at Morningside High School, Monroe Middle School, and single -family residences to the south. As such, mitigation measure **MM NOISE-1** is required. **MM NOISE-1** requires the use of temporary noise barriers such as plywood walls with a minimum ½-inch thickness or sound blankets meeting a sound transmission class (STC) rating of 25. Noise barriers shall be a minimum of 8 feet in height and block the line-of-sight between construction activities and noise-sensitive uses to the south, east, and west. Sound blankets meeting a STC 25 rating can achieve a minimum 7 to 10 dBA reduction for construction equipment, such as anticipated Project construction equipment, with 200 Hz or lower frequency. Reductions of up to 28 dBA can be achieved for construction equipment with 500 Hz frequency.[49]

Table 3: Project Construction Noise Levels

Receptor	Maximum Noise Level at Receptor with PDF prior to MM (L_{eq}) [1]	Maximum Noise Level at Receptor with PDF and MM (L_{eq}) [2]	Noise Threshold (dBA L_{eq}) [3]	Exceeded?
Receptor 1 – Morningside High School (west)	84.4	77.4	80	No

[48] Federal Highway Administration, *Special Report - Measurement, Prediction, and Mitigation*, Chapter 4 Mitigation, 2017. https://www.fhwa.dot.gov/environment/noise/construction_noise/special_report/hcn04.cfm

[49] Environmental Noise Control. *Portable Acoustic Panels*, 2024. Available at: Portable Acoustic Panels - Environmental Noise Control (https://environmental-noise-control.com/products/temporary-sound-walls/)

Table 3: Project Construction Noise Levels				
Receptor	Maximum Noise Level at Receptor with PDF prior to MM (L_{eq}) [1]	Maximum Noise Level at Receptor with PDF and MM (L_{eq}) [2]	Noise Threshold (dBA L_{eq}) [3]	Exceeded?
Receptor 2 – Single Family Residential (north)	78.9	71.9		No
Receptor 3 – Monroe Middle School (east)	81.9	74.9		No
Receptor 4 – Single Family Residential (south)	79.2	72.2		No
Receptor 5 – Future Child Development Center (east)	79.2	72.2		No
1. Assumes noise level reductions of up to 10 dBA provided by **PDF NOISE-1** (Noise Shielding and Muffling). 2. Assumes a minimum reduction of 7 dBA provided by **MM NOISE-1** (Temporary Walls). 3. Per the FTA's guidelines, daytime construction noise shall be limited to a maximum of 80 dBA L_{eq} at residential uses.				
Source: Federal Highway Administration, Roadway Construction Noise Model, 2006. Refer to **Appendix K** for noise modeling results for each construction phase.				

As shown in **Table 27**, Project construction noise would not exceed the FTA's significance criterion of 80 dBA L_{eq} with implementation of **MM NOISE-1**. It should be noted that the IUSD announced the closure of Morningside High School by the end of the 2024-2025 school year. In the event that Morningside High School terminates instruction and a noise-sensitive use does not utilize the space, temporary noise barriers shall not be required along the western boundary of the Project.

In addition, construction-related noise would be temporary and would not result in a permanent increase in ambient noise levels in the area. Project construction would take place on Mondays through Fridays and would not require construction activities on the weekends. Construction activities would also be prohibited between the hours of 8:00 p.m. and 7:00 a.m. Monday through Friday. The City's permitted hours of construction are required in recognition that construction activities undertaken during daytime hours are a typical part of living in an urban environment and do not cause a significant impact. For all of these reasons, the Project would not result in the generation of a substantial temporary 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 during construction. Construction noise impacts would be less than significant with mitigation incorporated.

Off-Site Construction Noise

In addition to on-site construction noise, the Project would generate mobile noise from delivery/haul trucks and construction workers traveling to and from the Project Site during Project construction. Haul trucks would likely travel to and from the Project Site using 104th Street and Crenshaw Boulevard. Haul and delivery trucks and construction workers are expected to arrive at the Project Site before construction starts and leave when construction ends, and thus, would not overlap with the Project's on-site construction equipment. In addition, construction

workers would come from various directions to the Project Site and would not arrive along one designated route. According to modeling assumptions included in the Air Quality Assessment prepared for the Project (**Appendix A**), the construction phase with the highest assumed number of trucks is grading. There would be up to 23 daily haul truck trips accessing the Project Site during the grading phase. A truck pass-by event would generate noise levels of up to 70 dBA Leq at 50 feet.[50] As shown in Table 31 , below, existing traffic noise would range from 60.4 to 71.7 dB. Assuming all 23 haul trucks would pass through the same roadway segment within a 15-minute period, the estimated noise level from grading haul truck trips would be 64.2 dBA L_{eq} at 50 feet from the roadway centerline. This worst-case noise level would not exceed the FTA's significance criterion of 80 dBA L_{eq} for construction activities. In addition, on-road construction truck pass-bys would not result in noise levels greater than 5 dBA over existing ambient conditions (see **Table 25**). Therefore, the Project's potential off-site construction traffic noise impacts would be less than significant because they would not generate a substantial temporary 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 during construction. Accordingly, no mitigation measures are required.

Operations

The Project consists of a residential community that includes 571 townhomes, two clubhouses for resident use only, and miscellaneous amenities and open space. Project operations would result in the generation of noise from mechanical equipment (e.g., HVAC, etc.), parking and access noise, and trash/recycling truck pickup noise. Reference noise level data are used to estimate the Project operational noise impacts from stationary sources. Noise levels were collected from published sources from similar types of activities and used to estimate noise levels expected with the Project's stationary sources. The reference noise levels are used to represent a worst-case noise environment as noise levels from stationary sources can vary throughout the day. Operational noise is evaluated based on an incremental increase in ambient noise levels of 5 dBA L_{eq}.

On-Site Mechanical Equipment Noise

Potential stationary noise sources related to long-term Project operations would include mechanical equipment (e.g., HVAC equipment) located at the townhomes. Mechanical equipment (e.g., HVAC equipment) typically generates noise levels of approximately 52 dBA at 50 feet.[51] Pursuant to the Municipal Code Section 5-39 (Machinery, Equipment, Fans, and Air-Conditioning), the operation of any machinery, equipment, device, pump, fan, compressor, air-conditioning apparatus, or similar mechanical device shall not create any noise which would cause the ambient noise level at the property line to increase by more than 5 dBA. Assuming that an HVAC unit is operated nearest to each receptor and not accounting for shielding provided by potential screening or architectural features, noise levels have been calculated and shown in

[50] University of Washington Department of Environmental and Occupational Health Sciences, Noise Navigator Sound Level Database, July 6, 2010

[51] Elliott H. Berger, Rick Neitzel, and Cynthia A. Kladden, *Noise Navigator Sound Level Database with Over 1700 Measurement Values*, July 6, 2010

Table 28: Mechanical Equipment Noise Levels. As shown, mechanical equipment noise levels would not increase ambient noise levels beyond the acceptable levels (5 dBA over ambient). Project mechanical equipment would not result in the generation of a substantial 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. Therefore, the Project would result in less than significant noise impacts related to the operation of on-site mechanical equipment and no mitigation measures are required.

Table 28: Mechanical Equipment Noise Levels

Receptor	Level at Receptor (dBA)[1, 2]	Ambient Level (dBA)[3]	Ambient + Project Noise at Receptor (dBA)	Incremental Increase (dBA)	Incremental Increase Threshold (dBA)	Significant?
1 – Morningside High School (west)	58.0	66.4	67.0	0.6	5.0	No
2 – Single Family Residential (north)	52.0	62.5	62.9	0.4	5.0	No
3 – Monroe Middle School (east)	58.0	64.2	65.1	0.9	5.0	No
4 – Single Family Residential (south)	58.0	64.4	65.3	0.9	5.0	No
5 – Future Child Development Center	58.0	66.4	67.0	0.6	5.0	No

1. Distance estimated assuming equipment location located nearest to each receptor.
2. Distance attenuation calculated assuming reference noise level of 52 dBA Leq at 50 feet: Source for reference level: Elliott H. Berger, Rick Neitzel, and Cynthia A. Kladden, Noise Navigator Sound Level Database with Over 1700 Measurement Values, July 6, 2010.
3. See **Table 25** and **Table 26** for representative ambient noise levels.

Open Space

The Project would include outdoor living (open) spaces for residents including two outdoor pool areas, pocket park, and miscellaneous passive open space. Per Assembly Bill 1307 (Public Resources Code Section 21085), for residential uses, the effects of noise generated by Project occupants and their guests on human beings is not a significant effect on the environment. Therefore, no further analysis is required.

Amplified Music

Noise levels from the potential installation of an amplified sound system at proposed club houses and outdoor pool areas have been estimated. This analysis does not apply to personal speakers (i.e., personal stereos or speakers) that may be operated by residents of the Project. It is assumed that the use of amplified sound systems would be allowable only during daytime hours (7:00 a.m. to 10:00 p.m.) as detailed in **PDF-NOISE-2**, below.

Project Design Feature

PDF NOISE -2 Operation of permanently wired amplified sound systems at outdoor club house space pool areas shall be limited to the hours of 7:00 a.m. to 10:00 p.m. and shall

not exceed a volume of 80 dBA measured at 3 feet from any speaker. In addition, all speakers shall be designed and installed to direct sound toward the center of the Project pool area.

Although amplified music from residential living areas typically includes background music that allows for conversation to take place, it has been assumed that sound levels would equate to loud music playing on a stereo to ensure a worst-case analysis. Music playing on a stereo generates noise levels of approximately 80 dBA at 3 feet from the speaker.[52] Although direct line-of-sight may not be available and shielding could be provided by perimeter walls and architectural features, noise level reductions (for shielding) have not been assumed in the modeling. Consequently, maximum noise levels reaching each receptor from each outdoor living space have been combined to provide an overall worst-case estimate of potential amplified music, assuming both spaces would utilize amplified sound systems simultaneously.

As shown in **Table 29: Outdoor Amplified Music Noise Levels**, noise levels from the outdoor open spaces generated by a permanent amplified sound system would not increase ambient noise levels beyond the acceptable levels (5 dBA over ambient pursuant to the Municipal Code). Project open space areas would not result in the generation of a substantial permanent increase in ambient noise levels due to amplified music 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. Therefore, the Project would result in a less than significant impact due to noise from outdoor open space generated by amplified music and no mitigation measures are required.

Table 4: Outdoor Amplified Music Noise Levels

Receptor[1]	Combined Amplified Noise Level at Receptor (dBA)	Ambient Level (dBA)[2]	Ambient + Amplified Noise at Receptor (dBA)	Incremental Increase (dBA)	Incremental Increase Threshold (dBA)	Significant?
1 – Morningside High School (west)	44.4	66.4	66.4	0.0	5.0	No
2 – Single Family Residential (north)	39.1	62.5	62.5	0.0	5.0	No
3 – Monroe Middle School (east)	54.8	64.2	64.7	0.5	5.0	No
4 – Single Family Residential (south)	33.8	64.4	64.4	0.0	5.0	No
5 – Future Child Development Center (east)	41.6	66.4	66.4	0.0	5.0	No

1. Distance measured from center of pool area to receptor property line.
2. See **Table 25** and **Table 26** for representative ambient noise levels.

[52] Elliott H. Berger, Rick Neitzel, and Cynthia A. Kladden, *Noise Navigator Sound Level Database with Over 1700 Measurement Values*, July 6, 2010

Trash and Recycling Pick-Up

Trash and recycling would be picked up along the internal Project drive aisles. Trash/recycling trucks and pickup activities customarily generate noise levels of approximately 85 dBA at 3.3 feet.[53] Trash/recycling truck pickup activity servicing the Project Site area currently occurs under existing conditions and would not be a new noise source. However, trash/recycling truck noise levels have been estimated based on the nearest drive aisle to each sensitive receptor.

As shown in **Table 30: Trash/Recycling Truck Noise Levels**, noise levels from trash/recycling truck pick up would not increase ambient noise levels beyond the acceptable levels (5 dBA over ambient). Trash and recycling truck pickup activity would not result in the generation of a substantial permanent increase in ambient noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. Therefore, the Project would result in a less than significant impact due to noise generated by trash and recycling trucks and no mitigation measures are required.

Table 30: Trash/Recycling Truck Noise Levels

Receptor[1]	Trash Truck Noise Level at Receptor (dBA)	Ambient Level (dBA)[2]	Ambient + Trash Truck Noise at Receptor (dBA)	Incremental Increase (dBA)	Incremental Increase Threshold (dBA)	Significant?
1 – Morningside High School (west)	55.4	66.4	66.7	0.3	5.0	No
2 – Single Family Residential (north)	47.8	62.5	62.6	0.1	5.0	No
3 – Monroe Middle School (east)	51.0	64.2	64.4	0.2	5.0	No
4 – Single Family Residential (south)	61.4	64.4	66.2	1.8	5.0	No
5 – Future Child Development Center (east)	61.4	66.4	67.6	1.2	5.0	No

1. Distance measured from nearest on-site drive aisle to receptor property line.
2. See **Table 25** and **Table 26** for representative ambient noise levels.

On-Site Parking

Passenger vehicles would access the Project Site from two entrances on 104th Street and one on Lemoli Avenue. Noises associated with parking activities include noise associated with vehicles starting and stopping, vehicle doors closing, car horns and car alarms, loading and unloading and conversations. The noise levels from these activities can reach up to 63 dBA L_{eq} and are short-term.[54] Each of the proposed units would include private attached garage spaces and on-street

[53] Elliott H. Berger, Rick Neitzel, and Cynthia A. Kladden, *Noise Navigator Sound Level Database with Over 1700 Measurement Values*, July 6, 2010
[54] Kariel, H. G., Noise in Rural Recreational Environments, Canadian Acoustics 19(5), 3-10, 1991

parking would be provided throughout the project along Lemoli Avenue, Darby Avenue, and Morningside Drive. The residential parking spaces would be enclosed and would not result in measurable increases in ambient noise levels within the Project Site area. On-street parking spaces would be dispersed throughout the interior of the Project Site, shielded by Project buildings, and would not be concentrated in a surface parking lot. As such, on-street parking is not expected to result in measurable increases in ambient noise levels within the Project Site area. Therefore, noise levels generated by Project parking activities, vehicle access, loading and unloading would not result in the generation of a substantial permanent increase in ambient noise levels in the vicinity of the Project Site in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. The potential impacts would be less than significant, and no mitigation measures are required.

On-Site Traffic

Passenger vehicles would access the Project Site from two entrances on 104th Street and one on Lemoli Avenue. On-site traffic noise levels were calculated using the methodology described in the FHWA Traffic Noise Model Technical Manual (1998) and calculations were validated with the results from FHWA's Traffic Noise Model Version 2.5. According to Project Traffic Study (**Appendix L-1**), the Project would generate 4,111 daily vehicle trips, consisting of 274 AM peak hour trips and 326 PM peak hour trips. Based on 326 peak hour auto trips, on-site travel would generate noise levels of 54.8 dBA L_{eq} at 50 feet from the roadway centerline. Based on this noise level, noise levels reaching nearby sensitive receptors were calculated based on the distance to the nearest on-site drive aisle.

As shown in **Table 31: On-Site Traffic Noise Levels**, noise levels from on-site vehicular travel would not increase ambient noise levels beyond the acceptable levels (5 dBA over ambient). On-site vehicular travel would not result in the generation of a substantial permanent increase in ambient noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. Therefore, the Project would result in a less than significant impact due to noise generated by on-site trips and no mitigation measures are required.

Table 31: On-Site Traffic Noise Levels

Receptor[1]	On-Site Traffic Noise Level at Receptor (dBA)	Ambient Level (dBA)[2]	Ambient + On-Site Traffic Noise Noise at Receptor (dBA)	Incremental Increase (dBA)	Incremental Increase Threshold (dBA)	Significant?
1 – Morningside High School (west)	48.8	66.4	66.5	0.1	5.0	No
2 – Single Family Residential (north)	41.2	62.5	62.5	0.0	5.0	No
3 – Monroe Middle School (east)	44.4	64.2	64.2	0.0	5.0	No

Table 31: On-Site Traffic Noise Levels						
Receptor[1]	**On-Site Traffic Noise Level at Receptor (dBA)**	**Ambient Level (dBA)[2]**	**Ambient + On-Site Traffic Noise Noise at Receptor (dBA)**	**Incremental Increase (dBA)**	**Incremental Increase Threshold (dBA)**	**Significant?**
4 – Single Family Residential (south)	54.8	64.4	64.9	0.5	5.0	No
5 – Future Child Development Center	60.8	66.4	67.5	1.1	5.0	No
1. Distance measured from nearest on-site drive aisle to receptor property line. 2. See **Table 25** and **Table 26** for representative ambient noise levels.						

On-Site Composite Noise

An evaluation of the Project's composite noise levels, including all on-site Project-related noise sources plus the existing ambient level, was conducted to identify the potential maximum Project-related noise level increase that may occur at noise-sensitive receptor locations. On-site noise sources associated with the Project would include the use of mechanical equipment and amplified music at outdoor spaces and the addition of trash/recycling pick up activity and on-site vehicle trips on an existing vacant site.

As described above, reference noise level data are used to estimate the Project operational noise impacts from stationary sources at nearby sensitive receptors based on a standard noise attenuation rate of 6 dB per doubling of distance. Noise level estimates do not account for the presence of intervening structures or topography, which may reduce noise levels at receptor locations. On-site noise sources were then combined by adding noise sources logarithmically using the formula below to estimate a combined composite on-site noise level:

$$L = 10 \log 10 \left(\sum_{i=1}^{n} 10^{(L_i/10)} \right)$$

Table 32: Composite On-Site Noise Levels presents the estimated composite noise from on-site Project-related noise sources at noise sensitive receptors. As reported in **Table 32**, the Project would result in a maximum increase of 2.7 dBA at the single-family residential uses located to the south of the Project Site, and lower dBA increases at other adjacent sensitive receptors. Composite Project noise levels would be below the 5 dBA L_{eq} significance threshold. Composite operational noise levels would not result in the generation of a substantial 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. Therefore, the on-site

composite noise level would not result in the generation of a substantial permanent increase in ambient noise levels in the vicinity of the Project Site in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. The potential impacts would be less than significant, and no mitigation measures are required.

Off-Site Traffic Noise

Implementation of the Project would generate increased traffic volumes along nearby roadway segments. According to the Average Daily Traffic (ADT) Volumes provided in the Traffic Study prepared by Kimley Horn (**Appendix L-1**), the Project would increase the ADT volume that would result in noise increases on Project Site area roadways. Traffic noise levels for roadways primarily affected by the Project were calculated using the FHWA's Highway Noise Prediction Model (FHWA-RD-77-108). Traffic noise modeling was conducted for conditions with and without the Project, based on traffic volumes from the Transportation Assessment. As shown in **Table 33: Opening Year and Opening Year Plus Project Traffic Noise Levels**, Opening Year Plus Project traffic-generated noise levels on Project Site area roadways would range between 61.4 dBA CNEL and 72.3 dBA CNEL at standard distance 50 feet from the roadway centerline, and the Project would result in a maximum increase of 0.4 dBA CNEL along 104th Street between Yukon Avenue and Crenshaw Boulevard, and all other locations studied results in smaller increases. Increases in traffic noise would not result in increases beyond acceptable levels. Therefore, impacts would be less than significant.

For the reasons substantiated above, 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. With the implementation of MM NOISE-1, impacts would be reduced to a less than significant level.

Mitigation Measures

MM NOISE-1: **Temporary Walls.** Noise barriers, such as temporary walls (minimum ½-inch thick plywood) or sound blankets (minimum STC 25 rating), that are a minimum of eight feet tall, shall be erected along the western, eastern, and southern Project boundaries such that the line-of-sight between noise-sensitive uses and construction activities are blocked. Should instruction be terminated at Morningside High School while the Project is undergoing construction, temporary walls shall not be required along the western Project boundary provided that the school remains vacant or noise-sensitive uses do not utilize the space.

Table 32: Composite On-Site Noise Levels

Receptor	Mechanical Equipment (dBA L_{eq})	Amplified Noise (dBA L_{eq})	Trash Truck (dBA L_{eq})	On-Site Traffic (dBA L_{eq})	Combined On-Site Project Noise Level (dBA L_{eq})	Ambient Level (dBA L_{eq})[1]	Ambient + Project Noise at Receptor (dBA $_{eq}$)	Incremental Increase (dBA L_{eq})	Incremental Increase Threshold (dBA L_{eq})	Significant?
1 – Morningside High School (west)	58.0	44.4	55.4	48.8	60.3	66.4	67.4	1.0	5.0	No
2 – Single Family Residential (north)	52.0	39.1	47.8	41.2	53.8	62.5	63.0	0.5	5.0	No
3 – Monroe Middle School (east)	58.0	54.8	51.0	44.4	60.4	64.2	65.7	1.5	5.0	No
4 – Single Family Residential (south)	58.0	33.8	61.4	54.8	63.6	64.4	67.1	2.7	5.0	No
5 – Future Child Development Center	58.0	41.6	61.4	60.8	65.1	66.4	68.8	2.4	5.0	No

1. See **Table 25** and **Table 26** for representative ambient noise levels.

Table 33: Opening Year and Opening Year Plus Project Traffic Noise Levels

Roadway Segment	Opening Year		Opening Year + Project		Incremental Increase (CNEL)	Incremental Increase Threshold (CNEL)	Significant Impact?
	ADT	dBA CNEL[1]	ADT	dBA CNEL[1]			
104th St between Yukon Ave and Crenshaw Blvd	12,150	62.2	13,390	62.6	0.4	5.0	No
Century Blvd between Yukon Ave and Crenshaw Blvd	38,940	72.3	38,940	72.3	0.0	5.0	No
Crenshaw Blvd between Century Blvd and 104th St	37,050	71.1	37,880	71.2	0.1	5.0	No
Crenshaw Blvd between 104th St and 108th St	41,070	71.6	41,280	71.6	0.0	5.0	No
Crenshaw Blvd between 108th St and 109th St	44,600	71.9	45,220	72.0	0.1	5.0	No
Crenshaw Blvd between 109th St and Thoreau St	38,050	71.3	38,670	71.3	0.0	5.0	No
Yukon Ave between Century Blvd and 104th St	15,060	65.1	16,090	65.4	0.3	5.0	No
Yukon Ave between 104th St to 108th St	10,180	61.4	10,180	61.4	0.0	5.0	No

ADT = average daily trips; dBA = A-weighted decibels; CNEL= Community Equivalent Noise Level
Traffic noise levels are at 50 feet from the roadway centerline.
Source: Based on traffic data provided by Kimley-Horn and Associates, Inc., July 2024. Refer to **Appendix K** for traffic noise modeling results.

5.13b Would the project generate excessive ground borne vibration or groundborne noise levels?

Less Than Significant Impact with Mitigation Incorporated.

Construction

On-Site Construction Vibration

Increases in ground-borne vibration levels attributable to the Project would be primarily associated with short-term construction-related activities. Project construction would have the potential to result in varying degrees of temporary ground-borne vibration, depending on the specific construction equipment used and the operations involved.

The FTA and the Caltrans have published standard vibration velocities for construction equipment operations. Building damage can be cosmetic or structural. Ordinary buildings that are not particularly fragile would not experience any cosmetic damage (e.g., plaster cracks) at distances beyond 30 feet. This distance can vary substantially depending on the soil composition and underground geological layer between vibration source and receiver. In addition, not all buildings respond similarly to vibration generated by construction equipment. Receptors susceptible to building damage include all structures located adjacent to the Project Site. The nearest vibration-sensitive structures to the Project Site are the single-family residential units to the south. This evaluation uses the structural damage criteria of 0.3 in/sec PPV for "older residential structures" as the homes located to the south of the Project are more than 50 years old. The Morningside High School Campus is located within a historic district. This evaluation uses the structural damage criteria of 0.25 in/sec PPV for "historic and some old buildings" for Morningside High School buildings. This evaluation uses a human annoyance criteria of 0.2 in/sec PPV (point of annoying).

Table 34: Typical Construction Equipment Vibration Levels lists the reference vibration levels for typical construction equipment (measured at 25 feet). The ground-borne vibration generated by construction equipment spreads through the ground and diminishes in magnitude with increases in distance. As shown in **Table 34**, based on FTA data, vibration velocities from typical heavy construction equipment that would be used during Project construction range from 0.076 to 0.21 in/sec PPV at 25 feet from the source of activity. Equipment expected to be used at the Project Site that FTA guidance includes reference vibration levels for include loaded haul trucks, vibratory compactor/roller, and large bulldozer. As shown in **Table 34**, at 25 feet, the operation of loaded haul trucks and large bulldozers would not exceed the threshold of 0.3 in/sec PPV for older residential uses or 0.2 in/sec PPV for human annoyance at the residential uses to the south. The nearest structure on the Morningside High School campus is located approximately 100 feet from the Project boundary. At 100 feet, construction activities would not exceed 0.25 in/sec PPV for historic buildings or 0.3 in/sec PPV for human annoyance at Morningside High School. The nearest vibration-sensitive structures are the older residential structures located as near as 10 feet from potential construction equipment activity. At 10 feet, vibration velocities would exceed both the structural damage and human annoyance threshold of 0.3 in/sec PPV and 0.2 in/sec PPV, respectively. Therefore, mitigation is required.

The required distances at which loaded trucks, large bulldozers, and vibratory compactors/rollers need to remain from adjacent structures is included as mitigation measure **MM NOISE-2**. At 15 feet, the operation of loaded trucks and large bulldozers would generate vibration velocities of 0.164 in/sec PPV and 0.191 in/sec PPV respectively, which would not exceed the applicable structural damage or human annoyance thresholds. At a distance of 26 feet, the use of a vibratory compactor/roller would not exceed structural damage or human annoyance thresholds. With incorporation of **MM NOISE-2**, structural damage and human annoyance thresholds would not be exceeded.

Table 34: Typical Construction Equipment Vibration Levels

Equipment	Reference Level PPV at 25 Feet (in/sec)	PPV at 10 Feet (in/sec)	PPV at 15 Feet (in/sec)	PPV at 26 Feet (in/sec)
Loaded Trucks	0.076	0.300	0.164	0.072
Large Bulldozer	0.089	**0.352**	0.191	0.084
Vibratory Compactor/Roller	0.210	**0.830**	**0.452**	0.198
Structural Damage Threshold	**--**	**0.30**	**0.30**	**0.30**
Exceeds Thresholds?	--	**Yes**	**Yes**	No
Human Annoyance Threshold	**--**	**0.20**	**0.20**	**0.20**
Exceeds Thresholds?		**Yes**	**Yes**	No

Source: Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual*, September 2018.
1. Per Mitigation Measure NOISE-2, large bulldozers and loaded trucks shall be a minimum distance of 15 feet from any adjacent structure and vibrator rollers shall be a minimum of 26 feet from any adjacent structure.

Off-Site Construction Vibration

With regard to construction trucks, Project construction would involve truck travel along nearby roadways, generating vibration events with each passing truck. According to the FTA's Transit Noise and Vibration Impact Assessment, a heavy truck rarely creates vibration levels that exceed 0.012 in/sec PPV at 50 feet when on a roadway.[55] The factors influencing levels of ground-borne vibration include vehicle speed, vehicle suspension, and wheel condition and type. The frequency of vibration events is not listed as an influencing factor for vibration velocity by the FTA. As such, multiple trucks traveling along the roadway would increase the frequency of vibration events but would not affect the vibration velocity experienced by receptors. Therefore, vibration impacts associated with construction of the Project would be less than significant and no mitigation measures are required.

On-Site Ground-Borne Noise

According to the FTA, airborne noise levels are higher than ground-borne noise levels. Unless indoor receptors have substantial sound insulation (e.g., recording studio) and would be exposed to vibration velocities great enough to cause substantial levels of ground-borne noise, ground-

[55] Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual*, September 2018

borne noise does not need to be assessed. Ground-borne noise is typically assessed for locations where subway or tunnel operations (where there is no airborne noise path) are present. The Project would not include a subway or tunnel, and all construction equipment would be located at grade. In addition, there are no substantially insulated indoor noise receptors located within the area surrounding the Project Site. Therefore, the effects of airborne noise would still be higher than ground-borne noise levels and impacts related to ground-borne noise during Project construction would be less than significant and no mitigation is required.

Operation

With respect to vibration-generating activities, operation of the Project would primarily involve personal automobiles used by residents and delivery trucks (e.g., UPS, FedEx, etc.). Due to the rapid drop-off rate of ground-borne vibration and the short duration of the associated events, vehicular traffic-induced ground-borne vibration is rarely perceptible beyond the roadway right-of-way, and rarely results in vibration levels that cause damage to buildings in the vicinity. According to the FTA's Transit Noise and Vibration Impact Assessment, trucks rarely create vibration levels that exceed 0.012 in/sec PPV when they are on roadways. Therefore, operation of the Project would result in less than significant ground-borne vibration impacts, and no mitigation is required.

Based on the reasons above, construction and operation of the Project would not generate excessive ground borne vibration or groundborne noise levels. With implementation of **MM NOISE-2**, impacts would be reduced to a less than significant level.

Mitigation Measures

MM NOISE-2: The use of large bulldozers and loaded trucks shall be a minimum of 15 feet away from any adjacent structure. The use of a vibratory compactor/roller shall be a minimum of 26 feet away from any adjacent structure. Any activity requiring a compactor or roller within 26 feet of an adjacent structure shall be conducted using a non-vibratory/static roller or a walk-behind roller.

5.13c 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 Project Site is located approximately 2.5 miles east of the LAX and one mile north of the Hawthorne Municipal Airport. The Project Site is not located within the Planning Boundary/Influence Area for Hawthorne Municipal Airport. According to the latest quarterly noise contours for LAX, the Project Site is located within the 65 dBA CNEL noise contour, which is consistent with the existing daytime ambient noise levels within the Project area. According to the Los Angeles County Airport Land Use Plan, residential uses within the 65 dBA noise contour "shall review noise insulation needs" and impacts are presumed to be potentially significant, requiring implementation of mitigation. The Inglewood 2021-2029 Housing Element implements a Residential Sound Insulation Program, which includes sound insulation utilizing grant funds from the Federal Aviation Administration and Los Angeles World Airports.

MM NOISE-3 includes requirements consistent with the Sound Insulation Program and requires either upgraded heating and cooling mechanical systems and/or the installation of noise insulation features. **MM NOISE-3** also requires the verification that all internal living spaces achieve a 45 dBA noise level as well as meet exterior standards in the Municipal Code. Therefore, with implementation of **MM NOISE-3**, impacts would be reduced to a less than significant level.

Mitigation Measures

MM NOISE-3: Areas of the Project that includes residential uses within 65 CNEL noise contour of LAX shall be designed to meet the City's interior noise standard of 45 CNEL, as well as meet exterior standards for the applicable zoning designation in outdoor areas, as provided by Inglewood Municipal Code, Section 5-30. Measures include, but are not limited to, the installation of upgraded heating and cooling mechanical systems that allow residents to keep windows closed and the installation of noise insulation features such as noise walls, glass noise barriers, double pane windows, insulated doors, roofing and siding, and landscaping.

Upon receipt of a development application that includes residential uses, such as the Proposed Project, within the 65 dB CNEL noise contour of LAX, the City Planning Division shall conduct a review of noise generation in the proposed development area and project features to be included to reduce noise levels to meet the City's Municipal Code requirements.

Cumulative Impacts

Cumulative Construction Noise

For the reasons set forth in the discussions above, the Project's construction activities would not result in a substantial temporary increase in ambient noise levels. Construction noise would be periodic and temporary noise impacts that would cease upon completion of construction activities. The Project would contribute to other proximate construction project noise impacts if construction activities were conducted concurrently. Noise from construction of projects is typically localized. In addition, construction noise would be attenuated by distance and intervening buildings, typical in an urban setting.

Construction of the future Child Development Center to be located adjacent to the Project Site to the east would potentially be under construction while the Project is under construction. Construction activities of the Child Development Center as well as other planned and approved projects near the Project Site would be required to comply with applicable City regulations related to noise and would take place during daytime hours on the days permitted by Section 5-41 of the Municipal Code, and projects requiring discretionary City approvals would be required to evaluate construction noise impacts, comply with the City's standard conditions of approval, and implement mitigation, if necessary, to minimize noise impacts. Construction noise impacts are by nature localized. Based on the fact that noise dissipates as it travels away from its source, noise impacts would be limited to the Project Site and vicinity. Potential overlap of Project construction with the Child Development Center could combine noise and result increased temporary noise level increases at Monroe Middle School and residential uses to the north and

east. As discussed above, Project construction would not result in significant impacts with incorporation of PDFs and implementation of mitigation. Therefore, Project construction would not result in a cumulatively considerable contribution to significant cumulative impacts, and impacts in this regard are not cumulatively considerable.

Cumulative Construction Vibration

Ground-borne vibration decreases rapidly with distance. Potential vibration impacts are generally limited to buildings and structures that are located in close proximity of construction activity. Due to the rapid attenuation characteristics of ground-borne vibration and given the distance of the nearest related project to the Project Site, there is no potential for cumulative construction vibration impact.

Cumulative Operational Noise

Cumulative Off-Site Traffic Noise. The cumulative mobile noise analysis is conducted in a two-step process. First, the combined effects from both the Project and other projects are assessed. Second, for combined effects that are determined to be cumulatively significant, the Project's incremental effects are then analyzed. A project's contribution to a cumulative traffic noise increase would be considered significant when the combined effect exceeds perception level (i.e., auditory level increase) threshold. The combined effect compares the "Cumulative With Project" condition to "Existing" conditions. This comparison accounts for the traffic noise increase generated by the Project combined with the traffic noise increase generated by cumulative projects and ambient growth.

The following criteria are used to evaluate whether the Cumulative with Project noise level would create a significant cumulative noise increase and whether the Project has an incremental effect in the cumulative noise increase.

- Combined Effect. The cumulative with Project noise level ("Cumulative With Project") would cause a significant cumulative impact if a 3.0 dB increase over "Existing" conditions occurs and the resulting noise level exceeds the applicable exterior standard at a sensitive use.
- Incremental Effects. The Project would cause a significant incremental effect if the "Cumulative With Project" condition causes a 1.0 dBA increase in noise over the "Cumulative Without Project" noise level.

Thus, although there may be a significant noise increase due to the Project in combination with identified cumulative projects (combined effects), the impact would only be significant if it can be demonstrated that the Project has an incremental effect exceeding 1.0 dBA. In other words, a significant portion of the noise increase must be due to the Project.

A significant impact would result only if both the combined and incremental effects criteria have been exceeded and if noise levels exceed acceptable noise levels. Noise by definition is a localized phenomenon and reduces as distance from the source increases. Consequently, only the Project and growth due to occur in the general area would contribute to cumulative noise impacts. Increases in local volumes from related projects within a half-mile radius of the Project Site have

been estimated and included in cumulative traffic conditions. **Table 35: Cumulative Plus Project Buildout Conditions Traffic Noise Levels** identifies the traffic noise effects along roadway segments in the vicinity of the Project Site for "Existing," "Cumulative Without Project," and "Cumulative With Project," conditions, and net cumulative impacts.

Table 35: Cumulative With Project Buildout Conditions Traffic Noise Levels

Roadway Segment	CNEL @ 50 feet from Centerline[1]			Combined Effects[2]	Incremental Effects[3]	Cumulatively Significant Impact?
	Existing	Cumulative Without Project	Cumulative With Project	dBA Difference: Existing and Cumulative With Project	dBA Difference: Cumulative Without and With Project	
104th St between Yukon Ave and Crenshaw Blvd	60.4	62.2	62.6	2.2	0.4	No
Century Blvd between Yukon Ave and Crenshaw Blvd	71.7	72.3	72.3	0.6	0.0	No
Crenshaw Blvd between Century Blvd and 104th St	70.5	71.1	71.2	0.7	0.1	No
Crenshaw Blvd between 104th St and 108th St	70.5	71.6	71.6	1.1	0.0	No
Crenshaw Blvd between 108th St and 109th St	70.9	71.9	72.0	1.1	0.1	No
Crenshaw Blvd between 109th St and Thoreau St	70.1	71.3	71.3	1.2	0.0	No
Yukon Ave between Century Blvd and 104th St	64.4	65.1	65.4	1.0	0.3	No
Yukon Ave between 104th St to 108th St	60.7	61.4	61.4	0.7	0.0	No

ADT = average daily trips; dBA = A-weighted decibels; CNEL = day-night noise level
1. Traffic noise levels are at 50 feet from the roadway centerline.
2. The cumulative with Project noise level ("Cumulative With Project") would cause a significant cumulative impact if a 3.0 dB increase over "Existing" conditions occurs and the resulting noise level exceeds the applicable exterior standard at a sensitive use.
3. The Project would cause a significant incremental effect if the "Cumulative With Project" condition causes a 1.0 dBA increase in noise over the "Cumulative Without Project" noise level.

Refer to **Appendix K** for traffic noise modeling assumptions and results.

First, it must be determined whether the "Cumulative With Project" 3.0 dB increase above existing conditions (Combined Effects) is exceeded. Next, under the Incremental Effects criteria, cumulative noise impacts are defined by determining if the forecast ambient ("Cumulative Without Project") noise level is increased by 1.0 dB or more. As shown in **Table 35**, Combined Effects (3.0 dB) and Incremental Effects (1.0 dB) criteria have not been exceeded along any of the studied roadway segments. Thus, the Project, in combination with cumulative background traffic noise levels, would result in a less than significant cumulative impact. The Project's contribution to traffic noise would not be cumulatively considerable.

Cumulative Stationary Noise. Stationary noise sources of the Project would result in an incremental increase in non-transportation noise sources in the Project Site vicinity. However, as discussed above, operational noise caused by the Project would be less than significant. Similar to the Project, other planned and approved projects would be required to mitigate for stationary noise impacts at nearby sensitive receptors, if necessary. As stationary noise sources are generally localized, there is a limited potential for other projects to contribute to cumulative noise impacts.

No known past, present, or reasonably foreseeable projects would combine with the operational noise levels generated by the Project to increase noise levels above acceptable standards because each project must comply with applicable City regulations that limit operational noise. Therefore, the Project, together with other projects, would not create a significant cumulative impact, and even if there were such a significant cumulative impact, the Project would not make a cumulatively considerable contribution to significant cumulative operational noises.

Given that noise dissipates as it travels away from its source, operational noise impacts from on-site activities and other stationary sources would be limited to the Project Site and vicinity. Thus, cumulative operational noise impacts from related projects, in conjunction with Project specific noise impacts, would not be cumulatively significant.

Cumulative Operational Vibration Impacts

Operation of the Project would primarily involve personal automobiles used by residents and delivery trucks (e.g., UPS, FedEx, etc.). Due to the rapid drop-off rate of ground-borne vibration, the short duration of the associated events, and the distance of cumulative projects, there is no potential for cumulative operational vibration impact.

5.14 Population and Housing

Environmental Issue	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)?			X	
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?				X

Impact Analysis

5.14a 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.

2020-2045 RTP/SCS

Household growth forecasts prepared by SCAG contained in the 2020-2045 RTP/SCS indicate that the number of households within the City will increase from 37,500 in 2016 to 47,700 in 2045, an increase of 10,200 households.[56] The Project would include 571 units, which represents 5.6 percent of the anticipated increase for the City by 2045. Thus, the Project's estimated household growth would be within regional growth projections for the City.

The 2020-2045 RTP/SCS includes population growth forecasts for the City between 2016 and 2045. The 2020-2045 RTP/SCS indicates that the population within the City will increase from 114,300 in 2016 to 137,100 in 2045, an increase of 22,800. Based on the City's average household size of 2.91, the Project's 571 proposed townhome units would result in a population increase of approximately 1,662 residents.[57] The Project's anticipated population growth (1,662 persons) would represent approximately 7.3 percent of the City's anticipated growth between 2016 and 2045. Thus, the Project's estimated population growth would be within regional growth projections for the City.

2024-2050 RTP/SCS

[56] SCAG, Connect SoCal 202020 Demographics and Growth Forecast, September 3, 2020, page 34, https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal_demographics-and-growth-forecast.pdf?1606001579. Accessed March 26, 2025.

[57] U.S. Census Bureau, QuickFacts: United States; Inglewood City, California, https://www.census.gov/quickfacts/fact/table/US,inglewoodcitycalifornia/LFE305220/. Accessed July 26, 2024.

Growth forecasts prepared by SCAG contained in the 2024-2050 RTP/SCS indicate that the number of households within the City will increase from 37,500 in 2019 to 61,600 in 2050, an increase of 24,100 households.[58] The Project would include 571 units, which represents 2.4 percent of the anticipated increase for the City by 2050. Additionally, the City's General Plan Housing Element for the 2021-2029 planning period has an objective of constructing 7,439 new units by 2029.[59] The Project's proposed 571 units would represent approximately 8 percent of the number of new units planned to be constructed by the City per the Housing Element. The Project's anticipated household growth (571 households) would represent approximately 2.4 percent of the City's anticipated household growth between 2019 and 2050. Thus, the Project's estimated household growth would be within regional growth projections for the City.

Based on the City's average household size of 2.91, the increase of 24,100 households in the City between 2019 and 2050 would result in an approximate increase of 70,131 persons in the City between 2019 and 2050.[60] When utilizing the same City average household size of 2.91, the Project's 571 proposed townhome units would result in a population increase of approximately 1,662 residents. The Project's anticipated population growth (1,662 persons) would represent approximately 2.4 percent of the City's anticipated growth between 2019 and 2050. Thus, the Project's estimated population growth would be within regional growth projections for the City.

Project construction would result in increased employment opportunities in the construction field, which could potentially result in increased population and housing demand in the City. However, it is assumed that construction labor for the Project would be provided by the existing local workforce in Inglewood and in the surrounding communities. Construction workers would typically remain at a job site for the time frame in which they are needed, whether for a particular phase of Project construction or until construction is completed. Therefore, Project construction is not anticipated to require workers to relocate permanently to the City as a consequence of working on the Project, thereby resulting in substantial unplanned population growth due to an increase in workforce.

Potential population growth impacts are also assessed based on a project's consistency with adopted plans that have addressed growth management from a local and regional standpoint. According to the General Plan, the Project Site is designated as Low Density, which allows a density of 23 du/ac. The Project would have a density of 24.97 du/ac. The Project requires approval of a General Plan Amendment to change the General Plan land use designation from Low Density to Medium Density, the latter allowing 43 du/ac. Upon the City's approval of the Project, the Project would be consistent with the Medium Density land use designation.

Overall, although the Project may result in direct population growth from future residents relocating to the City, the Project would not induce substantial unplanned population growth

[58] SCAG, Connect SoCal 2024 Demographics and Growth Forecast, April 4, 2024, page 39, https://scag.ca.gov/sites/main/files/file-attachments/23-2987-tr-demographics-growth-forecast-final-040424.pdf?1712261839. Accessed August 2, 2024.
[59] City of Inglewood, Draft Housing Element 2021-2029, January 2020, 2022, age 19, https://www.hcd.ca.gov/housing-elements/docs/inglewood-6th-draft020122.pdf. Accessed August 2, 2024.
[60] U.S. Census Bureau, QuickFacts: United States; Inglewood City, California, https://www.census.gov/quickfacts/fact/table/US,inglewoodcitycalifornia/LFE305220/. Accessed July 26, 2024.

exceeding regional population projects. Therefore, the Project would not induce substantial unplanned population growth. Impacts would be less than significant, and no mitigation measures would be required.

5.14b Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

No Impact. The Project Site is currently developed with vacant school buildings and recreational facilities. Therefore, the Project would not displace any existing people or housing, or require construction of replacement housing elsewhere. There would be no impact, and no mitigation measures would be required.

Cumulative Impacts

Project construction is anticipated to generate a number of construction-related jobs during the construction phases, which is temporary and as-needed to complete a particular phase of the construction process. As a result, construction workers typically work at several job sites within the region throughout the year and rotate from job site to job site. Therefore, most construction workers would not be expected to relocate their place of residence as a consequence of working on the Project and related projects. As such, a substantial number of new permanent residents would not be generated as a result of the construction of the Project and related projects, and cumulative impacts associated with population growth due to temporary construction jobs would be less than significant.

Cumulative growth is typically focused on the SCAG 2024-2050 RTP/SCS 2050 horizon as SCAG projections incorporate regional policies and are based on long-term demographic trends that average out short-term variations. Although development of the proposed residential units for the Project may result in direct population growth from future residents relocating to the City, the Project would not induce substantial unplanned population growth exceeding regional population projects. Additionally, the Project would not displace existing residential uses, as the Project Site currently does not include any residential uses. Thus, Project population and housing impacts would be less than significant.

Similar to the Project, a majority of the related projects are infill development in an already urbanized area, near existing employers, housing, and retail destinations, and are also consistent with the 2020-2045 RTP/SCS' focus on integrated land use planning. With the related projects being infill projects with developed infrastructure, like the Project, cumulative development would not lead to unplanned growth through need for new roads, infrastructure, etc. The City's General Plan Housing Element for the 2021-2029 planning period has an objective of constructing 7,439 new units by 2029. While the related projects could cumulatively increase population in the area, such increases would be expected to be within the City's expected General Plan Housing Element RHNA goals and SCAG's 2024-2050 growth forecasts. The Project would not substantially contribute to additional population growth in the area. Thus, the Project would not contribute considerably to cumulative population and housing impacts, and cumulative population and housing impacts would be less than significant**.**

5.15 Public Services

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physical 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:				
a) Fire protection?			X	
b) Police protection?			X	
c) Schools?			X	
d) Parks?			X	
e) Other public facilities?			X	

Impact Analysis

5.15a Fire Protection?

Less Than Significant Impact. The LACFD provides fire, rescue, and emergency services to the City. LACFD Division VI, Battalion 20 is the primary responder for medical and fire emergencies within the City of Inglewood. Battalion 20's headquarters is Station 171, located at 141 W. Regent Street, and other fire stations are located throughout the City, including Stations 170, 172, and 173. Stations are staffed full-time and there are three Battalion Chiefs, one for each shift. Other fulltime staff for Battalion 20 include a Deputy Fire Chief, Assistant Fire Chief, and Community Services.[61] The nearest fire station to the Project Site is LACFD Station 170, located approximately 940 feet east of the Project Site at 10701 Crenshaw Boulevard.

Project construction may require temporary lane closures on streets adjacent to the Project Site. However, Project construction activities would be temporary and would not require the complete closure of any public streets during construction, and temporary construction activities would not impede the use of the streets for emergencies or access for emergency vehicles, However, in the event of temporary rerouting of traffic fronting the Project Site, **MM TRAF-2** will be implemented. **MM TRAF-2** includes measures to ensure adequate vehicle access and pedestrian access during construction periods and would include temporary traffic control during all construction activities encroaching on public rights of way to improve traffic flow and safety on public roadways.

During any temporary partial street closure, emergency access and traffic detours would be established in coordination with the City and would conform to City standards. Additionally, although Project construction activities would increase the number of construction workers on-site and could potentially increase the demand for fire protection during construction activities, such an increase would be temporary for the duration of construction activities.

[61] City of Inglewood Safety Element, 2022

As a residential project, the Project would increase demand on fire protection providers. Access into the community would be controlled via vehicular gates that would be activated electronically for residents and would include a callbox for access for visitors and deliveries as well as a Knox box for fire access for the LACFD. However, as substantiated in Response 4.14a, the Project would not induce substantial population growth; therefore, the Project is not anticipated to cause LACFD to construct new fire protection facilities. The Project would be required to comply with Municipal Code Chapter 6, Fire Prevention, which requires that there is adequate fire flow serving the Project Site, fire prevention and suppression measures, fire access, and a sufficient number of hydrants. The Project would also comply with LACFD requirements for emergency access, fire lanes, fire protection and building standards, and fire flow and requirements set forth in the 2022 California Fire Code and 2022 CBC. The Project Applicant would be required to submit site plans to LACFD and incorporate LACFD fire protection and suppression features that are appropriate for the Project. Compliance with the local, regional, and State regulations and requirements would ensure that Project operations would not require the expansion of the existing LACFD Station 170 or any other fire stations within the City. Therefore, the Project would not require new or physically altered fire protection facilities and would not result in adverse physical impacts in this regard. Impacts would be less than significant, and no mitigation measures would be required.

5.15b Police Protection?

Less Than Significant Impact. The Inglewood Police Department (IPD) provides police protection services to the City. IPD is headquartered in City Hall, located approximately two miles northwest of the Project Site at 1 West Manchester Boulevard. The IPD employs 186 sworn personnel and 92 civilian support personnel. The department consists of several divisions, including the Detective Bureau, Patrol Bureau, Support Services, and Administrative Services. The Inglewood Police Department operates multiple teams within each division.[62]

As discussed in Response 4.15a, Project construction could encroach on adjacent roadways and temporarily impact street access and traffic flow. However, Project construction would not require the complete closure of any public streets during construction, and temporary construction activities would not impede the use of the streets for emergencies or access for emergency vehicles. **MM TRAF-2** will be implemented that includes measures to ensure adequate vehicle access and pedestrian access during construction periods and would include temporary traffic control during all construction activities encroaching on public rights of way to improve traffic flow and safety on public roadways. Additionally, during Project construction, the Project Site would be secured with perimeter fencing. Furthermore, although Project construction activities would increase the number of construction workers on-site, such an increase would be temporary for the duration of construction activities.

As the Project includes residential units, the Project would increase demand on police protection providers. However, as substantiated in Response 4.14a, the Project would not induce substantial population growth; therefore, the Project is not anticipated to cause IPD to construct new police

[62] City of Inglewood Safety Element, 2022

protection facilities or expand existing facilities. Project operations would feature several security features. During Project operations, the Project Site would be fenced. Entryways into the community via West 104th Street and Lemoli Avenue would be controlled via vehicular gates. The gates would be activated electronically for residents and would include a callbox for visitor and delivery access. Access to each home would be provided via private driveways and alleys. Additionally, community and recreational rooms would be open for a limited number of hours each day for residents and guests, and residents would have access via an electronic key fob. Security design measures for semi-public and private spaces, which may include but not be limited to, the use of security cameras, and well-illuminated public and semi-public space designed with a minimum of dead space to eliminate areas of concealment and to locate building entrances in high-foot traffic areas. These security features would minimize the Project's demand for police services.

For the reasons expounded above, the Project would not require new or physically altered police protection facilities and would not result in adverse physical impacts in this regard. Project impacts would be less than significant, and no mitigation measures would be required.

5.15c Schools?

Less Than Significant Impact. A significant impact may occur if a proposed project includes substantial employment or population growth, which could generate demand for school facilities that exceeds the capacity of the school district responsible for serving the Project Site. The Project would be served by the IUSD.

IUSD's 2023-2024 student enrollment is 8,724 students.[63] Schools within IUSD serve approximately 7,354 students from transitional kindergarten (TK) to 12th Grade in 16 schools in the City and an adjacent section of unincorporated Los Angeles County (Ladera Heights). The IUSD's schools include TK through high school (P-12) education in four TK-6 schools, two P-8 schools, four TK-8 schools, one grades 7-8 middle school, two comprehensive high schools, one IUSD-operated TK-8 charter school, one IUSD-operated charter high school, and one alternative education high school (grades 9-12). In addition, the IUSD serves students in one child development center and one adult education school that are not included in the enrollment numbers. Numerous independent charter schools are also in the IUSD's service area.[64] IUSD continues to experience declining enrollment reportedly caused by both declining birthrates and the number of students who reside within district boundaries.[65]

On March 20, 2024, the IUSD County Administrator stated that Morningside High School among other schools, was proposed to close at the end of the 2024-25 school year due to underutilization of its facilities from declining enrollment. The IUSD is still considering this option. The other conventional high school in IUSD, Inglewood High School, will remain open. Inglewood High School is under design to be reconstructed and is being designed with the capacity to house

[63] Data Quest, California Department of Education, 2023-2024 Enrollment by Grade. Inglewood Unified.
[64] Fiscal Crisis and Management Assistance Team (FCMAT), Inglewood Unified School District July 2023 Progress Report, 2023, page 1, https://4.files.edl.io/2ada/11/16/23/224436-2493f689-1c58-4b6b-a7cd-e71c9b7e978f.pdf. Accessed July 27, 2024.
[65] Fiscal Crisis and Management Assistance Team (FCMAT), Inglewood Unified School District July 2023 Progress Report, 2023, page 1, https://4.files.edl.io/2ada/11/16/23/224436-2493f689-1c58-4b6b-a7cd-e71c9b7e978f.pdf. Accessed July 27, 2024

both existing conventional high schools. Inglewood High School is scheduled to be completed in January 2028.[66]

The Project would remove approximately 12,000 sf of buildings associated with the former Woodworth Elementary School campus, field areas and would construct a new residential development that would include 571 residential units and its associated amenities. As detailed in Response 4.14a, the Project is estimated to introduce approximately 1,662 residents to the Project Site. This population could therefore result in the increase of demand for school services. However, pursuant to Section 65995 of the California Government Code, the Applicant would be required to pay developer school impact fees to the IUSD. Furthermore, pursuant to the California Government Code Section 65995/California Education Code Section 17620, mandatory payment of the school fees established by the IUSD in accordance with existing regulations regarding the calculation and payment of such fees would, by law, fully address any indirect impacts to schools as a result of the Project.

Given that IUSD facilities are generally underutilized and are in the process of being appropriately right-sized to accommodate student enrollment projections (including completion of the reconstruction of Inglewood High School), IUSD facilities would have the capacity to support the potential increased demand in school services generated by the Project.

Therefore, the Project would not require new or physically altered school facilities and would not result in adverse physical impacts in this regard. Impacts would be less than significant, and no mitigation measures would be required.

5.15d Parks?

Less Than Significant Impact. A significant impact to parks may occur if implementation of a project includes a new or physically altered park or creates the need for a new or physically altered park, the construction of which could cause substantial adverse physical impacts. The City's Parks, Recreation and Community Services Department is responsible for the provision, maintenance, and operation of public recreational and park facilities and services within the City. The nearest parks to the Project Site are Center Park and Darby Park located approximately 0.34-mile southwest and 0.78-mile north of the Project Site, respectively. As previously discussed in Response 4.14a, the population is expected to increase by about 1,662 residents with the addition of 571 residential townhome units.

The existing fields and courts on the Project Site between Morningside High School and Woodworth-Monroe School which include approximately 16 acres are available for public use to be rented when not in use by the schools. While the use of this field and courts would be removed with the Project, it should be noted that use of the existing fields and courts were available only when not in use by the schools and are not official parks. The nearest parks to the Project Site are Center Park and Darby Park located approximately 0.34-mile southwest and 0.78-mile north of the Project Site, respectively.

[66] Correspondence with Jordan Miles, IUSD, 7/22/2024.

The Project's population growth would increase the use of existing recreation facilities, and neighborhood and regional parks. However, the Project would provide approximately 375,622 sf of open space which would include 20,799 sf of private open space and 354,823 sf of common open space.

Common open space would include landscaped common areas between buildings and resident-serving dog and pocket parks that would offset some use of existing park facilities. In addition, the Project would be required to pay for the development of park land outlined in Section 12-105.9 of the Municipal Code to compensate for the increased demand on recreational facilities due to the new residential development. Additionally, pursuant to Section 9-106 of the Municipal Code, the Project would be imposed a new dwelling unit construction tax, which would be deposited into the Park Fund to finance park and recreational facilities within the City. Furthermore, it is unlikely that the Project would house a large enough number of people to substantially deteriorate these types of facilities. Therefore, the Project would not require new or physically altered park facilities and would not result in adverse physical impacts in this regard. Impacts would be less than significant, and no mitigation measures would be required.

5.15e Other public facilities?

Less Than Significant Impact. A significant impact may occur if a project generates a demand for other public facilities (such as libraries) that exceeds the capacity available. The City is served by the Inglewood Public Library system, with the nearest library being the Crenshaw Imperial Branch Library located approximately 0.3-mile south of the Project Site at 1141 Crenshaw Boulevard. 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. Upon Project development, the Project would contribute to the financing of library services through property taxes and utility user taxes, which would mitigate the need for new or physical altered library facilities. Therefore, the Project would not require new or physically altered public facilities such as libraries and therefore would not result in adverse physical impacts in this regard. Impacts would be less than significant, and no mitigation measures would be required.

Cumulative Impacts

Fire Protection Services

The related projects would cumulatively generate, in conjunction with the Project, the need for additional fire protection and emergency medical services from the LACFD. Although there would be cumulative demand on LACFD services, cumulative impacts on fire protection and medical services would be reduced through regulatory compliance and site-specific design and safety requirements, similar to the Project. All related projects would be subject to review by the LACFD for compliance with CBC and California Fire Code regulations related to emergency response, emergency access, fire flow, and fire safety.

The protection of public safety is the first responsibility of local government, and local officials have an obligation to give priority to the provision of adequate public safety services which are typically financed through the City general funds. Through the City's regular budgeting efforts,

LACFD's resource needs would be identified, and monies allocated according to the priorities at the time. The Project, as well as the related projects, would also generate revenues to the City's General Fund (in the form of property taxes, utility user taxes, etc.) that could be applied toward the provision of fire services, as deemed appropriate by the City.

Furthermore, project-by-project traffic mitigation, fire station response times, and system wide upgrades to improve response times, and other requirements imposed by the LACFD are expected to help support adequate response times. 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. Additionally, there are six LAFCD Stations within 2.0 miles of the Project Site, including Station 170, which is approximately 940 feet from the Project Site, that would be able to accommodate multiple responses in proximity to the Project Site.

For the reasons substantiated above, the Project would not make a cumulatively considerable contribution to any cumulative impact related to the construction of new fire facilities.

Police Protection Services

The related projects would cumulatively generate, in conjunction with the Project, the need for additional police protection services from the IPD. It is expected that the related projects (particularly those of a larger nature) would be subject to review by the IPD on a project-by-project basis to ensure that sufficient security measures are implemented to reduce potential impacts to police protection services. Many of the related projects would also be expected to provide security design features for their residents and patrons per standard development practices for the given uses. Each related project would be subject to the City's routine construction permitting process, which includes a review by the IPD to ensure that sufficient security measures are implemented.

Furthermore, as mentioned above, the provision of adequate public safety services, including police services, are typically financed through the City's general funds. As with fire protection services, through the City's regular budgeting efforts, IPD's resource needs would be identified, and monies allocated according to the priorities at the time. The Project, as well as the related projects, would also generate revenues to the City's General Fund that could be applied toward the provision of police protection services, as deemed appropriate by the City. Through the process of compliance, the ability of the IPD to provide adequate facilities to accommodate future growth and maintain acceptable levels of service would be ensured. Therefore, the Project would not make a cumulatively considerable contribution to any cumulative impact related to police protection services.

Schools

The Project proposes to develop 571 residential units, which could generate demand for school facilities that exceeds the capacity of the school district responsible for serving the Project Site. However, pursuant to Section 65995 of the California Government Code, the Applicant and related projects would be required to pay developer school impact fees to Inglewood Unified School District. Furthermore, pursuant to the California Government Code Section

65995/California Education Code Section 17620, mandatory payment of the school fees established by IUSD in accordance with existing regulations regarding the calculation and payment of such fees would, by law, fully address any indirect impacts to schools as a result of the Project and related projects. Additionally, given that the IUSD is in the process of right-sizing its facilities due to underutilization, IUSD facilities would have capacity to accommodate the potential increased demand for school services generated by the Project and related projects.

Accordingly, in compliance with Government Code Section 65995/California Education Code Section 17620, impacts on public schools from related projects would remain less than significant with payment of school impact fees. Additionally, the ongoing right-sizing of IUSD facilities would be redesigned to accommodate the potential increased demand for school services generated by related projects that would include residential uses. Therefore, the Project would not contribute considerably to any cumulative impacts to schools or libraries.

Parks

A significant impact to parks may occur if implementation of a Project includes a new or physically altered park or creates the need for a new or physically altered park, the construction of which could cause substantial adverse physical impacts.

The Project proposes the development of 571 residential uses, which would accordingly increase demand for off-site park services. However, the Project would provide private and common open space that would offset some use of existing park facilities. While the use of this field and courts would be removed with the Project, it should be noted that use of the existing fields and courts were available for use to the public only when not in use by the schools and are not official parks. The nearest parks to the Project Site are Center Park and Darby Park located approximately 0.34-mile southwest and 0.78-mile north of the Project Site, respectively.

The Project's population growth would increase the use of existing recreation facilities, and neighborhood and regional parks. However, the Project would provide approximately 375,622 sf of open space which would include 20,799 sf of private open space and 354,823 sf of common open space.

The Project would also be required to pay a development impact fee and new dwelling unit construction tax, as required by the City, to compensate for and finance the increased demand on recreational facilities due to residential development. Moreover, related projects requiring discretionary approvals would be subject to CEQA review by the City which would address, in part, parks and recreational facilities service demand. As with the Project, cumulative projects and other projects developed within the City would be subject to the City's Parkland dedication, in-lieu fee an park development fee, (Section 12-105.9 of the Municipal Code) as applicable. Thus, the Project would not contribute considerably to cumulative parks and recreation impacts, and cumulative parks and recreation impacts would be less than significant.

Other Governmental Services

With respect to libraries, the Project would generate a direct residential population that could increase the demand for libraries and other governmental services. However, upon Project

development, the Project would contribute to the financing of library services through property taxes and utility user taxes, which would mitigate the need for new or physical altered facilities. Each related project would also generate revenues to the City's General Fund (in the form of property taxes, sales tax, business tax, transient occupancy tax, etc.) that could be applied toward the provision of enhanced library services and governmental facilities, as deemed appropriate. Therefore, the Project would not contribute considerably to any cumulative impacts to libraries and other governmental services, and such cumulative impacts would be less than significant.

5.16 Recreation

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) 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?			X	
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?			X	

Impact Analysis

5.16a 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. While the use of this field and courts would be removed with the Project, it should be noted that use of the existing fields and courts were available for use to the public only when not in use by the schools and are not official parks. The nearest parks to the Project Site are Center Park and Darby Park located approximately 0.34-mile southwest and 0.78-mile north of the Project Site, respectively**.** As previously discussed in Response 4.14a, the population is expected to increase by about 1,662 residents with the addition of 571 residential townhome units. This population growth would increase the use of existing recreation facilities, and neighborhood and regional parks. However, the Project would provide approximately 375,622 sf of private and common open space, which would include private balconies, landscaped common areas between buildings and resident-serving dog and pocket parks that would offset some Project residents use of the existing City park facilities. Regardless, the Project would be required to pay a development impact fee for the development of park land outlined in Section 12-105.9 of the Municipal Code to compensate for the increased demand on recreational facilities due to the new residential development. Additionally, pursuant to Section 9-106 of the Municipal Code, a new dwelling unit construction tax would be imposed upon the Project, which would be deposited into the Park Fund to finance park and recreational facilities within the City. Therefore, 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. Impacts would be less than significant, and no mitigation measures would be required.

5.16b 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?

Less Than Significant Impact. The Project would remove approximately 12,000 sf of buildings associated with the former Woodworth Elementary School campus, field areas and would construct a new residential development.

The component of Project construction that involves construction of recreational facilities will, in and of itself, have a less than significant adverse physical effect on the environment. As discussed in Response 4.16a, the Project is expected to increase the City population by approximately 1,662 residents. However, the Project would include recreational amenities for use by future residents, including two pocket parks with playground equipment and two club houses which would feature workout rooms, restrooms, flex space, recreational pools, open space, office area, and lounging areas. Additionally, the Project would be required to pay for the development of park land outlined in Section 12-105.9 of the Municipal Code to compensate for the increased demand on recreational facilities due to the new residential development. Pursuant to Section 9-106 of the Municipal Code, a new dwelling unit construction tax would be imposed upon the Project, which would be deposited into the Park Fund to finance park and recreational facilities within the City. Therefore, the Project would not include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment. Impacts would be less than significant, and no mitigation measures would be required.

Cumulative Impacts

As discussed above, development of the proposed residential units for the Project would increase the local population, thereby increasing the use of existing recreational facilities and neighborhood and regional parks. While the use of this field and courts would be removed with the Project, use of the existing fields and courts were available for use to the public only when not in use by the schools and are not official parks. The nearest parks to the Project Site are Center Park and Darby Park located approximately 0.34-mile southwest and 0.78-mile north of the Project Site, respectively. However, the Project would provide approximately 375,622 sf of private and common open space that would offset some use of existing park facilities. The Project would also be required to pay a development impact fee and new dwelling unit construction tax, as required by the City, to compensate for and finance the increased demand on recreational facilities due to residential development. Related projects requiring discretionary approvals would be subject to CEQA review by the City which would address, in part, parks and recreational facilities service demand. As with the Project, related projects would also be required to mitigate potential impacts to existing recreational facilities through the payment of a development impact fee and a new dwelling unit construction tax for park land, as applicable. Thus, the Project would not contribute considerably to cumulative parks and recreation impacts, and cumulative parks and recreation impacts would be less than significant.

5.17 Transportation

This Section is based on the Traffic Study prepared by Kimley-Horn on June 2025 and Vehicle Miles Traveled Screening Memorandum and TDM prepared by Kimley-Horn on June 2025, which are included in their entirety in **Appendix L-1: Traffic Study** and **Appendix L-2: Vehicle Miles Traveled Screening Memorandum and TDM.**

Environmental Issue	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?			X	
b) Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?		X		
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (for example, farm equipment)?			X	
d) Result in inadequate emergency access?		X		

Impact Analysis

5.17a 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 Project Site is located in the southeastern portion of the City. Regional access to the Project Site is provided by I-105, approximately 0.9 mile to the south of the Project Site, I-405, approximately 1.9 miles west of the Project Site, and I-110, approximately 2.9 miles east of the Project Site.

The Project would provide access for multiple modes of travel, including vehicles, pedestrians and cyclists. Vehicular ingress and egress for residents and visitors to the Project Site would be provided via two driveways along West 104th Street. One entry would align with Darby Avenue where Darby Avenue would be extended to cross West 104th Street and continue south into the Project site, and a second entry would align with Woodworth Avenue where Woodworth Avenue would be extended to cross West 104th Street into the Project Site. The entryways would be framed by landscaping and distinctive entry monuments and feature a turnaround for both vehicular and fire access. Access into the community would be controlled via vehicular gates that would be activated electronically for residents and would include a callbox for access for visitors and deliveries as well as a Knox box for fire access. A third driveway would be for residential ingress and egress only and would be located at the south boundary of the Project Site, connecting to Lemoli Avenue.

As discussed below, the Project would not conflict with any adopted policies, plans, or programs regarding alternative transportation because the Project would not conflict with a program plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.

City of Inglewood Mobility Plan

The 2019 City of Inglewood Mobility Plan provides the framework for addressing current and future infrastructure needs and establishes the vision, goals, policies, infrastructure enhancements and program requirements to improve the City's local transportation network and access to the regional transportation system. The relevant goals and objectives are identified below as well as the corresponding strategies to achieve the goals and objectives:

Goal No. 1: Sustainability and Environmental Considerations

Strategy 1.1 – Relieve Congestion. The City will apply Transportation Demand Management (TDM) programs aimed to reduce travel of single-occupancy vehicle trips during peak commute hours. Some key components of the TDM programs may include, but are not limited to, the following: a) offer employee incentives to walk, bicycle, or take transit to work, etc; b) provide bicycle-friendly facilities at employment areas; and c) facilitate carpool or vanpool programs for employees.

Strategy 1.2 – Alternative Fuel Vehicles

By increasing access to electric charging facilities and promoting the purchase of neighborhood electric vehicles, electric cars, or hybrid gas/electric cars the City will:

- Encourage the use of alternative fuel vehicles through marketing and education
- Incorporate electric vehicle charging stations and priority parking into developments

The performance measures used to assess and evaluate this strategy are the following:

- Number of electric charging stations within the City
- Improved air quality by reduction of greenhouse gases

Goal No. 3: Create an Efficient, Balanced, Multimodal Mobility Network

Strategy 3.1 – Complete Streets. Develop and enhance a pedestrian network that consists of elements that encourage walking to and from destinations, and first and last mile options. Provide bicycle infrastructure including, but not limited to, bike paths, bicycle lanes, hubs, and secure bicycle parking at major transit locations.

Goal No. 5: Safety – Maintain and promote safety for pedestrians, bicyclists, motorists, transit riders, trucks and delivery vehicles.

Strategy 5.1 – Promote Safer Transportation Network. Provide the most feasible, most appropriate multimodal infrastructure that is safe and accessible to every member of the community, especially vulnerable populations such as children and the elderly. Provide and

maintain adequate sidewalk widths and amenities to ensure a safe experience for pedestrians citywide.

Strategy 6.2 – Linkages between Transit and Land Use

Providing linkages between transit and land use entails encouraging land use and growth patterns that facilitate transit and non-motorized transportation including, but not limited to, provision of regional transit connections to major employment, commercial, and dense housing areas, and providing an employee shuttle program to reduce vehicles on the transportation network and providing neighborhood circulator systems. Transit improvements would be monitored to meet implementation targets. To encourage land use growth that facilitates transit the City will promote the following both the development of Transit Oriented Development Communities, housing and employment at transit-oriented development and infill development.

- Housing and Employment at Transit Oriented Development (TOD). Policies for increased densities with TOD up-zoning. Monitor growth of housing and employment near rail stations to meet the TOD targets.
- Infill Development. Infill refers to the development of vacant parcels within previously built areas. Infill development with transit connectivity to regional transit and along transit/multi-modal corridors. The City would identify and provide infill development database which would be monitored to meet implementation targets.

General Plan

Land Use Element

The City's General Plan Land Use Element, that was amended in 2016, identifies the following circulation goals and objectives that are consistent with the City's Mobility Plan:

- Promote and support adequate public transportation within the City and the region
- Develop modified traffic systems that will discourage through traffic from utilizing neighborhood streets,
- Develop a safe and adequate pedestrian circulation system which is barrier free for the handicapped.

Project Consistency

A major transit stop is defined in PRC Section 21064.3 as a stop containing a rail or bus rapid transit station, a ferry terminal served by bus or rail transit, or the intersection of two or more major bus routes with headways of 20 minutes or less during the morning and afternoon peak commute hours. Furthermore, pursuant to PRC Section 21155(b), this definition also includes major transit stops that are included in the applicable regional transportation plan. A high-quality transit corridor is defined in PRC Section 21155(b) as "[a] corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours."

The Project Site meets this definition, as it is located within one-half mile of a major transit stop, as well as two existing transit stops along a high-quality transit corridor.

The Project is located within a one-half mile of two existing transit stops along a high-quality transit corridor. One existing transit stop is located on the northwest and southeast corners of the intersection of Crenshaw Boulevard at Century Boulevard, approximately 0.4 miles northeast of the Project Site. This intersection services Metro Line 117 and Metro Line 210. Metro Line 117 runs west and east with stops located on the northwest and southeast corners of the intersection. Metro Line 210 runs north and south with stops located on the northeast and southwest corners of the intersection. Metro Line 117 operates between LAX and the City of Downey via Century Boulevard with 15-minute headways on weekdays during peak commute periods. Metro Line 210 operates between Hollywood/Vine Station and South Bay Galeria via mainly Crenshaw Boulevard with 10-minute headways on weekdays and 15-minute headways on weekends during peak commute periods.

The Project is also with one-half mile of a high-quality transit corridor (Crenshaw Boulevard). The closest noted existing transit stop is located on the southwest and northeast corners of the intersection of Crenshaw Boulevard at 104th Street, approximately 0.2 miles east of the Project Site, which services Metro Line 210. The Project Site is an infill development within an existing urban area, surrounded by residential, commercial, school and entertainment uses. The close proximity of transit and complementary land uses would serve to reduce vehicle trips and would be consistent with the Mobility Plan and Land Use Element goals and strategies. The Project Site is planned to promote pedestrian and bicycle use via internal connections within the Project Site. The walkways minimize the extent of pedestrian and bicycle interaction with vehicles at the Project Site and provide a comfortable, convenient, and safe environment which in turn can encourage use of active transportation modes. The Project Site is further planned to provide bicycle parking within clubhouses for visitors and residents, minimizing traffic on local roadways.

While the Project would increase daily trips to the Project Site, the Project would not alter the local circulation system, and residents and visitors would continue using the same local roadways for access to the Project Site. The proximity of transit and complementary land uses would serve to reduce vehicle trips and would be consistent with the Mobility Plan and Land Use Element goals and strategies.

The Project is therefore found to be in alignment with the City's General Plan, the City's Mobility Plan, goals related to circulation, pedestrian and bicycle safety, and appropriate and supportive active multimodal transportation infrastructure. Therefore, the Project would not conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities. Impacts would be less than significant, and no mitigation measures would be required.

5.17b Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?

Less Than Significant Impact with Mitigation Incorporated. Senate Bill 743 (SB 743) was approved by California legislature in September 2013. SB 743 requires changes to CEQA,

specifically directing the Governor's Office of Planning and Research (OPR) to develop alternative metrics to the use of vehicular "Level of Service" (LOS) for evaluating transportation projects. OPR has prepared a technical advisory (OPR Technical Advisory) for evaluating transportation impacts in CEQA and has recommended that VMT replace LOS as the primary measure of transportation impacts. The Natural Resources Agency has adopted updates to CEQA Guidelines to incorporate SB 743 that requires the use of VMT for the purposes of determining a significant transportation impact under CEQA.

A qualitative VMT assessment was conducted for the Project based on guidance by the City of Inglewood Transportation Impact Analysis Guidelines (TIA Guidelines, October 2022) and CEQA Guidelines Section 15064.3. The following screening criteria were evaluated for the Project.

City of Inglewood VMT Calculator Screening

Based on the City of Inglewood TIA Guidelines, no further VMT analysis is required if a residential project meets at least one of the following criteria:

- The project generates less than 250 net new daily trips.
- 100% of the dwelling units are set aside for low-income households.

The Project would generate 250 or more net new daily trips. Also, as noted in the Project description, 10% of dwelling units would be affordable for low income households.

City of Inglewood VMT Calculator

The City has developed a VMT Calculator tool used to estimate Project-specific daily vehicle trips, daily VMT, residential VMT per capita, and employment VMT per employee metrics for land use development projects. The City of Inglewood's VMT Calculator tool results indicate that the unmitigated residential VMT per capita for the proposed project is 14.68 which exceeds the City's threshold of 9.66 VMT per capita. A significant VMT impact would occur without mitigation.

To address this impact, a range of Transportation Demand Management (TDM) strategies was added into the Project. These measures, when modeled through the City of Inglewood VMT Calculator tool, result in a mitigated residential VMT per capita of 9.66, which meets the threshold of no significant impact.

Mitigation Measures

MM TRAF-1: A comprehensive Transportation Demand Management (TDM) Plan will be implemented by the Applicant with the objective of reducing VMT by encouraging the use of alternative transportation modes and decreasing reliance on single-occupancy vehicles.

The TDM Plan would include the following strategies as VMT measures:

- Unbundled Parking: Residential parking will be unbundled from the cost of housing and offered through separate agreements or lease addenda. At the time of certificate of occupancy, implementation may be

formalized via covenant and included as a condition of approval. This strategy may help incentivize households to reduce vehicle ownership, promoting use of shared mobility, walking, biking, and transit. The Project will charge a monthly parking fee consistent with market rates.

- Reduced Parking Supply. The Project proposes a parking supply reduction from the City's parking code. Based on the City of Inglewood parking code, the parking requirement for the Project is 1,332 parking spaces. The proposed parking supply for the Project is 1,122 parking spaces, resulting in a reduction of 210 parking spaces. A reduction in parking supply incentivizes residents to use other modes of transportation such as transit. The reduced supply may be feasible due to the Project's proximity to transit and supportive measures such as car-share, bike-share, and improved pedestrian connectivity.
- Promotions and Marketing. The Project would provide marketing and promotional material to at least 95% of residents to promote nearby transit routes and facilities and nearby multi-model infrastructure (bike lanes and sidewalks) to encourage residents to use multi-modal facilities and reduce VMT. This program may include:
    - Educational materials such as pamphlets provided to all residents during move-in
    - Ongoing email and mobile communications promoting car-share, bike-share, and transit
    - Incentives for new residents
- Car-Share. The Project would promote a phone application (app) for the community that allows residents to share information with regards to similar travel destinations to encourage residents to carpool to those similar destinations instead of using single-occupancy vehicles (SOV), thus reducing VMT.
- Bike-Share. The Project would provide a communal bike rack with communal bikes that residents can use to encourage bike riding to nearby destinations and would reduce VMT.
- Pedestrian Network Enhancements. The Project provides sidewalks to all residences and connects to the off-site sidewalk network, which encourages multi-modal transportation, as opposed to using vehicles, and thus reducing VMT.

Therefore, the Project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b). Impacts would be less than significant with mitigation.

5.17c 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. An impact would occur if the Project substantially increases roadway hazards due to a geometric design feature or the introduction of incompatible uses (i.e., farming equipment).

The Project would provide access for all modes of travel, including vehicles, pedestrians, and cyclists. Vehicular ingress and egress for residents and visitors to the Project Site would be

provided via two driveways along West 104th Street. One entry would align with Darby Avenue where Darby Avenue would be extended to cross West 104th Street and continue south into the Project site, and a second entry would align with Woodworth Avenue where Woodworth Avenue would be extended to cross West 104th Street into the Project Site. The entryways would be framed by landscaping and distinctive entry monuments and feature a turnaround for both vehicular and fire access. Access into the community would be controlled via vehicular gates that would be activated electronically for residents. A third driveway would be for residential ingress and egress only and would be located at the south boundary of the Project Site, connecting to Lemoli Avenue.

The Project would include a private internal road system. Morningside Drive would serve the Project Site as its east/west roadway and as a fire lane. North and south private roads would include Champions Drive, Darby Avenue, Lemoli Avenue and Woodworth Avenue, which are also fire lanes. Champions Drive would extend along the entire western boundary of the Project Site. Within the Project Site, Darby Avenue would begin at the northern Project Site boundary, near the northeastern corner, then extend south beyond Morningside Drive to become Lemoli Avenue. Lemoli Avenue would then continue south to connect to the existing Lemoli Avenue south of the Project Site. Within the Project Site, Woodworth Avenue would begin at the northern Project Site boundary, near the northwestern corner, then extend south to dead-end at Morningside Drive. Alleyways between homes would provide access for residents and the Fire Department.

The designs and dimensions of the driveways and internal roadways would be designed to comply with the City's current design requirements. The Project would not be placing incompatible uses such as farm equipment at the Project Site. The Project would not have the potential to increase hazards due to geometric design. Thus, the Project does not propose any improvements with potential to increase hazards due to incompatible uses. The Project would not substantially increase hazards due to a geometric design feature or incompatible uses. The Project would result in a less than significant impact in this regard, and no mitigation measures would be required.

5.17d Would the project result in inadequate emergency access?

Less Than Significant Impact with Mitigation Incorporated. Construction activities associated with the Project, are expected to be primarily contained within the Project Site boundaries. However, in the event of temporary rerouting of pedestrian traffic along sidewalks fronting the Project Site, **MM TRAF-2** and **MM TRAF-3** will be implemented. **MM TRAF-2** includes measures to ensure pedestrian safety along the affected sidewalks and temporary walkways (e.g., use of directional signage, maintaining continuous and unobstructed pedestrian paths). **MM TRAF-3**, provides measures to ensure the haul route scheduling would be sequenced to minimize conflicts with pedestrians, school buses and cars at the arrival and dismissal times of the school day.

The following mitigation measures are recommended to minimize potential impacts to schools and pedestrians during Project construction.

Mitigation Measures

MM TRAF-2: The Applicant shall prepare a detailed Construction Management Plan that shall include, but not be limited to, the following elements, as appropriate:

- Requiring workers and construction trucks to generally travel outside of the peak hours
- Prohibition of construction worker parking on nearby residential streets
- Temporary traffic control during all construction activities encroaching on public rights of way to improve traffic flow and safety on public roadways
- Scheduling of construction activities to reduce the effect on traffic flow on surrounding arterial streets
- Safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers as appropriate
- Scheduling of construction-related deliveries so as to generally occur outside the commuter peak hours
- Installation of appropriate traffic signs around the Project Site to ensure pedestrian, bicycle, and vehicle safety
- Haul route scheduling (see MM TRAF-3)
- Maintenance of pedestrian access during construction

MM TRAF-3: Haul route scheduling shall be sequenced to minimize conflicts with pedestrians, school buses and cars at the arrival and dismissal times of the school day. Haul route trucks shall not be routed past the school during periods when school is in session, especially when students are arriving or departing from the campus. Haul route scheduling will be included in the detailed Construction Management Plan noted in MM TRAF-1.

Implementation of the **MM TRAF-2** and **MM TRAF-3** would ensure that vehicle and emergency vehicle access would be maintained throughout the course of construction activities. Therefore, the Project would not result in in adequate emergency access. Impacts would be less than significant with mitigation incorporated.

Cumulative Impacts

Whether a project would have a potential cumulative VMT impact is determined by assessing its consistency with the SCAG RTP/ SCS. Projects that are consistent with the RTP/SCS in terms of location, density, and land-use assist in meeting the region's air quality and greenhouse gas goals.

The Project would be consistent with the 2020-2045 and 2024 -2050 SCAG RTP/ SCS as it is an infill development within one-half mile of a major transit stop, as well as two existing transit stops

along a high-quality transit corridor. Furthermore, the Project is located within close proximity to supporting land uses such as residential, institutional, and commercial uses. Because the Project is consistent with the RTP/SCS and has a less than a significant VMT impact, the Project would have a less than significant cumulative impact on VMT.

With regard to design hazards, the Project would not result in a significant impact. Each related project would be reviewed by the City to ensure compliance with the City's requirements relative to the provision of safe access for vehicles, pedestrian, and bicyclists, which would incorporate standards for adequate sight distance, sidewalks, crosswalks, and pedestrian movement controls to protect pedestrian and enhance bicycle safety. Furthermore, since modifications to access and circulation plans are largely confined to a project site and immediate surrounding area, a combination of impacts with other related projects that could potentially lead to cumulative impacts is not expected. Therefore, the Project's contribution to a cumulative impact associated with hazardous design conditions would not be considerable.

Also, with regard to emergency access, the Project would not result in a significant impact. The Project Site and the surrounding area are located in an established urban area with a surrounding roadway network that includes multiple routes in the area that are available for emergency vehicles and evacuation. Drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic.

As with the Project, related projects would be reviewed by the City to ensure compliance with the City's requirements relative to the provision of emergency access. Furthermore, since modification to emergency access and circulation plans are largely confined to a project site and immediate surrounding area, a combination of impacts with other related projects that could potentially lead to a cumulative impact is not expected. Therefore, the Project's contribution to cumulative emergency access impacts would not be considerable. Based on the above, the Project's contribution to cumulative transportation impacts would not be cumulatively considerable, and cumulative impacts would be less than significant.

Each cumulative project would be required to comply with City requirements regarding haul routes and would implement mitigation measures and/or include project characteristics, such as traffic controls and safety procedures, as part of a Construction Management Plan, to reduce potential traffic impacts during construction.

Therefore, the Project would not make a cumulatively considerable contribution to a cumulative impact on emergency access, and the cumulative impact would be less than significant.

5.18 Tribal Cultural Resources

This Section is based on AB 52 communications initiated by the City.

Environmental Issue	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 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				
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k); or		X		
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.		X		

Impact Analysis

5.18ai 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)?

Less Than Significant Impact with Mitigation Incorporated. Pursuant to the Assembly Bill 52 amendments to CEQA (2014), consultation letters were sent to the following California Native American tribes and contacts that have requested to be contacted about projects within the City's jurisdiction on October 10, 2024:

- Robert Dorame, Chairperson – Gabrieleno Tongva Indians of California
- Sandonne Goad, Chairperson – Gabrieleno/Tongva Nation
- Anthony Morales, Chairperson – Gabrieleno/Tongva San Gabriel Band of Mission Indians
- Charles Alvarez, Chairperson – Gabrieleno-Tongva Tribe
- Andrew Salas, Chairperson – Gabrieleno Band of Mission Indians – Kizh Nation

Of the tribes contacted, one response was received by the Gabrieleno Band of Mission Indians – Kizh Nation (Kizh Nation) on October 15, 2024 noting the project is within the tribe's ancestral territory and, as such, the tribe requested to partake in government-to-government consultation with regard to the project and its potential impact to TCRs. On that same date, the City responded to officially begin consultation with Kizh Nation. On October 21, 2025, Kizh Nation requested additional locational information related to the project, which the City provided on the same date. On October 23, 2025, Kizh Nation provided confidential information related to their connection to the Project area, concerns related to inadvertent discoveries of Tribal Cultural Resources (TCRs) as a result of the Project, and proposed mitigation measures to reduce impacts to TCRs. On May 8, 2025, the City provided written confirmation that Kizh Nation's request have been incorporated into mitigation measures and provided a copy of the measure for their record. This written communication also included confirmation that consultation has been concluded.

While consultation did not identify any TCRs that are listed, or eligible for listing, in the California Register of Historical Resources (CRHR) or a local register, concerns were expressed by the consulting Tribe, Kizh Nation, related to the potential for impacts to occur to such resources not previously identified within the Project area. As such, the Project would be required to implement **MM CUL-1**, **MM CUL-2**, **MM TCR-1**, and **MM TCR-2** which set forth procedures for the retention of a qualified archaeologist, a Native American monitor representing the Gabrieleno Band of Mission Indians – Kizh Nation, and inadvertent discovery of archaeological resources that are TCRs, respectively. In addition, the Project would require adherence to **MM CUL-3** and **MM TCR-3** related to the proper treatment of human remains, should they be encountered. Implementation of the measures would reduce Project impacts to TCRs to a less than significant level.

5.18aii 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: 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.

Less Than Significant Impact with Mitigation Incorporated. See above for an overview of consultation conducted with California Native American tribes, pursuant to the Assembly Bill 52 amendments to CEQA (2014). While consultation did not identify any specific TCRs for agency consideration, concerns were expressed by the consulting Tribe, Kizh Nation, related to the potential for impacts to occur to such resources not previously identified within the Project area. As such, the Project would be required to implement **MM CUL-1**, **MM CUL-2**, **MM TCR-1**, and **MM TCR-2** which set forth procedures for the retention of a qualified archaeologist, a Native American monitor representing the Gabrieleno Band of Mission Indians – Kizh Nation, and inadvertent discovery of archaeological resources that are TCRs, respectively. In addition, the Project would require adherence to **MM CUL-3** and **MM TCR-3** related to the proper treatment of human remains, should they be encountered. Implementation of the measures would reduce Project impacts to TCRs to a less than significant level.

Mitigation Measures

MM TCR-1: Retain a Native American Monitor Prior to Commencement of Ground-Disturbing Activities. The project applicant/lead agency shall retain a Native American Monitor from or approved by the Gabrieleño Band of Mission Indians – Kizh Nation. The monitor shall be retained prior to the commencement of any "ground-disturbing activity" for the subject project at all project locations (i.e., both on-site and any off-site locations that are included in the project description/definition and/or required in connection with the project, such as public improvement work). "Ground-disturbing activity" shall include, but is not limited to, demolition, pavement removal, potholing, auguring, grubbing, tree removal, boring, grading, excavation, drilling, and trenching. A copy of the executed monitoring agreement shall be submitted to the lead agency prior to the earlier of the commencement of any ground-disturbing activity, or the issuance of any permit necessary to commence a ground-disturbing activity.

The monitor will complete daily monitoring logs that will provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of ground-disturbing activities, soil types, cultural-related materials, and any other facts, conditions, discovered TCRs, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., (collectively, tribal cultural resources, or "TCR"), as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs will be provided to the project applicant/lead agency upon written request to the Tribe.

On-site tribal monitoring shall conclude upon one of the following (1) written confirmation to the Kizh from a designated point of contact for the project applicant/lead agency that all ground-disturbing activities and phases that may involve ground-disturbing activities on the project site or in connection with the project are complete; or (2) a determination and written notification by the Kizh to the project applicant/lead agency that no future, planned construction activity and/or development/construction phase at the project site possesses the potential to impact Kizh TCRs.

MM TCR-2: Unanticipated Discovery of Tribal Cultural Resource Objects (Non-Funerary/Non-Ceremonial). Upon discovery of any TCRs, all construction activities in the immediate vicinity of the discovery shall cease (i.e., not less than the surrounding 50 feet) and shall not resume until the discovered TCR has been fully assessed by the Kizh monitor and/or Kizh archaeologist. The Kizh will recover and retain all discovered TCRs in the form and/or manner the Tribe deems appropriate, in the Tribe's sole discretion, and for any purpose the Tribe deems appropriate, including for educational, cultural and/or historic purposes.

MM TCR-3: Unanticipated Discovery of Human Remains and Associated Funerary or Ceremonial Objects. Native American human remains are defined in PRC 5097.98 (d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, called associated grave goods in Public Resources Code Section 5097.98, are also to be treated according to this statute. If Native American human remains and/or grave goods are discovered or recognized on the project site, then Public Resource Code 5097.9 as well as Health and Safety Code Section 7050.5 shall be followed. Human remains and grave/burial goods shall be treated alike per California Public Resources Code section 5097.98(d)(1) and (2). Preservation in place (i.e., avoidance) is the preferred manner of treatment for discovered human remains and/or burial goods. Any discovery of human remains/burial goods shall be kept confidential to prevent further disturbance.

5.19 Utilities and Service Systems

This Section is based on the WSA, prepared by Todd Groundwater, November 2024, Due Diligence Report, prepared by D&D, April 22, 2022, and Sewer Area Study, prepared by D&D, November 1, 2023, which are included in their entirety in **Appendix N: Water Supply Assessment, Appendix O: Due Diligence Report,** and **Appendix P: Sewer Area Study.**

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
4) a) Require or result in the relocation or construction of new or expanded facilities concerning the following, the construction or relocation of which could cause significant environmental effects? i. Water, ii. Wastewater Treatment, iii. Stormwater Drainage, iv. Electric Power, Natural Gas, and Telecommunications.			X	
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?			X	
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?			X	
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?			X	
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?			X	

Impact Analysis

5.19a Require or result in the relocation or construction of new or expanded facilities concerning the following, the construction or relocation of which could cause significant environmental effects?

i. Water?

Less Than Significant Impact. As described in Response 4.10b, the City provides water services to the Project Site. The existing water system surrounding the Project Site includes 6-inch and 8-

inch water mains along West 104th Street and South 10th Avenue. The 6-inch water line specifically serves Inglewood Unified School District, and the 8-inch water line serves the residences north of the Project Site. Flow tests on West 104th Street and Yukon Avenue show a static pressure of 80 pounds per square inch (psi).[67]

During construction, water will be required intermittently for dust control, equipment cleaning, soil grading and preparation during the early phases of the Project. The latter phases of construction normally require less water usage. Since water usage during construction is typically less demanding than the water usage for the proposed Project, it is anticipated that existing water infrastructure would meet the limited, temporary water demand associated with construction of the Project, and that the water purveyor is able to provide water during construction.

To provide an estimation of existing water use, the WSA prepared for the Project (**Appendix N**) estimated that the vacant school site and all paved areas currently use no water. The remaining grass area was assumed to be irrigated only on sports fields, as observed in aerial imagery and evapotranspiration (ET) data. This is a conservative estimate, assuming less existing water use on-site, so that the net Project demand is a larger amount. The Project's existing average daily demand over this seasonally irrigated field area was estimated using 110 percent of the Los Angeles County Sanitation District's (LACSD's) sewage generation factor of 100 gallons per day (gpd) per 1,000 square feet for irrigated sports fields, golf courses, and public parks. This estimate is appropriate to account for any additional water demand for possible minor losses on-site, such as water use due to human consumption (cooking, drinking, watering indoor plants, evaporation), that would deviate from the LACSD sewage generation factors. As shown in **Table 36: Estimated Existing Water Demand,** existing water use over the entire Project Site is estimated at 16.5 acre-feet per year (AFY).[68]

[67] D&D Engineering, Inc., Due Diligence Report, 2022. Appendix O.
[68] Todd Groundwater, Water Supply Assessment.

Table 36: Estimated Existing Water Demand					
Land Use	**Size**	**Unit**	**Average Daily Sewage Generation (gpd/unit)[1]**	**Average Daily Demand (gpd)[2]**	**Average Annual Demand (AFY)[3]**
Seasonally Irrigated Field	134,125	Sf	0.1	14,753.8	16.5
Hardscape/Blacktop	106,139	Sf	0	0	0
Non-irrigated Field	523,000	sf	0	0	0
Total Existing Water Demand to be Removed				*14,753.8*	*16.5*

sf = square foot, gpd = gallons per day, AFY = acre-foot per year
1. Average Daily Sewer Flow factors from LACSD sewage generation factors.
2. Calculated sewer generation based on LACSD data with application of a 110 percent factor to estimate potable supply.
3. Total demand for an average year.
Source: Todd Groundwater, Water Supply Assessment, 2024.

Table 37: Estimated Proposed Water Demand shows the Project's estimated proposed water demand. The Project's estimated proposed water demand was calculated using sewage generation factors and water use factors from LACSD and Monterey Peninsula Water Management District (MPWMD), respectively. Water use factors via sewage generation are estimated as 110 percent of the sewer flow value provided by LACSD to account for any additional water demand that would deviate from the LACSD sewage generation factors. Factors from MPWMD were used for pool water demand, as LACSD does not provide an estimate; proposed water demand for all other proposed land uses used water use factors via sewer generation.

The future water demand for the Project is a conservative estimate because the residential units are estimated with the same water demand as a single-family home (260 gpd), but the residential units for the proposed Project are connected townhomes and expected to consume less water than a single-family home. Additionally, the Project would install an irrigation system that would include a variety of water conservation features including the use of a flow sensor at the point of connection that can detect possible leaks and shut the system down so system integrity can be ensured. The irrigation controller will incorporate SWAT that will allow automatic run times based on local weather conditions. The controller would also utilize a rain shut-off device. Shrubs and ground cover will be irrigated with drip tubing to reduce evaporation. The combination of these factors will ensure a sustainable landscape in the community that minimizes the use of limited water resources. Given the conservative water consumption rate for the proposed residential units and the implementation of various water conservation measures, the estimated water use using standard values is conservative, and the Project water demand will likely be less than estimated.

As shown in **Table 37**, total future Project water demand is expected to be approximately 190.8 AFY. The existing demand was estimated at 16.5 AFY. The net Project demand is therefore expected to be 174.3 AFY. As the Project's anticipated water demand is greater than the existing water demand of the Project Site, the Project could potentially impact surrounding water infrastructure.

Table 37: Estimated Proposed Water Demand					
Land Use	**Size**	**Unit**	**Average Daily Sewage Generation (gpd/unit)[1]**	**Average Daily Demand (gpd)[2]**	**Average Annual Demand (AFY)**
Single Family Home	571	home	260	163,306	182.9
Fitness Center with Showers	8,204	sf	0.6	5,415	6.1
Pools[3]	900	sf	0.2	161	0.2
Subtotal Projected Indoor Water Demand				*168,881*	*189.2*
Public Park and Landscaping	13,068	sf	0.1	1,437	1.6
Total Proposed Water Demand				*170,319*	*190.8*

sf = square foot, gpd = gallons per day, AFY = acre-foot per year
1. Average Daily Sewer Flow factors from LACSD sewage generation factors or MPWMD water use.
2. Calculated sewer generation based on LACSD data with application of a 110 percent factor to estimate potable supply.
3. Pool water use factor from MPWMD.
Source: Todd Groundwater, Water Supply Assessment, 2024.

To accommodate the anticipated increased water demand, the Project would construct new internal 8- and 10-inch domestic waterlines that would connect to the existing water main along West 104th Street. The Project would also install new fire water line systems that would connect to existing mainlines. Although the Project would require the construction of new internal water facilities, all proposed water facilities would be contained within the Project Site and would not encroach on surrounding existing water infrastructure. Additionally, the Project would be served by existing public water infrastructure, and upon installation of the proposed internal domestic and fire water lines, would not require the relocation of public water infrastructure.

For the reasons listed above, although the Project would require or result in the relocation or construction of new or expanded water facilities, the construction or relocation of such facilities would not cause significant environmental effects. Impacts would be less than significant, and no mitigation measures would be required.

ii. Wastewater Treatment?

Less Than Significant Impact. The City is within the jurisdictional boundaries of LACSD No. 5. According to the will serve letter provided by the LACSD, and included in **Appendix P**, the wastewater flow originating from the Project will discharge to the 12-inch Inglewood-Orange Avenue Trunk Sewer along 108th Street to the south of the Project Site, for conveyance to either or both the regional South Inglewood-Orange Avenue Trunk Sewer, located in Doty Avenue at 104th Street, or South Inglewood-Orange Avenue Trunk Sewer, located in Yukon Avenue at Imperial. The 18-inch diameter South Inglewood-Orange Trunk Sewer in Doty Avenue has a capacity of 3 million gallons per day (mgd) and conveyed a peak flow of 0.5 mgd when last measured in 2017. The 21-inch diameter South Inglewood- Orange Avenue Trunk Sewer in Yukon Avenue has a capacity of 4.7 mgd and conveyed a peak flow of 3.1 mgd when last measured in 2017. Wastewater from the Project Site would be treated at Joint Water Pollution Control Plant (JWPCP) in the City of Carson. The JWPCP currently provides primary and secondary treatment

for a design capacity of 400 mgd of wastewater, and an average flow of approximately 243.1 mgd.[69] All these wastewater facilities are owned and operated by LACSD.

Construction activities for the Project could result in temporary wastewater generation on-site. However, such generation would be temporary when compared with the wastewater generated by the Project. In addition, construction workers would typically utilize portable restrooms and hand wash areas, which are anticipated to utilize imported water and would not contribute to direct wastewater flows to the City's wastewater system. Thus, wastewater generation from Project construction activities is not anticipated to cause any measurable increase in wastewater flows.

Construction impacts associated with wastewater infrastructure would primarily be confined to trenching for miscellaneous utility lines and connections to public infrastructure. Installation of wastewater infrastructure will be limited to on-site wastewater distribution, including a proposed on-site 10-inch sewer pipe, as further described below; and minor off-site work associated with lateral connections to the existing LACSD sewer main. Any work that may affect services to the existing sewer lines or impacts to LACSD facilities or plant will be coordinated with LACSD. Furthermore, construction management and access plans would ensure safe pedestrian access as well as emergency vehicle access and safe vehicle travel. Moreover, when considering impacts resulting from the installation of any required wastewater infrastructure, all impacts are of a relatively short-term duration and would cease to occur once the installation is complete.

The Project Site is currently developed with existing recreational facilities within the Morningside High School campus and vacant school buildings within the former Woodworth Elementary School campus, which has been vacant since 2019. It is therefore conservatively assumed that the Project Site currently does not generate wastewater.

According to the Sewer Area Study prepared for the Project (**Appendix P**), based on LACSD wastewater generation factors, the average sewer flow from a single-family residential unit is 260 gallons per day (gpd). Using a 2.5 peak sewer factor, the peak sewer flow generated by the 571 proposed townhome units would be approximately 371,150 gpd or 0.574 cubic feet per second (cfs).

To accommodate the anticipated wastewater generation, the Project would install a new on-site 10-inch sewer pipe with a minimum slope of 0.32 percent. This new sewer pipe would have a half-full capacity of 0.58 cfs, which is greater than the projected peak sewer flow rate generated by the Project. Therefore, the proposed on-site 10-inch sewer pipe at minimum slope would have enough capacity to convey wastewater from the Project Site.[70] The Project would also be required to pay connection fees in compliance with the California Health and Safety Code.

Additionally, the Project's projected wastewater generation of approximately 371,150 gpd, or 0.37 mgd, would represent a minimal portion of the maximum capacity of the regional South Inglewood-Orange Avenue Trunk Sewer in Doty Avenue (approximately 12.4 percent), the regional South Inglewood-Orange Avenue Trunk Sewer in Yukon Avenue (approximately 7.9

[69] Appendix O: Sewer Area Study
[70] D&D Engineering, Inc., Sewer Area Study, 2023. Appendix O

percent), and the JWPCP (approximately 0.09 percent). Therefore, the Project would well be within the capacity of public wastewater treatment infrastructure and would not require the relocation or construction of such facilities.

Therefore, although the Project would require or result in the relocation or construction of new or expanded wastewater treatment facilities, the relocation or construction of such facilities would not cause significant environmental effects. Impacts would be less than significant, and no mitigation measures would be required.

iii. Stormwater Drainage?

Less Than Significant Impact. Refer to Response 4.10c concerning drainage patterns and stormwater drainage systems. As discussed in Response 4.10c, although the Project would require the construction of new BMPs, all proposed drainage improvements would be located within the Project Site and designed and constructed in compliance with existing regulations. As shown in **Table 17**, implementation of the proposed BMPs would mitigate the 50-year storm runoff to within the allowable limits per LACDPW and would not result in on- or off-site flooding. As such, the Project would not require or result in the relocation or construction of new or expanded off-site public stormwater facilities, and the Project would connect to existing off-site storm drain infrastructure, and no upgrades or expansion of such off-site facilities would occur with Project implementation.

The Project would not require or result in the relocation or construction of new or expanded stormwater facilities, the relocation or construction of such facilities would not cause significant environmental effects. Therefore, impacts would be less than significant, and no mitigation measures would be required.

iv. Electric Power, Natural Gas, and Telecommunications?

Less Than Significant Impact. The City's electrical power is provided by SCE, and natural gas is provided by SoCalGas. The City's telecommunications are provided by various companies. SCE, SoCalGas, and local telecommunications companies operate and maintain transmission and distribution infrastructure throughout the City. Refer to Responses 4.6a and 4.6b for further discussions concerning electricity and natural gas. The Project would include on-site connections to existing telecommunication services. The Project would not require or result in the relocation or construction of new or expanded off-site electric power, natural gas, or telecommunications facilities which could cause significant environmental effects. Therefore, impacts would be less than significant, and no mitigation measures would be required.

5.19b Would the Project have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry and multiple dry years?

Less Than Significant Impact. As described in Response 4.10b, the City of Inglewood, the water retailer for the Project Site, provides water supply across most of the City. The City's water supply includes potable groundwater and imported water, and non-potable recycled water. Groundwater is pumped from City-owned wells and imported water is purchased from the WBMWD through MWD. The City also purchases recycled water from WBMWD, which is used for landscape irrigation at City parks, cemeteries, and schools and other non-potable purposes.

The City of Inglewood 2020 Urban Water Management Plan (UWMP) includes an analysis of expected future water supply for the City. **Tables 38** through **40** show the expected supply and demand during each hydrologic year type with a 20-year projection from 2025 to 2045. The normal year was defined as being equivalent to the 2020 supply and demand, as shown in **Table 38: Future Water Supply and Demand Normal Year**. A single dry year was considered as having three percent higher demand than a normal year, as shown in **Table 39: Future Water Supply and Demand Single Dry Year**. A five consecutive year drought was considered to have a demand five percent higher than normal, as shown on **Table 40: Future Water Supply and Demand Multiple Dry Years.**

Table 38: Future Water Supply and Demand Normal Year

Normal Year	2025 (AFY)	2030 (AFY)	2035 (AFY)	2040 (AFY)	2045 (AFY)
Water Supply	12,000	12,000	12,000	12,000	12,000
Water Demand	10,962	11,041	11,145	11,268	11,405
Surplus	1,038	959	855	732	595

AFY = acre-foot per year
Source: Todd Groundwater, Water Supply Assessment, November 2024.

Table 39: Future Water Supply and Demand Single Dry Year

Single Dry Year	2025 (AFY)	2030 (AFY)	2035 (AFY)	2040 (AFY)	2045 (AFY)
Water Supply	12,000	12,000	12,000	12,000	12,000
Water Demand	11,291	11,372	11,479	11,606	11,747
Surplus	709	628	521	394	253

AFY = acre-foot per year
Source: Todd Groundwater, Water Supply Assessment, November 2024.

Table 40: Future Water Supply and Demand Multiple Dry Years

Multiple Dry Years		2025 (AFY)	2030 (AFY)	2035 (AFY)	2040 (AFY)	2045 (AFY)
First Year	Water Supply	12,000	12,000	12,000	12,000	12,000
	Water Demand	11,510	11,593	11,702	11,831	11,975
	Surplus	490	407	298	169	25
Second Year	Water Supply	12,000	12,000	12,000	12,000	12,000
	Water Demand	11,510	11,593	11,702	11,831	11,975
	Surplus	490	407	298	169	25
Third Year	Water Supply	12,000	12,000	12,000	12,000	12,000
	Water Demand	11,510	11,593	11,702	11,831	11,975
	Surplus	490	407	298	169	25
Fourth Year	Water Supply	12,000	12,000	12,000	12,000	12,000
	Water Demand	11,510	11,593	11,702	11,831	11,975
	Surplus	490	407	298	169	25
Fifth Year	Water Supply	12,000	12,000	12,000	12,000	12,000
	Water Demand	11,510	11,593	11,702	11,831	11,975
	Surplus	490	407	298	169	25

AFY = acre-foot per year

Source: Todd Groundwater, Water Supply Assessment, November 2024.

Tables 38 through **40** show the City expects to have a surplus of supply ranging from 1,038 AFY to 595 AFY over time in a normal year and 490 AFY in 2025 to 25 AFY over time in a multiple dry year period. It is noteworthy that the City and their wholesalers did not experience a water supply shortage during the 2012-2016 drought. According to the MWD's UWMP, water supplies are projected to remain at similar levels during multiple year droughts through 2045.

Therefore, the City has concluded that it will have sufficient water supply to fulfill demand in normal, single dry, and multiple dry years with a 20-year projection. To further increase their portfolio, the City has stated that they plan to purchase and store water in the West Coast Basin. The amounts to be supplied from these projects are not yet quantified, pending further development of purchase agreements, but the base agreement water supply will continue to be available. As documented in its UWMP, the City has a portfolio of supplies to rely on during normal and dry years.

The reliability of this supply is evidenced by the fact that the City was supplied with 100 percent of its demand during the most recent multi-year drought. Additionally, recent water use shows that conservation measures implemented by the City were successful in reducing demand in the service area.

The City's 2020 UWMP did not specifically include the Project in its water demand estimates, as future demand was generally estimated based on population and not land use. Nonetheless, the UWMP anticipates some residential, commercial, and institutional growth in the service area that is applicable to the Project. In addition, the SCAG population estimates for the City are much larger than those used in the UWMP. These larger SCAG population estimates were used by WBMWD and MWD to forecast regional demand for imported water and show sufficiency.

As documented in the City's 2020 UWMP, water demand estimates for residential customers are projected to increase by 783 AFY from 2020 to 2045. As discussed in Response 4.19a.i, the net water demand for the Project is estimated at 174.3 AFY; this conservatively assumes little existing water demand on-site and no additional water conservation.

While the City's UWMP does not explicitly include this Project in their future demand projections, the Project water demand can be accommodated within the planned growth in the respective UWMPs of the City and its wholesalers. Therefore, the City would have sufficient water supplies available to serve the Project and reasonably foreseeable development. Impacts would be less than significant, and no mitigation measures would be required.

5.19c 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 projected demand in addition to the provider's existing commitments?

Less Than Significant Impact. As demonstrated in Sections 4.19a.ii and Sections 4.19a.iii, there is existing treatment capacity in the region for estimated Project wastewater generation. Project development would not significantly impact LACSD wastewater treatment facility capacity. The Project would not require or result in the relocation or construction of new or expanded off-site

sewer facilities, the construction or relocation of which could cause significant environmental effects. Therefore, impacts would be less than significant, and no mitigation measures would be required.

5.19d 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. Consolidated Disposal Services (CDS), a subsidiary of Republic Services, Inc., provides waste hauler services in the City, including the Project Site. The City primarily disposes waste at various landfills throughout Los Angeles County.

In 2021, the total amount of solid waste disposed of at in-county Class III landfills, permitted inert landfills, transformation facilities, and out-of-County landfills was approximately 11.5 million tons. The remaining permitted disposal capacity for the County's Class III (nonhazardous solid waste) landfills is estimated at approximately 187.9 million tons as of July 2021, the most recent data available.

As of July 2021, waste from the County was disposed of primarily at the Sunshine Canyon and Chiquita landfill sites. Of the 187.9 million tons of remaining capacity within the County, 52.22 million tons, or approximately 28 percent, was located at Sunshine Canyon landfill, which has a remaining life of 16 years; and 51.63 million tons, or approximately 28 percent, was located at the Chiquita Canyon landfill, which has a remaining life of 26 years. In addition to in-County landfills, out-of-County disposal facilities are also available to the County.[71]

However, effective January 1, 2025, Chiquita Canyon Landfill closed active waste disposal operations. The County will conduct a comprehensive assessment of the closure's implications, including its effect on waste disposal operations.[72] Nevertheless, given that the total remaining permitted disposal capacity for the County's landfills without Chiquita Canyon landfill would be approximately 136.3 million tons and that out-of-County disposal facilities also continue to have availability to accept solid waste, the remaining County landfills have sufficient capacity to accommodate solid waste even with the closure of the Chiquita Canyon Landfill.

As discussed in County of Los Angeles Department of Public Works, County of Los Angeles Countywide Integrated Waste Management Plan: 2021 Annual Report, a shortfall in solid waste disposal capacity within the County is not anticipated to occur within the next 15 years under current conditions. The County anticipates that future disposal needs over the next 15 years can be adequately met through increased waste reduction and diversion efforts, development of alternative technologies, export of waste to out-of-County facilities, the Waste-by-Rail system to Mesquite Regional Landfill, in Imperial County, and if found to be environmentally sound and technically feasible, the expansion of in-County Class III landfill capacity.

[71] County of Los Angeles Department of Public Works, County of Los Angeles Countywide Integrated Waste Management Plan: 2021 Annual Report, December 2022, Appendix E-2. https://pw.lacounty.gov/epd/swims/ShowDoc.aspx?id=17450&hp=yes&type=PDF, accessed February 17, 2025.

[72] KTLA, Castaic landfill to close after years of odor complaints, Southern California landfill to close after years of odor complaints, accessed February 17, 2025.

Project construction would result in generation of construction and demolition (C&D) debris such as metal scrap, lumber, concrete which will be collected and diverted to a C&D debris facility for materials to be recycled and/or discarded. As shown in **Table 41: Estimated Solid Waste Generation**, C&D of the Project is estimated to generate approximately 545,849 tons of C&D debris. This estimation is a conservative estimate as it assumes that no reductions in waste generation would occur due to recycling.

Table 41 shows the amount of solid waste that would be produced by Project operations.

Table 41: Estimated Solid Waste Generation

Land Use	Size	Waste Generation Rate	Waste Generated (lbs)	Waste Generated (tons)
Demolition				
School	12,000 ksf	46 tons/ksf	1,085,600,000 lbs	542,800 tons
Construction[1]				
Residential	754.452 ksf	4,020 lbs/ksf	3,032,897 lbs	1,516 tons
Clubhouse	762.684 ksf	4,020 lbs/ksf	3,065,990 lbs	1,533 tons
Total C&D Waste			*1,091,698,887 lbs*	*545,849 tons*
Operations[2]				
Single Family Residential	571 du	10 lbs/du/day	5,170 lbs	2.86 tons
Total Operational Waste			*5,170 lbs/day*	*2.86 tpd*

ksf = thousand square feet; lbs = pounds; tpd = tons per day, du = dwelling unit

1. The construction waste generation rate of 4,020 lb/ksf is based on the U.S.EPA, Characterization of Building-Related Construction and Demolition Debris in the United States, Table A-2, June 1998.
2. Generation factors provided by the CalRecycle website, refer to Estimated Solid Waste Generation Rates, https://www2.calrecycle.ca.gov/WasteCharacterization/General/Rates. Accessed June 3, 2024.

Residual wastes such as trash packing materials, and plastics could require disposal at landfill. Solid waste generated by construction and operation of the Project could be accommodated by the County's available regional landfills, as discussed above. Disposal and recycling of the demolition and construction debris would be required to comply with all federal, State, and local regulations. All construction activities would be subject to conformance with relevant federal, State, and local requirements related to solid waste disposal. The Project would be required to comply with the California Integrated Waste Management Act of 1989 (AB 939), which requires that at least 50 percent of waste produced is recycled, reduced, or composted and is included in Section 7-50 of the Municipal Code, Solid Waste Ordinance and Section 7-53 of the Municipal Code, Mandatory Organic Waste Disposal Reduction Ordinance, which would achieve compliance with State law.

As detailed in **Table 41**, Project operations would generate approximately 2.86 tons per day (tpd). The estimated amount of solid waste is conservative because the waste generation factors do not account for recycling or other diversion measures. The annual amount of solid waste generated by the Project would represent a minor amount of the estimated 137 million tons of

remaining disposal capacity at the County's Class III landfills.[73] As such, the solid waste generated by the Project would be accommodated by the County's landfills that serve the Project Site.

During operation, the Project would be required to comply with CalRecycle's waste diversion rate target of 50 percent of the waste stream. The Project would also be subject to AB 1826, which requires businesses to provide separate recycling bins for organic waste. Therefore, the Project would be subject to compliance with the CALGREEN Code, other State regulations, and City regulations regarding solid waste management and reduction. As such, the Project would not 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. Impacts would be less than significant, and no mitigation measures would be required.

4.19e Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Less Than Significant Impact. See Response 4.19d above.

Cumulative Impacts

Water and Water Supply

All of the related projects are subject to City review to assure that the existing public utility facilities would be adequate to meet the domestic water and fire water demands of each project. Developers are required to improve facilities where appropriate and development cannot proceed without appropriate verification and approval by the City of Inglewood. Required improvements by related projects if they should occur, would be limited to minor, local improvements. Such improvements require only minor construction with very limited short-term construction impacts on traffic and perhaps noise. As noted above, the Project would not require improvements to local mainlines.

The City, as a public water service provider, is required to prepare and periodically update an UWMP to plan and provide for water supplies to serve existing and projected demands within its jurisdiction. The UWMP prepared by the City is based on the growth projections that are provided in the 2020-2045 SCAG RTP/SCS, which is updated on 4-year cycles to account for changes in growth rates, and which accounts for existing development within the City, as well as projected growth anticipated to occur through redevelopment of existing uses and development of new uses. Each of the related projects would need to be consistent with the SCAG RTP/SCS projections in order to be accounted for in the City's UWMP current and projected available water demand. As the City's UWMP is based on growth projections in the SCAG RTP/SCS, no significant cumulative water supply impact is anticipated from cumulative development.

As discussed above, the Project's net demand on water supplies would fall within the available and projected water supplies projected in the City's UWMP. Related projects would be required to provide local connections subject to review for service availability, subject to the City water

[73] County of Los Angeles Department of Public Works, Los Angeles County Integrated Waste Management Plan 2021 Annual Report, December 2022, page 22, https://dpw.lacounty.gov/epd/swims/News/swims-more-links.aspx?id=4#. Accessed August 26, 2024.

system rules and requirements. Therefore, cumulative impacts on the relocation or construction of new or expanded water facilities and water supply would be less than significant.

Wastewater Treatment

The Project would result in the additional generation of sewer flow. However, as discussed above, to mitigate the Project's potential impacts to the LACSD sewer system, the Project would be required to pay connection fees in compliance with the California Health and Safety Code. Similarly, future projects connecting to the same sewer system would also be required to pay connection fees to LACSD prior to commencement of operation of the projects. As with the Project, all related projects in the City would be subject to the provisions of the Municipal Code requiring provision of on-site infrastructure, improvements to address local capacity issues and payment of fees for future sewerage replacement and/or relief improvements. If system upgrades are required as a result of a given project's additional flow, arrangements would be made between the related projects and LACSD to construct the necessary improvements.

Wastewater generated by the Project would be conveyed via the existing wastewater conveyance systems for treatment at the JWPCP. As previously stated, the existing design capacity of the JWPCP is approximately 400 mgd with an existing average daily flow of approximately 243.1 mgd. The estimated wastewater generation increase of the Project would be 371,150 gpd, or 0.37 mgd, which represents less than one percent of the available capacity in the JWPCP. The related projects would also be required to coordinate with LACSD to mitigate any potential impacts to LACSD-owned wastewater infrastructure. Therefore, cumulative impacts on the relocation or construction of new or expanded wastewater treatment facilities would be less than significant.

Stormwater Drainage

As described in **Section 5.10, Hydrology and Water Quality**, above, in accordance with City and County requirements, the Project and related projects would be required to implement BMPs to manage stormwater runoff in accordance with applicable regulations. Therefore, cumulative impacts on the relocation or construction of new or expanded wastewater treatment facilities would be less than significant.

Electric Power, Natural Gas, and Telecommunications

Due to shared urban infrastructure, the Project and related projects would cumulatively increase energy and telecommunication service demand on the local energy and telecommunications infrastructure. However, as discussed above, sufficient infrastructure capacity is available to accommodate the Project. Additionally, as with the Project, related projects would be reviewed by the City to ensure that sufficient capacity is available or additional improvements are made to provide capacity prior to construction. Therefore, cumulative impacts on the relocation or construction of new or expanded electric power, natural gas, and telecommunications facilities would be less than significant.

Solid Waste

The Project in conjunction with related projects would increase the need for solid waste disposal during their respective construction and operation periods. However, with the implementation of solid waste policies and objectives intended to help achieve the requirements of AB 939 and the City's 50-percent diversion goal, it is expected that the Project and related projects would not substantially reduce the projected timeline for Sunshine Canyon Landfill to reach capacity. Therefore, cumulative impacts regarding the generation of solid waste in excess of State or local standards, and compliance with federal, State, and local management and reduction statutes and regulations related to solid waste would be less than significant.

5.20 Wildfire

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?			X	
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?			X	
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?			X	
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?			X	

Impact Analysis

5.20a If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

5.20b If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project, 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?

5.20c If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project 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?

5.20d If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project 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?

Less than Significant Impact. See Response 4.9g. According to CAL FIRE, the Project Site is not within or near a State Responsibility Area or a Very High Fire Hazard Severity Zones (VHFHSZ).[74] The nearest VHFHSZ is located approximately 4.3 miles northwest of the Project Site. The Project Site is relatively flat and developed with urban uses, which precludes factors such as slopes or strong winds from exacerbating fire risk. The Project is located on an existing developed site and would connect to existing utilities and would not require the installation or maintenance of infrastructure that may exacerbate fire risk. Post-fire impacts such as drainage changes and landslides would not occur as the Project Site and its surroundings are highly urbanized and mostly flat and do not have any steep slopes or hillsides that would be susceptible to landslides or flooding. Therefore, the Project would result in less than signifiant impacts related to wildfire, and no mitigation measures would be required.

Cumulative Impacts

Neither the Project Site nor any of the sites of the related projects are located near or within the boundaries of a State Responsibility Area or land classified as VHFHSZ. Therefore, no cumulative impacts related to this issue would occur.

[74] California Department of Forestry and Fire Protection. Fire Hazard Severity Zone Viewer, https://experience.arcgis.com/experience/03beab8511814e79a0e4eabf0d3e7247/. Accessed May 23, 2024.

5.21 Mandatory Findings of Significance

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Does the Project:				
a) 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?		X		
b) 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 the past projects, the effects of other current projects, and the effects of probable future projects.)			X	
c) Have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?		X		

Impact Analysis

5.21a 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?

Less Than Significant With Mitigation Incorporated.

The preceding analysis does not reveal any significant immitigable impacts to the environment. The Project Site is located within a highly urbanized area. There is no Habitat Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plan which applies to the Project. No wildlife corridors, native wildlife nursery sites, or bodies of water in which fish are present are located on the Project Site or in the surrounding area.

However, the Project Site and parkway does include trees that could support nesting birds. Migratory nongame native bird species are protected by international treaty under the Federal MBTA of 1918 (50 C.F.R. Section 10.13). Sections 3503, 3503.5, and 3513 of the California Fish and Game Code prohibit take of all birds and their active nests including raptors and other migratory nongame birds (as listed under the Federal MBTA).

Construction of the Project would include removal and replacement of 70 on-site trees. The removed trees would be replaced per City of Inglewood Municipal Code and its stipulated requirements, and the Project will plant approximately 300 trees featuring a diverse range of species.

To the extent feasible, tree and vegetation removal would take place outside of the general avian breeding season; however, if these activities occur within this season, the Applicant and construction contractor(s) would be required to comply with federal law and the MBTA. In compliance with federal law, a nesting bird survey would be performed by a qualified biologist within 72 hours of any construction activities including ground disturbance, tree removal or vegetation trimming during the nesting season. If active nests are identified during the survey, the qualified biologist will establish appropriate measures to avoid impacts on active nests, which may include a buffer around designated nests or other avoidance measures. The biologist will continue to monitor the nest throughout the duration of the construction activities within the vicinity of the nest, and the measures will remain in place until it has been determined the young have fledged or the nest has been abandoned.

Compliance with the laws will be effective in mitigating any increased effects during breeding season. Due to the Project's location in a highly developed urban area, the are no likely candidate, sensitive, or special-status species. With compliance with applicable laws and regulations, the Project would not have a substantial adverse effect on any nesting birds. Impacts would be less than significant, and no mitigation measures would be required.

The Project would not eliminate important examples of the major periods of California history or prehistory. As discussed in **Section 5.5, Cultural Resources**, there would be no direct or indirect impacts to historical resources. With the Project's implementation of **MM CUL-1** and **MM CUL-2** impacts to archaeological resources would be reduced to a less than significant level. Impacts to human remains would be less than significant with implementation of **MM CUL-3.**

As discussed in Section **5.7, Geology and Soils**, excavation for the Project has potential to encounter sediments with paleontological resources. As such, in order to mitigate potential impacts to paleontological resources, the Project would incorporate **MM GEO-1** through **MM GEO-4**, which address procedures regarding the unanticipated discovery of paleontological resources during ground-disturbing activities. Therefore, following compliance with **MM GEO-1** through **GEO-4**, the Project's potential impacts to paleontological resources would be reduced to a less than significant level.

While tribal consultation did not identify any TCRs that are listed, or eligible for listing, in the CRHR or a local register, concerns were expressed by the consulting Tribe, Kizh Nation, related to the potential for impacts to occur to such resources not previously identified within the Project area. As such, the Project would be required to implement **MM CUL-1**, **MM CUL-2**, **MM TCR-1**, and **MM TCR-2** which set forth procedures for the retention of a qualified archaeologist, a Native American monitor representing the Gabrieleno Band of Mission Indians – Kizh Nation, and inadvertent discovery of archaeological resources that are TCRs, respectively. In addition, the Project would require adherence to **MM CUL-3** and **MM TCR-3** related to the proper treatment

of human remains, should they be encountered. Implementation of the measures would reduce Project impacts to TCRs to a less than significant level.

Overall, based on the preceding analysis of potential impacts, no evidence is presented that the Project would degrade the quality of the environment, with incorporation of mitigation measures.

5.21b 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 the past projects, the effects of other current projects, and the effects of probable future projects.)

Less Than Significant Impact. CEQA requires that the analysis of potential project impacts include cumulative impacts. CEQA defines cumulative impacts as "two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts."[75] This analysis of cumulative impacts need not be as in-depth as the analysis of the Project's impacts, but instead is to "be guided by the standards of practicality and reasonableness."[76]

As listed in **Appendix Q: Related Projects List** and Map **Related Projects**, the City identified 20 related projects within an approximately 0.5-mile radius of the Project Site and Project Site intersections.

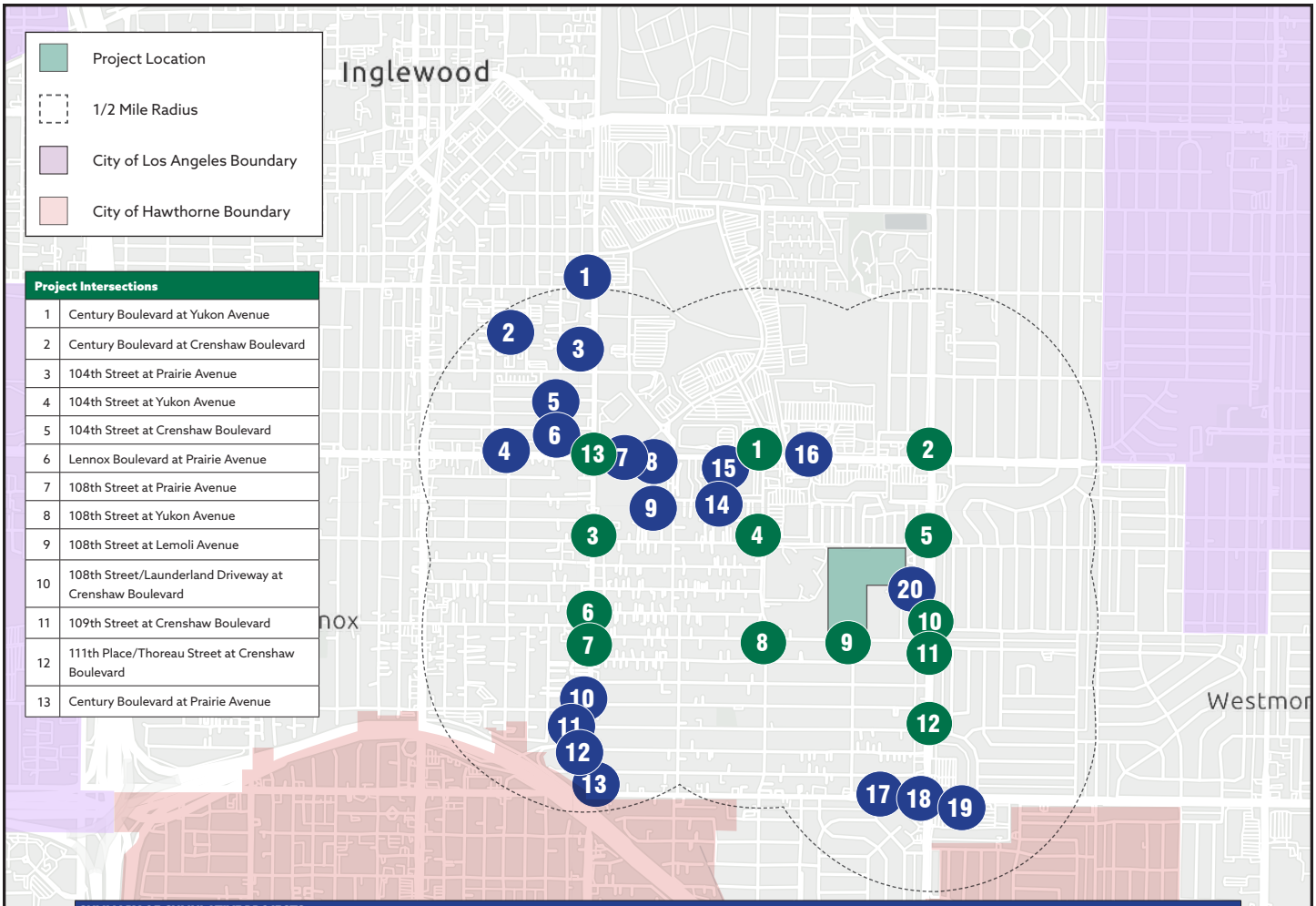
The cumulative analyses for each environmental issue in this Initial Study are provided following the assessments of Project impacts. The related projects are utilized to analyze cumulative impacts associated with Project implementation discussed above. As described above, due to the distance of most of the related projects from the Project Site and the physical conditions in the vicinity of the Project Site, and with the incorporation of the regulatory compliance measures and mitigation measures previously identified in this IS, the Project would not have impacts that are individually limited but cumulatively considerable. Therefore, cumulative impacts would be less than significant.

5.21c Does the project have environmental effects which will cause substantial adverse effects on human beings, directly or indirectly?

Less Than Significant Impact With Mitigation Incorporated. As discussed in the respective sections, the Project would have no potentially significant environmental impacts that would not be reduced to less than significant following compliance with the established regulatory framework and/or recommended mitigation measures.

The Project would not cause substantial adverse effects on human beings directly or indirectly. Therefore, the Project's impacts concerning adverse environmental effects on human beings would be less than significant with mitigation incorporated.

[75] State CEQA Guidelines, 14 California Code of Regulations, § 15355, et seq.
[76] Ibid.



Project Intersections	
1	Century Boulevard at Yukon Avenue
2	Century Boulevard at Crenshaw Boulevard
3	104th Street at Prairie Avenue
4	104th Street at Yukon Avenue
5	104th Street at Crenshaw Boulevard
6	Lennox Boulevard at Prairie Avenue
7	108th Street at Prairie Avenue
8	108th Street at Yukon Avenue
9	108th Street at Lemoli Avenue
10	108th Street/Launderland Driveway at Crenshaw Boulevard
11	109th Street at Crenshaw Boulevard
12	111th Place/Thoreau Street at Crenshaw Boulevard
13	Century Boulevard at Prairie Avenue

SUMMARY OF CUMULATIVE PROJECTS

Project #	Location	Land Use	Quantity	Unit	Trip Generation Estimates						
					Daily	AM Peak Hour			PM Peak Hour		
						In	Out	Total	In	Out	Total
Existing Use											
20	10711 S 10th Ave	Child Development Center	110	Student	450	45	40	85	41	46	87
Proposed Use											
1	901 S Prairie Ave	Low-Rise Residential w/ Ground-Floor Commercial	40	DU	138	4	14	18	10	4	14
2	555 W Hardy St	Hospital Renovation									
3	1050 S Praire Ave	Hollywood Park Project Phase 1 - Retail	890	KSF	32,939	464	284	748	1,452	1,574	3,026
3	1050 S Praire Ave	Hollywood Park Project Phase 1 - Multifamily Housing	2,500	DU	11,350	213	713	926	595	380	975
3	1050 S Praire Ave	Hollywood Park Project Phase 1 - Office	780	KSF	8,455	1,044	142	1,186	191	932	1,123
3	1050 S Praire Ave	Hollywood Park Project Phase 1 - Hotel	300	Room	2,397	77	61	138	90	87	177
3	1050 S Praire Ave	Hollywood Park Project Phase 1 - Open Space	25	Acre	110	5	4	9	4	5	9
3	1050 S Praire Ave	Hollywood Park Project Phase 1 - Civic Site	4	Acre	20	1	1	2	1	1	2
4	4200 Century Blvd	High-Rise Residential w/ 1st floor Comm'l	11	Occ. DU	*	*	*	3	*	*	2
4	4200 Century Blvd	Hotel	293	Room	2,341	76	59	135	88	85	173
5	616 - 620 99th St	Affordable Housing	20	DU	96	2	5	7	5	4	9
6	4041, 4049-4055 W Century Blvd	Hotel	142	Room	1,135	37	29	66	43	41	84
7	3900 W Century Blvd	Hotel Renovation									
8	3846 W Century Blvd	Warehousing	335	KSF	573	44	13	57	17	44	61
9	3820 102nd St	Hotel	174	Room	1,390	45	35	80	52	50	102
10	11111 S Prairie Ave	Hotel	120	Room	959	31	24	55	36	35	71
11	11143 S Prairie Ave	Hotel	104	Room	831	27	21	48	31	30	61
12	11227 S Praire Ave	Multifamily Housing (Mid-Rise)	440	DU	1,998	37	125	162	105	67	172
13	11312 S Praire Ave	Fast-Food Restaurant w/ Drive-thru	3.7	KSF	1,730	84	81	165	64	59	123
14	3700 102nd St	Warehousing	79	KSF	136	10	3	13	4	10	14
15	3640 W Century Blvd	Hotel	150	Room	1,199	39	30	*	45	43	88
16	Century Blvd / Club Dr	Electronic Billboard									
17	3209 Imperial Hwy	Multifamily Housing (Low-Rise)	20	DU	135	2	6	8	6	4	10
18	Imperial Hwy / Crenshaw Blvd	Residential Multifamily Housing (Mid-Rise)	1,534	DU	6,962	130	437	567	365	233	598
18	Imperial Hwy / Crenshaw Blvd Retail	Shopping Center (>150k)	188.4	KSF	6,971	98	60	158	307	333	640
18	Imperial Hwy / Crenshaw Blvd Office	General Office Building	22.6	KSF	244	30	4	34	6	27	33
19	2616 - 2878 W Imperial Hwy	Strip Retail Plaza (<40k)	13	KSF	708	18	12	30	43	43	86
20	10711 S 10th Ave	Child Development Center	192	Student	785	79	70	149	71	80	151
Total Project Trips					**83,152**	**2,552**	**2,193**	**4,679**	**3,590**	**4,125**	**7,717**

KSF = Thousand Square Feet, DU = Dwelling Units, ADT = Average Daily Traffic

SOURCE: Kimley-Horn, 2025

FIGURE 23: Related Projects

INGLEWOOD MORNINGSIDE PROJECT

Kimley»Horn

6.0 INTRODUCTION

6.1 Mitigation Measures from Prior EIR: 2020-2045 and 2024/2050 RTP/SCS and MMP

Public Resources Code (PRC) Section 21155.2 requires that a Transit Priority Project (TPP) also incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. Prior applicable EIRs include SCAG's 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) Program EIR and the 2024-2050 RTP/SCS Program EIR.

The Mitigation Monitoring Program (MMP) for the 2020-2045 and 2024-2050 RTP/SCS Program EIR include programmatic mitigation measures to be implemented by SCAG and project-level mitigation measures that SCAG encourages local agencies to implement, as appropriate and feasible, as part of project-specific environmental review.

As stated by SCAG, SCAG has no authority to impose mitigation measures on individual projects for which it is not the lead agency. However, for projects seeking to use CEQA streamlining and/or tier from the Program EIR, project-level mitigation measures included in the Program EIR (or comparable measures) should be required by the local lead agency as appropriate and feasible. Many lead agencies have existing regulations, policies, and/or standard conditions of approval that address potential impacts. Nothing in the Program EIR is intended to supersede existing regulations and policies of individual jurisdictions. Since SCAG has no authority to impose mitigation measures, mitigation measures to be implemented by local jurisdictions are subject to a lead agency's independent discretion as to whether measures are applicable to projects in their respective jurisdictions. Lead agencies may use, amend, or not use measures identified in the Program EIR as appropriate to address project-specific conditions. The determination of significance and identification of appropriate mitigation is solely the responsibility of the lead agency.

In compliance with PRC Section 21151.2, the City has reviewed all of the mitigation measures in the 2020-2045 and 2024-2050 RTP/SCS PEIR MMRP and determined their potential applicability to the Project. (shown in Table 42 and 43) into the Project. For each mitigation measure that is applicable, the City determined whether to use: (1) SCAG's MMRP mitigation measure; (2) an equally effective City mitigation measure (consistent with the MMRP mitigation measures); (3) federal, state, regional, or City regulation; or (4) no mitigation, as there was no potential for a significant environmental effect. Where applicable, any new project design features (PDFs) and/or mitigation measures shall be identified in this section to help reduce or avoid all potentially significant impacts on the environment. The applicability determination is found in Table 42 and Table 43.

Table 42: Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures

Impact and Mitigation Measure	Applicability to the Project
AESTHETICS	
Impact AES-1 Potential to have a substantial adverse effect on a scenic vista. **PMM AES-1**: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to address potential aesthetic impacts to scenic vistas, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Use a palette of colors, textures, building materials that are graffiti-resistant, and/or plant materials that complement the surrounding landscape and development. b) Use contour grading to better match surrounding terrain. Contour edges of major cut-and-fill to provide a more natural looking finished profile. c) Use alternating facades to "break up" large facades and provide visual interest. d) Design new corridor landscaping to respect existing natural and man-made features and to complement the dominant landscaping of the surrounding areas. e) Replace and renew landscaping along corridors with road widenings, interchange projects, and related improvements. f) Retain or replace trees bordering highways, so that clear-cutting is not evident. g) Provide new corridor landscaping that respects and provides appropriate transition to existing natural and man-made features	**Not applicable.** Pursuant to PRC Section 21099(d)(1), aesthetic impacts of a residential or mixed-use project in a Transit Priority Area (TPA) are not considered significant impacts on the environment. As the Project is within a TPA, there is no significant aesthetic impact, and no mitigation is required. This measure is intended to mitigate impacts on scenic vistas. The Project Site is within a fully urbanized area of the City dominated by residential, commercial, and school development. There are no designated or otherwise identified scenic vistas within the City or within the vicinity of the Project Site. Although the Project's residential and open space uses would be visible to the public from the public right-of-way along West 104th Street, South 10th Avenue, and Yukon Avenue, the Project would not change the current views to or from any scenic vistas, as none are present within the vicinity of the Project Site. Thus, this mitigation measure is not applicable to the Project.

Table 42: Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures

Impact and Mitigation Measure	Applicability to the Project
and is complementary to the dominant landscaping or native habitats of surrounding areas. h) Reduce the visibility of construction staging areas by fencing and screening these areas with low contrast materials consistent with the surrounding environment, and by revegetating graded slopes and exposed earth surfaces at the earliest opportunity. i) Use see-through safety barrier designs (e.g., railings rather than walls).	
Impact AES-2 Potential to substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway. See PMM AES-1, above.	**Not applicable.** Pursuant to PRC Section 21099(d)(1), aesthetic impacts of a residential or mixed-use project in a TPA are not considered significant impacts on the environment. As the Project is within a TPA, there is no significant aesthetic impact, and no mitigation is required. There are no State-designated scenic highways in the City. According to the California Department of Transportation (Caltrans) Scenic Highways Mapping Program, the closest scenic byway is the Arroyo Seco Historic Parkway Scenic Byway (I-110) located northeast of the Project Site, north of downtown Los Angeles and south of I-210 in Pasadena. The Project Site is more than seven miles from this portion of I-110. An eligible scenic highway which includes a portion of Lincoln Boulevard (State Route 187) between Venice Boulevard and Ozone Street is located almost eight miles northwest of the Project Site. Therefore, the Project would not damage scenic resources within a State scenic highway. Thus, this mitigation measure is not applicable to the Project.
Impact AES-3 Potential to substantially degrade the existing visual character or quality of the site and its surroundings. In an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality.	**Not applicable.** Pursuant to PRC Section 21099(d)(1), aesthetic impacts of a residential or mixed-use project in a TPA are not considered significant impacts on the environment. As the Project is within a TPA, there is no significant aesthetic impact, and no mitigation is required.

Table 42: Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures

Impact and Mitigation Measure	Applicability to the Project
PMM AES-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to address potential aesthetic impacts that substantially degrade visual character, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: • Minimize contrasts in scale and massing between the projects and surrounding natural forms and development, minimize their intrusion into important viewsheds, and use contour grading to better match surrounding terrain in accordance with county and city hillside ordinances, where applicable. • Design landscaping along highway corridors to add significant natural elements and visual interest to soften the hard-edged, linear transportation corridors. • Require development of design guidelines for projects that make elements of proposed buildings/facilities visually compatible, or minimize visibility of changes in visual quality or character through use of hardscape and softscape solutions. Specific measures to be addressed include setback buffers, landscaping, color, texture, signage, and lighting criteria. • Design projects consistent with design guidelines of applicable general plans. • Require that sites are kept in a blight/nuisance-free condition. Remove blight or nuisances that compromise visual character or visual quality of project areas including graffiti abatement, trash removal, landscape management, maintenance of signage and billboards in good condition, and replace compromised native vegetation and landscape. • Where sound walls are proposed, require sound wall construction and design methods that account for visual impacts as follows:	The Project is located in an urbanized area and thus, pursuant to Impact AES-3, the analysis herein is focused on whether the Project would conflict with applicable zoning and other regulations governing scenic quality. Overall, the Project would not conflict with applicable zoning and other regulations governing scenic quality. The Project would be consistent with the scenic standards and regulations contained in the City's General Plan, Design and Development Standards and Guidelines and Municipal Code. Pursuant to Inglewood Municipal Code Section 12-39.50, the Project would undergo Site Plan Review to ensure that the Project meets City requirements for site layout and building orientation, architectural design, neighborhood compatibility, landscaping, parking accommodations, signs and other applicable design considerations. Thus, this mitigation measure is not applicable to the Project.

Table 42: Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures

Impact and Mitigation Measure	Applicability to the Project
– use transparent panels to preserve views where sound walls would block views from residences; – use landscaped earth berm or a combination wall and berm to minimize the apparent sound wall height; – construct sound walls of materials whose color and texture complements the surrounding landscape and development; • Design sound walls to increase visual interest, reduce apparent height, and be visually compatible with the surrounding area; and landscape the sound walls with plants that screen the sound wall, preferably with either native vegetation or landscaping that complements the dominant landscaping of surrounding areas.	
Impact AES-4 Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area. **PMM AES-3:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to address potential aesthetic impacts that substantially degrade visual character, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Use lighting fixtures that are adequately shielded to a point below the light bulb and reflector and that prevent unnecessary glare onto adjacent properties. b) Restrict the operation of outdoor lighting for construction and operation activities to the hours of 7:00 a.m. to 10:00 p.m. or as otherwise required by applicable local rules or ordinances. c) Use high pressure sodium and/or cut-off fixtures instead of typical mercury-vapor fixtures for outdoor lighting. d) Use unidirectional lighting to avoid light trespass onto adjacent properties.	**Not applicable.** Pursuant to PRC Section 21099(d)(1), aesthetic impacts of a residential or mixed-use project in a TPA are not considered significant impacts on the environment. As the Project is within a TPA, there is no significant aesthetic impact, and no mitigation is required. The Project would not degrade the visual character as the development and as it would create visually attractive residential development that would include new housing with landscaping throughout the Project Site. This would include a variety of drought tolerant and native trees, groundcover, shrubs, and vines that are designed to create inviting streetscapes and parks and foster a walkable pedestrian-oriented neighborhood. The Project will plant approximately 300 trees, featuring a diverse range of species, and incorporate them into various locations of the Project. The Project would introduce new sources of light and glare that are typically associated with residential and amenity buildings, including interior, security, and wayfinding lighting sources. However, all Project lighting would comply with current energy standards and codes, while providing efficient and effective on site lighting. Nighttime security lighting for the Project would be

Table 42: Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures

Impact and Mitigation Measure	Applicability to the Project
e) Design exterior lighting to confine illumination to the project site, and/or to areas which do not include light-sensitive uses. f) Provide structural and/or vegetative screening from light-sensitive uses. g) Shield and direct all new street and pedestrian lighting away from light-sensitive off-site uses. h) Use non-reflective glass or glass treated with a non-reflective coating for all exterior windows and glass used on building surfaces. i) Architectural lighting shall be directed onto the building surfaces and have low reflectivity to minimize glare and limit light onto adjacent properties.	provided to illuminate entrances, and internal roadways and walkways. However, all exterior lights would be wall- or ground-mounted and shielded away from adjacent land uses and security lighting would be designed to prevent light trespass onto adjacent properties. The Project buildings would be prohibited from using highly reflective building materials such as mirrored glass on exterior facades. Thus, this mitigation measure is not applicable to the Project.
AGRICULTURAL RESOURCES	
Impact AG-1 Potential to 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. **PMM AG-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to address potential adverse effects on agricultural resources, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Require project sponsors to mitigate for loss of farmland by providing permanent protection of in-kind farmland in the form of easements, fees, or elimination of development rights/potential. b) Project relocation or corridor realignment to avoid Prime Farmland, Unique Farmland, or Farmland of Local or Statewide Importance.	**Not applicable.** The Project Site is located in an urbanized area of the City. No agricultural uses or related farmland operations are present within the Project Site or surrounding area. The Project Site is not located on designated Prime Farmland, Unique Farmland, or Farmland of Statewide Importance as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program. The urban character of the Project Site would be consistent with the Farmland Mapping and Monitoring Program's definition of "Urban and Built-Up Land," which does not constitute farmland. Therefore, the Project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural uses. Thus, this mitigation measure is not applicable to the Project.

Table 42: Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures

Impact and Mitigation Measure	Applicability to the Project
c) Maintain and expand agricultural land protections such as urban growth boundaries. d) Provide for mitigation fees to support a mitigation bank that invests in farmer education, agricultural infrastructure, water supply, marketing, etc. that enhance the commercial viability of retained agricultural lands. e) Minimize severance and fragmentation of agricultural land by constructing underpasses and overpasses at reasonable intervals to provide property access. f) Use berms, buffer zones, setbacks, and fencing to reduce conflicts between new development and farming uses and protect the functions of farmland.	
Impact AG-2 Potential to conflict with existing zoning for agricultural use, or a Williamson Act contract. **PMM AG-2:** Project level mitigation measures can and should be considered by Lead Agencies as applicable and feasible. Measures to reduce substantial adverse effects on Williamson Act contracts to the maximum extent practicable, as determined appropriate by each Lead Agency, may include the following, or other comparable measures: a) Project relocation or corridor realignment to avoid lands in Williamson Act contracts. b) Establish conservation easements consistent with the recommendations of the Department of Conservation, or 20-year Farmland Security Zone contracts (Government Code Section 51296 et seq.), 10-year Williamson Act contracts (Government Code Section 51200 et seq.), or use of other conservation tools available from the California Department of Conservation Division of Land Resource Protection.	**Not applicable.** The Project Site currently has a General Plan land use designation of Low Density Residential and a zoning designation of Residential Single Family (R-1). The Project would request the approvals for a General Plan Amendment from Low Density to Medium Density and a Zone Change from R-1 to Residential Multiple Family (R-3). None of these land use or zoning designations permit agricultural use. Thus, this mitigation measure is not applicable to the Project.

Table 42: Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures

Impact and Mitigation Measure	Applicability to the Project
Impact AG-3 Potential to conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined in Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g)). **PMM AG-3:** Project level mitigation measures can and should be considered by Lead Agencies as applicable and feasible. Measures to reduce substantial adverse effects, through the conversion of Farmland to maximum extent practicable, as determined appropriate by each Lead Agency, may include the following, or other comparable measures: a) Minimize construction related impacts to agricultural and forestry resources by locating materials and stationary equipment in such a way as to prevent conflict with agriculture and forestry resources. b) Establish conservation easements consistent with the recommendations of the Department of Conservation, or 20-year Farmland Security Zone contracts (Government Code Section 51296 et seq.), 10-year Williamson Act contracts (Government Code Section 51200 et seq.), or use of other conservation tools available from the California Department of Conservation Division of Land Resource Protection.	**Not applicable.** The Project Site is not designated as forestland, timberland, or zoned Timberland Production. Thus, this mitigation measure is not applicable to the Project.
Impact AG-4 Potential to result in the loss of forest land or conversion of forest land to non-forest use. See PMM AG-3, above.	**Not applicable.** The Project Site does not contain forest land; therefore, no forest land would be lost or converted to non-forest uses. Thus, this mitigation measure is not applicable to the Project.
Impact AG-5 Potential to 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.	**Not applicable.** As the Project Site is currently not used for any agricultural uses and is not forest land, no agricultural use or forest land would be converted. Thus, this mitigation measure is not applicable to the Project.

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Impact and Mitigation Measure	Applicability to the Project
See PMM AG-2, PMM AG-3, and PMM GHG-2. **PMM AG-4**: Project level mitigation measures can and should be considered by Lead Agencies as applicable and feasible. Measures to reduce substantial adverse effects, through the conversion of Farmland, to the maximum extent practicable, as determined appropriate by each Lead Agency, may include the following, or other comparable measures: a) Design proposed projects to minimize, to the greatest extent feasible, the loss of the highest valued agricultural land. b) Redesign project features to minimize fragmenting or isolating Farmland. Where a project involves acquiring land or easements, ensure that the remaining non-project area is of a size sufficient to allow economically viable farming operations. The project proponents shall be responsible for acquiring easements, making lot line adjustments, and merging affected land parcels into units suitable for continued commercial agricultural management. c) Reconnect utilities or infrastructure that serve agricultural uses if these are disturbed by project construction. If a project temporarily or permanently cuts off roadway access or removes utility lines, irrigation features, or other infrastructure, the project proponents shall be responsible for restoring access as necessary to ensure that economically viable to ensure that economically viable farming operations are not interrupted. **PMM AG-5**: Project level mitigation measures can and should be considered by Lead Agencies as applicable and feasible. Measures to reduce substantial adverse effects, through the conversion of Farmland, to the maximum extent practicable, as determined appropriate by each Lead Agency, may include the following, or other comparable measures:	

Table 42: Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures

Impact and Mitigation Measure	Applicability to the Project
a) Manage project operations to minimize the introduction of invasive species or weeds that may affect agricultural production on adjacent agricultural land. Where a project has the potential to introduce sensitive species or habitats or have other spill-over effects on nearby agricultural lands, the project proponents shall be responsible for acquiring easements on nearby agricultural land and/or financially compensating for indirect effects on nearby agricultural land. Easements (e.g., flowage easements) shall be required for temporary or intermittent interruption in farming activities (e.g., because of seasonal flooding or groundwater seepage). Acquisition or compensation would be required for permanent or significant loss of economically viable operations.	
AIR QUALITY	
Impact AQ-1 Conflict with or obstruct implementation of the applicable air quality plan. No mitigation measures required.	**Not applicable.** No mitigation measures related to this issue were identified in the 2020-2045 RTP/SCS MMRP; therefore, no mitigation measures apply to the Project.
Impact AQ-2 Potential to violate any air quality standard or contribute substantially to an existing or projected air quality violation. **PMM AQ-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to violating air quality standards. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Minimize land disturbance. b) Suspend grading and earth moving when wind gusts exceed 25 miles per hour unless the soil is wet enough to prevent dust plumes.	**This Mitigation Measure is incorporated through regulatory compliance and incorporation of project specific mitigation measures and design features.** The Project would be consistent as it would comply with existing regulations that have been identified and are required by the Southern California Air Quality Management District (SCAQMD) and the California Air Resources Board (CARB) to facilitate consistency with plans for attainment for the National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS), as applicable and feasible. Adherence to the following requirements by SCAQMD, CARB, the State of California, and the federal government would further ensure consistency with PMM AQ-1.

Table 42: Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures

Impact and Mitigation Measure	Applicability to the Project
c) Cover trucks when hauling dirt. d) Stabilize the surface of dirt piles if not removed immediately. e) Limit vehicular paths on unpaved surfaces and stabilize any temporary roads. f) Minimize unnecessary vehicular and machinery activities. g) Sweep paved streets at least once per day where there is evidence of dirt that has been carried on to the roadway. h) Revegetate disturbed land, including vehicular paths created during construction to avoid future off-road vehicular activities. i) On Caltrans projects, Caltrans Standard Specifications 10-Dust Control, 17-Watering, and 18-Dust Palliative shall be incorporated into project specifications. j) Require contractors to assemble a comprehensive inventory list (i.e., make, model, engine year, horsepower, emission rates) of all heavy-duty off-road (portable and mobile) equipment (50 horsepower and greater) that could be used an aggregate of 40 or more hours for the construction project. Prepare a plan for approval by the applicable air district demonstrating achievement of the applicable percent reduction for a CARB-approved fleet. Daily logging of the operating hours of the equipment shall also be required. k) Ensure that all construction equipment is properly tuned and maintained. l) Minimize idling time to 5 minutes or beyond regulatory requirements — saves fuel and reduces emissions. m) Provide an operational water truck on-site at all times. Use watering trucks to minimize dust; watering should be sufficient to confine dust plumes to the project work areas. Sweep paved streets at least	Consistent with SCAQMD Rule 402 and 403, the following measures would be incorporated into Project plans and specifications: • Water or a stabilizing agent shall be applied to exposed surfaces at least three times per day to prevent generation of dust plumes. • The construction contractor shall utilize at least one of the following measures at each vehicle egress to a paved public road: - Install a pad consisting of washed gravel maintained in clean condition to a depth of at least six inches and extending at least 30 feet wide and at least 50 feet long; - Pave the surface extending at least 100 feet and at least 20 feet wide; - Utilize shaker devices to remove bulk material from tires and vehicle undercarriages; or - Install a wheel washing system to remove bulk material from tires and vehicle undercarriages. • Construction activity on unpaved surfaces shall be suspended when wind speed exceeds 25 miles per hour (such as instantaneous gusts). • Ground cover in disturbed areas shall be replaced as quickly as possible. • Traffic speeds on all unpaved roads shall be reduced to 15 mph or less. • Streets shall be swept at the end of the day if visible soil is carried onto adjacent public paved roads. If feasible, use water sweepers with reclaimed water. • Large bulldozers and excavators shall be suspended during third smog alerts.

Table 42: Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures

Impact and Mitigation Measure	Applicability to the Project
once per day where there is evidence of dirt that has been carried on to the roadway. n) Utilize existing power sources (e.g., power poles) or clean fuel generators rather than temporary power generators. o) Develop a traffic plan to minimize community impacts as a result of traffic flow interference from construction activities. The plan may include advance public notice of routing, use of public transportation, and satellite parking areas with a shuttle service. Schedule operations affecting traffic for off-peak hours. Minimize obstruction of through-traffic lanes. Provide a flag person to guide traffic properly and ensure safety at construction sites. Project sponsors should consider developing a goal for the minimization of community impacts. p) As appropriate, require that portable engines and portable engine-driven equipment units used at the project work site, with the exception of on-road and off-road motor vehicles, obtain CARB Portable Equipment Registration with the state or a local district permit. Arrange appropriate consultations with the CARB or the District to determine registration and permitting requirements prior to equipment operation at the site. q) Require projects to use Tier 4 Final equipment or better for all engines above 50 horsepower (hp). In the event that construction equipment cannot meet to Tier 4 Final engine certification, the project representative or contractor must demonstrate through future study with written findings supported by substantial evidence that is approved by SCAG before using other technologies/strategies. Alternative applicable strategies may include, but would not be limited to, construction equipment with Tier 4 Interim or reduction in the number and/or horsepower rating of construction equipment and/or limiting the number of construction equipment operating at the same time. All equipment	Consistent with SCAQMD Rule 1113, the following measures would be incorporated into Project plans and specifications: • The contractor shall use architectural coatings that average 50 grams (g)/ Liters of Volatile Organic Compound (L VOC) content or less. • The development shall utilize low VOC cleaning supplies. Consistent with Section 2485 of Title 13 of the California Code of Regulations (CCR), the following measures shall be incorporated into Project plans and specifications: • Diesel-fueled heavy-duty trucks shall be prohibited from idling in excess of five minutes, both on- and off-site. Compliance with these existing regulations would facilitate consistency with plans for attainment of air quality standards identified by SCAQMD, CARB, the State of California, and the federal government, and would be equivalent to PMM AQ-1. In addition to complying with regulations, Project Specific Mitigation Measure AQ-2 requires the use of construction equipment that would meet CARB Tier 4 Final emissions standards or similarly effective equipment in order to reduce diesel exhaust construction emissions, consistent with PMM AQ-1. **PDF AQ-1** Prior to the issuance of demolition permits, signage containing the complaint number of SCAQMD will be installed. **MM AQ-2** Off-Road Diesel-Powered Construction Equipment. All off-road diesel-powered construction equipment greater than 25 horsepower must meet California Air Resources Board Tier 4 Final off-road emissions standards. Requirements for Tier 4 Final equipment will be included in applicable bid documents and successful contractor(s) must demonstrate the ability to supply such equipment. A copy of each unit's Best Available Control Technology (BACT) documentation (certified tier specification or model year

Table 42: Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures

Impact and Mitigation Measure	Applicability to the Project
must be tuned and maintained in compliance with the manufacturer's recommended maintenance schedule and specifications. All maintenance records for each equipment and their contractor(s) should make available for inspection and remain on-site for a period of at least two years from completion of construction, unless the individual project can demonstrate that Tier 4 engines would not be required to mitigate emissions below significance thresholds. Project sponsors should also consider including ZE/ZNE technologies where appropriate and feasible. r) Projects located within the South Coast Air Basin should consider applying for South Coast AQMD "SOON" funds which provides funds to applicable fleets for the purchase of commercially available low emission heavy-duty engines to achieve near-term reduction of NOx emissions from in-use off-road diesel vehicles. s) Projects located within AB 617 communities should review the applicable Community Emissions Reduction Plan (CERP) for additional mitigation that can be applied to individual projects. t) Where applicable, projects should provide information about air quality related programs to schools, including the Environmental Justice Community Partnerships (EJCP), Clean Air Ranger Education (CARE), and Why Air Quality Matters programs u) Projects should work with local cities and counties to install adequate signage that prohibits truck idling in certain locations (e.g., near schools and sensitive receptors). v) As applicable for airport projects, the following measures should be considered: a. Considering operational improvements to reduce taxi time and auxiliary power unit usage, where feasible. Additionally, consider single engine taxing, if feasible as allowed per Federal Aviation Administration guidelines.	specification), and CARB or SCAQMD operating permit (if applicable) will be provided to the City upon request. Regarding energy conservation, the Project would include rooftop solar to offset the amount of electricity needed and incorporate all required Title 24 measures. Regarding water energy conservation, the Project would incorporate a variety of strategies for sustainability and water conservation based on state and local guidelines including compliance with the Model Water Efficient Landscape Ordnance (MWELO) and all additional local requirements. Plant species will be predominantly low and moderate water use specific to the local climate. Plants will be grouped in hydrozones based on similar water use demands and planting design with respond to specific site conditions. The irrigation system would include a variety of water conservation features including the use of a flow sensor at the point of connection that can detect possible leaks and shut the system down so system integrity can be ensured. The irrigation controller will incorporate Smart Water Application Technology (SWAT) that will allow it to automatically adjust run times based on local weather conditions. The controller would also utilize a rain shut off device. Shrubs and ground cover will be irrigated with drip tubing which reduces evaporation and eliminates wasteful overspray and trees will receive supplemental water from high efficiency micro spray nozzles. The combination of these factors will ensure a sustainable landscape in the community that maximizes the use of limited water resources.

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Impact and Mitigation Measure	Applicability to the Project
b. Set goals to achieve a reduction in emissions from aircraft operations over the lifetime of the proposed project. c. Require the use of ground service equipment (GSE) that can operate on battery-power. If electric equipment cannot be obtained, require the use of alternative fuel, the cleanest gasoline equipment, or Tier 4, at a minimum. w) As applicable for port projects, the following measures should be considered: a. Develop specific timelines for transitioning to zero emission cargo handling equipment (CHE). b. Develop interim performance standards with a minimum amount of CHE replacement each year to ensure adequate progress. c. Use short side electric power for ships, which may include tugboats and other ocean-going vessels or develop incentives to gradually ramp up the usage of shore power. d. Install the appropriate infrastructure to provide shore power to operate the ships. Electrical hookups should be appropriately sized. e. Maximize participation in the Port of Los Angeles' Vessel Speed Reduction Program or the Port of Long Beach's Green Flag Initiation Program in order to reduce the speed of vessel transiting within 40 nautical miles of Point Fermin. f. Encourage the participation in the Green Ship Incentives. g. Offer incentives to encourage the use of on-dock rail. x) As applicable for rail projects, the following measures should be considered: a. Provide the highest incentives for electric locomotives and then locomotives that meet Tier 5 emission standards with	

Table 42: Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures

Impact and Mitigation Measure	Applicability to the Project
a floor on the incentives for locomotives that meet Tier 4 emission standards. y) Project that will introduce sensitive receptors within 500 feet of freeways and other sources should consider installing high efficiency of enhanced filtration units, such as Minimum Efficiency Reporting Value (MERV) 13 or better. Installation of enhanced filtration units can be verified during occupancy inspection prior to the issuance of an occupancy permit. z) Develop an ongoing monitoring, inspection, and maintenance program for the MERV filters. a. Disclose potential health impacts to prospective sensitive receptors from living in close proximity to freeways or other sources of air pollution and the reduced effectiveness of air filtration systems when windows are open or residents are outside. b. Identify the responsible implementing and enforcement agency to ensure that enhanced filtration units are installed on-site before a permit of occupancy is issued. c. Disclose the potential increases in energy cost for running the HVAC system to prospective residences. d. Provide information to residences on where MERV filters can be purchased. e. Provide recommended schedule (e.g., every year or every six months) for replacing the enhanced filtration units. f. Identify the responsible entity such as future residents themselves, Homeowner's Association, or property managers for ensuring enhanced filtration units are replaced on time. g. Identify, provide, and disclose ongoing cost sharing strategies, if any, for replacing the enhanced filtration units.	

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Impact and Mitigation Measure	Applicability to the Project
h. Set criteria for assessing progress in installing and replacing the enhanced filtration units. i. Develop a process for evaluating the effectiveness of the enhanced filtration units. aa) Consult the SCAG Environmental Justice Toolbox for potential measures to address impacts to low-income and/or minority communities. bb) The following criteria related to diesel emissions shall be implemented on by individual project sponsors as appropriate and feasible: – Diesel nonroad vehicles on site for more than 10 total days shall have either (1) engines that meet EPA on road emissions standards or (2) emission control technology verified by EPA or CARB to reduce PM emissions by a minimum of 85%. – Diesel generators on site for more than 10 total days shall be equipped with emission control technology verified by EPA or CARB to reduce PM emissions by a minimum of 85%. – Nonroad diesel engines on site shall be Tier 2 or higher. – Diesel nonroad construction equipment on site for more than 10 total days shall have either (1) engines meeting EPA Tier 4 nonroad emissions standards or (2) emission control technology verified by EPA or CARB for use with nonroad engines to reduce PM emissions by a minimum of 85% for engines for 50 hp and greater and by a minimum of 20% for engines less than 50 hp. – Emission control technology shall be operated, maintained, and serviced as recommended by the emission control technology manufacturer. – Diesel vehicles, construction equipment, and generators on site shall be fueled with ultra-low sulfur diesel fuel (ULSD) or a	

Table 42: Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures

Impact and Mitigation Measure	Applicability to the Project
biodiesel blend approved by the original engine manufacturer with sulfur content of 15 ppm or less. – The construction contractor shall maintain a list of all diesel vehicles, construction equipment, and generators to be used on site. The list shall include the following: i. Contractor and subcontractor name and address, plus contact person responsible for the vehicles or equipment. ii. Equipment type, equipment manufacturer, equipment serial number, engine manufacturer, engine model year, engine certification (Tier rating), horsepower, engine serial number, and expected fuel usage and hours of operation. iii. For the emission control technology installed: technology type, serial number, make, model, manufacturer, EPA/CARB verification number/level, and installation date and hour-meter reading on installation date. – The contractor shall establish generator sites and truck-staging zones for vehicles waiting to load or unload material on site. Such zones shall be located where diesel emissions have the least impact on abutters, the general public, and especially sensitive receptors such as hospitals, schools, daycare facilities, elderly housing, and convalescent facilities. – The contractor shall maintain a monthly report that, for each on road diesel vehicle, nonroad construction equipment, or generator onsite, includes: i. Hour-meter readings on arrival on-site, the first and last day of every month, and on off-site date.	

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Impact and Mitigation Measure	Applicability to the Project
ii. Any problems with the equipment or emission controls. iii. Certified copies of fuel deliveries for the time period that identify: 1. Source of supply 2. Quantity of fuel 3. Quantity of fuel, including sulfur content (percent by weight) cc) Project should exceed Title-24 Building Envelope Energy Efficiency Standards (California Building Standards Code). The following measures can be used to increase energy efficiency: – Install programmable thermostat timers – Obtain Third-party HVAC commissioning and verification of energy savings (to be grouped with exceedance of Title 24) – Install energy efficient appliances (Typical reductions for energy-efficient appliances can be found in the Energy Star and Other Climate Protection Partnerships Annual Reports.) – Install higher efficacy public street and area lighting – Limit outdoor lighting requirements – Replace traffic lights with LED traffic lights – Establish onsite renewable or carbon neutral energy systems – generic, solar power and wind power – Utilize a combined heat and power system – Establish methane recovery in Landfills and Wastewater Treatment Plants. – Locate project near bike path/bike lane	

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Impact and Mitigation Measure	Applicability to the Project
– Provide pedestrian network improvements, such as interconnected street network, narrower roadways and shorter block lengths, sidewalks, accessibility to transit and transit shelters, traffic calming measures, parks and public spaces, minimize pedestrian barriers. – Provide traffic calming measures, such as: i. Marked crosswalks ii. Count-down signal timers iii. Curb extensions iv. Speed tables v. Raised crosswalks vi. Raised intersections vii. Median islands viii. Tight corner radii ix. Roundabouts or mini-circles x. On-street parking xi. Chicanes/chokers – Create urban non-motorized zones – Provide bike parking in non-residential and multi-unit residential projects – Dedicate land for bike trails – Limit parking supply through: i. Elimination (or reduction) of minimum parking requirements ii. Creation of maximum parking requirements iii. Provision of shared parking	

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Impact and Mitigation Measure	Applicability to the Project
– Require residential area parking permit. – Provide ride-sharing programs i. Designate a certain percentage of parking spacing for ride sharing vehicles ii. Designating adequate passenger loading and unloading and waiting areas for ride-sharing vehicles iii. Providing a web site or messaging board for coordinating rides iv. Permanent transportation management association membership and finding requirement.	
Impact AQ-3 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. See PMM AQ-1, above.	**Substantially conforms through regulatory compliance.** See discussion of the applicability of PMM AQ-1, above.
Impact AQ-4 Expose sensitive receptors to substantial pollutant concentrations. See PMM AQ-1, above.	**This Mitigation Measure is incorporated through regulatory compliance and incorporation of project specific mitigation measures.** See discussion of the applicability of PMM AQ-1, above. In addition, the Project would include Project Specific MM AQ-1, Mitigation Measure AQ-1 which prohibits the installation of wood-burning and natural gas fireplaces. As listed above as part of the discussion of the applicability under PMM AQ-1, the Project would also incorporate MM AQ-2 which requires off-road diesel-powered construction equipment greater than 25 horsepower must meet California Air Resources Board Tier 4 Final off-road emissions standard.

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Impact and Mitigation Measure	Applicability to the Project
	MM AQ-1 The installation of wood-burning and natural gas fireplaces shall be prohibited. The purpose of this measure is to limit emissions of ROG, CO, particulate matter, and visible emissions from wood-burning and natural gas devices used for supplemental heat, or ambiance and does not apply to natural gas HVAC equipment. This prohibition shall be noted on the deed and/or lease agreements for future property owners/tenants to comply with. **MM AQ-2** Off-Road Diesel-Powered Construction Equipment. All off-road diesel-powered construction equipment greater than 25 horsepower must meet California Air Resources Board Tier 4 Final off-road emissions standards. Requirements for Tier 4 Final equipment will be included in applicable bid documents and successful contractor(s) must demonstrate the ability to supply such equipment. A copy of each unit's Best Available Control Technology (BACT) documentation (certified tier specification or model year specification), and CARB or SCAQMD operating permit (if applicable) will be provided to the City upon request.
Impact AQ-5 Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people. No mitigation measures required.	**Not applicable.** No mitigation measures related to this issue were identified in the 2020-2045 RTP/SCS MMRP; therefore, no mitigation measures apply to the Project.
BIOLOGICAL RESOURCES	
Impact BIO-1 Have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or US Fish and Wildlife Service.	**Not applicable.** The Project Site is in an urbanized area within the City. Vegetation within the Project Site is comprised of non-native grass for athletic field use and ornamental landscaping. There is no wetland or riparian habitat or other sensitive natural community on or adjacent to the Project Site. The Project Site is not part of an established wildlife corridor. Project development would occur within the Project Site and would not impact the movement of any

Table 42: Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures

Impact and Mitigation Measure	Applicability to the Project
PMM BIO-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to threatened and endangered species, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Require project design to avoid occupied habitat, potentially suitable habitat, and designated critical habitat, wherever practicable and feasible. b) Where avoidance is determined to be infeasible, provide conservation measures to fulfill the requirements of the applicable authorization for incidental take pursuant to Section 7 or 10(a) of the federal Endangered Species Act or Section 2081 of the California Endangered Species Act to support issuance of an incidental take permit, and/or as identified in local or regional plans. Conservation strategies to protect the survival and recovery of federally and state-listed endangered and local special status species may include: i. Impact minimization strategies ii. Contribution of in-lieu fees for in-kind conservation and mitigation efforts iii. Use of in-kind mitigation bank credits iv. Funding of research and recovery effort v. Habitat restoration vi. Establishment of conservation easements vii. Permanent dedication of in-kind habitat c) Design projects to avoid desert native plants protected under the California Desert Native Plants Act, salvage and relocate desert	native wildlife species. Furthermore, no water bodies that could serve as a habitat for fish exist on the Project Site or in the vicinity of the Project Site. Regardless of the non-applicability of this mitigation measure, the Project would be required to comply with the federal Migratory Bird Treaty Act to avoid potential impacts to migratory birds.

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Impact and Mitigation Measure	Applicability to the Project
native plants, and/or pay in lieu fees to support off-site long-term conservation strategies. d) Temporary access roads and staging areas will not be located within areas containing sensitive plants, wildlife species or native habitat wherever feasible, so as to avoid or minimize impacts to these species. e) Develop and implement a Worker Environmental Awareness Program (environmental education) to inform project workers of their responsibilities to avoid and minimize impacts on sensitive biological resources. f) Retain a qualified botanist to document the presence or absence of special status plants before project implementation. g) Appoint a qualified biologist to monitor construction activities that may occur in or adjacent to occupied sensitive species' habitat to facilitate avoidance of resources not permitted for impact. h) Appoint a qualified biologist to monitor implementation of mitigation measures. i) Schedule construction activities to avoid sensitive times for biological resources (e.g., steelhead spawning periods during the winter and spring, nesting bird season) and to avoid the rainy season when erosion and sediment transport is increased. j) Develop an invasive species control plan associated with project construction. k) If construction occurs during breeding seasons in or adjacent to suitable habitat, include appropriate sound attenuation measures required for sensitive avian species and other best management practices appropriate for potential local sensitive wildlife. l) Conduct pre-construction monitoring to delineate occupied sensitive species' habitat to facilitate avoidance.	

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Impact and Mitigation Measure	Applicability to the Project
m) Where projects are determined to be within suitable habitat and may impact listed or sensitive species that have specific field survey protocols or guidelines outlined by the USFWS, CDFW, or other local agency, conduct preconstruction surveys that follow applicable protocols and guidelines and are conducted by qualified and/or certified personnel. n) Project design should address the protection of habitat on both sides of a freeway to improve effectiveness of the crossings. o) Project sponsors shall consider the impacts of nitrogen deposition on sensitive species.	
Impact BIO-2 Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service. **PMM BIO-2:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to riparian habitats and other sensitive natural communities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Consult with the USFWS and NMFS where such state-designated sensitive or riparian habitats provide potential or occupied habitat for federally listed rare, threatened, and endangered species afforded protection pursuant to the federal ESA. b) Consult with the USFS where such state-designated sensitive or riparian habitats provide potential or occupied habitat for federally listed rare, threatened, and endangered species afforded protection pursuant to the federal ESA and any additional species afforded protection by an adopted Forest Land Management Plan	**Not applicable.** See consistency analysis for PMM BIO-1 under Impact BIO-1. According to the United States Fish and Wildlife Service (USFWS) National Wetlands Inventory, no riparian habitats or wetlands are present on or adjacent to the Project Site. The Project would not be developed on sensitive or riparian habitat. Therefore, development of the Project would not result in adverse effects to any sensitive or riparian habitat that could support any species identified or designated as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game (CDFG) or USFWS. Thus, this mitigation measure is not applicable to the Project.

Table 42: Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures

Impact and Mitigation Measure	Applicability to the Project
or Resource Management Plan for the four national forests in the six-county area: Angeles, Cleveland, Los Padres, and San Bernardino. c) Consult with the CDFW where such state-designated sensitive or riparian habitats provide potential or occupied habitat for state-listed rare, threatened, and endangered species afforded protection pursuant to the California ESA, or Fully Protected Species afforded protection pursuant to the State Fish and Game Code. d) Consult with the CDFW pursuant to the provisions of Section 1600 of the State Fish and Game Code as they relate to lakes and streambeds. e) Consult with the USFWS, USFS, CDFW, and counties and cities in the SCAG region, where state-designated sensitive or riparian habitats are occupied by birds afforded protection pursuant to the Migratory Bird Treaty Act during the breeding season. f) Consult with the CDFW for state-designated sensitive or riparian habitats where fur-bearing mammals, afforded protection pursuant to the provisions of the State Fish and Game Code for fur-beaming mammals, are actively using the areas in conjunction with breeding activities. g) Require project design to avoid sensitive natural communities and riparian habitats, wherever practicable and feasible. Where practicable and feasible, require upland buffers that sufficiently minimize impacts to riparian corridors. h) Where avoidance is determined to be infeasible, develop sufficient conservation measures through coordination with local agencies and the regulatory agency (i.e., USFWS or CDFW) to protect sensitive natural communities and riparian habitats and develop appropriate compensatory mitigation, where required.	

Table 42: Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures

Impact and Mitigation Measure	Applicability to the Project
i) Appoint a qualified wetland biologist to monitor construction activities that may occur in or adjacent to sensitive communities. j) Appoint a qualified wetland biologist to monitor implementation of mitigation measures. k) Schedule construction activities to avoid sensitive times for biological resources and to avoid the rainy season when erosion and sediment transport is increased. l) When construction activities require stream crossings, schedule work during dry conditions and use rubber-wheeled vehicles, when feasible. Have a qualified wetland scientist determine if potential project impacts require a Notification of Lake or Streambed Alteration to CDFW during the planning phase of projects. m) Consult with local agencies, jurisdictions, and landowners where such state-designated sensitive or riparian habitats are afforded protection pursuant an adopted regional conservation plan. n) Install fencing and/or mark sensitive habitat to be avoided during construction activities. o) Salvage and stockpile topsoil (the surface material from 6 to 12 inches deep) and perennial native plants, when recommended by the qualified wetland biologist, for use in restoring native vegetation to areas of temporary disturbance within the project area. Salvage of soils containing invasive species, seeds and/or rhizomes will be avoided as identified by the qualified wetland biologist. p) Revegetate with appropriate native vegetation following the completion of construction activities, as identified by the qualified wetland biologist. q) Complete habitat enhancement (e.g., through removal of non-native invasive wetland species and replacement with more ecologically valuable native species).	

Table 42: Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures

Impact and Mitigation Measure	Applicability to the Project
r) Use Best Management Practices (BMPs) at construction sites to minimize erosion and sediment transport from the area. BMPs include encouraging growth of vegetation in disturbed areas, using straw bales or other silt-catching devices, and using settling basins to minimize soil transport.	
Impact BIO-3 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. See PMM BIO-1 and PMM BIO-2, above. **PMM BIO-3**: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to wetlands, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency. a) Require project design to avoid federally protected aquatic resources consistent with the provisions of Sections 404 and 401 of the CWA, wherever practicable and feasible. b) Where the lead agency has identified that a project, or other regionally significant project, has the potential to impact other wetlands or waters, such as those considered Waters Of the State of California under the State Wetland Definition and Procedures for Dischargers of Dredged or Fill Material to Waters of the State, not protected under Section 404 or 401 of the CWA, seek comparable coverage for these wetlands and waters in consultation with the SWRCB, applicable RWQCB, and CDFW.	**Not applicable.** See consistency analysis for PMM BIO-1 and PMM BIO-2 under Impacts BIO-1 and BIO-2, respectively. The Project Site does not include any protected wetlands or water features that are in the jurisdiction and responsibility of the U.S. Army Corps of Engineers (USACE) or any other state or federal public agencies and/or Lead Agencies. Thus, this mitigation measure is not applicable to the Project.

Table 42: Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures

Impact and Mitigation Measure	Applicability to the Project
c) Where avoidance is determined to be infeasible, develop sufficient conservation measures to fulfill the requirements of the applicable authorization for impacts to federal and state protected aquatic resource to support issuance of a permit under Section 404 of the CWA as administered by the USACE. The use of an authorized Nationwide Permit or issuance of an individual permit requires the project applicant to demonstrate compliance with the USACE's Final Compensatory Mitigation Rule. The USACE reviews projects to ensure environmental impacts to aquatic resources are avoided or minimized as much as possible. Consistent with the administration's performance standard of "no net loss of wetlands" a USACE permit may require a project proponent to restore, establish, enhance or preserve other aquatic resources in order to replace those affected by the proposed project. This compensatory mitigation process seeks to replace the loss of existing aquatic resource functions and area. Project proponents required to complete mitigation are encouraged to use a watershed approach and watershed planning information. The new rule establishes performance standards, sets timeframes for decision making, and to the extent possible, establishes equivalent requirements and standards for the three sources of compensatory mitigation: – Permittee-responsible mitigation – Contribution of in-kind in-lieu fees – Use of in-kind mitigation bank credits – Where avoidance is determined to be infeasible and d) Where avoidance is determined to be infeasible and proposed projects' impacts exceed an existing Nationwide Permit (NWP) and/or California SWRCB-certified NWP, or applicable County Special Area Management Plan (SAMP), the lead agency should provide USACE and SWRCB (where applicable) an alternative	

Table 42: Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures

Impact and Mitigation Measure	Applicability to the Project
analysis consistent with the Least Environmentally Damaging Practicable Alternatives in this order of priorities: – Avoidance – Impact Minimization – On-site alternatives – Off-site alternatives e) Require review of construction drawings by a certified wetland delineator as part of each project-specific environmental analysis to determine whether aquatic resources will be affected and, if necessary, perform formal wetland delineation.	
Impact BIO-4 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. See PMM BIO-1 through PMM BIO-3, above. **PMM BIO-4:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to wildlife movement, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Consult with the USFS where impacts to migratory wildlife corridors may occur in an area afforded protection by an adopted Forest Land Management Plan or Resource Management Plan for the four national forests in the six-County area: Angeles, Cleveland, Los Padres, and San Bernardino.	**Not applicable**. See consistency analysis for PMM BIO-1, PMM BIO-2, and PMM BIO-3 under Impacts BIO-1, BIO-2, and BIO-3, respectively. The Project Site is in an urbanized area. The Project would not be developed on or adjacent to any existing open space, habitat area, wildlife nursery, or wildlife corridor. Therefore, development of the Project would not interfere with the movement of any native resident or migratory fish or wildlife species; with established native resident or migratory wildlife corridors; or impede the use of native wildlife nursery sites. Thus, this mitigation measure is not applicable to the Project. Regardless of the non-applicability of this mitigation measure, the Project would be required to comply with the Migratory Bird Treaty Act to avoid potential impacts to migratory birds.

Table 42: Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures

Impact and Mitigation Measure	Applicability to the Project
b) Consult with counties, cities, and other local organizations when impacts may occur to open space areas that have been designated as important for wildlife movement related to local ordinances or conservation plans. c) Prohibit construction activities within 500 feet of occupied breeding areas for wildlife afforded protection pursuant to Title 14 § 460 of the California Code of Regulations protecting fur-bearing mammals, during the breeding season. d) Conduct a survey to identify active raptor and other migratory nongame bird nests by a qualified biologist at least two weeks before the start of construction at project sites from February 1 through August 31. e) Prohibit construction activities with 300 feet of occupied nest of birds afforded protection pursuant to the Migratory Bird Treaty Act, during the breeding season. f) Ensure that suitable nesting sites for migratory nongame native bird species protected under the Migratory Bird Treaty Act and/or trees with unoccupied raptor nests should only be removed prior to February 1, or following the nesting season. g) When feasible and practicable, proposed projects will be designed to minimize impacts to wildlife movement and habitat connectivity and preserve existing and functional wildlife corridors. h) Conduct site-specific analyses of opportunities to preserve or improve habitat linkages with areas on- and off-site. i) Long linear projects with the possibility of impacting wildlife movement should analyze habitat linkages/wildlife movement corridors on a broad scale to avoid critical narrow choke points that could reduce function of recognized movement corridor.	

Table 42: Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures

Impact and Mitigation Measure	Applicability to the Project
j) Require review of construction drawings and habitat connectivity mapping by a qualified biologist to determine the risk of habitat fragmentation. k) Pursue mitigation banking to preserve habitat linkages and corridors (opportunities to purchase, maintain, and/or restore offsite habitat). l) When practicable and feasible design projects to promote wildlife corridor redundancy by including multiple connections between habitat patches. m) Evaluate the potential for installation of overpasses, underpasses, and culverts to create wildlife crossings in cases where a roadway or other transportation project may interrupt the flow of species through their habitat. Retrofitting of existing infrastructure in project areas should also be considered for wildlife crossings for purposes of mitigation. n) Install wildlife fencing where appropriate to minimize the probability of wildlife injury due to direct interaction between wildlife and roads or construction. o) Where avoidance is determined to be infeasible, design sufficient conservation measures through coordination with local agencies and the regulatory agency (i.e., USFWS or CDFW) and in accordance with the respective counties and cities general plans to establish plans to mitigate for the loss of fish and wildlife movement corridors and/or wildlife nursery sites. The consideration of conservation measures may include the following measures, in addition to the measures outlined in MM-BIO-1(b), where applicable: – Wildlife movement buffer zones – Corridor realignment – Appropriately spaced breaks in center barriers – Stream rerouting	

Table 42: Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures

Impact and Mitigation Measure	Applicability to the Project
– Culverts – Creation of artificial movement corridors such as freeway under- or overpasses – Other comparable measures p) Where the lead agency has identified that a RTP/SCS project, or other regionally significant project, has the potential to impact other open space or nursery site areas, seek comparable coverage for these areas in consultation with the USFWS, CDFW, NMFS, or other local jurisdictions. q) Incorporate applicable and appropriate guidance (e.g., FHWA-HEP-16-059), as well as best management practices, to benefit pollinators with a focus on native plants. r) Implement berms and sound/sight barriers at all wildlife crossings to encourage wildlife to utilize crossings. Sound and lighting should also be minimized in developed areas, particularly those that are adjacent to or go through natural habitats. s) Reduce lighting impacts on sensitive species through implementation of mitigation measures such as, but not limited to: – Use high pressure sodium and/or cut-off fixtures instead of typical mercury-vapor fixtures for outdoor lighting. – Design exterior lighting to confine illumination to the project site – Provide structural and/or vegetative screening from light-sensitive uses. – Use non-reflective glass or glass treated with a non-reflective coating for all exterior windows and glass used on building surfaces.	

Table 42: Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures

Impact and Mitigation Measure	Applicability to the Project
– Architectural lighting shall be directed onto the building surfaces and have low reflectivity to minimize glare and limit light onto adjacent properties. t) Reduce noise impacts to sensitive species through implementation of mitigation measures such as, but not limited to: – Install temporary noise barriers during construction. – Include permanent noise barriers and sound-attenuating features as part of the project design. Barriers could be in the form of outdoor barriers, sound walls, buildings, or earth berms to attenuate noise at adjacent sensitive uses. – Ensure that construction equipment are properly maintained per manufacturers' specifications and fitted with the best available noise suppression devices (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds silencers, wraps). All intake and exhaust ports on power equipment shall be muffled or shielded. – Use hydraulically or electrically powered tools (e.g., jack hammers, pavement breakers, and rock drills) for project construction to avoid noise associated with compressed air exhaust from pneumatically powered tools. However, where use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust should be used; this muffler can lower noise levels from the exhaust by up to about 10 dBA. External jackets on the tools themselves should be used, if such jackets are commercially available, and this could achieve a further reduction of 5 dBA. Quieter procedures should be used, such as drills rather than impact equipment, whenever such procedures are available and consistent with construction procedures.	

Table 42: Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures

Impact and Mitigation Measure	Applicability to the Project
– Using rubberized asphalt or "quiet pavement" to reduce road noise for new roadway segments, roadways in which widening or other modifications require re-pavement, or normal reconstruction of roadways where re-pavement is planned – Use equipment and trucks with the best available noise control techniques (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds, wherever feasible) for project construction. – Use techniques such as grade separation, buffer zones, landscaped berms, dense plantings, sound walls, reduced-noise paving materials, and traffic calming measures. u) Require large buffers between sensitive uses and freeways. v) Create corridor redundancy to help retain functional connectivity and resilience.	
Impact BIO-5 Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. See PMM BIO-1 through PMM BIO-4, above. **PMM BIO-5:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce conflicts with local policies and ordinances protecting biological resources, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Consult with the appropriate local agency responsible for the administration of the policy or ordinance protecting biological resources.	**Consistent**. See consistency analysis for PMM BIO-1, PMM BIO-2, PMM BIO3, and PMM BIO-4 under BIO-1, BIO-2, BIO-3, and BIO-4, respectively. The Project would not be developed on existing open space or sensitive habitat. The Project Site is in an urbanized area and contains ornamental landscaping and street trees. Based on the Arborist Report prepared for this SCEA, a total of 70 trees were identified within Project Site and all would require removal. Of the 70 trees, 33 trees have a minimum trunk diameter of eight inches and fall under the City's Tree Preservation Regulations contained in Section 12-110 through 12-127 of the City's Municipal Code. The protected trees will be replaced per City's Municipal Code Section 12-113. Including replacement trees, the Project would plant approximately 300 trees, featuring a diverse range of species, and incorporate them into various locations of the

Table 42: Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures

Impact and Mitigation Measure	Applicability to the Project
b) Prioritize retention of trees on-site consistent with local regulations. Provide adequate protection during the construction period for any trees that are to remain standing, as recommended by an International Society of Arboriculture (ISA) certified arborist. c) If specific project area trees are designated as "Protected Trees," "Landmark Trees," or "Heritage Trees," obtain approval for encroachment or removals through the appropriate entity, and develop appropriate mitigation measures at that time, to ensure that the trees are replaced. Mitigation trees shall be locally collected native species, as directed by a qualified biologist. d) Appoint an ISA certified arborist to monitor construction activities that may occur in areas with trees are designated as "Protected Trees," "Landmark Trees," or "Heritage Trees," to facilitate avoidance of resources not permitted for impact. Before the start of any clearing, excavation, construction or other work on the site, securely fence off every protected tree deemed to be potentially endangered by said site work. Keep such fences in place for duration of all such work. Clearly mark all trees to be removed. e) Establish a scheme for the removal and disposal of logs, brush, earth and other debris that will avoid injury to any protected tree. Where proposed development or other site work could encroach upon the protected perimeter of any protected tree, incorporate special measures to allow the roots to breathe and obtain water and nutrients. Minimize any excavation, cutting, filing, or compaction of the existing ground surface within the protected perimeter. Require that no change in existing ground level occur from the base of any protected tree at any time. Require that no burning or use of equipment with an open flame occur near or within the protected perimeter of any protected tree. f) Require that no storage or dumping of oil, gas, chemicals, or other substances that may be harmful to trees occur from the base of any	Project. The removal and placement of new and replacement trees would be subject to the review and approval of the City. As such, the Project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. The Project would be consistent with this mitigation measure.

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Impact and Mitigation Measure	Applicability to the Project
protected trees, or any other location on the site from which such substances might enter the protected perimeter. Require that no heavy construction equipment or construction materials be operated or stored within a distance from the base of any protected trees. Require that wires, ropes, or other devices not be attached to any protected tree, except as needed for support of the tree. Require that no sign, other than a tag showing the botanical classification, be attached to any protected tree. g) Thoroughly spray the leaves of protected trees with water periodically during construction to prevent buildup of dust and other pollution that would inhibit leaf transpiration, as directed by the certified arborist. h) If any damage to a protected tree should occur during or as a result of work on the site, the appropriate local agency will be immediately notified of such damage. If, such tree cannot be preserved in a healthy state, as determined by the certified arborist, require replacement of any tree removed with another tree or trees on the same site deemed adequate by the local agency to compensate for the loss of the tree that is removed. Remove all debris created as a result of any tree removal work from the property within two weeks of debris creation, and such debris shall be properly disposed of in accordance with all applicable laws, ordinances, and regulations. Design projects to avoid conflicts with local policies and ordinances protecting biological resources. i) Where avoidance is determined to be infeasible, sufficient conservation measures to fulfill the requirements of the applicable policy or ordinance shall be developed, such as to support issuance of a tree removal permit. The consideration of conservation measures may include: – Avoidance strategies – Contribution of in-lieu fees	

Table 42: Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures

Impact and Mitigation Measure	Applicability to the Project
– Planting of replacement trees – Re-landscaping areas with native vegetation post-construction – Other comparable measures developed in consultation with local agency and certified arborist.	
Impact BIO-6 Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. See PMM BIO-1 through PMM BIO-5, above. **PMM BIO-6:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects on HCPs and NCCPs, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Consult with the appropriate federal, state, and/or local agency responsible for the administration of HCPs or NCCPs. b) Wherever practicable and feasible, the project shall be designed to avoid lands preserved under the conditions of an HCP or NCCP. c) Where avoidance is determined to be infeasible, sufficient conservation measures to fulfill the requirements of the HCP and/or NCCP, which would include but not be limited to applicable authorization for incidental take pursuant to Section 7 or 10(a) of the federal Endangered Species Act or Section 2081 of the California ESA, shall be developed to support issuance of an incidental take permit or any other permissions required for development within the HCP/NCCP boundaries. The consideration of additional	**Not applicable.** See consistency analysis for PMM BIO-1 under Impact BIO-1. This mitigation measure does not apply to the Project because the Project Site is not subject to any provisions of any Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan. Thus, this mitigation measure is not applicable to the Project.

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Impact and Mitigation Measure	Applicability to the Project
conservation measures would include the measures outlined in SMM-BIO-2, where applicable.	
CULTURAL RESOURCES	
Impact CULT-1 Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5. **PMM CULT-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to historical resources, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Pursuant to CEQA Guidelines Section 15064.5, conduct a record search during the project planning phase at the appropriate Information Center to determine whether the project area has been previously surveyed and whether historical resources were identified. b) During the project planning phase, retain a qualified architectural historian, defined as an individual who meets the Secretary of the Interior's (SOI) Professional Qualification Standards (PQS) in Architectural History, to conduct historic architectural surveys if a built environment resource greater than 45 years in age may be affected by the project or if recommended by the Information Center. c) Comply with Section 106 of the National Historic Preservation Act (NHPA) including, but not limited to, projects for which federal funding or approval is required for the individual project. This law requires federal agencies to evaluate the impact of their actions on resources included in or eligible for listing in the National Register. Federal agencies must coordinate with the State Historic	**This Mitigation Measure is incorporated through implementation of project specific mitigation measures which are equal to or more effective than this Mitigation Measure.** The Morningside High School Site Upgrade and Woodworth Elementary School Demolition Project Mitigated Negative Declaration (MND) (prior MND) incorporated mitigation measures to be implemented by the IUSD to reduce direct impacts related to demolition of portions of the Morningside High School and campus to less than significant. The prior MND sufficiently addressed direct impacts as a result of demolition of the recreational facilities and fields and Woodworth Elementary School that are part of the current Project Site. As such, the proposed Project would not cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5 Regarding archaeological resources, the archaeological sensitivity of the Project area is low. Nevertheless, ground-disturbing activities have the potential to reveal buried deposits not observed on the surface during previous surveys. To mitigate such impacts, the Project would be required to implement Project Specific Mitigation Measures, MM CUL-1, MM CUL-2, MM TCR-1, and MM TCR-2 which set forth procedures for the retention of a qualified archaeologist, a Native American monitor representing the Gabrieleno Band of Mission Indians – Kizh Nation, and inadvertent discovery of archaeological resources, respectively. **MM CUL-1 Retention of a Qualified Archaeologist:** Prior to start of ground-disturbing activities, a Qualified Archaeologist (defined as meeting the Secretary of the Interior's Professional

Table 42: Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures

Impact and Mitigation Measure	Applicability to the Project
Preservation Officer in evaluating impacts and developing mitigation. These mitigation measures may include, but are not limited to the following: - Employ design measures to avoid historical resources and undertake adaptive reuse where appropriate and feasible. If resources are to be preserved, as feasible, carry out the maintenance, repair, stabilization, rehabilitation, restoration, preservation, conservation or reconstruction in a manner consistent with the Secretary of the Interior's Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings. If resources would be impacted, impacts should be minimized to the extent feasible. - Where feasible, noise buffers/walls and/or visual buffers/landscaping should be constructed to preserve the contextual setting of significant built resources. d) If a project requires the relocation, rehabilitation, or alteration of an eligible historical resource, the Secretary of the Interior's Standards for the Treatment of Historic Properties should be used to the maximum extent possible to ensure the historical significance of the resource is not impaired. The application of the standards should be overseen by an architectural historian or historic architect meeting the SOI PQS. Prior to any construction activities that may affect the historical resource, a report, meeting industry standards, should identify and specify the treatment of character-defining features and construction activities and be provided to the Lead Agency for review and approval. e) If a project would result in the demolition or significant alteration of a historical resource eligible for or listed in the National Register of Historic Places (NRHP), California Register of Historical Resources (CRHR), or local register, recordation should take the form of Historic American Buildings Survey (HABS), Historic American	Qualification Standards for archaeology) shall be retained to prepare cultural resources sensitivity training for construction personnel. The Qualified Archaeologist, or their designee, shall instruct all onsite construction personnel on the types of archaeological resources that may be encountered and the procedures to follow in the event of an inadvertent discovery of archaeological resources or human remains. The Applicant shall ensure that construction personnel are made available for and attend the training and retain documentation demonstrating attendance. **MM CUL-2 Inadvertent Discovery of Cultural Resources**: In the event that any subsurface cultural resources are encountered at the project site during construction or the course of any ground disturbance activities, all such activities shall halt immediately within 50 feet. The applicant shall notify the City and consult with a Secretary of Interior qualified archaeologist who shall evaluate the find in accordance with Federal, State, and local guidelines, including those set forth in the California Public Resources Code Section 21083.2 and shall determine the necessary findings as to the origin and disposition to assess the significance of the find. If any find is determined to be significant, appropriate avoidance measures recommended by the consultant and approved by the City must be followed unless avoidance is determined to be unnecessary or infeasible by the City. If avoidance is unnecessary or infeasible, other appropriate measures (e.g., data recovery, excavation) shall be instituted. For any resources of Native American origin, the City shall also contact the Tribes that elected to consult on the Project to identify its potential as a Tribal Cultural Resource (TCR). Should the resource, in consultation between the City and Tribe(s), be determined a TCR, the City shall also consult with Tribes regarding avoidance or other measures recommended by the consultant. All identified cultural resources will be recorded

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Impact and Mitigation Measure	Applicability to the Project
Engineering Record (HAER), or Historic American Landscape Survey (HALS) documentation, and should be performed by an architectural historian or historian who meets the SOI PQS. Recordation should meet the SOI Standards and Guidelines for Architectural and Engineering, which defines the products acceptable for inclusion in the HABS/HAER/HALS collection at the Library of Congress. The specific scope and details of documentation should be developed at the project level in coordination with the Lead Agency. f) During the project planning phase, obtain a qualified archaeologist, defined as one who meets the SOI PQS for archaeology, to conduct a record search at the appropriate Information Center of the California Historical Resources Information System (CHRIS) to determine whether the project area has been previously surveyed and whether resources were identified. g) Contact the NAHC to request a Sacred Lands File search and a list of relevant Native American contacts who may have additional information. h) During the project planning phase, obtain a qualified archaeologist or architectural historian (depending on applicability) to conduct archaeological and/or historic architectural surveys as recommended by the qualified professional, the Lead Agency, or the Information Center. In the event the qualified professional or Information Center will make a recommendation on whether a survey is warranted based on the sensitivity of the project area for archaeological resources. Survey shall be conducted where the records indicate that no previous survey has been conducted, or if survey has not been conducted within the past 10 years. If tribal resources are identified during tribal outreach, consultation, or the record search, a Native American representative traditionally affiliated with the project area, as identified by the NAHC, shall be	on appropriate California Department of Parks and Recreation (DPR) 523 series forms and evaluated for significance. All records will be submitted to the City of Inglewood, Consulting Tribe(s), and South Central Coastal Information Center (SCCIC). **MM TCR-1: Retain a Native American Monitor Prior to Commencement of Ground-Disturbing Activities.** The project applicant/lead agency shall retain a Native American Monitor from or approved by the Gabrieleño Band of Mission Indians – Kizh Nation. The monitor shall be retained prior to the commencement of any "ground-disturbing activity" for the subject project at all project locations (i.e., both on-site and any off-site locations that are included in the project description/definition and/or required in connection with the project, such as public improvement work). "Ground-disturbing activity" shall include, but is not limited to, demolition, pavement removal, potholing, auguring, grubbing, tree removal, boring, grading, excavation, drilling, and trenching. A copy of the executed monitoring agreement shall be submitted to the lead agency prior to the earlier of the commencement of any ground-disturbing activity, or the issuance of any permit necessary to commence a ground-disturbing activity. The monitor will complete daily monitoring logs that will provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of ground-disturbing activities, soil types, cultural-related materials, and any other facts, conditions, discovered TCRs, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., (collectively, tribal cultural resources, or "TCR"), as well as any discovered Native American (ancestral) human

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Impact and Mitigation Measure	Applicability to the Project
given the opportunity to provide a representative or monitor to assist with archaeological surveys. i) If potentially significant archaeological resources are identified through survey, and impacts to these resources cannot be avoided, a Phase II Testing and Evaluation investigation should be performed by a qualified archaeologist prior to any construction-related ground-disturbing activities to determine significance. If resources determined significant or unique through Phase II testing, and avoidance is not possible, appropriate resource-specific mitigation measures should be established by the lead agency, in consultation with consulting tribes, where appropriate, and undertaken by qualified personnel. These might include a Phase III data recovery program implemented by a qualified archaeologist and performed in accordance with the OHP's Archaeological Resource Management Reports (ARMR): Recommended Contents and Format and Guidelines for Archaeological Research Designs. Additional options can include 1) interpretative signage, or 2) educational outreach that helps inform the public of the past activities that occurred in this area. Should the project require extended Phase I testing, Phase II evaluation, or Phase III data recovery, a Native American representative traditionally affiliated with the project area, as indicated by the NAHC, shall be given the opportunity to provide a representative or monitor to assist with the archaeological assessments. The long-term disposition of archaeological materials collected from a significant resource should be determined in consultation with the affiliated tribe(s), where relevant; this could include curation with a recognized scientific or educational repository, transfer to the tribe, or respectful reinternment in an area designated by the tribe. j) In cases where the project area is developed and no natural ground surface is exposed, sensitivity for subsurface resources should be assessed based on review of literature, geology, site development	remains and burial goods. Copies of monitor logs will be provided to the project applicant/lead agency upon written request to the Tribe. On-site tribal monitoring shall conclude upon one of the following: (1) written confirmation to the Kizh from a designated point of contact for the project applicant/lead agency that all ground-disturbing activities and phases that may involve ground-disturbing activities on the project site or in connection with the project are complete; or (2) a determination and written notification by the Kizh to the project applicant/lead agency that no future, planned construction activity and/or development/construction phase at the project site possesses the potential to impact Kizh TCRs. **MM TCR-2: Unanticipated Discovery of Tribal Cultural Resource Objects (Non-Funerary/Non-Ceremonial).** Upon discovery of any TCRs, all construction activities in the immediate vicinity of the discovery shall cease (i.e., not less than the surrounding 50 feet) and shall not resume until the discovered TCR has been fully assessed by the Kizh monitor and/or Kizh archaeologist. The Kizh will recover and retain all discovered TCRs in the form and/or manner the Tribe deems appropriate, in the Tribe's sole discretion, and for any purpose the Tribe deems appropriate, including for educational, cultural and/or historic purposes.

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history, and consultation with tribal parties. If this archaeological desktop assessment indicates that the project is located in an area sensitive for archaeological resources, as determined by the Lead Agency in consultation with a qualified archaeologist, the project should retain an archaeological monitor and, in the case of sensitivity for tribal resources, a tribal monitor, to observe ground disturbing operations, including but not limited to grading, excavation, trenching, or removal of existing features of the subject property. The archaeological monitor should be supervised by an archaeologist meeting the SOI PQS k) Conduct construction activities and excavation to avoid cultural resources (if identified). If avoidance is not feasible, further work may be needed to determine the importance of a resource. Retain a qualified archaeologist, and/or as appropriate, a qualified architectural historian who should make recommendations regarding the work necessary to assess significance. If the cultural resource is determined to be significant under state or federal guidelines, impacts to the cultural resource will need to be mitigated. l) Stop construction activities and excavation in the area where cultural resources are found until a qualified archaeologist can determine whether these resources are significant, and tribal consultation can be conducted, in the case of tribal resources. If the archaeologist determines that the discovery is significant, its long-term disposition should be determined in consultation with the affiliated tribe(s); this could include curation with a recognized scientific or educational repository, transfer to the tribe, or respectful reinternment in an area designated by the tribe.	
Impact CULT-2 Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5.	**Substantially conforms through regulatory compliance.** See discussion under PMM CULT-1 above.

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Impact and Mitigation Measure	Applicability to the Project
See PMM CULT-1, above.	
Impact CULT-3 Disturb human remains, including those interred outside of dedicated cemeteries. **PMM CULT-2:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to human remains, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) In the event of discovery or recognition of any human remains during construction or excavation activities associated with the project, in any location other than a dedicated cemetery, cease further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent human remains until the coroner of the county in which the remains are discovered has been informed and has determined that no investigation of the cause of death is required. b) If any discovered remains are of Native American origin, as determined by the county Coroner, an experienced osteologist, or another qualified professional: – Contact the County Coroner to contact the NAHC to designate a Native American Most Likely Descendant (MLD). The MLD should make a recommendation to the landowner or the person responsible for the excavation work, for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods. This may include obtaining a qualified archaeologist or team of archaeologists to properly excavate the human remains. In some cases, it is necessary for the Lead Agency, qualified archaeologist, or	**This Mitigation Measure is incorporated through implementation of project-specific mitigation measures which are equal to or more effective than this Mitigation Measure.** Given that the Project Site has been subject to extensive disruption, the potential to disturb or impact any human remains is unlikely. However, there is always a possibility that human remains could be interred beneath the Project Site. If human remains are found, those remains would require proper treatment in accordance with applicable laws. PRC Section 5097, *et seq*., and California Health and Safety Code (HSC) Sections 7050.5-7055 describe the general provisions regarding human remains, including the requirements if any human remains are accidentally discovered during excavation of a site. Adherence with **MM CUL-3** and **MM TCR-3** would ensure the proper treatment of human remains should they be encountered. **MM CUL-3 Inadvertent Discovery of Human Remains**: In the event that human skeletal remains are encountered at the project site during construction or the course of any ground disturbance activities, all such activities shall halt immediately within 100 feet, pursuant to State Health and Safety Code Section 7050.5 which requires that no further ground disturbance shall occur until the County Coroner has made the necessary findings as to the origin and disposition pursuant to California Public Resources Code Section 5097.98. Additionally, the following procedures shall be followed: Contact the County Coroner: 1104 N. Mission Road Los Angeles, CA 90033 (323) 343-0512 (8 a.m. to 5 p.m. Monday through Friday) or (323) 343-0714 (After Hours, Saturday, Sunday, and Holidays)

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developer to also reach out to the NAHC to coordinate and ensure notification in the event the Coroner is not available. – If the NAHC is unable to identify a MLD, or the MLD fails to make a recommendation within 48 hours after being notified by the commission, or the landowner or his representative rejects the recommendation of the MLD and the mediation by the NAHC fails to provide measures acceptable to the landowner, obtain a culturally affiliated Native American monitor, and an archaeologist, if recommended by the Native American monitor, and rebury the Native American human remains and any associated grave goods, with appropriate dignity, on the property and in a location that is not subject to further subsurface disturbance.	If the remains are determined to be of Native American descent, the Coroner has 24 hours to notify the Native American Heritage Commission (NAHC). The NAHC will immediately notify the person they believe to be the Most Likely Descendent (MLD) of the ancestral remains. The MLD has 48 hours to make recommendations to the owner, or representative, for the treatment or disposition, with proper dignity, of the human remains and grave goods. If the owner does not accept the descendant's recommendations, the owner or the descendent may request mediation by the NAHC. **MM TCR-3: Unanticipated Discovery of Human Remains and Associated Funerary or Ceremonial Objects.** Native American human remains are defined in PRC 5097.98 (d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, called associated grave goods in Public Resources Code Section 5097.98, are also to be treated according to this statute. If Native American human remains and/or grave goods are discovered or recognized on the project site, then Public Resource Code 5097.9 as well as Health and Safety Code Section 7050.5 shall be followed. Human remains and grave/burial goods shall be treated alike per California Public Resources Code section 5097.98(d)(1) and (2). Preservation in place (i.e., avoidance) is the preferred manner of treatment for discovered human remains and/or burial goods. Any discovery of human remains/burial goods shall be kept confidential to prevent further disturbance.

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Impact and Mitigation Measure	Applicability to the Project
ENERGY	
Impact ENR-1 Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation. No mitigation measures required.	**No mitigation applies.** No mitigation measures related to this issue were identified in the 2020-2045 RTP/SCS MMRP, and no mitigation measures apply to the Project.
Impact ENR-2 Conflict with or obstruct a state or local plan for renewable energy or energy efficiency. No mitigation measures required.	**No mitigation applies.** No mitigation measures related to this issue were identified in the 2020-2045 RTP/SCS MMRP, and no mitigation measures apply to the Project.
GEOLOGY AND SOILS	
Impact GEO-1 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; (ii) strong seismic ground shaking; (iii) seismic-related ground failure, including liquefaction; (iv) landslides. No mitigation measures required.	**No mitigation applies.** No mitigation measures related to this issue were identified in the 2020-2045 RTP/SCS MMRP, and no mitigation measures apply to the Project.
Impact GEO-2 Result in substantial soil erosion or the loss of topsoil. **PMM GEO-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to historical resources, as applicable and feasible. Such	**Substantially conforms through regulatory compliance.** The Project would be consistent with this mitigation measure because the Project would be required to comply with existing regulatory requirements pertaining to erosion and stormwater control. For example, the Project would be required to obtain and comply with the Construction General Permit from the State Water Resources

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Impact and Mitigation Measure	Applicability to the Project
measures may include the following or other comparable measures identified by the Lead Agency: a) Consistent with the CBC and local regulatory agencies with oversight of development associated with the Plan, ensure that site-specific geotechnical investigations conducted by a qualified geotechnical expert are conducted to ascertain soil types prior to preparation of project designs. These investigations can and should identify areas of potential failure and recommend remedial geotechnical measures to eliminate any problems. b) Consistent with the requirements of the State Water Resources Control Board (SWRCB) for projects over one acre in size, obtain coverage under the General Construction Activity Storm Water Permit (General Construction Permit) issued by the SWRCB and prepare a stormwater pollution prevention plan (SWPPP) and submit the plan for review and approval by the Regional Water Quality Control Board (RWQCB). At a minimum, the SWPPP should include a description of construction materials, practices, and equipment storage and maintenance; a list of pollutants likely to contact stormwater; site-specific erosion and sedimentation control practices; a list of provisions to eliminate or reduce discharge of materials to stormwater; best management practices (BMPs); and an inspection and monitoring program. c) Consistent with the requirements of the SWRCB and local regulatory agencies with oversight of development associated with the Plan, ensure that project designs provide adequate slope drainage and appropriate landscaping to minimize the occurrence of slope instability and erosion. Design features should include measures to reduce erosion caused by storm water. Road cuts should be designed to maximize the potential for revegetation. d) Consistent with the CBC and local regulatory agencies with oversight of development associated with the Plan, ensure that, prior to preparing project designs, new and abandoned wells are	Control Board (SWRCB). Stormwater best management practices (BMPs) would be implemented to limit erosion, minimize sedimentation, and control stormwater runoff water quality during construction activities. The Project would also be required to obtain a National Pollutant Discharge Elimination System (NPDES) Construction General Permit (CGP) from the State Water Resources Control Board (SWRCB) and prepare a Stormwater Pollution Prevention Plan (SWPPP) which would include best management practices (BMPs) to reduce water quality impacts, including various measures to control on-site erosion.

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Impact and Mitigation Measure	Applicability to the Project
identified within construction areas to ensure the stability of nearby soils.	
Impact GEO-3 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 mitigation measures required.	**No mitigation applies.** No mitigation measures related to this issue were identified in the 2020-2045 RTP/SCS MMRP, and no mitigation measures apply to the Project.
Impact GEO-4 Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property. No mitigation measures required.	**No mitigation applies.** No mitigation measures related to this issue were identified in the 2020-2045 RTP/SCS MMRP, and no mitigation measures apply to the Project.
Impact GEO-5 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. No mitigation measures required.	**No mitigation applies.** No mitigation measures related to this issue were identified in the 2020-2045 RTP/SCS MMRP, and no mitigation measures apply to the Project.
Impact GEO-6 Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature. **PMM GEO-2:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to paleontological resources. Such measures may include the following or other comparable measures identified by the Lead Agency:	**This Mitigation Measure is incorporated through implementation of project specific mitigation measures which are equal to or more effective than this Mitigation Measure.** No paleontological resources were identified within the Project area as a part of the Paleontological Resources Assessment prepared for the Project. However, the age and composition of soils and sediments across the Project area, combined with the knowledge of paleontological resources identified within similar sediment deposits in California, indicate a moderate to high sensitivity for paleontological resources. As such, in order to mitigate potential impacts to

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Impact and Mitigation Measure	Applicability to the Project
a) Ensure compliance with the Paleontological Resources Preservation Act, the Federal Land Policy and Management Act, the Antiquities Act, Section 5097.5 of the Public Resources Code (PRC), adopted county and city general plans, and other federal, state and local regulations, as applicable and feasible, by adhering to and incorporating the performance standards and practices from the 2010 Society for Vertebrate Paleontology (SVP) standard procedures for the assessment and mitigation of adverse impacts to paleontological resources. b) Obtain review by a qualified paleontologist (e.g. who meets the SVP standards for a Principal Investigator or Project Paleontologist or the Bureau of Land Management (BLM) standards for a Principal Investigator), to determine if the project has the potential to require ground disturbance of parent material with potential to contain unique paleontological or resources, or to require the substantial alteration of a unique geologic feature. The assessment should include museum records searches, a review of geologic mapping and the scientific literature, geotechnical studies (if available), and potentially a pedestrian survey, if units with paleontological potential are present at the surface. c) Avoid exposure or displacement of parent material with potential to yield unique paleontological resources. d) Where avoidance of parent material with the potential to yield unique paleontological resources is not feasible: 1. All on-site construction personnel receive Worker Education and Awareness Program (WEAP) training prior to the commencement of excavation work to understand the regulatory framework that provides for protection of paleontological resources and become familiar with diagnostic characteristics of the materials with the potential to be encountered.	paleontological resources, the Project would incorporate project specific MM GEO-1 through MM GEO-4, which address procedures regarding the unanticipated discovery of paleontological resources during ground-disturbing activities. **MM GEO-1** Retention of Qualified Paleontologist. The Applicant shall retain a paleontologist who meets the Society of Vertebrate Paleontology's (SVP, 2010) definition for qualified professional paleontologist (Qualified Paleontologist) to carry out all mitigation related to paleontological resources. Prior to the start of ground-disturbing activities, the Qualified Paleontologist or their designee shall conduct construction worker paleontological resources sensitivity training for all construction personnel. Construction personnel shall be informed on how to identify the types of paleontological resources that may be encountered, the proper procedures to be enacted in the event of an inadvertent discovery of paleontological resources, and safety precautions to be taken when working with paleontological monitors. The Applicant shall ensure that construction personnel are made available for and attend the training and retain documentation demonstrating attendance. **MM GEO-2** Paleontological Monitoring. Paleontological Monitoring. Paleontological monitoring shall be conducted during ground-disturbing activities below 10 feet in Quaternary alluvium. Monitoring shall be conducted by a qualified paleontological monitor (SVP, 2010) working under the direct supervision of the Qualified Paleontologist. Monitoring shall consist of visually inspecting fresh exposures of rock for larger fossil remains and, where appropriate, collecting sediment samples to wet or dry screen to test promising horizons for smaller fossil remains. If the Qualified Paleontologist determines that full-time monitoring is no longer warranted, based on the specific geologic conditions at the surface or at depth, the Qualified Paleontologist may recommend

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2. A qualified paleontologist prepares a Paleontological Resource Management Plan (PRMP) to guide the salvage, documentation and repository of unique paleontological resources encountered during construction. The PRMP should adhere to and incorporate the performance standards and practices from the 2010 SVP Standard procedures for the assessment and mitigation of adverse impacts to paleontological resources. If unique paleontological resources are encountered during construction, use a qualified paleontologist to oversee the implementation of the PRMP. 3. Monitor ground disturbing activities in parent material, with a moderate to high potential to yield unique paleontological resources using a qualified paleontological monitor meeting the standards of the SVP or the BLM to determine if unique paleontological resources are encountered during such activities, consistent with the specified or comparable protocols. 4. Identify where ground disturbance is proposed in a geologic unit having the potential for containing fossils and specify the need for a paleontological monitor to be present during ground disturbance in these areas. e) Avoid routes and project designs that would permanently alter unique geological features. f) Salvage and document adversely affected resources sufficient to support ongoing scientific research and education. g) Significant recovered fossils should be prepared to the point of curation, identified by qualified experts, listed in a database to facilitate analysis, and deposited in a designated paleontological curation facility. h) Following the conclusion of the paleontological monitoring, the qualified paleontologist should prepare a report stating that the	that monitoring be reduced to periodic spot-checking or cease entirely. **MM GEO-3** Paleontological Resource Discovery. If a potential fossil is found, the paleontological monitor shall be allowed to temporarily divert or redirect grading and excavation activities in the area of the exposed fossil to facilitate evaluation of the discovery. An appropriate buffer area shall be established around the find where construction activities shall not be allowed to continue. Work shall be allowed to continue outside of the buffer area. At the monitor's discretion, and to reduce any construction delay, the grading and excavation contractor shall assist in removing rock/sediment samples for initial processing and evaluation. If a fossil is determined to be significant, the Qualified Paleontologist shall implement a paleontological salvage program to remove the resources from their location, following the guidelines of the SVP (2010). Any fossils encountered and recovered shall be prepared to the point of identification, catalogued, and curated at a public, non-profit institution with a research interest in the material and with retrievable storage, such as the Natural History Museum of Los Angeles County, if such an institution agrees to accept the fossils. If no institution accepts the fossil collection, they shall be donated to a local school in the area for educational purposes. Accompanying notes, maps, and photographs shall also be filed at the repository and/or school. If construction personnel discover any potential fossils during construction while the paleontological monitor is not present, regardless of the depth of work or location, work at the discovery location shall cease in a 50-foot radius of the discovery until the Qualified Paleontologist has assessed the discovery and recommended and implemented appropriate treatment as described earlier in this measure.

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paleontological monitoring requirement has been fulfilled and summarize the results of any paleontological finds. The report should be submitted to the lead CEQA and the repository curating the collected artifacts, and should document the methods and results of all work completed under the PRMP, including treatment of paleontological materials, results of specimen processing, analysis, and research, and final curation arrangements.	**MM GEO-4** Monitoring Report. At the conclusion of paleontological monitoring and prior to the release of the grading bond, the Qualified Paleontologist shall prepare a report summarizing the results of the monitoring and salvage efforts, the methodology used in these efforts, as well as a description of the fossils collected and their significance. The report shall be submitted to the District, the Natural History Museum of Los Angeles County, and representatives of other appropriate or concerned agencies to signify the satisfactory completion of the project and required mitigation measures.
GREENHOUSE GAS EMISSIONS	
Impact GHG-1 Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment. **PMM GHG-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to greenhouse gas emissions, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Integrate green building measures consistent with CALGreen (California Building Code Title 24), local building codes and other applicable laws, into project design including: i. Use energy efficient materials in building design, construction, rehabilitation, and retrofit. ii. Install energy-efficient lighting, heating, and cooling systems (cogeneration); water heaters; appliances; equipment; and control systems. iii. Reduce lighting, heating, and cooling needs by taking advantage of light-colored roofs, trees for shade, and sunlight.	**Substantially conforms through regulatory compliance and Project features.** The Project would be required to comply with similar regulations that are equal or more effective than this mitigation measure. The City's Energy and Climate Action Plan (ECAP) presents strategies for reducing energy consumption and GHG emissions and promoting energy conservation and environmental initiatives. In order to determine consistency with the ECAP, the City of Inglewood has developed Climate-Ready Development Standards to aid in measuring the value of certain design and construction measures incorporated into proposed development projects toward emission reduction goals. The Project would incorporate several of the ECAP measures that would result in reduced GHG emissions including the following: • The Project would be constructed in accordance with Title 24 of the California Building Standards Code – Energy Efficiency Standards as well as the appliance energy efficiency standards in Title 20 of the California Code of Regulations.

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iv. Incorporate passive environmental control systems that account for the characteristics of the natural environment. v. Use high-efficiency lighting and cooking devices. vi. Incorporate passive solar design. vii. Use high-reflectivity building materials and multiple glazing. viii. Prohibit gas-powered landscape maintenance equipment. ix. Install electric vehicle charging stations. x. Reduce wood burning stoves or fireplaces. xi. Provide bike lanes accessibility and parking at residential developments. b) Reduce emissions resulting from projects through implementation of project features, project design, or other measures, such as those described in Appendix F of the State CEQA Guidelines. c) Include off-site measures to mitigate a project's emissions. d) Measures that consider incorporation of Best Available Control Technology (BACT) during design, construction and operation of projects to minimize GHG emissions, including but not limited to: i. Use energy and fuel-efficient vehicles and equipment; ii. Deployment of zero- and/or near zero emission technologies; iii. Use lighting systems that are energy efficient, such as LED technology; iv. Use the minimum feasible amount of GHG-emitting construction materials; v. Use cement blended with the maximum feasible amount of flash or other materials that reduce GHG emissions from cement production; vi. Incorporate design measures to reduce GHG emissions from solid waste management through encouraging solid waste recycling and reuse;	• All residential units will be EV capable and two on-site EV Charging stations would be provided at each of the clubhouse buildings. • The Project would include solar panels which would generate power to meet at least 50 percent of the Project's energy demand. • The Project would incorporate a variety of strategies for sustainability and water conservation. Plant species will be predominantly low and moderate water use specific to the local climate. The irrigation system would include a variety of water conservation features including the incorporation of Smart Water Application Technology (SWAT) that will allow it to automatically adjust run times based on local weather conditions. Furthermore, the Project would be consistent with the strategies of the ECAP (Strategy 2: Increase Energy Efficiency, Strategy 3: Support Renewable Energy Generation, Strategy 4: Improve Transportation Options: Strategy 5: Reduce Consumption and Waste, and Strategy 6: Adapt to the Potential Impacts of Climate Change). The Project would be an infill development located near transit, and near residential, commercial, entertainment and service uses. Additionally, because the Project is consistent with the ECAP, the Project would not conflict with an applicable plan, policy, or regulation of an agency developed for the purpose of reducing GHG emissions. Collectively, these Project features and the Project's required regulatory compliance (e.g., Title 24 and CalGreen compliance) would result in reduced energy consumption, reduced vehicle miles traveled (VMT), and corresponding reduction in GHG emissions, consistent with the Project-related mitigation identified by SCAG.

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vii. Incorporate design measures to reduce energy consumption and increase use of renewable energy; viii. Incorporate design measures to reduce water consumption; ix. Use lighter-colored pavement where feasible; x. Recycle construction debris to maximum extent feasible; xi. Plant shade trees in or near construction projects where feasible; and xii. Solicit bids that include concepts listed above. e) Measures that encourage transit use, carpooling, bike-share and car-share programs, active transportation, and parking strategies, including, but not limited to the following: i. Promote transit-active transportation coordinated strategies; ii. Increase bicycle carrying capacity on transit and rail vehicles; iii. Improve or increase access to transit; iv. Increase access to common goods and services, such as groceries, schools, and day care; v. Incorporate affordable housing into the project; vi. Incorporate the neighborhood electric vehicle network; vii. Orient the project toward transit, bicycle and pedestrian facilities; viii. Improve pedestrian or bicycle networks, or transit service; ix. Provide traffic calming measures; x. Provide bicycle parking; xi. Limit or eliminate park supply through: i. Elimination (or reduction) of minimum parking requirements, ii. Creation of maximum parking requirements, iii. Provision of shared parking; xii. Unbundle parking costs;	Thus, application of this mitigation measure is not required due to compliance with regulatory compliance measures and Project features.

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Impact and Mitigation Measure	Applicability to the Project
xiii. Provide parking cash-out programs; xiv. Implement or provide access to commute reduction program; f) Incorporate bicycle and pedestrian facilities into project designs, maintaining these facilities, and providing amenities incentivizing their use; and planning for and building local bicycle projects that connect with the regional network; g) Improving transit access to rail and bus routes by incentives for construction of transit facilities within developments, and/or providing dedicated shuttle service to transit stations; and h) Adopting employer trip reduction measures to reduce employee trips such as vanpool and carpool programs, providing end-of-trip facilities, and telecommuting programs including but not limited to measures that: i. Provide car-sharing, bike sharing, and ride-sharing programs; ii. Provide transit passes; iii. Shift single occupancy vehicle trips to carpooling or vanpooling, for example providing ride-matching services; iv. Provide incentives or subsidies that increase that use of modes other than single-occupancy vehicle; v. Provide on-site amenities at places of work, such as priority parking for carpools and vanpools, secure bike parking, and showers and locker rooms; vi. Provide employee transportation coordinators at employment sites; vii. Provide a guaranteed ride home service to users of non-auto modes. i) Designate a percentage of parking spaces for ride-sharing vehicles or high-occupancy vehicles, and provide adequate passenger loading and unloading for those vehicles;	

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j) Land use siting and design measures that reduce GHG emissions, including: i. Developing on infill and brownfields sites; ii. Building compact and mixed-use developments near transit; iii. Retaining on-site mature trees and vegetation, and planting new canopy trees; iv. Measures that increase vehicle efficiency, encourage use of zero and low emissions vehicles, or reduce the carbon content of fuels, including constructing or encouraging construction of electric vehicle charging stations or neighborhood electric vehicle networks, or charging for electric bicycles; and v. Measures to reduce GHG emissions from solid waste management through encouraging solid waste recycling, composting, and reuse. k) Consult the SCAG Environmental Justice Toolbox for potential measures to address impacts to low-income and/or minority communities. The measures provided above are also intended to be applied in low income and minority communities as applicable and feasible. l) Require at least five percent of all vehicle parking spaces include electric vehicle charging stations, or at a minimum, require the appropriate infrastructure to facilitate sufficient electric charging for passenger vehicles and trucks to plug-in. m) Encourage telecommuting and alternative work schedules, such as: i. Staggered starting times ii. Flexible schedules iii. Compressed work weeks n) Implement commute trip reduction marketing, such as: i. New employee orientation of trip reduction and alternative mode options	

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Impact and Mitigation Measure	Applicability to the Project
ii. Event promotions iii. Publications o) Implement preferential parking permit program p) Implement school pool and bus programs q) Price workplace parking, such as: i. Explicitly charging for parking for its employees; ii. Implementing above market rate pricing; iii. Validating parking only for invited guests; iv. Not providing employee parking and transportation allowances; and v. Educating employees about available alternatives.	
Impact GHG-2 Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases. See PMM GHG-1, above.	See discussion for PMM GHG-1 under GHG-1 for discussion of the Project's consistency with this mitigation measure.
HAZARDS AND HAZARDOUS MATERIALS	
Impact HAZ-1 Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. **PMM HAZ-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to the routine transport, use, or disposal of hazardous materials, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Where the construction or operation of projects involves the transport of hazardous material, provide a written plan of proposed	**Substantially conforms through regulatory compliance.** Construction of the Project would involve the temporary use of hazardous substances in the form of paint, adhesives, surface coatings and other finishing materials, and cleaning agents, fuels, and oils typically used in construction. However, all such substances and materials would be used, stored, and disposed of in accordance with applicable laws and regulations and manufacturers' instructions and are not expected to cause risk to the public or nearby schools. In addition, all construction work would be performed consistent with applicable federal and California Occupational Safety and

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Impact and Mitigation Measure	Applicability to the Project
routes of travel demonstrating use of roadways designated for the transport of such materials. b) Specify Project requirements for interim storage and disposal of hazardous materials during construction and operation. Storage and disposal strategies must be consistent with applicable federal, state, and local statutes and regulations. Specify the appropriate procedures for interim storage and disposal of hazardous materials, anticipated to be required in support of operations and maintenance activities, in conformance with applicable federal, state, and local statutes and regulations, in the business plan for projects as applicable and appropriate. c) Submit a Hazardous Materials Business/Operations Plan for review and approval by the appropriate local agency. Once approved, keep the plan on file with the Lead Agency (or other appropriate government agency) and update, as applicable. The purpose of the Hazardous Materials Business/Operations Plan is to ensure that employees are adequately trained to handle the materials and provides information to the local fire protection agency should emergency response be required. The Hazardous Materials Business/Operations Plan should include the following: – The types of hazardous materials or chemicals stored and/or used on-site, such as petroleum fuel products, lubricants, solvents, and cleaning fluids. – The location of such hazardous materials. – An emergency response plan including employee training information. – A plan that describes the way these materials are handled, transported and disposed. d) Follow manufacturer's recommendations on use, storage, and disposal of chemical products used in construction.	Health Administration (OSHA) Safety and Health Standards and California OSHA (Cal/OSHA) requirements to ensure the safety and well-being of construction workers. The types of potentially hazardous substances and materials that would be used during Project operation would include those typical of residential developments, such as small quantities of cleaning solvents, painting supplies, pesticides for landscaping, and pool maintenance. However, such substances and materials would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. Therefore, operation of the project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials, and the Project is consistent with this mitigation measure. Thus, application of this mitigation measure is not required.

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e) Avoid overtopping construction equipment fuel gas tanks. f) Properly contain and remove grease and oils during routine maintenance of construction equipment. g) Properly dispose of discarded containers of fuels and other chemicals. h) Prior to shipment remove the most volatile elements, including flammable natural gas liquids, as feasible. i) Identify and implement more stringent tank car safety standards. j) Improve rail transportation route analysis, and modification of routes based on that analysis. k) Use the best available inspection equipment and protocols and implement positive train control. l) Reduce train car speeds to 40 miles per hour when passing through urbanized areas of any size. m) Limit storage of crude oil tank cars in urbanized areas of any size and provide appropriate security in storage yards for all shipments. n) Notify in advance county and city emergency operations offices of all crude oil shipments, including a contact number that can provide real-time information in the event of an oil train derailment or accident. o) Report quarterly hazardous commodity flow information, including classification and characterization of materials being transported, to all first response agencies (49 Code Fed. Regs. 15.5) along the mainline rail routes used by trains carrying crude oil identified. p) Fund training and outfitting emergency response crews that includes the cost of backfilling personnel while in training. q) Undertake annual emergency responses scenario/field based training including Emergency Operations Center Training activations with local emergency response agencies.	

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Impact HAZ-2 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. See PMM HAZ-1, above. **PMM HAZ-2:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce hazards related to the reasonably foreseeable upsets and accidents involving the release of hazardous materials, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: Require implementation of safety standards regarding transport of hazardous materials, including but not limited to the following: a) Removal of the most volatile elements, including flammable natural gas liquids, prior to shipment; b) More stringent tank car safety standards; c) Improved rail transportation route analysis, and modification of routes based on that analysis; d) Utilization of the best available inspection equipment and protocols, and implementation of positive train control; e) Reduced train car speeds to 40 miles per hour when passing through urbanized areas of any size; f) Limitations on storage of hazardous materials tank cars in urbanized areas of any size and provide appropriate security in storage yards for all shipments; g) Advance notification to county and city emergency operations offices of all crude oil and hazardous materials shipments, including	**Substantially conforms through regulatory compliance.** See consistency analysis for PMM HAZ-1 under HAZ-1. Due to the age of the existing vacant school buildings on-site (constructed in 1960), there is a potential for asbestos-containing materials (ACMs) and lead-based paint (LBP) to be present on-site. Additionally, suspect ACM was observed in the form of floor tiles and ceiling tiles in the existing vacant school buildings on-site, and paint coating of the structures appeared in fair condition at the time of the site reconnaissance conducted for the Project Site. With compliance with the applicable regulatory requirements, impacts pertaining to the release of or exposure to hazardous substances would be minimized and the Project would be consistent with this mitigation measure.

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a contact number that can provide real-time information in the event of an oil train derailment or accident; h) Quarterly hazardous commodity flow information, including classification and characterization of materials being transported, to all first response agencies (49 Code Fed. Regs. 15.5) along the mainline rail routes used by trains carrying hazardous materials.	
Impact HAZ-3 Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. See PMM HAZ-1 and PMM HAZ-2, above. **PMM HAZ-3:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to the release of hazardous materials within one-quarter mile of schools, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Where the construction and operation of projects involves the transport of hazardous materials, avoid transport of such materials within one-quarter mile of schools, when school is in session, wherever feasible. b) Where it is not feasible to avoid transport of hazardous materials, within one-quarter mile of schools on local streets, provide notifications of the anticipated schedule of transport of such materials.	**Substantially conforms through regulatory compliance.** See consistency analysis for PMM HAZ-1 and PMM HAZ-2 under Impacts HAZ-1 and HAZ-2, respectively. Schools within one quarter mile of the Project Site include Morningside High School, IUSD Child Development Center and Woodworth-Monroe TK-8 Academy. All potentially hazardous materials used on the Project Site during Project construction and operations would be contained, stored, and used in accordance with manufacturer's instructions and handled in compliance with applicable federal and State standards and regulations. Operation of the Project would use minor amounts of hazardous materials and would be limited to those similar to any other residential urban development (cleaning solutions, pool chemicals, pesticides, fertilizers and other landscaping supplies). However, such substances and materials would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. Therefore, construction and operation of the Project would not create a significant risk of exposure to hazardous materials for the public or the environment, including schools. Thus, application of this mitigation measure is not required due to regulatory compliance.
Impact HAZ-4 Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5	**Not Applicable.** Government Code Section 65962.5 refers to the Hazardous Waste and Substances Site List, commonly known as the Cortese List, maintained by the California Department of Toxic

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and, as a result, would it create a significant hazard to the public or the environment. **PMM HAZ-4:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to projects that are located on a site which is included on the Cortese List, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) For any listed sites or sites that have the potential for residual hazardous materials as a result of historic land uses, complete a Phase I Environmental Site Assessment, including a review and consideration of data from all known databases of contaminated sites, during the process of planning, environmental clearance, and construction for projects. b) Where warranted due to the known presence of contaminated materials, submit to the appropriate agency responsible for hazardous materials/wastes oversight a Phase II Environmental Site Assessment report if warranted by a Phase I report for the project site. The reports should make recommendations for remedial action, if appropriate, and be signed by a Registered Environmental Assessor, Professional Geologist, or Professional Engineer. c) Implement the recommendations provided in the Phase II Environmental Site Assessment report, where such a report was determined to be necessary for the construction or operation of the project, for remedial action. d) Submit a copy of all applicable documentation required by local, state, and federal environmental regulatory agencies, including but not limited to: permit applications, Phase I and II Environmental Site Assessments, human health and ecological risk assessments,	Substances Control (DTSC). The Cortese list contains hazardous waste and substance sites including public drinking water wells with detectable levels of contamination, sites with known underground storage tanks having a reportable release, solid waste disposal facilities from which there is a known migration, hazardous substance sites selected for remedial action, historic Cortese sites, and sites with known toxic material identified through the abandoned site assessment program. According to the Phase I ESA, several environmental risk sites were found to exist, including off-site, cross-gradient portions of Morningside High School and Woodworth-Monroe TK-8 Academy (formerly Monroe Middle School) According to the Phase I ESA, none of these listings are an environmental concern for the Project Site because no recorded violations or previous leaks or spills have been documented at any of the listings in the vicinity of the Project Site. Other nearby listed sites are also unlikely to impact the Project Site due to their distance from the Project Site and their cross-gradient locations. Thus, PMM HAZ-4 is not applicable.

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remedial action plans, risk management plans, soil management plans, and groundwater management plans. e) Conduct soil sampling and chemical analyses of samples, consistent with the protocols established by the U.S. EPA to determine the extent of potential contamination beneath all underground storage tanks (USTs), elevator shafts, clarifiers, and subsurface hydraulic lifts when on-site demolition or construction activities would potentially affect a particular development or building. f) Consult with the appropriate local, state, and federal environmental regulatory agencies to ensure sufficient minimization of risk to human health and environmental resources, both during and after construction, posed by soil contamination, groundwater contamination, or other surface hazards including, but not limited to, underground storage tanks, fuel distribution lines, waste pits and sumps. g) Obtain and submit written evidence of approval for any remedial action if required by a local, state, or federal environmental regulatory agency. h) Cease work if soil, groundwater, or other environmental medium with suspected contamination is encountered unexpectedly during construction activities (e.g., identified by odor or visual staining, or if any underground storage tanks, abandoned drums, or other hazardous materials or wastes are encountered), in the vicinity of the suspect material. Secure the area as necessary and take all appropriate measures to protect human health and the environment, including but not limited to, notification of regulatory agencies and identification of the nature and extent of contamination. Stop work in the areas affected until the measures have been implemented consistent with the guidance of the appropriate regulatory oversight authority.	

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i) Soil generated by construction activities should be stockpiled on-site in a secure and safe manner. All contaminated soils determined to be hazardous or non-hazardous waste must be adequately profiled (sampled) prior to acceptable reuse or disposal at an appropriate off-site facility. Complete sampling and handling and transport procedures for reuse or disposal, in accordance with applicable local, state and federal laws and policies. j) Groundwater pumped from the subsurface should be contained on-site in a secure and safe manner, prior to treatment and disposal, to ensure environmental and health issues are resolved pursuant to applicable laws and policies. Utilize engineering controls, which include impermeable barriers to prohibit groundwater and vapor intrusion into the building. k) As needed and appropriate, prior to issuance of any demolition, grading, or building permit, submit for review and approval by the Lead Agency (or other appropriate government agency) written verification that the appropriate federal, state and/or local oversight authorities, including but not limited to the Regional Water Quality Control Board (RWQCB), have granted all required clearances and confirmed that the all applicable standards, regulations, and conditions have been met for previous contamination at the site. l) Develop, train, and implement appropriate worker awareness and protective measures to assure that worker and public exposure is minimized to an acceptable level and to prevent any further environmental contamination as a result of construction. m) If asbestos-containing materials (ACM) are found to be present in building materials to be removed, submit specifications signed by a certified asbestos consultant for the removal, encapsulation, or enclosure of the identified ACM in accordance with all applicable laws and regulations, including but not necessarily limited to:	

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California Code of Regulations, Title 8; Business and Professions Code; Division 3; California Health and Safety Code Section 25915-25919.7; and other local regulations. n) Where projects include the demolitions or modification of buildings constructed prior to 1978, complete an assessment for the potential presence or lack thereof of ACM, lead based paint, and any other building materials or stored materials classified as hazardous waste by state or federal law. o) Where the remediation of lead-based paint has been determined to be required, provide specifications to the appropriate agency, signed by a certified Lead Supervisor, Project Monitor, or Project Designer for the stabilization and/or removal of the identified lead paint in accordance with all applicable laws and regulations, including but not necessarily limited to: California Occupational Safety and Health Administration's (Cal OSHA's) Construction Lead Standard, Title 8 California Code of Regulations (CCR) Section 1532.1 and Department of Health Services (DHS) Regulation 17 CCR Sections 35001–36100, as may be amended. If other materials classified as hazardous waste by state or federal law are present, the project sponsor should submit written confirmation to the appropriate local agency that all state and federal laws and regulations should be followed when profiling, handling, treating, transporting, and/or disposing of such materials.	
Impact HAZ-5 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. See PMM NOISE-1, below.	**This Mitigation Measure is incorporated through regulatory compliance and project specific mitigation measures which are equal to or more effective than this Mitigation Measure.** The Project Site is located approximately 1.0-mile north of the Hawthorne Municipal Airport and approximately 2.5 miles east of the Los Angeles International Airport (LAX). The Project Site is not located within the Airport Influence Area for the Hawthorne Municipal Airport. However, the northwestern corner of the Project

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	Site falls within the Airport Influence Area and 65 db CNEL noise exposure contour for LAX. According to the Los Angeles County Airport Land Use Plan, residential uses within the 65 dBA noise contour shall review noise insulation needs. While a portion of the housing within the Project Site is within the noise contours, any new housing that is built within the LAX Influence Area would be required to comply with the City's development standards and regulations to reduce the impact of aircraft noise impacts on the residences. New housing must be properly insulated to meet Title 24 requirements and Inglewood Municipal Code requirements requiring a 45 dB interior noise standard. Federal Aviation Administration (FAA) 14 CFR Part 77.9 requires that all structures exceeding 200 feet above ground level (AGL) be submitted to the FAA so that an aeronautical study can be conducted. The FAA's objective in conducting aeronautical studies is to ensure that proposed structures do not have an effect on the safety of air navigation and the efficient utilization of navigable airspace by aircraft. The Project would not construct any buildings or structures to a height that would interfere with or obstruct any local airport operations. The height of each proposed residence would be approximately 35 feet, not to exceed a height of 40 feet/3 stories. The two recreation clubhouse buildings would each be two stories; one would be 29 feet and the other 28 feet and 5 inches in height. Any construction cranes would be less than 80 feet in height and would not be subject to 14 CFR Part 77.9 because they do not exceed 200 feet. The Inglewood 2021-2029 Housing Element implements a Residential Sound Insulation Program, which includes sound insulation utilizing grant funds from the Federal Aviation Administration and Los Angeles World Airports. Project specific mitigation measure MM NOISE-3 requires the verification that all

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	internal living spaces achieve a 45 dBA noise level as well as meet exterior standards in the Municipal Code. With implementation of MM NOISE-3, the Project would not result in excessive noise for people residing within the Project Site. Nearby residential, schools, and other noise sensitive land uses near the Project area would also be subject to exterior noise standards contained in the Municipal Code.
Impact HAZ-6 Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. See PMM HAZ-1 through PMM HAZ-4 and PMM TRA-5. **PMM HAZ-5:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects which may impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Continue to coordinate locally and regionally based on ongoing review and integration of projected transportation and circulation conditions. b) Develop new methods of conveying projected and real time information to citizens using emerging electronic communication tools including social media and cellular networks; c) Continue to evaluate lifeline routes for movement of emergency supplies and evacuation.	**This Mitigation Measure is incorporated though regulatory compliance and incorporation of a project specific mitigation measure that is equal to or more effective than this Mitigation Measure.** The Project Site is located in an established urban area that is well-served by an existing roadway network. The County of Los Angeles has an adopted Operational Area Emergency Response Plan (2023) which focuses on emergencies requiring multi-agency and/or multi-jurisdictional responses. The City of Inglewood Office of Emergency Services (OES), coordinates with local agencies and neighboring jurisdictions, as well as regional and state agencies, to prepare for, respond to, and recover from emergencies and disasters. The OES is responsible for maintaining and updating the City of Inglewood Emergency Plan, which serves as a guide to ensure optimum flexibility during emergencies. According to the City of Inglewood Safety Element adopted in 2022, Century Boulevard and Yukon Avenue, are identified as local evacuation routes. Development of the Project would not infringe on those streets and would not interfere with the City's emergency evacuation plan. During an unanticipated disaster event, City and County agencies (i.e., Police and Fire Departments) would implement operational protocols, as well as plans and programs, on a case by-case basis to facilitate emergency evacuations and/or response, which would consider traffic conditions at the time of the emergency. In such

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	instances, traffic would be routed along the City's disaster routes, as determined appropriate, by the applicable responding City agencies. Compliance with existing regulations would ensure that implementation of the Project would not impair or physically interfere with an adopted emergency response plan or with an emergency evacuation plan. Furthermore, a detailed Construction Management Plan, included as **MM TRAF-2**, would be implemented to minimize construction impacts for vehicles, bicyclists, and pedestrians.
Impact HAZ-7 Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires. See PMM WF-1, below.	**Not applicable.** See discussion of the applicability of PMM WF-1 under WF-2, below. The Project Site is in a fully urbanized area and it is not adjacent to any wildland. Additionally, according to the California Department of Forestry and Fire Protection (CAL FIRE), the Project Site is not within a State Responsibility Area or a very high fire hazard severity zone (VHFHSZ). Thus, this mitigation measure is not applicable to the Project.
HYDROLOGY AND WATER QUALITY	
Impact HYD-1 Potential to violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality. **PMM HYD-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects from violation of any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater	**Substantially complies through regulatory compliance.** The Project would be required to comply with existing regulatory requirements pertaining to water quality standards and waste discharge requirements during construction and operation, as governed by the Los Angeles Regional Water Quality Control Board (LARWQCB) and the City. The Project would be required to obtain and comply with the Construction General Permit from the State Water Resources Control Board (SWRCB). Stormwater best management practices (BMPs) would be implemented to limit erosion, minimize sedimentation, and control stormwater runoff water quality during construction activities. The Project would disturb more than 1 acre

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quality, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Complete, and have approved, a Stormwater Pollution Prevention Plan (SWPPP) prior to initiation of construction. b) Implement Best Management Practices to reduce the peak stormwater runoff from the project site to the maximum extent practicable. c) Comply with the Caltrans storm water discharge permit as applicable; and identify and implement Best Management Practices to manage site erosion, wash water runoff, and spill control. d) Complete, and have approved, a Standard Urban Stormwater Management Plan, prior to occupancy of residential or commercial structures. e) Ensure adequate capacity of the surrounding stormwater system to support stormwater runoff from new or rehabilitated structures or buildings. f) Prior to construction within an area subject to Section 404 of the Clean Water Act, obtain all required permit approvals and certifications for construction within the vicinity of a watercourse: g) Where feasible, restore or expand riparian areas such that there is no net loss of impervious surface as a result of the project. h) Install structural water quality control features, such as drainage channels, detention basins, oil and grease traps, filter systems, and vegetated buffers to prevent pollution of adjacent water resources by polluted runoff where required by applicable urban storm water runoff discharge permits, on new facilities. i) Provide operational best management practices for street cleaning, litter control, and catch basin cleaning are implemented to prevent water quality degradation in compliance with applicable storm water runoff discharge permits; and ensure treatment controls are	of soil, and therefore, would require the preparation of a SWPPP as part of the Construction General Permit requirements. Construction BMPs included in the SWPPP would include, but are not limited to, erosion control measures, sediment control measures, and hazardous materials, storage, disposal, and spill measures The Project would implement a combination of raised and surface-level biofiltration stormwater planters and underground detention basins to accommodate the 85th percentile, 24-hour storm, as required by the County's LID Standards Manual. Additionally, Project operation itself would not result in discharges that would cause regulatory standards to be violated in the Los Angeles River Watershed. Thus, incorporation of this mitigation measure is not required due to regulatory compliance.

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in place as early as possible, such as during the acquisition process for rights-of-way, not just later during the facilities design and construction phase. j) Comply with applicable municipal separate storm sewer system discharge permits as well as Caltrans' storm water discharge permit including long-term sediment control and drainage of roadway runoff. k) Incorporate as appropriate treatment and control features such as detention basins, infiltration strips, and porous paving, other features to control surface runoff and facilitate groundwater recharge into the design of new transportation projects early on in the process to ensure that adequate acreage and elevation contours are provided during the right-of-way acquisition process. l) Upgrade stormwater drainage facilities to accommodate any increased runoff volumes. These upgrades may include the construction of detention basins or structures that will delay peak flows and reduce flow velocities, including expansion and restoration of wetlands and riparian buffer areas. System designs shall be completed to eliminate increases in peak flow rates from current levels. m) Encourage Low Impact Development (LID) and incorporation of natural spaces that reduce, treat, infiltrate and manage stormwater runoff flows in all new developments, where practical and feasible.	
Impact HYD-2 Potential to substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin. **PMM HYD-2**: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse	**Not applicable.** Regarding Project construction, no water supply wells are located within or in the vicinity of the Project Site. Additionally, groundwater was not encountered in any of the exploratory borings performed on-site to the maximum depth of 30 feet and dewatering is not anticipated for the Project. The Project would not include the construction of any water supply wells, nor would the Project impact any existing water supply wells. The Project Site is also not within a groundwater recharge area or

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effects from violation of any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Avoid designs that require continual dewatering where feasible. For projects requiring continual dewatering facilities, implement monitoring systems and long-term administrative procedures to ensure proper water management that prevents degrading of surface water and minimizes adverse impacts on groundwater for the life of the project, Construction designs shall comply with appropriate building codes and standard practices including the Uniform Building Code. b) Maximize, where practical and feasible, permeable surface area in existing urbanized areas to protect water quality, reduce flooding, allow for groundwater recharge, and preserve wildlife habitat. Minimize new impervious surfaces, including the use of in-lieu fees and off-site mitigation. c) Avoid construction and siting on groundwater recharge areas, to prevent conversion of those areas to impervious surface. d) Reduce hardscape to the extent feasible to facilitate groundwater recharge as appropriate.	facility, nor does it represent a source of groundwater recharge. Thus, this mitigation measure is not applicable to the Project.
Impact HYD-3a Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river through the addition of impervious surfaces, in a manner that would result in substantial erosion or siltation on or off site. See PMM HYD-1, above.	**Substantially complies through regulatory compliance.** See discussion for PMM HYD-1 under HYD-1 for discussion of the Project's consistency with this mitigation measure. As discussed under HYD-1, the Project already substantially conforms with this mitigation measure, because the Project would implement the regulatory requirements discussed above under HYD-1.

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Impact HYD-3b Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river through the addition of impervious surfaces, in a manner that would result in flooding on site or off site. See PMM HYD-1 and PMM HYD-2, above.	**Substantially conforms through regulatory compliance**. See discussion for PMM HYD-1 and PMM HYD-2 under HYD-1 and HYD-2, respectively for discussion of the Project's consistency with this mitigation measure.
Impact HYD-3c 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 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. See PMM HYD-1 and PMM HYD-2, above.	**Substantially conforms through regulatory compliance**. See discussion for PMM HYD-1 and HYD-2 under HYD-1 and HYD-2, respectively for discussion of the proposed project's consistency with this mitigation measure.
Impact HYD-4 In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation. **PMM HYD-4**: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures capable of avoiding or reducing the potential impacts of locating structures that would impede or redirect flood flows, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Ensure that all roadbeds for new highway and rail facilities be elevated at least one foot above the 100- year base flood elevation. Since alluvial fan flooding is not often identified on FEMA flood maps, the risk of alluvial fan flooding should be evaluated and projects should be sited to avoid alluvial fan flooding. Delineation	**Not applicable.** According to the Federal Emergency Management Agency (FEMA), the Project Site is located within Zone X, which is defined as an area of minimal flood hazard and outside of the 0.2 percent (500-year) annual chance floodplain. Additionally, there are no dams located within or in the vicinity of the Project Site, and the Project Site is not within a dam inundation area. Therefore, the Project would not impede or redirect flood flows. Thus, this mitigation measure is not applicable to the Project.

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of floodplains and alluvial fan boundaries should attempt to account for future hydrologic changes caused by global climate change.	
Impact HYD-5 Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. See PMM HYD-2, above.	**Not applicable.** See discussion of the applicability of PMM HYD-2 above.
LAND USE AND PLANNING	
Impact LU-1 Potential for the Plan to physically divide an established community. **PMM LU-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects that physically divide a community, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Facilitate good design for land use projects that build upon and improve existing circulation patterns b) Encourage implementing agencies to orient transportation projects to minimize impacts on existing communities by: – Selecting alignments within or adjacent to existing public rights of way. – Design sections above or below-grade to maintain viable vehicular, cycling, and pedestrian connections between portions of communities where existing connections are disrupted by the transportation project.	**Not applicable.** The Project does not contain features or new infrastructure that would cause a permanent disruption in the physical arrangement of an established community. Thus, this mitigation measure is not applicable to the Project.

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Impact and Mitigation Measure	Applicability to the Project
– Wherever feasible incorporate direct crossings, overcrossings, or under crossings at regular intervals for multiple modes of travel (e.g., pedestrians, bicyclists, vehicles). c) Where it has been determined that it is infeasible to avoid creating a barrier in an established community, consider other measures to reduce impacts, including but not limited to: – Alignment shifts to minimize the area affected. – Reduction of the proposed right-of-way take to minimize the overall area of impact. – Provisions for bicycle, pedestrian, and vehicle access across improved roadways.	
Impact LU-2 Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. **PMM LU-2:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects that physically divide a community, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) When an inconsistency with the adopted general plan policy or land use regulation (adopted for the purpose of avoiding or mitigating an impact) is identified modify the transportation or land use project to eliminate the conflict; or, determine if the environmental, social, economic, and engineering benefits of the project warrant an amendment to the general plan or land use regulation.	**Not applicable.** The Project would be substantially consistent with all applicable plans, policies and regulations adopted for the purpose of avoiding or mitigating an environmental effect associated with development of the Project Site. The Inglewood General Plan Land Use Element (1980, amended 1986, 2009, 2016) sets forth goals and policies to guide day-to-day land use policies and to meet the existing and future needs and desires of the community. The Project would include a request to amend the Project Site's General Plan land use designation from Low Density to Medium Density and to change its associated zoning from R-1 to R-3. The R-3 zones permits one-family dwellings, one or more one-family dwellings per lot, and multi-family dwellings. The Project would be consistent with the density and land use designations of the R-3 zone. In addition, the Project would be consistent with the goals and policies of the City of Inglewood General Plan Land Use Element, Environmental Justice Element, Housing Element or the SCAG 2020-2045 RTP/SCS or the 2024 RTP/SCS.

Table 42: Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures

Impact and Mitigation Measure	Applicability to the Project
	More specifically, the Project would support goals and policies of these documents, as it is an infill development in an urban area that is near transit that would contribute toward the City's long-term housing needs. The Project would provide a modern new development and associated landscaping within the City's existing urban fabric, creating architectural diversity among the City's older and newer housing stock. The Project would provide new housing, including affordable housing, near existing services, transit and infrastructure would contribute to the orderly development of new housing in the City. New landscaping and trees would encourage pedestrian circulation at the street level. Therefore, the Project would not result in a conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the Project, and the Project as a whole ensures consistency. Thus, this mitigation measure is not applicable to the Project.
MINERAL RESOURCES	
Impact MIN-1 Potential to 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. **PMM MIN-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce the use of mineral resources that could be of value to the region, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Provide for the efficient use of known aggregate and mineral resources or locally important mineral resource recovery sites, by ensuring that the consumptive use of aggregate resources is minimized and that access to recoverable sources of aggregate is	**Not applicable.** According to the California Geological Survey, the Project Site is not located in Mineral Resource Zone (MRZ) 2, which is defined as a MRZ where adequate information indicates that significant mineral deposits are present or a likelihood of their presence and development should be controlled. As noted in the Phase I ESA, there are three oil wells located within 2,000 feet of the Project Site. However, all three wells are listed as dry wells that are plugged, and none are within the boundaries of the Project Site. Additionally, according to the California Department of Conservation's Mines Online database, there are no mines within the vicinity of the Project Site. Furthermore, no mineral extraction operations currently occur on the Project Site. Thus, this mitigation measure is not applicable to the Project.

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Impact and Mitigation Measure	Applicability to the Project
not precluded, as a result of construction, operation and maintenance of projects. b) Where avoidance is infeasible, minimize impacts to the efficient and effective use of recoverable sources of aggregate through measures that have been identified in county and city general plans, or other comparable measures such as: 1. Recycle and reuse building materials resulting from demolition, particularly aggregate resources, to the maximum extent practicable. 2. Identify and use building materials, particularly aggregate materials, resulting from demolition at other construction sites in the SCAG region, or within a reasonable hauling distance of the project site. 3. Design transportation network improvements in a manner (such as buffer zones or the use of screening) that does not preclude adjacent or nearby extraction of known mineral and aggregate resources following completion of the improvement and during long-term operations. 4. Avoid or reduce impacts on known aggregate and mineral resources and mineral resource recovery sites through the evaluation and selection of project sites and design features (e.g., buffers) that minimize impacts on land suitable for aggregate and mineral resource extraction by maintaining portions of MRZ-2 areas in open space or other general plan land use categories and zoning that allow for mining of mineral resources.	
Impact MIN-2 Potential to 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.	**Not applicable.** See discussion for PMM MIN-1 under Impact MIN-1.

Table 42: Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures

Impact and Mitigation Measure	Applicability to the Project
See PMM MIN-1, above.	
NOISE	
Impact NOISE-1 Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. **PMM NOISE-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects that physically divide a community, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Install temporary noise barriers during construction. b) Include permanent noise barriers and sound-attenuating features as part of the project design. Barriers could be in the form of outdoor barriers, sound walls, buildings, or earth berms to attenuate noise at adjacent sensitive uses. c) Schedule construction activities consistent with the allowable hours pursuant to applicable general plan noise element or noise ordinance d) Post procedures and phone numbers at the construction site for notifying the Lead Agency staff, local Police Department, and construction contractor (during regular construction hours and off-hours), along with permitted construction days and hours, complaint procedures, and who to notify in the event of a problem. e) Notify neighbors and occupants within 300 feet of the project construction area at least 30 days in advance of anticipated times	**This Mitigation Measure is incorporated through project design features, compliance with regulatory compliance measures, and implementation of project-specific Mitigation Measures which are equal to or more effective than this Mitigation Measure**. The City permits construction activities between the hours of 7:00 a.m. and 8:00 p.m. Monday through Friday. The Project would limit all construction activity to permitted hours, consistent with PMM NOISE-1(c). Project design feature PDF NOISE-1 requires noise shielding and muffling, consistent with PMM NOISE-1(g). Project-Specific Mitigation Measure NOISE-1 requires temporary noise barriers, consistent with PMM NOISE-1(a) and (b). With regards to operational noise, PDF NOISE-2 limits the allowable hours for amplified sound at outdoor clubhouse areas and requires that speakers be directed toward the center of the pool area, away from sensitive uses. Compliance with regulatory measures in combination with project-specific PDFs and MMs, noise related to construction and operation of the Project would not exceed applicable thresholds and no substantial temporary or permanent increase in ambient noise levels in excess of established standards would occur. **PDF NOISE-1**: Noise Shielding and Muffling. Power construction equipment (including combustion engines), fixed or mobile, will be equipped with noise shielding and muffling devices consistent with manufacturers' standards or the Best Available Control Technology. All equipment will be properly maintained, and the Applicant or Owner will require any construction contractor to keep

Table 42: Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures

Impact and Mitigation Measure	Applicability to the Project
when noise levels are expected to exceed limits established in the noise element of the general plan or noise ordinance. f) Designate an on-site construction complaint and enforcement manager for the project. g) Ensure that construction equipment are properly maintained per manufacturers' specifications and fitted with the best available noise suppression devices (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds silencers, wraps). All intake and exhaust ports on power equipment shall be muffled or shielded. h) Use hydraulically or electrically powered tools (e.g., jack hammers, pavement breakers, and rock drills) for project construction to avoid noise associated with compressed air exhaust from pneumatically powered tools. However, where use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust should be used; this muffler can lower noise levels from the exhaust by up to about 10 dBA. External jackets on the tools themselves should be used, if such jackets are commercially available, and this could achieve a further reduction of 5 dBA. Quieter procedures should be used, such as drills rather than impact equipment, whenever such procedures are available and consistent with construction procedures. i) Where feasible, design projects so that they are depressed below the grade of the existing noise- sensitive receptor, creating an effective barrier between the roadway and sensitive receptors. j) Where feasible, improve the acoustical insulation of dwelling units where setbacks and sound barriers do not provide sufficient noise reduction. k) Using rubberized asphalt or "quiet pavement" to reduce road noise for new roadway segments, roadways in which widening or other	documentation on-site during any earthwork or construction activities demonstrating that the equipment has been maintained in accordance with manufacturer's specifications. **PDF NOISE -2** Operation of permanently wired amplified sound systems at outdoor club house space pool areas shall be limited to the hours of 7:00 a.m. to 10:00 p.m. and shall not exceed a volume of 80 dBA measured at 3 feet from any speaker. In addition, all speakers shall be designed and installed to direct sound toward the center of the Project pool area. **MM NOISE-1:** Temporary Walls. Noise barriers, such as temporary walls (minimum ½-inch thick plywood) or sound blankets (minimum STC 25 rating), that are a minimum of eight feet tall, shall be erected along the western, eastern, and southern Project boundaries such that the line-of-sight between noise-sensitive uses and construction activities are blocked. Should instruction be terminated at Morningside High School while the Project is undergoing construction, temporary walls shall not be required along the western Project boundary provided that the school remains vacant or noise-sensitive uses do not utilize the space.

Table 42: Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures

Impact and Mitigation Measure	Applicability to the Project
modifications require re-pavement, or normal reconstruction of roadways where re-pavement is planned. l) Projects that require pile driving or other construction noise above 90 dBA in proximity to sensitive receptors, should reduce potential pier drilling, pile driving and/or other extreme noise generating construction impacts greater than 90 dBA; a set of site-specific noise attenuation measures should be completed under the supervision of a qualified acoustical consultant. m) Use land use planning measures, such as zoning, restrictions on development, site design, and buffers to ensure that future development is compatible with adjacent transportation facilities and land uses; n) Monitor the effectiveness of noise reduction measures by taking noise measurements and installing adaptive mitigation measures to achieve the standards for ambient noise levels established by the noise element of the general plan or noise ordinance. o) Use equipment and trucks with the best available noise control techniques (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds, wherever feasible) for project construction. p) Stationary noise sources can and should be located as far from adjacent sensitive receptors as possible and they should be muffled and enclosed within temporary sheds, incorporate insulation barriers, or use other measures as determined by the Lead Agency (or other appropriate government agency) to provide equivalent noise reduction. q) Use of portable barriers in the vicinity of sensitive receptors during construction. r) Implement noise control at the receivers by temporarily improving the noise reduction capability of adjacent buildings (for instance by	

Table 42: Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures

Impact and Mitigation Measure	Applicability to the Project
the use of sound blankets), and implement if such measures are feasible and would noticeably reduce noise impacts. s) Monitor the effectiveness of noise attenuation measures by taking noise measurements. t) Maximize the distance between noise-sensitive land uses and new roadway lanes, roadways, rail lines, transit centers, park-and-ride lots, and other new noise-generating facilities. u) Construct sound reducing barriers between noise sources and noise-sensitive land uses. v) Stationary noise sources can and should be located as far from adjacent sensitive receptors as possible and they should be muffled and enclosed within temporary sheds, incorporate insulation barriers, or use other measures as determined by the Lead Agency (or other appropriate government agency) to provide equivalent noise reduction. w) Use techniques such as grade separation, buffer zones, landscaped berms, dense plantings, sound walls, reduced-noise paving materials, and traffic calming measures. x) Consult the SCAG Environmental Justice Toolbox for potential measures to address impacts to low-income and/or minority communities.	
Impact NOISE-2 Generation of excessive groundborne vibration or groundborne noise levels. See PMM NOISE-1, above. **PMM NOISE-2:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse	**This Mitigation Measure is incorporated through compliance with regulatory compliance measures and implementation of project-specific mitigation measures which are equal to or more effective than this Mitigation Measure**. See above for discussion of consistency with PMM NOISE-1 under Impact NOISE-1. Construction activities would be performed in accordance with all applicable state and federal laws and City Codes and policies governing building construction and activities. Construction is expected to occur between 7:00 a.m. and 8:00 p.m., Monday through Friday, and would comply with the City of Inglewood

Table 42: Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures

Impact and Mitigation Measure	Applicability to the Project
effects related to violating noise standards, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) For projects that require pile driving or other construction techniques that result in excessive vibration, such as blasting, determine the potential vibration impacts to the structural integrity of the adjacent buildings within 50 feet of pile driving locations. b) For projects that require pile driving or other construction techniques that result in excessive vibration, such as blasting, determine the threshold levels of vibration and cracking that could damage adjacent historic or other structure, and design means and construction methods to not exceed the thresholds. c) For projects where pile driving would be necessary for construction due to geological conditions, utilize quiet pile driving techniques such as predrilling the piles to the maximum feasible depth, where feasible. Predrilling pile holes will reduce the number of blows required to completely seat the pile and will concentrate the pile driving activity closer to the ground where pile driving noise can be shielded more effectively by a noise barrier/curtain. d) Restrict construction activities to permitted hours in accordance with local jurisdiction regulation. e) Properly maintain construction equipment and outfit construction equipment with the best available noise suppression devices (e.g., mufflers, silences, wraps). f) Prohibit idling of construction equipment for extended periods of time in the vicinity of sensitive receptors.	Municipal Code limits regarding construction activity (Municipal Code Section 5-41). Construction of the Project would not require high-impact construction methods such as pile driving or blasting. As such, groundborne vibration during Project construction would be generated from conventional heavy construction equipment, such as bulldozers and excavators. Project-Specific MM NOISE-2 requires that specific vibratory equipment be operated at minimum distances from adjacent structures to reduce potential vibration impacts, consistent with PMM NOISE-2. **MM NOISE-2:** The use of large bulldozers and loaded trucks shall be a minimum of 15 feet away from any adjacent structure. The use of a vibratory compactor/roller shall be a minimum of 26 feet away from any adjacent structure. Any activity requiring a compactor or roller within 26 feet of an adjacent structure shall be conducted using a non-vibratory/static roller or a walk-behind roller.
Impact NOISE-3 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	**This Mitigation Measure is incorporated through compliance with regulatory compliance measures and implementation of project-specific mitigation measure which are equal to or more effective than this Mitigation Measure.** The Project Site is located

Table 42: Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures

Impact and Mitigation Measure	Applicability to the Project
expose people residing or working in the project area to excessive noise levels. See PMM NOISE-1, above.	approximately 2.5 miles east of the LAX and one mile north of the Hawthorne Municipal Airport. The Project Site is not located within the Planning Boundary/Influence Area for Hawthorne Municipal Airport. According to the latest quarterly noise contours for LAX, the Project Site is located within the 65 dBA CNEL noise contour, which is consistent with the existing daytime ambient noise levels within the Project area. According to the Los Angeles County Airport Land Use Plan, residential uses within the 65 dBA noise contour "shall review noise insulation needs" and impacts are presumed to be potentially significant, requiring implementation of mitigation. The Inglewood 2021-2029 Housing Element implements a Residential Sound Insulation Program, which includes sound insulation utilizing grant funds from the Federal Aviation Administration and Los Angeles World Airports. **MM NOISE-3:** Areas of the Project that includes residential uses within 65 CNEL noise contour of LAX shall be designed to meet the City's interior noise standard of 45 CNEL, as well as meet exterior standards for the applicable zoning designation in outdoor areas, as provided by Inglewood Municipal Code, Section 5-30. Measures include, but are not limited to, the installation of upgraded heating and cooling mechanical systems that allow residents to keep windows closed and the installation of noise insulation features such as noise walls, glass noise barriers, double pane windows, insulated doors, roofing and siding, and landscaping. Upon receipt of a development application that includes residential uses, such as the Proposed Project, within the 65 dB CNEL noise contour of LAX, the City Planning Division shall conduct a review of noise generation in the proposed development area and project features to be included to reduce noise levels to meet the City's Municipal Code requirements.
POPULATION AND HOUSING	

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Impact and Mitigation Measure	Applicability to the Project
Impact POP-1: Induce substantial unplanned population growth to areas of the region either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., by extending roads and other infrastructure). No project-level mitigation measures were identified for this issue.	**Not applicable**. Growth forecasts prepared by SCAG contained in the 2024-2050 RTP/SCS indicate that the number of households within the City will increase from 37,500 in 2019 to 61,600 in 2050, an increase of 24,100 households. The Project would include 571 units, which represents 2.4 percent of the anticipated increase for the City by 2050. Furthermore, the City's General Plan Housing Element for the 2021-2029 planning period has an objective of constructing 7,439 new units by 2029.[1] The Project's proposed 571 units would represent approximately 8 percent of the number of new units planned to be constructed by the City per the Housing Element. Thus, this mitigation measure is not applicable to the Project because it does not exceed the City's residential growth forecasts
Impact POP-2 Displace substantial amounts of existing housing, necessitating the construction of replacement housing elsewhere. **PMM POP-1**: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce the displacement of existing housing, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Evaluate alternate route alignments and transportation facilities that minimize the displacement of homes and businesses. Use an iterative design and impact analysis where impacts to homes or	**Not applicable.** The Project would not displace any existing housing. Thus, this mitigation measure is not applicable to the Project.

[1] City of Inglewood, Draft Housing Element 2021-2029, January 2020, 2022, age 19, https://www.hcd.ca.gov/housing-elements/docs/inglewood-6th-draft020122.pdf. Accessed August 2, 2024.

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Impact and Mitigation Measure	Applicability to the Project
businesses are involved to minimize the potential of impacts on housing and displacement of people. b) Prioritize the use existing ROWs, wherever feasible. c) Develop a construction schedule that minimizes potential neighborhood deterioration from protracted waiting periods between right-of-way acquisition and construction. d) Review capacities of available urban infrastructure and augment capacities as needed to accommodate demand in locations where growth is desirable to the local lead Agency and encouraged by the SCS (primarily TPAs, where applicable). e) When General Plans and other local land use regulations are amended or updated, use the most recent growth projections and RHNA allocation plan.	

Table 42: Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures

Impact and Mitigation Measure	Applicability to the Project
PUBLIC SERVICES	
Impact PSF-1 Result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities, need for new or physically altered fire protection facilities, the construction of which could cause significant environmental impacts in order to maintain acceptable service ratios, response times, or other performance objectives. See PMM PSP-1, below.	**Substantially conforms through regulatory compliance.** The Project would be required to comply with Municipal Code Chapter 6, Fire Prevention, which requires that there is adequate fire flow serving the Project Site, fire prevention and suppression measures, fire access, and a sufficient number of hydrants. The Project would also comply with LACFD requirements for emergency access, fire lanes, fire protection and building standards, and fire flow and requirements set forth in the 2022 California Fire Code and 2022 CBC. The Project Applicant would be required to submit site plans to LACFD and incorporate LACFD fire protection and suppression features that are appropriate for the Project. Compliance with the local, regional, and State regulations and requirements would ensure that Project operations would not require the expansion of other fire stations within the City. In addition, in the event of temporary rerouting of traffic fronting the Project Site, MM TRAF-2 will be implemented. MM TRAF-2 includes measures to ensure adequate vehicle access and pedestrian access during construction periods and would include temporary traffic control during all construction activities encroaching on public rights of way to improve traffic flow and safety on public roadways. Therefore, compliance with existing requirements would ensure conformance with this mitigation measure.
Impact PSP-1 Result in substantial adverse physical impacts associated with the provision of new or physically altered police facilities, need for new or physically altered police facilities, the construction of which could cause significant environmental impacts in order to maintain acceptable service ratios, response times, or other performance objectives.	**Substantially conforms through regulatory compliance.** The Inglewood Police Department (IPD) provides police protection services to the City. IPD is headquartered in City Hall, located approximately two miles northwest of the Project Site at 1 West Manchester Boulevard.

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Impact and Mitigation Measure	Applicability to the Project
PMM PSP-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects of constructing new emergency response facilities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: • Coordinate with emergency response agencies to ensure that there are adequate governmental facilities to maintain acceptable service ratios, response times or other performance objectives for emergency response services and that any required additional construction of buildings is incorporated into the project description. • Where current levels of services at the project site are found to be inadequate, provide fair share contributions towards infrastructure improvements, as appropriate and applicable, to mitigate identified CEQA impacts. • Project sponsors can and should develop traffic control plans for individual projects. Traffic control plans should include information on lane closures and the anticipated flow of traffic during the construction period. The basic objective of each traffic control plan (TCP) is to permit the contractor to work within the public right of way efficiently and effectively while maintaining a safe, uniform flow of traffic. The construction work and the public traveling through the work zone in vehicles, bicycles or as pedestrians must be given equal consideration when developing a traffic control plan.	In accordance with existing City regulations, the Project would implement appropriate temporary security features during construction (such as installing fencing and security lighting around the Project Site). Project operations would feature several security features. During Project operations, the Project Site would be fenced. Entryways into the community via West 104th Street and Lemoli Avenue would be controlled via vehicular gates. The gates would be activated electronically for residents and would include a callbox for visitor and delivery access. Access to each home would be provided via private driveways and alleys. Additionally, community and recreational rooms would be open for a limited number of hours each day for residents and guests, and residents would have access via an electronic key fob. Security design measures for semi-public and private spaces, which may include but not be limited to, the use of security cameras, and well-illuminated public and semi-public space designed with a minimum of dead space to eliminate areas of concealment and to locate building entrances in high-foot traffic areas. These security features would minimize the Project's demand for police services. As such, the Project would not require the addition of a new police facility or the expansion, consolidation, or relocation of an existing police station to maintain service ratios. Therefore, compliance with existing regulations would ensure conformance with this mitigation measure.
Impact PSS-1 Result in substantial adverse physical impacts associated with the provision of new or physically altered educational facilities, need for new or physically altered educational facilities, the construction of which could cause significant environmental impacts in order to maintain acceptable service ratios, response times, or other performance objectives.	**Substantially conforms through regulatory compliance.** The Project would substantially conform to this mitigation measure due to its compliance with existing regulatory requirements. Specifically, pursuant to the California Government Code Section 65995/California Education Code Section 17620, mandatory

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Impact and Mitigation Measure	Applicability to the Project
PMM PSS-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects of constructing new or physically altered school facilities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Where construction or expansion of school facilities is required to meet public school service ratios, require school district fees, as applicable.	payment of the school fees established by the IUSD in accordance with existing regulations regarding the calculation and payment of such fees would, by law, fully address any indirect impacts to schools as a result of the Project. Therefore, pursuant to existing regulatory requirements, the Project would be consistent with this mitigation measure.
Impact PSL-1 Result in substantial adverse physical impacts associated with the provision of new or physically altered library facilities, need for new or physically altered library facilities, the construction of which could cause significant environmental impacts in order to maintain acceptable service ratios, response times, or other performance objectives. **PMM PSL-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects of construction of new or altered library facilities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Where construction or expansion of library facilities is required to meet public library service ratios, require library fees, as appropriate and applicable, to mitigate identified CEQA impacts.	**Substantially conforms through regulatory compliance.** The Project Site is located in an urbanized area of the City that is already served by the Inglewood Public Library system, with the nearest library being the Crenshaw Imperial Branch Library located approximately 0.3-mile south of the Project Site at 1141 Crenshaw Boulevard. While the Project's residential population could result in an increased 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. Upon Project development, the Project would contribute to the financing of library services through property taxes and utility user taxes, which would mitigate the need for new or physical altered library facilities.
RECREATION	

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Impact and Mitigation Measure	Applicability to the Project
Impact REC-1 Potential to 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. **PMM REC-1**: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects on the use of existing neighborhood and regional parks or other recreational facilities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Prior to the issuance of permits, where projects require the construction or expansion of recreational facilities or the payment of equivalent Quimby fees, consider increasing the accessibility to natural areas and lands for outdoor recreation from the proposed project area, in coordination with local and regional open space planning and/or responsible management agencies. b) Prior to the issuance of permits, where projects require the construction or expansion of recreational facilities or the payment of equivalent Quimby fees, encourage patterns of urban development and land use which reduce costs on infrastructure and make better use of existing facilities, using strategies such as: i. Increasing the accessibility to natural areas for outdoor recreation ii. Utilizing "green" development techniques iii. Promoting water-efficient land use and development iv. Encouraging multiple uses, such as the joint use of schools v. Including trail systems and trail segments in General Plan recreation standards.	**Substantially conforms through regulatory compliance.** Several existing parks and recreational facilities are located in the vicinity of the Project Site. The Project would include common open space such as landscaped common areas between buildings and resident-serving dog and pocket parks that would offset some use of existing park facilities. In addition, the Project would be required to pay for the development of park land outlined in Section 12-105.9 of the Municipal Code to compensate for the increased demand on recreational facilities due to the new residential development. Additionally, pursuant to Section 9-106 of the Municipal Code, the Project would be imposed a new dwelling unit construction tax, which would be deposited into the Park Fund to finance park and recreational facilities within the City.
Impact REC-2 Result in substantial adverse physical impacts associated with the provision of new or physically altered park facilities, need for new	See discussion of applicability of PMM REC-1, PMM AQ-2, and PMM NOISE-1 above.

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Impact and Mitigation Measure	Applicability to the Project
or physically altered park facilities, the construction of which could cause significant environmental impacts in order to maintain acceptable service ratios, or other performance objectives. ***Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.*** See PMM REC-1, PMM AQ-2, and PMM NOISE-1, above.	
TRANSPORTATION	
Impact TRA-1 Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. No mitigation measures required.	**No mitigation applies.** No mitigation measures related to this issue were identified in the 2020-2045 RTP/SCS MMRP, and no mitigation measures apply to the Project.
Impact TRA-2 Conflict or be inconsistent with CEQA Guidelines section 15064.3(b). **PMM TRA-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to transportation-related impacts, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: • Transportation demand management (TDM) strategies should be incorporated into individual land use and transportation projects and plans, as part of the planning process. Local agencies should incorporate strategies identified in the Federal Highway	**This Mitigation Measure is incorporated through incorporation of project specific mitigation measure.** The City has developed a VMT Calculator tool used to estimate Project-specific daily vehicle trips, daily VMT, residential VMT per capita, and employment VMT per employee metrics for land use development projects. The City of Inglewood's VMT Calculator tool results indicate that the unmitigated residential VMT per capita for the proposed project is 14.68 which exceeds the City's threshold of 9.66 VMT per capita. A significant VMT impact would occur without mitigation. To address this impact, a range of Transportation Demand Management (TDM) strategies was added into the Project. These measures, when modeled through the City of Inglewood VMT

Table 42: Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures

Impact and Mitigation Measure	Applicability to the Project
Administration's publication: Integrating Demand Management into the Transportation Planning Process: A Desk Reference (August 2012) into the planning process (FHWA 2012). For example, the following strategies may be included to encourage use of transit and non-motorized modes of transportation and reduce vehicle miles traveled on the region's roadways: - include TDM mitigation requirements for new developments; - incorporate supporting infrastructure for non-motorized modes, such as, bike lanes, secure bike parking, sidewalks, and crosswalks; - provide incentives to use alternative modes and reduce driving, such as, universal transit passes, road and parking pricing; - implement parking management programs, such as parking cash-out, priority parking for carpools and vanpools; - develop TDM-specific performance measures to evaluate project-specific and system-wide performance; - incorporate TDM performance measures in the decision-making process for identifying transportation investments; - implement data collection programs for TDM to determine the effectiveness of certain strategies and to measure success over time; and - set aside funding for TDM initiatives. - The increase in per capita VMT on facilities experiencing LOS F represents a significant impact compared to existing conditions. To assess whether implementation of these specific mitigation strategies would result in measurable traffic congestion reductions, implementing actions may need to be further refined within the overall parameters of the proposed Plan and matched to local conditions in any subsequent project-level environmental analysis.	Calculator tool, result in a mitigated residential VMT per capita of 9.66, which meets the threshold of no significant impact. **MM TRAF-1:** A comprehensive Transportation Demand Management (TDM) Plan will be implemented by the Applicant with the objective of reducing VMT by encouraging the use of alternative transportation modes and decreasing reliance on single-occupancy vehicles. The TDM Plan would include the following strategies as VMT measures: • Unbundled Parking: Residential parking will be unbundled from the cost of housing and offered through separate agreements or lease addenda. At the time of certificate of occupancy, implementation may be formalized via covenant and included as a condition of approval. This strategy may help incentivize households to reduce vehicle ownership, promoting use of shared mobility, walking, biking, and transit. The Project will charge a monthly parking fee consistent with market rates. • Reduced Parking Supply. The Project proposes a parking supply reduction from the City's parking code. Based on the City of Inglewood parking code, the parking requirement for the Project is 1,332 parking spaces. The proposed parking supply for the Project is 1,122 parking spaces, resulting in a reduction of 210 parking spaces. A reduction in parking supply incentivizes residents to use other modes of transportation such as transit. The reduced supply may be feasible due to the Project's proximity to transit and supportive measures such as car-share, bike-share, and improved pedestrian connectivity. • Promotions and Marketing. The Project would provide marketing and promotional material to at least 95% of

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Impact and Mitigation Measure	Applicability to the Project
	residents to promote nearby transit routes and facilities and nearby multi-model infrastructure (bike lanes and sidewalks) to encourage residents to use multi-modal facilities and reduce VMT. This program may include: o Educational materials such as pamphlets provided to all residents during move-in o Ongoing email and mobile communications promoting car-share, bike-share, and transit o Incentives for new residents • Car-Share. The Project would promote a phone application (app) for the community that allows residents to share information with regards to similar travel destinations to encourage residents to carpool to those similar destinations instead of using single-occupancy vehicles (SOV), thus reducing VMT. • Bike-Share. The Project would provide a communal bike rack with communal bikes that residents can use to encourage bike riding to nearby destinations and would reduce VMT. • Pedestrian Network Enhancements. The Project provides sidewalks to all residences and connects to the off-site sidewalk network, which encourages multi-modal transportation, as opposed to using vehicles, and thus reducing VMT. Impacts would be less than significant with mitigation.
Impact TRA-3 Substantially increase hazards due to geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).	**Not applicable.** No mitigation measures related to this issue were identified in the 2020-2045 RTP/SCS MMRP, and no mitigation measures apply to the Project.

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Impact and Mitigation Measure	Applicability to the Project
No mitigation measures required.	
Impact TRA-4 Result in inadequate emergency access. ***Impact WF-1 Substantially impair an adopted emergency response plan or emergency evacuation plan.*** **PMM TRA-2:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects which may substantially impair implementation of an adopted emergency response plan or emergency evacuation plan, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Prior to construction, project implementation agencies can and should ensure that all necessary local and state road and railroad encroachment permits are obtained. The project implementation agency can and should also comply with all applicable conditions of approval. As deemed necessary by the governing jurisdiction, the road encroachment permits may require the contractor to prepare a traffic control plan in accordance with professional engineering standards prior to construction. Traffic control plans can and should include the following requirements: - Identification of all roadway locations where special construction techniques (e.g., directional drilling or night construction) would be used to minimize impacts to traffic flow. - Development of circulation and detour plans to minimize impacts to local street circulation. This may include the use of	**Substantially conforms through regulatory compliance and project specific mitigation measures which are equal to or more effective than this Mitigation Measure.** Construction activities associated with the Project, are expected to be primarily contained within the Project Site boundaries. However, in the event of temporary rerouting of pedestrian traffic along sidewalks fronting the Project Site, MM TRAF-2 and MM TRAF-3 will be implemented. MM TRAF-2 includes measures to ensure pedestrian safety along the affected sidewalks and temporary walkways (e.g., use of directional signage, maintaining continuous and unobstructed pedestrian paths,). MM TRAF-3, provides measures to ensure the haul route scheduling would be sequenced to minimize conflicts with pedestrians, school buses and cars at the arrival and dismissal times of the school day. The following mitigation measures are recommended to minimize potential impacts to schools and pedestrians during Project construction. **MM TRAF-2:** The Applicant shall prepare a detailed Construction Management Plan that shall include, but not be limited to, the following elements, as appropriate: • Requiring workers and construction trucks to generally travel outside of the peak hours • Prohibition of construction worker parking on nearby residential streets • Temporary traffic control during all construction activities encroaching on public rights of way to improve traffic flow and safety on public roadways • Scheduling of construction activities to reduce the effect on traffic flow on surrounding arterial streets

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Impact and Mitigation Measure	Applicability to the Project
signing and flagging to guide vehicles through and/or around the construction zone. - Scheduling of truck trips outside of peak morning and evening commute hours. - Limiting of lane closures during peak hours to the extent possible. - Usage of haul routes minimizing truck traffic on local roadways to the extent possible. - Inclusion of detours for bicycles and pedestrians in all areas potentially affected by project construction. - Installation of traffic control devices as specified in the California Department of Transportation Manual of Traffic Controls for Construction and Maintenance Work Zones. - Development and implementation of access plans for highly sensitive land uses such as police and fire stations, transit stations, hospitals, and schools. The access plans would be developed with the facility owner or administrator. To minimize disruption of emergency vehicle access, affected jurisdictions can and should be asked to identify detours for emergency vehicles, which will then be posted by the contractor. Notify in advance the facility owner or operator of the timing, location, and duration of construction activities and the locations of detours and lane closures. - Storage of construction materials only in designated areas. - Coordination with local transit agencies for temporary relocation of routes or bus stops in work zones, as necessary. - Ensure the rapid repair of transportation infrastructure in the event of an emergency through cooperation among public agencies and by identifying critical infrastructure needs	• Safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers as appropriate • Scheduling of construction-related deliveries so as to generally occur outside the commuter peak hours • Installation of appropriate traffic signs around the Project Site to ensure pedestrian, bicycle, and vehicle safety • Haul route scheduling (see MM TRAF-2) • Maintenance of pedestrian access during construction **MM TRAF-3**: Haul route scheduling shall be sequenced to minimize conflicts with pedestrians, school buses and cars at the arrival and dismissal times of the school day. Haul route trucks shall not be routed past the school during periods when school is in session, especially when students are arriving or departing from the campus. Haul route scheduling will be included in the detailed Construction Management Plan noted in MM TRAF-2. Implementation of the MM TRAF-2 and MM TRAF-3 would ensure that vehicle and emergency vehicle access would be maintained throughout the course of construction activities.

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Impact and Mitigation Measure	Applicability to the Project
necessary for: a) emergency responders to enter the region, b) evacuation of affected facilities, and c) restoration of utilities. - Enhance emergency preparedness awareness among public agencies and with the public at large.	
TRIBAL CULTURAL RESOURCES	
Impact TCR-1 Cause a substantial adverse change in the significance of a tribal cultural resource defined in Public Resources Code section 21074 that is: *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.*** See PMM CULT-1, above. **PMM TCR-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects on tribal cultural resources, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Avoidance and preservation of the resources in place, including, but not limited to, planning and construction to avoid the resources and protect the cultural and natural context, or planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria;	**Substantially conforms through regulatory compliance and project specific mitigation measures which are equal to or more effective than this Mitigation Measure.** See consistency analysis for PMM CULT-1 under Impact CULT-1. The Project would be required to implement MM CUL-1, MM CUL-2, MM TCR-1, and MM TCR-2 which set forth procedures for the retention of a qualified archaeologist, a Native American monitor representing the Gabrieleno Band of Mission Indians – Kizh Nation, and inadvertent discovery of archaeological resources that are TCRs, respectively. In addition, the Project would require adherence to MM CUL-3 and MM TCR-3 related to the proper treatment of human remains, should they be encountered. Implementation of the measures would reduce Project impacts to TCRs to a less than significant level. **MM TCR-1: Retain a Native American Monitor Prior to Commencement of Ground-Disturbing Activities.** The project applicant/lead agency shall retain a Native American Monitor from or approved by the Gabrieleño Band of Mission Indians – Kizh Nation. The monitor shall be retained prior to the commencement of any "ground-disturbing activity" for the subject project at all project locations (i.e., both on-site and any off-site locations that are included in the project description/definition and/or required in connection with the project, such as public improvement work). "Ground-disturbing activity" shall include, but is not limited to, demolition, pavement removal, potholing, auguring, grubbing, tree removal, boring, grading, excavation, drilling, and trenching. A copy of the executed monitoring agreement shall be submitted to the

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Impact and Mitigation Measure	Applicability to the Project
b) Treating the resource with culturally appropriate dignity taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following: protecting the cultural character and integrity of the resource; protecting the traditional use of the resource; and protecting the confidentiality of the resource; c) Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places; and protecting the resource.	lead agency prior to the earlier of the commencement of any ground-disturbing activity, or the issuance of any permit necessary to commence a ground-disturbing activity. The monitor will complete daily monitoring logs that will provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of ground-disturbing activities, soil types, cultural-related materials, and any other facts, conditions, discovered TCRs, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., (collectively, tribal cultural resources, or "TCR"), as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs will be provided to the project applicant/lead agency upon written request to the Tribe. On-site tribal monitoring shall conclude upon the latterone of the following (1) written confirmation to the Kizh from a designated point of contact for the project applicant/lead agency that all ground-disturbing activities and phases that may involve ground-disturbing activities on the project site or in connection with the project are complete; or (2) a determination and written notification by the Kizh to the project applicant/lead agency that no future, planned construction activity and/or development/construction phase at the project site possesses the potential to impact Kizh TCRs. **MM TCR-2**: **Unanticipated Discovery of Tribal Cultural Resource Objects (Non-Funerary/Non-Ceremonial**). Upon discovery of any TCRs, all construction activities in the immediate vicinity of the discovery shall cease (i.e., not less than the surrounding 50 feet) and shall not resume until the discovered TCR has been fully assessed by the Kizh monitor and/or Kizh archaeologist. The Kizh will recover and retain all discovered TCRs in the form and/or manner the Tribe deems appropriate, in the Tribe's sole discretion, and for any

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Impact and Mitigation Measure	Applicability to the Project
	purpose the Tribe deems appropriate, including for educational, cultural and/or historic purposes. **MM TCR-3: Unanticipated Discovery of Human Remains and Associated Funerary or Ceremonial Objects.** Native American human remains are defined in PRC 5097.98 (d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, called associated grave goods in Public Resources Code Section 5097.98, are also to be treated according to this statute. If Native American human remains and/or grave goods are discovered or recognized on the project site, then Public Resource Code 5097.9 as well as Health and Safety Code Section 7050.5 shall be followed. Human remains and grave/burial goods shall be treated alike per California Public Resources Code section 5097.98(d)(1) and (2). Preservation in place (i.e., avoidance) is the preferred manner of treatment for discovered human remains and/or burial goods. Any discovery of human remains/burial goods shall be kept confidential to prevent further disturbance.
UTILITIES AND SERVICE SYSTEMS	
Impact USSW-1 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. ***Impact USSW-2 Comply with federal, state, and local management and reduction statutes and regulations related to solid waste.*** **PMM USSW-2:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce the generation of solid waste, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:	**Substantially conforms through regulatory compliance.** The Project would comply with applicable provisions of this mitigation measure through existing regulations. Disposal and recycling of the demolition and construction debris would be required to comply with all federal, State, and local regulations. All construction activities would be subject to conformance with relevant federal, State, and local requirements related to solid waste disposal. The Project would be required to comply with the California Integrated Waste Management Act of 1989 (AB 939), which requires that at least 50 percent of waste produced is recycled, reduced, or composted and is included in Section 7-50 of the Municipal Code, Solid Waste Ordinance and Section 7-53 of the Municipal Code,

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Impact and Mitigation Measure	Applicability to the Project
Integrate green building measures with CALGreen (California Building Code Title 24) into project design, including but not limited to the following: a) Reuse and minimization of construction and demolition (C&D) debris and diversion of C&D waste from landfills to recycling facilities. b) Inclusion of a waste management plan that promotes maximum C&D diversion. c) Source reduction through (1) use of materials that are more durable and easier to repair and maintain, (2) design to generate less scrap material through dimensional planning, (3) increased recycled content, (4) use of reclaimed materials, and (5) use of structural materials in a dual role as finish material (e.g., stained concrete flooring, unfinished ceilings, etc.). d) Reuse of existing structure and shell in renovation projects. e) Development of indoor recycling program and space. f) Discourage the siting of new landfills unless all other waste reduction and prevention actions have been fully explored. If landfill siting or expansion is necessary, site landfills with an adequate landfill-owned, undeveloped land buffer to minimize the potential adverse impacts of the landfill in neighboring communities. g) Discourage exporting of locally generated waste outside of the SCAG region during the construction and implementation of a project. Encourage disposal within the county where the waste originates as much as possible. Promote green technologies for long-distance transport of waste (e.g., clean engines and clean locomotives or electric rail for waste-by-rail disposal systems) and consistency with SCAQMD and Connect SoCal policies can and should be required.	Mandatory Organic Waste Disposal Reduction Ordinance, which would achieve compliance with State law. The annual amount of solid waste generated by the Project would represent a minor amount of the estimated 137 million tons of remaining disposal capacity at the County's Class III landfills. As such, the solid waste generated by the Project would be accommodated by the County's landfills that serve the Project Site. During operation, the Project would be required to comply with CalRecycle's waste diversion rate target of 50 percent of the waste stream. The Project would also be subject to AB 1826, which requires businesses to provide separate recycling bins for organic waste. Therefore, the Project would be subject to compliance with the CALGREEN Code, other State regulations, and City regulations regarding solid waste management and reduction. As such, the Project would not 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.

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Impact and Mitigation Measure	Applicability to the Project
h) Encourage waste reduction goals and practices and look for opportunities for voluntary actions to exceed the 80 percent waste diversion target. i) Encourage the development of local markets for waste prevention, reduction, and recycling practices by supporting recycled content and green procurement policies, as well as other waste prevention, reduction and recycling practices. j) Develop ordinances that promote waste prevention and recycling activities such as: requiring waste prevention and recycling efforts at all large events and venues; implementing recycled content procurement programs; and developing opportunities to divert food waste away from landfills and toward food banks and composting facilities. k) Develop and site composting, recycling, and conversion technology facilities that have minimum environmental and health impacts. l) Integrate reuse and recycling into residential industrial, institutional and commercial projects. m) Provide education and publicity about reducing waste and available recycling services. n) Implement or expand city or county-wide recycling and composting programs for residents and businesses. This could include extending the types of recycling services offered (e.g., to include food and green waste recycling) and providing public education and publicity about recycling services.	
Impact USWW-1 Require or result in the relocation or construction of new or expanded wastewater treatment or storm drainage facilities, the construction or relocation of which could cause significant environmental effects.	**Not Applicable.** Regardless of the non-applicability of this mitigation measure, the project will comply with it through regulatory measure compliance. See discussion for PMM HYD-1 under HYD-1 for discussion of the Project's consistency with this mitigation measure. Wastewater from the Project Site would be treated at Joint Water Pollution Control Plant (JWPCP) in the City of

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Impact and Mitigation Measure	Applicability to the Project
See PMM HYD-1, above. **PMM USWW-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects on utilities and service systems, particularly for construction of wastewater facilities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: • During the design and CEQA review of individual future projects, implementing agencies and projects sponsors shall determine whether sufficient wastewater capacity exists for the proposed projects. There CEQA determinations must ensure that the proposed development can be served by its existing or planned treatment capacity. If adequate capacity does not exist, project sponsors shall coordinate with the relevant service provider to ensure that adequate public services and utilities could accommodate the increased demand, and if not, infrastructure improvements for the appropriate public service or utility shall be identified in each project's CEQA documentation. The relevant public service provider or utility shall be responsible for undertaking project-level review as necessary to provide CEQA clearance for new facilities.	Carson. The JWPCP currently provides primary and secondary treatment for a design capacity of 400 mgd of wastewater, and an average flow of approximately 243.1 mgd. To accommodate the anticipated wastewater generation, the Project would install a new on-site 10-inch sewer pipe with a minimum slope of 0.32 percent. This new sewer pipe would have a half-full capacity of 0.58 cfs, which is greater than the projected peak sewer flow rate generated by the Project. Therefore, the proposed on-site 10-inch sewer pipe at minimum slope would have enough capacity to convey wastewater from the Project Site. The Project would also be required to pay connection fees in compliance with the California Health and Safety Code. Additionally, the Project's projected wastewater generation of approximately 371,150 gpd, or 0.37 mgd, would represent a minimal portion of the maximum capacity of the regional South Inglewood-Orange Avenue Trunk Sewer in Doty Avenue (approximately 12.4 percent), the regional South Inglewood-Orange Avenue Trunk Sewer in Yukon Avenue (approximately 7.9 percent), and the JWPCP (approximately 0.09 percent). Therefore, the Project would well be within the capacity of public wastewater treatment infrastructure and would not require the relocation or construction of such facilities. Further, the Project developer would be required to pay standard utility connection fees. Therefore, payment of standard utilities connection fees and ongoing user fees would offset the Project's impacts on existing sewer and stormwater collection services.
Impact USWW-2 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.	**Not Applicable.** See discussion for PMM USWW-1 under USWW-1, for discussion of the Project's consistency with this mitigation measure.

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Impact and Mitigation Measure	Applicability to the Project
See PMM UWW-1, above.	
Impact USWS-1 Require or result in the relocation or construction of new or expanded water facilities, the construction or relocation of which could cause significant environmental effects. **PMM USWS-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to ensure sufficient water supplies, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Reduce exterior consumptive uses of water in public areas, and should promote reductions in private homes and businesses, by shifting to drought-tolerant native landscape plantings, using weather-based irrigation systems, educating other public agencies about water use, and installing related water pricing incentives. b) Promote the availability of drought-resistant landscaping options and provide information on where these can be purchased. Use of reclaimed water especially in median landscaping and hillside landscaping can and should be implemented where feasible. c) Implement water conservation best practices such as low-flow toilets, water-efficient clothes washers, water system audits, and leak detection and repair. d) For projects located in an area with existing reclaimed water conveyance infrastructure and excess reclaimed water capacity, use reclaimed water for non- potable uses, especially landscape irrigation. For projects in a location planned for future reclaimed water service, projects should install dual plumbing systems in anticipation of future use. Large developments could treat wastewater onsite to tertiary standards and use it for non-potable uses onsite.	**Substantially conforms through regulatory compliance.** According to the Water Supply Assessment (WSA), prepared for the Project, there is sufficient water supplies to serve the Project. To accommodate the anticipated increased water demand, the Project would construct new internal 8- and 10-inch domestic waterlines that would connect to the existing water main along West 104th Street. The Project would also install new fire water line systems that would connect to existing mainlines. Furthermore, the Project would incorporate a variety of strategies for water conservation based on state and local guidelines including compliance with the Model Water Efficient Landscape Ordnance (MWELO) and all additional local requirements. Plant species will be predominantly low and moderate water use specific to the local climate. Plants will be grouped in hydrozones based on similar water use demands and planting design with respond to specific site conditions. The irrigation system would include a variety of water conservation features including the use of a flow sensor at the point of connection that can detect possible leaks and shut the system down so system integrity can be ensured. The irrigation controller will incorporate Smart Water Application Technology (SWAT) that will allow it to automatically adjust run times based on local weather conditions. The controller would also utilize a rain shut off device. Shrubs and ground cover will be irrigated with drip tubing which reduces evaporation and eliminates wasteful overspray and trees will receive supplemental water from high efficiency micro spray nozzles. The combination of these factors will ensure a sustainable landscape in the community that maximizes the use of limited water resources. Further, the Project developer would be required to pay standard utility connection fees.

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Impact and Mitigation Measure	Applicability to the Project
Impact USWS-2 Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years. See PMM USWS-1, above.	**Substantially conforms through regulatory compliance.** See discussion for PMM USWS-1 under USWS-1, for discussion of the Project's consistency with this mitigation measure.
WILDFIRE	
Impact WF-2 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. ***Impact HAZ-7 Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.*** **PMM WF-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to wildfire risk, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Launch fire prevention education for local cities and counties such that local fire agencies, homeowners, as well as commercial and industrial businesses are aware of potential sources of fire ignition and the related procedures to curb or lessen any activities that might initiate fire ignition. b) Ensure structures in high fire risk areas are built to current state and federal standards which serve to greatly increase the chances the structure will survive a wildfire and also allow for people to shelter-in-place.	**Not applicable.** The Project Site is located in a highly urbanized area of the City and is not located within a Very High Fire Hazard Severity Zone. Therefore, the Project Site is not subject to a wildland fire hazard. Thus, this mitigation measure is not applicable to the Project.

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Impact and Mitigation Measure	Applicability to the Project
c) Improve road access for emergency response and evacuation so people can evacuate safely and timely when necessary. d) Improve, and educate regarding, local emergency communications and notifications with residents and businesses. e) Enforce defensible space regulations to keep overgrown and unmanaged vegetation, accumulations of trash and other flammable material away from structures. f) Provide public education about wildfire risk and fire prevention measures, and safety procedures and practices to allow for safe evacuation and/or options to shelter-in-place. g) Include external sprinklers with an independent water source to reduce flammability of structures. h) Include local solar power paired with batteries to reduce power flow in electricity lines. i) For developments in high fire-prone areas, have a fire protection plan for residents and businesses. j) Provide fire hazard and fire safety education for homeowners in or near fire hazard areas. k) Developments in fire-prone areas should have fire-resistant feature, such as: - Ember-resistant vents - Fire-resistant roofs - Surrounding defensible space - Proper maintenance and upkeep of structures and surrounding area	
Impact WF-3 Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources,	**Not applicable.** See consistency analysis for PMM WF-1 under WF-2 for discussion of the Project's consistency with this mitigation

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Impact and Mitigation Measure	Applicability to the Project
power lines or other utilities) that may exacerbate fire risks or that may result in temporary or ongoing impacts to the environment. See PMM HAZ-4, above. **PMM WF-2:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to wildfire risk, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) New development or infrastructure activity within very high hazard severity zones or SRAs shall be required to – Submit a fire protection plan including the designation of fire watch staff; – Maintain water and other fire suppression equipment designated solely for firefighting on site for any construction and maintenance activities; – Locate construction and maintenance equipment in designated "safe areas" such that they do not discharge combustible materials; and – Designate trained fire watch staff during project construction to reduce risk of fire hazards.	measure. Thus, this mitigation measure is not applicable to the Project.
Impact WF-4 Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope stability, or drainage changes. See PMM WF-1, PMM WF-2, PMM HYD-1, and PMM HAZ-4, above.	**Not applicable.** See consistency analysis for PMM WF-1, PMM WF-2, PMM HYD1, and PMM HAZ-4 under WF-1, WF-2, HYD-1, and HAZ-4, respectively. Thus, this mitigation measure is not applicable to the Project.

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Impact and Mitigation Measure	Applicability to the Project
Source: SCAG, Connect SoCal 2020 Program EIR, Exhibit A: Revised Mitigation Monitoring and Reporting Program for the Final Connect SoCal PEIR, September 3, 2020, https://scag.ca.gov/sites/main/files/file-attachments/exhibit-a_connectsocal_peir_revisedmmrp.pdf?1606004474. Accessed February 25, 2025.	

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Impact and Mitigation Measure	Applicability to the Project
AESTHETICS	
***Impact AES-1 Potential to have a substantial adverse effect on a scenic vista*.** In accordance with provisions of CEQA Guidelines Sections 15091(a)(2) and 15126.4(a)(1)(B), a lead agency for a project can and should consider mitigation measures to address potential aesthetic impacts to scenic vistas, as applicable and feasible. Such measures may include the following or other comparable measures identified by the lead agency: a) Use a palette of colors, textures, building materials that are graffiti-resistant, and/or plant materials that complement the surrounding landscape and development. b) Use contour grading to better match surrounding terrain. Contour edges of major cut-and-fill to provide a more natural looking finished profile. c) Replace and renew landscaping along corridors with road widenings, interchange projects, and related improvements. d) Retain or replace trees bordering highways, so that clear-cutting is not evident. e) Provide new corridor landscaping that provides appropriate transitions to existing natural and man-made features and is complementary to the dominant landscaping or native habitats of surrounding areas. f) Reduce the visibility of construction staging areas by fencing and screening these areas with low contrast materials consistent with the surrounding environment, and by revegetating graded slopes and exposed earth surfaces at the earliest opportunity. g) Use see-through safety barrier designs (e.g., railings rather than walls), as appropriate	**Not applicable.** Pursuant to PRC Section 21099(d)(1), aesthetic impacts of a residential or mixed-use project in a Transit Priority Area (TPA) are not considered significant impacts on the environment. As the Project is within a TPA, there is no significant aesthetic impact, and no mitigation is required. This measure is intended to mitigate impacts on scenic vistas. The Project Site is within a fully urbanized area of the City dominated by residential, commercial, and school development. There are no designated or otherwise identified scenic vistas within the City or within the vicinity of the Project Site. Although the Project's residential and open space uses would be visible to the public from the public right-of-way along West 104th Street, South 10th Avenue, and Yukon Avenue, the Project would not change the current views to or from any scenic vistas, as none are present within the vicinity of the Project Site. Thus, this mitigation measure is not applicable to the Project.

Table 43: Applicability of 2024-2050 RTP/SCS Final EIR Mitigation Measures

Impact and Mitigation Measure	Applicability to the Project
Impact AES-2 Potential to substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway. See PMM AES-1, above.	**Not applicable.** Pursuant to PRC Section 21099(d)(1), aesthetic impacts of a residential or mixed-use project in a TPA are not considered significant impacts on the environment. As the Project is within a TPA, there is no significant aesthetic impact, and no mitigation is required. There are no State-designated scenic highways in the City.[2] The closest officially designated or eligible State scenic highway is State Route 1 (Pacific Coast Highway), approximately six miles southwest of the Project Site. There are also no scenic resources on the Project Site or in the surrounding areas. Santa Monica Boulevard, which extends west of West Hollywood and through the City to the southwest, is a historic scenic parkway (old Route 66) as described in General Plan Open Space Element Policy OS 6.2. The Project Site is 0.61 miles southeast of the closest segment of Route 66, and would not result in impacts on views of Santa Monica Boulevard due to multi-story buildings surrounding the Project Site. The Project would not impact any scenic resources. Thus, this mitigation measure is not applicable to the Project.
Impact AES-3 Potential to substantially degrade the existing visual character or quality of the site and its surroundings. In an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality. **PMM AES-2**: In accordance with provisions of CEQA Guidelines Sections 15091(a)(2) and 15126.4(a)(1)(B), a lead agency for a project can and should consider mitigation measures to address potential aesthetic impacts that substantially degrade visual character, as applicable and feasible. Such	**Not applicable.** Pursuant to PRC Section 21099(d)(1), aesthetic impacts of a residential or mixed-use project in a TPA are not considered significant impacts on the environment. As the Project is within a TPA, there is no significant aesthetic impact, and no mitigation is required. The Project is located in an urbanized area and thus, pursuant to Impact AES-3, the analysis herein is focused on whether the Project would conflict with applicable zoning and other regulations governing scenic quality. Overall, the Project would not conflict with applicable zoning and other regulations governing scenic quality.

Table 43: Applicability of 2024-2050 RTP/SCS Final EIR Mitigation Measures

Impact and Mitigation Measure	Applicability to the Project
measures may include the following or other comparable measures identified by the lead agency: a) Minimize contrasts in scale and massing between the projects and surrounding natural forms and development, minimize their intrusion into important viewsheds, and use contour grading to better match surrounding terrain in accordance with county and city hillside ordinances, where applicable. b) Design landscaping along highway corridors to add substantial natural elements and visual interest to soften the hard-edged, linear transportation corridors. c) Develop design guidelines for projects that make elements of proposed buildings/facilities visually compatible or minimize visibility of changes in visual quality or character through use of hardscape and softscape solutions. Specific measures to be addressed include setback buffers, landscaping, color, texture, signage, and lighting criteria. d) Design projects consistent with design guidelines of applicable general plans. e) Keep sites in a blight/nuisance-free condition. Remove blight or nuisances that compromise visual character or visual quality of project areas including graffiti abatement, trash removal, landscape management, maintenance of signage and billboards in good condition, and replace compromised native vegetation and landscape. f) Where sound walls are proposed, account for visual impacts during sound wall construction and design methods as follows: – Use transparent panels to preserve views where sound walls would block views from residences; – Use landscaped earth berm or a combination wall and berm to minimize the apparent sound wall height;	The Project would be consistent with the scenic standards and regulations contained in the City's General Plan, Design and Development Standards and Guidelines and Municipal Code. Pursuant to Inglewood Municipal Code Section 12-39.50, the Project would undergo Site Plan Review to ensure that the Project meets City requirements for site layout and building orientation, architectural design, neighborhood compatibility, landscaping, parking accommodations, signs and other applicable design considerations. Thus, this mitigation measure is not applicable to the Project.

Table 43: Applicability of 2024-2050 RTP/SCS Final EIR Mitigation Measures

Impact and Mitigation Measure	Applicability to the Project
– Construct sound walls of materials whose color and texture complements the surrounding landscape and development; g) Design sound walls to increase visual interest, reduce apparent height, and be visually compatible with the surrounding area; and landscape the sound walls with plants that screen the sound wall, preferably with either native vegetation or landscaping that complements the dominant landscaping of surrounding areas	
Impact AES-4 Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area. **PMM AES-3:** In accordance with provisions of CEQA Guidelines Sections 15091(a)(2) and 15126.4(a)(1)(B), a lead agency for a project can and should consider mitigation measures to address potential aesthetic impacts that substantially degrade visual character, as applicable and feasible. Such measures may include the following or other comparable measures identified by the lead agency: a) Use lighting fixtures that are shielded to a point below the light bulb and reflector and that prevent unnecessary glare onto adjacent properties. b) Restrict the operation of outdoor lighting for construction and operation activities to the hours of 7 a.m. to 10 p.m. c) Use energy-efficient, low-glare fixtures for outdoor lighting. d) Use unidirectional lighting to avoid light trespass onto adjacent properties. e) Design exterior lighting to confine illumination to the project site, and/or to areas that do not include light-sensitive uses. f) Provide structural and/or vegetative screening from light-sensitive uses.	**Not applicable.** Pursuant to PRC Section 21099(d)(1), aesthetic impacts of a residential or mixed-use project in a TPA are not considered significant impacts on the environment. As the Project is within a TPA, there is no significant aesthetic impact, and no mitigation is required. The Project would not degrade the visual character as the development and as it would create visually attractive residential development that would include new housing with landscaping throughout the Project Site. This would include a variety of drought tolerant and native trees, groundcover, shrubs, and vines that are designed to create inviting streetscapes and parks and foster a walkable pedestrian-oriented neighborhood. The Project will plant approximately 300 trees, featuring a diverse range of species, and incorporate them into various locations of the Project. The Project would introduce new sources of light and glare that are typically associated with residential and amenity buildings, including interior, security, and wayfinding lighting sources. However, all Project lighting would comply with current energy standards and codes, while providing efficient and effective on site lighting. Nighttime security lighting for the Project would be provided to illuminate entrances, and internal roadways and walkways. However, all exterior lights would be wall- or ground-mounted and shielded away from adjacent land uses and security lighting would be designed to prevent light trespass onto adjacent

Table 43: Applicability of 2024-2050 RTP/SCS Final EIR Mitigation Measures

Impact and Mitigation Measure	Applicability to the Project
g) Shield and direct all new street and pedestrian lighting away from light-sensitive off-site uses. h) Use non-reflective glass or glass treated with a non-reflective coating for all exterior windows and glass used on building surfaces. i) Direct architectural lighting onto the building surfaces and have low reflectivity to minimize glare and limit light spillover onto adjacent properties.	properties. The Project buildings would be prohibited from using highly reflective building materials such as mirrored glass on exterior facades. Thus, this mitigation measure is not applicable to the Project.
AGRICULTURAL RESOURCES	
Impact AG-1 Potential to 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. **PMM AG-1:** In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to address potential adverse effects on agricultural resources, as applicable and feasible. Such measures may include the following or other comparable measures identified by the lead agency: a) Provide permanent protection of in-kind farmland in the form of easements, fees, or elimination of development rights/potential to mitigate for loss of farmland. b) Project relocation or corridor realignment to avoid Prime Farmland, Unique Farmland, or Farmland of Local or Statewide Importance. c) Maintain and expand agricultural land protections such as urban growth boundaries. d) Provide for mitigation fees to support a mitigation bank that invests in farmer education, agricultural infrastructure, water	**Not applicable.** The Project Site is located in an urbanized area of the City. No agricultural uses or related farmland operations are present within the Project Site or surrounding area. The Project Site is not located on designated Prime Farmland, Unique Farmland, or Farmland of Statewide Importance as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program. The urban character of the Project Site would be consistent with the Farmland Mapping and Monitoring Program's definition of "Urban and Built-Up Land," which does not constitute farmland. Therefore, the Project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural uses. Thus, this mitigation measure is not applicable to the Project.

Table 43: Applicability of 2024-2050 RTP/SCS Final EIR Mitigation Measures

Impact and Mitigation Measure	Applicability to the Project
supply, marketing, etc. that enhance the commercial viability of retained agricultural lands. e) Minimize severance and fragmentation of agricultural land by constructing underpasses and overpasses at reasonable intervals to provide property access. f) Use berms, buffer zones, setbacks, and fencing to reduce conflicts between new development and farming uses and protect the functions of farmland.	
Impact AG-2 Potential to conflict with existing zoning for agricultural use, or a Williamson Act contract. Identical to 2020-2045 RTP/SCS PMM AG-2	**Not applicable.** The Project Site currently has a General Plan land use designation of Low Density Residential and a zoning designation of Residential Single Family (R-1). The Project would request the approvals for a General Plan Amendment from Low Density to Medium Density and a Zone Change from R-1 to Residential Multiple Family (R-3). None of these land use or zoning designations permit agricultural use. Thus, this mitigation measure is not applicable to the Project.
Impact AG-3 Potential to conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined in Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g)). **PMM AG-3:** Project level mitigation measures can and should be considered by lead agencies as applicable and feasible. Measures to reduce substantial adverse effects, through the conversion of forest land to maximum extent practicable, as determined appropriate by each lead agency, may include the following, or other comparable measures: a) Minimize construction related impacts to forestry resources by locating materials and stationary equipment in such a way as to prevent conflict with forestry resources. b) Acquire conservation easements for the loss of forestland.	**Not applicable.** The Project Site is not designated as forestland, timberland, or zoned Timberland Production. Thus, this mitigation measure is not applicable to the Project.

Table 43: Applicability of 2024-2050 RTP/SCS Final EIR Mitigation Measures

Impact and Mitigation Measure	Applicability to the Project
c) Coordinate with responsible agencies including the United States Forest Service and Bureau of Land Management, as appropriate, regarding applicable requirements for transportation and urban land use projects within designated National Monuments in the SCAG region.	
Impact AG-4 Potential to result in the loss of forest land or conversion of forest land to non-forest use. See PMM AG-3, above.	**Not applicable.** The Project Site does not contain forest land; therefore, no forest land would be lost or converted to non-forest uses. Thus, this mitigation measure is not applicable to the Project.
Impact AG-5 Potential to 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. See PMM AG-2 and PMM GHG-2. **PMM AG-4**: Project level mitigation measures can and should be considered by lead agencies as applicable and feasible. Measures to reduce substantial adverse effects, through the conversion of Farmland, to the maximum extent practicable, as determined appropriate by each lead agency, may include the following, or other comparable measures: a) Design proposed projects to minimize, to the greatest extent feasible, the loss of the highest valued agricultural land. b) Redesign project features to minimize fragmenting or isolating Farmland. Where a project involves acquiring land or easements, ensure that the remaining non-project area is of a size sufficient to allow economically viable farming operations. The project proponents shall be responsible for acquiring easements, making lot line adjustments, and merging affected land parcels into units suitable for continued commercial agricultural management.	**Not applicable.** As the Project Site is currently not used for any agricultural uses and is not forest land, no agricultural use or forest land would be converted. Thus, this mitigation measure is not applicable to the Project.

Table 43: Applicability of 2024-2050 RTP/SCS Final EIR Mitigation Measures

Impact and Mitigation Measure	Applicability to the Project
c) Reconnect utilities or infrastructure that serve agricultural uses if these are disturbed by project construction. If a project temporarily or permanently cuts off roadway access or removes utility lines, irrigation features, or other infrastructure, the project proponents shall be responsible for restoring access as necessary to ensure that economically viable farming operations are not interrupted. **PMM AG-5**: Project level mitigation measures can and should be considered by lead agencies as applicable and feasible. Measures to reduce substantial adverse effects, through the conversion of Farmland, to the maximum extent practicable, as determined appropriate by each lead agency, may include the following, or other comparable measures: a) Manage project operations to minimize the introduction of invasive species or weeds that may affect agricultural production on adjacent agricultural land. Where a project has the potential to introduce sensitive species or habitats or have other spill-over effects on nearby agricultural lands, the project proponents shall be responsible for acquiring easements on nearby agricultural land and/or financially compensating for indirect effects on nearby agricultural land. Easements (e.g., flowage easements) shall be required for temporary or intermittent interruption in farming activities (e.g., because of seasonal flooding or groundwater seepage). Acquisition or compensation would be required for permanent or significant loss of economically viable operations.	
AIR QUALITY	
Impact AQ-1 Potential to conflict with or obstruct implementation of the applicable air quality plan. **PMM AQ-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce significant adverse	**This Mitigation Measure is incorporated through regulatory compliance and incorporation of project specific mitigation measures and design features.** The Project would be consistent as it would comply with existing regulations that have been identified and are required by the Southern California Air Quality Management District (SCAQMD) and the California Air Resources Board (CARB) to facilitate consistency with plans for attainment for

Table 43: Applicability of 2024-2050 RTP/SCS Final EIR Mitigation Measures

Impact and Mitigation Measure	Applicability to the Project
effects related to violating air quality standards. Such measures may include the following or other comparable measures identified by the lead agency: a) Minimize land disturbance. b) Suspend grading and earth moving when wind gusts exceed 25 miles per hour unless the soil is wet enough to prevent dust plumes. c) Cover trucks when hauling dirt. d) Stabilize the surface of dirt piles if not removed immediately. e) Limit vehicular paths on unpaved surfaces and stabilize any temporary roads. f) Minimize unnecessary vehicular and machinery activities. g) Sweep paved streets at least once per day where there is evidence of dirt that has been carried on to the roadway. h) Revegetate disturbed land, including vehicular paths created during construction to avoid future off-road vehicular activities. i) On Caltrans projects, Caltrans Standard Specifications 10-Dust Control, 17-Watering, and 18-Dust Palliative shall be incorporated into project specifications. j) Assemble a comprehensive inventory list (i.e., make, model, engine year, horsepower, emission rates) of all heavy-duty off-road (portable and mobile) equipment (50 horsepower [hp] and greater) that could be used an aggregate of 40 or more hours for the construction project. Prepare a plan for approval by the applicable air district demonstrating achievement of the applicable percent reduction for a CARB-approved fleet. k) Ensure that all construction equipment is properly tuned and maintained. l) Minimize idling time to 5 minutes—saves fuel and reduces emissions.	the National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS), as applicable and feasible. Adherence to the following requirements by SCAQMD, CARB, the State of California, and the federal government would further ensure consistency with PMM AQ-1. Consistent with SCAQMD Rule 402 and 403, the following measures would be incorporated into Project plans and specifications: • Water or a stabilizing agent shall be applied to exposed surfaces at least three times per day to prevent generation of dust plumes. • The construction contractor shall utilize at least one of the following measures at each vehicle egress to a paved public road: - Install a pad consisting of washed gravel maintained in clean condition to a depth of at least six inches and extending at least 30 feet wide and at least 50 feet long; - Pave the surface extending at least 100 feet and at least 20 feet wide; - Utilize shaker devices to remove bulk material from tires and vehicle undercarriages; or - Install a wheel washing system to remove bulk material from tires and vehicle undercarriages. • Construction activity on unpaved surfaces shall be suspended when wind speed exceeds 25 miles per hour (such as instantaneous gusts). • Ground cover in disturbed areas shall be replaced as quickly as possible. • Traffic speeds on all unpaved roads shall be reduced to 15 mph or less. • Streets shall be swept at the end of the day if visible soil is carried onto adjacent public paved roads. If feasible, use water sweepers with reclaimed water.

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Impact and Mitigation Measure	Applicability to the Project
m) Provide an operational water truck on-site at all times. Use watering trucks to minimize dust; watering should be sufficient to confine dust plumes to the project work areas. Sweep paved streets at least once per day where there is evidence of dirt that has been carried on to the roadway. n) Utilize existing power sources (e.g., power poles) or clean fuel generators rather than temporary power generators. o) Develop a traffic plan to minimize traffic flow interference from construction activities. The plan may include advance public notice of routing, use of public transportation, and satellite parking areas with a shuttle service. Schedule operations affecting traffic for off-peak hours. Minimize obstruction of through-traffic lanes. Provide a flag person to guide traffic properly and ensure safety at construction sites. p) Obtain CARB Portable Equipment Registration with the state or a local district permit for portable engines and portable engine-driven equipment units used at the project work site, with the exception of on-road and off-road motor vehicles. Arrange appropriate consultations with CARB or the local air district to determine registration and permitting requirements prior to equipment operation at the site. q) Use Tier 4 Final equipment or better for all engines above 50 hp. In the event that construction equipment cannot meet to Tier 4 Final or better engine certification, the Project representative or contractor must demonstrate through future study with written findings supported by substantial evidence that is approved by the project's lead agency before using other technologies/strategies. Alternative applicable strategies may include, but would not be limited to, construction equipment with Tier 4 Interim or reduction in the number and/or horsepower rating of construction equipment and/or limiting the number of construction equipment operating at	• Large bulldozers and excavators shall be suspended during third smog alerts. Consistent with SCAQMD Rule 1113, the following measures would be incorporated into Project plans and specifications: • The contractor shall use architectural coatings that average 50 grams (g)/ Liters of Volatile Organic Compound (L VOC) content or less. • The development shall utilize low VOC cleaning supplies. Consistent with Section 2485 of Title 13 of the California Code of Regulations (CCR), the following measures shall be incorporated into Project plans and specifications: • Diesel-fueled heavy-duty trucks shall be prohibited from idling in excess of five minutes, both on- and off-site. Compliance with these existing regulations would facilitate consistency with plans for attainment of air quality standards identified by SCAQMD, CARB, the State of California, and the federal government, and would be equivalent to PMM AQ-1, ensuring that there is no conflict or obstruction of the implementation of the applicable air quality plan. Project construction would take place during the City's allowable hours Monday through Friday. Conservatively assuming that all modeled equipment would be operational simultaneously, construction impacts would not exceed SCAQMD daily thresholds and there would be no conflict with the implementation of the applicable air quality plan. During Project construction, the use of heavy-duty equipment would be based on the task at hand and typically does not require all modeled equipment be used simultaneously. Any equipment that is not required or not in use would be shut off and would not be allowed to idle, resulting in lower daily emissions. Therefore, compliance with existing regulations would ensure that impacts to air quality

Table 43: Applicability of 2024-2050 RTP/SCS Final EIR Mitigation Measures

Impact and Mitigation Measure	Applicability to the Project
the same time. All equipment must be tuned and maintained in compliance with the manufacturer's recommended maintenance schedule and specifications. All maintenance records for each equipment and their contractor(s) should make available for inspection and remain on-site for a period of at least two years from completion of construction, unless the individual project can demonstrate that Tier 4 Final or better engines would not be required to mitigate emissions below significance thresholds. Project sponsors should also consider including ZE/ZNE technologies where appropriate and feasible or higher tier standard diesel equipment as it becomes developed and feasible. r) Projects located within the South Coast Air Basin and the Coachella Valley should consider applying for South Coast AQMD "SOON" funds which provides funds to applicable fleets for the purchase of commercially available low-emission heavy-duty engines to achieve near-term reduction of NOx emissions from in-use off-road diesel vehicles. s) Projects located within AB 617 communities should review the applicable Community Emissions Reduction Plan (CERP) for identification of additional feasible mitigation that can be applied to individual projects. t) Where applicable, projects should provide information about air quality related programs to schools, including the Environmental Justice Community Partnerships (EJCP), Clean Air Ranger Education (CARE), and Why Air Quality Matters programs. u) Projects should work with local cities and counties to install adequate signage that prohibits truck idling in certain locations (e.g., near schools and sensitive receptors). v) As applicable for airport projects, the following measures should be considered:	during the construction period would remain less than significant during the entire construction period. In addition to complying with regulations, Project Specific Mitigation Measure AQ-2 requires the use of construction equipment that would meet CARB Tier 4 Final emissions standards or similarly effective equipment in order to reduce diesel exhaust construction emissions, consistent with PMM AQ-1. **MM AQ-2** Off-Road Diesel-Powered Construction Equipment. All off-road diesel-powered construction equipment greater than 25 horsepower must meet California Air Resources Board Tier 4 Final off-road emissions standards. Requirements for Tier 4 Final equipment will be included in applicable bid documents and successful contractor(s) must demonstrate the ability to supply such equipment. A copy of each unit's Best Available Control Technology (BACT) documentation (certified tier specification or model year specification), and CARB or SCAQMD operating permit (if applicable) will be provided to the City upon request. Consistent with PMM AQ-1 ff), the Project would install signage that includes the complaint number for SCAQMD through Project Specific Project Design Feature AQ-1. **PDF AQ-1** Prior to the issuance of demolition permits, signage containing the complaint number of SCAQMD will be installed. Regarding energy conservation, the Project would include rooftop solar to offset the amount of electricity needed and incorporate all required Title 24 measures. Regarding water energy conservation, the Project would incorporate a variety of strategies for sustainability and water conservation based on state and local guidelines including compliance with the Model Water Efficient Landscape Ordnance (MWELO) and all additional local requirements. Plant species will be predominantly low and moderate water use specific to the local climate. Plants will be

Table 43: Applicability of 2024-2050 RTP/SCS Final EIR Mitigation Measures

Impact and Mitigation Measure	Applicability to the Project
– Considering operational improvements to reduce taxi time and auxiliary power unit usage, where feasible. Additionally, consider single engine taxing, if feasible as allowed per Federal Aviation Administration guidelines. – Set goals to achieve a reduction in emissions from aircraft operations over the lifetime of the proposed project. – Use ground service equipment (GSE) that can operate on battery-power. If using electric equipment is not feasible, require the use of alternative fuel, the cleanest gasoline equipment, or Tier 4 Final, at a minimum. w) As applicable for port projects, the following measures should be considered: – Develop specific timelines for transitioning to zero-emissions cargo handling equipment (CHE). – Develop interim performance standards with a minimum amount of CHE replacement each year to ensure adequate progress. – Use short side electric power for ships, which may include tugboats and other ocean-going vessels or develop incentives to gradually ramp up the usage of shore power. – Install the appropriate infrastructure to provide shore power to operate the ships. Electrical hookups should be appropriately sized. – Maximize participation in the Port of Los Angeles' Vessel Speed Reduction Program or the Port of Long Beach's Green Flag Initiation Program in order to reduce the speed of vessel transiting within 40 nautical miles of Point Fermin. – Encourage the participation in the Green Ship Incentives. – Offer incentives to encourage the use of on-dock rail. x) As applicable for rail projects, the following measures should be considered:	grouped in hydrozones based on similar water use demands and planting design with respond to specific site conditions. The irrigation system would include a variety of water conservation features including the use of a flow sensor at the point of connection that can detect possible leaks and shut the system down so system integrity can be ensured. The irrigation controller will incorporate Smart Water Application Technology (SWAT) that will allow it to automatically adjust run times based on local weather conditions. The controller would also utilize a rain shut off device. Shrubs and ground cover will be irrigated with drip tubing which reduces evaporation and eliminates wasteful overspray and trees will receive supplemental water from high efficiency micro spray nozzles. The combination of these factors will ensure a sustainable landscape in the community that maximizes the use of limited water resources. The Project would develop a residential development on an urban infill site located near public multiple transportation options, near jobs, and would provide bicycle stalls to incentivize increased bicycling and would encourage pedestrian circulation at the street level through new landscaping and trees, and separate pedestrian and vehicle entrances into the Project Site.

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Impact and Mitigation Measure	Applicability to the Project
– Provide the highest incentives for electric locomotives and then locomotives that meet Tier 5 emission standards with a floor on the incentives for locomotives that meet Tier 4 emission standards. y) Projects that will introduce sensitive receptors within 500 feet of freeways and other sources should consider installing high-efficiency or enhanced filtration units, such as Minimum Efficiency Reporting Value (MERV) 13 or better. Installation of enhanced filtration units can be verified during occupancy inspection prior to the issuance of an occupancy permit. z) Develop an ongoing monitoring, inspection, and maintenance program for the MERV filters. – Disclose potential health impacts to prospective sensitive receptors from living in close proximity to freeways or other sources of air pollution and the reduced effectiveness of air filtration systems when windows are open or residents are outside. – Identify the responsible implementing and enforcement agency to ensure that enhanced filtration units are installed on-site before a permit of occupancy is issued. – Disclose the potential increase in energy costs for running the HVAC system to prospective residents. – Provide information to residents on where MERV filters can be purchased. – Provide recommended schedule (e.g., every year or every six months) for replacing the enhanced filtration units. – Identify the responsible entity such as future residents themselves, Homeowner's Association, or property managers for ensuring enhanced filtration units are replaced on time. – Identify, provide, and disclose ongoing cost-sharing strategies, if any, for replacing the enhanced filtration units.	

Table 43: Applicability of 2024-2050 RTP/SCS Final EIR Mitigation Measures

Impact and Mitigation Measure	Applicability to the Project
– Set criteria for assessing progress in installing and replacing the enhanced filtration units; and – Develop a process for evaluating the effectiveness of the enhanced filtration units. aa) Consult the SCAG Equity Resources for Action (ERA) Toolbox available on the SCAG's Environmental Justice webpage for potential measures to address impacts to low-income and/or communities of color. bb) The following criteria related to diesel emissions shall be implemented on by individual project sponsors as appropriate and feasible: – Diesel nonroad vehicles on site for more than 10 total days shall have either (1) engines that meet EPA on road emissions standards or (2) emission control technology verified by EPA or CARB to reduce PM emissions by a minimum of 85%. – Diesel generators on site for more than 10 total days shall be equipped with emission control technology verified by EPA or CARB to reduce PM emissions by a minimum of 85%. – Nonroad diesel engines on site shall be Tier 2 or higher. – Diesel nonroad construction equipment on site for more than 10 total days shall have either (1) engines meeting EPA Tier 4 nonroad emissions standards or (2) emission control technology verified by EPA or CARB for use with nonroad engines to reduce PM emissions by a minimum of 85% for engines for 50 hp and greater and by a minimum of 20% for engines less than 50 hp. – The construction contractor shall maintain a list of all diesel vehicles, construction equipment, and generators to be used on site. The list shall include the following:	

Table 43: Applicability of 2024-2050 RTP/SCS Final EIR Mitigation Measures

Impact and Mitigation Measure	Applicability to the Project
iv. Contractor and subcontractor name and address, plus contact person responsible for the vehicles or equipment. v. Equipment type, equipment manufacturer, equipment serial number, engine manufacturer, engine model year, engine certification (Tier rating), horsepower, engine serial number, and expected fuel usage and hours of operation. vi. For the emission control technology installed: technology type, serial number, make, model, manufacturer, EPA/CARB verification number/level, and installation date and hour-meter reading on installation date. – The contractor shall establish generator sites and truck-staging zones for vehicles waiting to load or unload material on site. Such zones shall be located where diesel emissions have the least impact on abutters, the general public, and especially sensitive receptors such as hospitals, schools, daycare facilities, elderly housing, and convalescent facilities. – The contractor shall maintain a monthly report that, for each on road diesel vehicle, nonroad construction equipment, or generator onsite, includes: iv. Hour-meter readings on arrival on-site, the first and last day of every month, and on off-site date. v. Any problems with the equipment or emission controls. vi. Certified copies of fuel deliveries for the time period that identify: 4. Source of supply 5. Quantity of fuel	

Table 43: Applicability of 2024-2050 RTP/SCS Final EIR Mitigation Measures

Impact and Mitigation Measure	Applicability to the Project
6. Quantity of fuel, including sulfur content (percent by weight) cc) Promote energy efficiency and exceed Title-24 Building Envelope Energy Efficiency Standards (California Building Standards Code): – Install programmable thermostat timers – Obtain Third-party HVAC commissioning and verification of energy savings (to be grouped with exceedance of Title 24). – Install energy efficient appliances (Typical reductions for energy-efficient appliances can be found in the Energy Star and Other Climate Protection Partnerships Annual Reports.) – Install higher efficacy public street and area lighting – Limit outdoor lighting requirements – Replace traffic lights with LED traffic lights – Establish onsite renewable or carbon neutral energy systems – generic, solar power and wind power – Utilize a combined heat and power system dd) Promote transportation efficiency. The following measures can be used to increase transportation efficiency: – Locate project near bike path/bike lane – Provide pedestrian network improvements, such as interconnected street network, narrower roadways and shorter block lengths, sidewalks, accessibility to transit and transit shelters, traffic calming measures, parks and public spaces, minimize pedestrian barriers. – Provide traffic calming measures, such as: xii. Marked crosswalks xiii. Count-down signal timers	

Table 43: Applicability of 2024-2050 RTP/SCS Final EIR Mitigation Measures

Impact and Mitigation Measure	Applicability to the Project
xiv. Curb extensions xv. Speed tables xvi. Raised crosswalks xvii. Raised intersections xviii. Median islands xix. Tight corner radii xx. Roundabouts or mini-circles xxi. On-street parking xxii. Chicanes/chokers – Create urban non-motorized zones – Provide bike parking in non-residential and multi-unit residential projects – Dedicate land for bike trails – Limit parking supply through: iv. Elimination (or reduction) of minimum parking requirements v. Creation of maximum parking requirements vi. Provision of shared parking – Require residential area parking permit. – Provide ride-sharing programs v. Designate a certain percentage of parking spacing for ride sharing vehicles vi. Designating adequate passenger loading and unloading and waiting areas for ride-sharing vehicles vii. Providing a web site or messaging board for coordinating rides	

Table 43: Applicability of 2024-2050 RTP/SCS Final EIR Mitigation Measures

Impact and Mitigation Measure	Applicability to the Project
viii. Permanent transportation management association membership and finding requirement. ee) Lengthen the construction period during smog season (May through October) by extending the construction hours per workday or number of days worked per week, to minimize the number of vehicles and equipment operating at the same time. ff) Install signage containing the complaint number of the local air district where construction activities are located at the construction sites.	
Impact AQ-2 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. See PMM AQ-1, above.	**Substantially conforms through regulatory compliance.** See discussion of the applicability of PMM AQ-1, above.
Impact AQ-3 Expose sensitive receptors to substantial pollutant concentrations. See PMM AQ-1, above. **PMM AQ-2:** Projects subject to California Environmental Quality Act (CEQA) review (i.e., non-exempt projects) and located within the jurisdiction of the South Coast Air Quality Management District (SCAQMD) and within one-quarter mile (1,320 feet) of a sensitive land use shall prepare an air quality analysis that evaluates potential localized project air quality impacts in conformance with SCAQMD methodology for assessing localized significance thresholds (LST) air quality impacts. If air pollutants are determined to have the potential to exceed the SCAQMD-adopted thresholds of significance, the project shall incorporate feasible mitigation measures to reduce air pollutant emissions.	**This Mitigation Measure is incorporated through regulatory compliance and incorporation of project specific mitigation measures.** See discussion of the applicability of PMM AQ-1, above. A Project-Specific Air Quality Assessment has been prepared, consistent with PMM AQ-2, in which localized impacts have been analyzed and impacts were determined to be less than significant. In addition, the Project would include Project Specific MM AQ-1, Mitigation Measure AQ-1 which prohibits the installation of wood-burning and natural gas fireplaces. As listed above as part of the discussion of the applicability under PMM AQ-1, the Project would also incorporate MM AQ-2 which requires off-road diesel-powered construction equipment greater than 25 horsepower must meet California Air Resources Board Tier 4 Final off-road emissions standard. **MM AQ-1** The installation of wood-burning and natural gas fireplaces shall be prohibited. The purpose of this measure is to limit

Table 43: Applicability of 2024-2050 RTP/SCS Final EIR Mitigation Measures

Impact and Mitigation Measure	Applicability to the Project
	emissions of ROG, CO, particulate matter, and visible emissions from wood-burning and natural gas devices used for supplemental heat, or ambiance and does not apply to natural gas HVAC equipment. This prohibition shall be noted on the deed and/or lease agreements for future property owners/tenants to comply with. **MM AQ-2** Off-Road Diesel-Powered Construction Equipment. All off-road diesel-powered construction equipment greater than 25 horsepower must meet California Air Resources Board Tier 4 Final off-road emissions standards. Requirements for Tier 4 Final equipment will be included in applicable bid documents and successful contractor(s) must demonstrate the ability to supply such equipment. A copy of each unit's Best Available Control Technology (BACT) documentation (certified tier specification or model year specification), and CARB or SCAQMD operating permit (if applicable) will be provided to the City upon request.
Impact AQ-4 Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people. See PMM AQ-1, above. **PMM AQ-3:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to other emissions (such as those leading to odors) adversely affecting a substantial number of people. Such measures may include the following or other comparable measures identified by the lead agency: a) Implement an odor management plan that consistent with the requirements from the local air quality management district or air pollution control district.	**Substantially conforms through regulatory compliance.** Odors that could be generated by construction activities are required to follow SCAQMD Rule 402 to prevent odor nuisances on sensitive land uses. Odors may be generated during construction activities such as, equipment diesel exhaust, architectural coatings, VOCs, and paving activities. However, these odors would be temporary, are not expected to affect a substantial number of people and would disperse rapidly. The SCAQMD CEQA Air Quality Handbook identifies certain land uses as sources of odors. These land uses include agriculture (farming and livestock), wastewater treatment plants, food processing plants, chemical plants, composting facilities, refineries, landfills, dairies, and fiberglass molding. The Project would not include any of the land uses that have been identified by the

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Impact and Mitigation Measure	Applicability to the Project
b) Implement an odor control technique(s) or strategy(ies) consistent with the requirements from the local air quality management district or air pollution control district. Odor control techniques or strategies may include air filters, air scrubbers, enclosures, buzzer zones, physical barriers, housekeeping practices, or other techniques or strategies.	SCAQMD as odor sources. Therefore, the Project would not create objectionable odors.
BIOLOGICAL RESOURCES	
Impact BIO-1 Have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or US Fish and Wildlife Service. PMM BIO-1: In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to threatened and endangered species, and species that meet the definition of "rare" as defined in CEQA Guidelines Section 15380(b)(2). Such measures may include the following or other comparable measures identified by the lead agency: a) Avoid occupied habitat and potentially suitable habitat for threatened, endangered, or rare species, as well as designated critical habitat in project design, wherever practicable and feasible. Where projects are determined to contain suitable habitat and may impact listed or sensitive species that have specific field survey protocols or guidelines outlined by the USFWS, CDFW, or other local agency, prior to construction, conduct preconstruction focused species surveys that follow applicable protocols and guidelines and are conducted by qualified and/or certified personnel. If sensitive plants or wildlife are present, identify and implement species-specific measures to avoid, minimize, and mitigate for potential impacts in consultation with USFWS or CDFW.	**Not applicable.** The Project Site is in an urbanized area within the City. Vegetation within the Project Site is comprised of non-native grass for athletic field use and ornamental landscaping. There is no wetland or riparian habitat or other sensitive natural community on or adjacent to the Project Site. The Project Site is not part of an established wildlife corridor. Project development would occur within the Project Site and would not impact the movement of any native wildlife species. Furthermore, no water bodies that could serve as a habitat for fish exist on the Project Site or in the vicinity of the Project Site. Regardless of the non-applicability of this mitigation measure, the Project would be required to comply with the federal Migratory Bird Treaty Act to avoid potential impacts to migratory birds**.**

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Impact and Mitigation Measure	Applicability to the Project
b) Where avoidance is determined to be infeasible for species protected under FESA, CESA, or local/regional species habitat conservation plan, provide conservation measures to result in no net loss of sensitive habitats and open space and fulfill the requirements of the applicable authorization for incidental take pursuant to Section 7 or 10(a) of the federal ESA, Section 2081 of the California ESA to support issuance of an incidental take permit, and/or as identified in local or regional plans. Conservation strategies to protect the survival and recovery of federally and state-listed endangered and local special-status species may include: i. Impact minimization strategies ii. Contribution of in-lieu fees for in-kind conservation and mitigation efforts iii. Use of in-kind mitigation bank credits iv. Funding of research and recovery effort v. Habitat restoration vi. Establishment of conservation easements i. Permanent dedication of in-kind habitat c) Design projects to avoid desert native plants protected under the California Desert Native Plants Act, salvage and relocate desert native plants, and/or pay in lieu fees to support off-site long-term conservation strategies. d) Temporary access roads and staging areas will not be located within areas containing sensitive plants, wildlife species or native habitat wherever feasible, so as to avoid or minimize impacts to these species e) Develop and implement a Worker Environmental Awareness Program (environmental education) to inform project workers of	

Table 43: Applicability of 2024-2050 RTP/SCS Final EIR Mitigation Measures

Impact and Mitigation Measure	Applicability to the Project
their responsibilities to avoid and minimize impacts on sensitive biological resources. f) Retain a qualified botanist to document the presence or absence of special status plants before project implementation. g) Appoint a qualified biologist to monitor construction activities that may occur in or adjacent to occupied sensitive species' habitat to facilitate avoidance of resources not permitted for impact. h) Appoint a qualified biologist to monitor implementation of mitigation measures. i) Schedule construction activities to avoid sensitive times for biological resources (e.g., steelhead spawning periods during the winter and spring, nesting bird season) and to avoid the rainy season when erosion and sediment transport is increased. j) Develop an invasive species control plan associated with project construction k) If construction occurs during breeding seasons in or adjacent to suitable habitat, include appropriate sound attenuation measures required for sensitive avian species and other best management practices appropriate for potential local sensitive wildlife l) Conduct pre-construction surveys to delineate occupied sensitive species' habitat to facilitate avoidance. m) Project design should address the protection of habitat on both sides of a freeway to improve effectiveness of the crossings and may use alternatives to hydrocarbon-based asphalt paving to mitigate for potential hydrocarbon and heavy metal contamination.	
Impact BIO-2 Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service.	**Not applicable.** See consistency analysis for PMM BIO-1 under Impact BIO-1. According to the United States Fish and Wildlife Service (USFWS) National Wetlands Inventory, no riparian habitats or wetlands are present on or adjacent to the Project Site. The Project would not be

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Impact and Mitigation Measure	Applicability to the Project
See PMM BIO-1, above. **PMM BIO-2:** In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to riparian habitats and other sensitive natural communities. Such measures may include the following or other comparable measures identified by the lead agency: a) Consult with the USFWS and NMFS where such state-designated sensitive or riparian habitats provide potential or occupied habitat for federally listed rare, threatened, and endangered species afforded protection pursuant to the federal ESA. b) Consult with the USFS where such state-designated sensitive or riparian habitats provide potential or occupied habitat for federally listed rare, threatened, and endangered species afforded protection pursuant to the federal ESA and any additional species afforded protection by an adopted Forest Land Management Plan or Resource Management Plan for the four national forests in the six-county area: Angeles, Cleveland, Los Padres, and San Bernardino. c) Consult with the CDFW where such state-designated sensitive or riparian habitats provide potential or occupied habitat for state-listed rare, threatened, and endangered species afforded protection pursuant to the California ESA, or Fully Protected Species afforded protection pursuant to the State Fish and Game Code. d) Consult with the CDFW pursuant to the provisions of Section 1600 of the State Fish and Game Code as they relate to Lakes and Streambeds.	developed on sensitive or riparian habitat. Therefore, development of the Project would not result in adverse effects to any sensitive or riparian habitat that could support any species identified or designated as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game (CDFG) or USFWS. Thus, this mitigation measure is not applicable to the Project.

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Impact and Mitigation Measure	Applicability to the Project
e) Consult with the USFWS, USFS, CDFW, and counties and cities in the SCAG region, where state-designated sensitive or riparian habitats are occupied by birds afforded protection pursuant to the MBTA during the breeding season. f) Consult with the CDFW for state-designated sensitive or riparian habitats where furbearing mammals, afforded protection pursuant to the provisions of the State Fish and Game Code for fur-bearing mammals, are actively using the areas in conjunction with breeding activities. g) Require project design to avoid sensitive natural communities and riparian habitats, wherever practicable and feasible. Where practicable and feasible, require upland buffers that sufficiently minimize impacts to riparian corridors. h) Where avoidance is determined to be infeasible, develop sufficient conservation measures through coordination with local agencies and the regulatory agency (i.e., USFWS or CDFW) to protect sensitive natural communities and riparian habitats and develop appropriate compensatory mitigation, where required. i) Appoint a qualified biologist to monitor construction activities that may occur in or adjacent to sensitive communities. j) Appoint a qualified biologist to monitor implementation of mitigation measures. k) Schedule construction activities to avoid sensitive times for biological resources and to avoid the rainy season when erosion and sediment transport is increased. l) When construction activities require stream crossings, schedule work during dry conditions and use rubber-wheeled vehicles, when feasible. Have a qualified wetland scientist or regulatory specialist determine if potential project impacts require a Notification of Lake	

Table 43: Applicability of 2024-2050 RTP/SCS Final EIR Mitigation Measures

Impact and Mitigation Measure	Applicability to the Project
or Streambed Alteration to CDFW during the planning phase of projects. m) Consult with local agencies, jurisdictions, and landowners where such state-designated sensitive or riparian habitats are afforded protection pursuant to an adopted regional conservation plan. n) Install temporary construction fencing and/or mark sensitive habitat to be avoided during construction activities. o) Salvage and stockpile topsoil (the surface material from 6 to 12 inches deep) and perennial native plants, when recommended by the qualified ecologist/biologist, for use in restoring native vegetation to areas of temporary disturbance within the project area. Salvage of soils containing invasive species, seeds and/or rhizomes will be avoided as identified by the qualified ecologist/biologist. p) Revegetate with appropriate indigenous native vegetation following the completion of construction activities. as identified by the qualified ecologist/biologist. q) Complete habitat enhancement (e.g., through removal of non-native invasive wetland species and replacement with more ecologically valuable native species). r) Use Best Management Practices (BMPs) at construction sites to minimize erosion and sediment transport from the area. BMPs include encouraging growth of native vegetation in disturbed areas, using straw bales or other silt-catching devices, and using settling basins to minimize soil transport.	
Impact BIO-3 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.	**Not applicable.** See consistency analysis for PMM BIO-1 and PMM BIO-2 under Impacts BIO-1 and BIO-2, respectively. The Project Site does not include any protected wetlands or water features that are in the jurisdiction and responsibility of the U.S. Army Corps of Engineers (USACE) or any other state or federal public

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Impact and Mitigation Measure	Applicability to the Project
See PMM BIO-1 and PMM BIO-2, above. **PMM BIO-3**: In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to wetlands. Such measures may include the following or other comparable measures identified by the lead agency. a) Conduct an aquatic resources delineation by a qualified biologist or regulatory specialist to identify and map the extent of state and federally protected aquatic resources. Avoid state and federally protected aquatic resources in project design, consistent with the provisions of Sections 404 and 401 of the CWA and Section 1600 of Fish and Game Code, wherever practicable and feasible. b) Where the lead agency has identified that a project, or other regionally significant project, has the potential to impact other wetlands or waters, such as those considered waters of the state of California under the State Wetland Definition and Procedures for Dischargers of Dredged or Fill Material to Waters of the State, not protected under Section 404 or 401 of the CWA, seek comparable coverage for these wetlands and waters in consultation with the SWRCB, applicable RWQCB, and CDFW. c) Where avoidance of wetlands is determined to be infeasible, develop sufficient conservation measures to fulfill the requirements of the applicable authorization for impacts to federal and state protected aquatic resource to support issuance of a permit under Section 404 of the CWA as administered by the USACE or SAA by the CDFW. The use of an authorized Nationwide Permit or issuance of an individual permit requires the project applicant to demonstrate compliance with USACE's Final Compensatory Mitigation Rule or the CDFW SAA conditions. The USACE reviews projects to ensure environmental impacts to aquatic resources are avoided or	agencies and/or Lead Agencies. Thus, this mitigation measure is not applicable to the Project.

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Impact and Mitigation Measure	Applicability to the Project
minimized as much as feasible. Consistent with the administration's performance standard of "no net loss of wetlands" a USACE permit may require a project proponent to restore, establish, enhance, or preserve other aquatic resources in order to replace those affected by the proposed project. This compensatory mitigation process seeks to replace the loss of existing aquatic resource functions and area. Project proponents required to complete mitigation are encouraged to use a watershed approach and watershed planning information. The rule establishes performance standards, sets timeframes for decision making, and to the maximum extent feasible, establishes equivalent requirements and standards for the three sources of compensatory mitigation: --Permittee-responsible mitigation --Contribution of in-kind in-lieu fees --Use of in-kind mitigation bank credits d) Where avoidance is determined to be infeasible and proposed projects' impacts exceed an existing Nationwide Permit (NWP) and/or California SWRCB-certified NWP, the lead agency should provide USACE and SWRCB (where applicable) an alternative analysis consistent with the Least Environmentally Damaging Practicable Alternatives in this order of priorities: --Avoidance --Impact Minimization --On-site alternatives --Off-site alternatives e) Require review of construction drawings by a certified wetland delineator as part of each project-specific environmental analysis to determine whether aquatic resources will be affected and, if necessary, perform formal wetland delineation.	

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Impact and Mitigation Measure	Applicability to the Project
Impact BIO-4 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. See PMM BIO-1 through PMM BIO-3, above. **PMM BIO-4:** In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to wildlife movement. Such measures may include the following or other comparable measures identified by the lead agency: a) Consult with the USFS where impacts to migratory wildlife corridors may occur in an area afforded protection by an adopted Forest Land Management Plan or Resource Management Plan for the four national forests in the six-county area: Angeles, Cleveland, Los Padres, and San Bernardino. b) Consult with counties, cities, and other local organizations when impacts may occur to open space areas that have been designated as important for wildlife movement related to local ordinances or conservation plans. c) Prohibit construction activities within 500 feet of occupied breeding areas for wildlife afforded protection pursuant to Title 14 Section 460 of the California Code of Regulations protecting fur-bearing mammals, during the breeding season. d) Conduct a survey to identify active raptor and other migratory nongame bird nests by a qualified biologist at least two weeks before the start of construction at project sites from February 1 through August 31. e) Prohibit construction activities within 300 feet, or modified as appropriate by a qualified biologist, of occupied nest of birds	**Not applicable**. See consistency analysis for PMM BIO-1, PMM BIO-2, and PMM BIO-3 under Impacts BIO-1, BIO-2, and BIO-3, respectively. The Project Site is in an urbanized area. The Project would not be developed on or adjacent to any existing open space, habitat area, wildlife nursery, or wildlife corridor. Therefore, development of the Project would not interfere with the movement of any native resident or migratory fish or wildlife species; with established native resident or migratory wildlife corridors; or impede the use of native wildlife nursery sites. Thus, this mitigation measure is not applicable to the Project. Regardless of the non-applicability of this mitigation measure, the Project would be required to comply with the Migratory Bird Treaty Act to avoid potential impacts to migratory birds.

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Impact and Mitigation Measure	Applicability to the Project
afforded protection pursuant to the Migratory Bird Treaty Act, during the breeding season. f) Ensure that suitable nesting sites for migratory nongame native bird species protected under the Migratory Bird Treaty Act and/or trees with unoccupied raptor nests should only be removed prior to February 1, or following the nesting season. g) When feasible and practicable, minimize impacts to wildlife movement and habitat connectivity and preserve existing and functional wildlife corridors in project design. h) Conduct site-specific analyses of opportunities to preserve or improve habitat linkages with areas on- and off-site. i) Long linear projects with the possibility of impacting wildlife movement should analyze habitat linkages/wildlife movement corridors on a broad scale to avoid critical narrow choke points that could reduce function of recognized movement corridor. j) Review construction drawings and habitat connectivity mapping by a qualified biologist to determine the risk of habitat fragmentation. k) Pursue mitigation banking to preserve habitat linkages and corridors (opportunities to purchase, maintain, and/or restore offsite habitat). l) When practicable and feasible design projects to promote wildlife corridor redundancy by including multiple connections between habitat patches. m) Evaluate the potential for installation of overpasses, underpasses, and culverts to create wildlife crossings in cases where a roadway or other transportation project may interrupt the flow of species through their habitat. Provide wildlife crossings in accordance with proven standards, such as FHWA's Critter Crossings or Ventura County Mitigation Guidelines and in consultation with wildlife corridor authorities.	

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Impact and Mitigation Measure	Applicability to the Project
n) Install directional wildlife fencing where appropriate to minimize the probability of wildlife injury due to direct interaction between wildlife and roads or construction. o) Where avoidance is determined to be infeasible, design sufficient conservation measures through coordination with local agencies and the regulatory agency (i.e., USFWS or CDFW) and in accordance with the respective counties and cities general plans to establish plans to mitigate for the temporal or permanent loss of fish and wildlife movement corridors and/or wildlife nursery sites. The consideration of conservation measures may include the following measures, in addition to the measures outlined in PMMBIO-1(b), where applicable: – Wildlife movement buffer zones – Corridor realignment – Appropriately spaced breaks in center barriers – Stream rerouting – Culverts – Creation of artificial movement corridors such as freeway under- or overpasses – Acquire contiguous adjacent land parcels to be protected in perpetuity from encroachment and development – Other comparable measures p) Where the lead agency has identified that an RTP/SCS project, or other regionally significant project, has the potential to impact open space or wildlife nursery site areas that are not designated as such by federal, state, or local jurisdictions, seek comparable coverage for these areas in consultation with the USFWS, CDFW, NMFS, or other local jurisdictions.	

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Impact and Mitigation Measure	Applicability to the Project
q) Incorporate applicable and appropriate guidance (e.g., FHWA-HEP-16-059), as well as best management practices, to benefit pollinators with a focus on native plants. r) Implement berms and sound/sight barriers at all wildlife crossings to encourage wildlife to utilize crossings. Sound and lighting should also be minimized in developed areas, particularly those that are adjacent to or go through natural habitats. s) Reduce lighting impacts on sensitive species through implementation of mitigation measures such as but not limited to: – Use high-pressure sodium and/or cut-off fixtures instead of typical mercury-vapor fixtures for outdoor lighting. – Design exterior lighting to confine illumination to the project site. – Provide structural and/or vegetative screening from light-sensitive uses. – Use non-reflective glass or glass treated with a non-reflective coating for all exterior windows and glass used on building surfaces. – Direct architectural lighting onto the building surfaces and have low reflectivity to minimize glare and limit light onto adjacent properties. t) Reduce noise impacts to sensitive species through implementation of mitigation measures such as, but not limited to: – Install temporary noise barriers during construction. – Include permanent noise barriers and sound-attenuating features as part of the project design. Barriers could be in the form of outdoor barriers, sound walls, buildings, or earth berms to attenuate noise at adjacent sensitive uses.	

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Impact and Mitigation Measure	Applicability to the Project
– Provide structural and/or vegetative screening from light-sensitive uses. – Ensure that construction equipment are properly maintained per manufacturers' specifications and fitted with the best available noise suppression devices (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds silencers, wraps). All intake and exhaust ports on power equipment shall be muffled or shielded. – Use hydraulically or electrically powered tools (e.g., jack hammers, pavement breakers, and rock drills) for project construction to avoid noise associated with compressed air exhaust from pneumatically powered tools. However, where use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust should be used; this muffler can lower noise levels from the exhaust by up to about 10 dBA. External jackets on the tools themselves should be used, if such jackets are commercially available, and this could achieve a further reduction of 5 dBA. Quieter procedures should be used, such as drills rather than impact equipment, whenever such procedures are available and consistent with construction procedures. – Using rubberized asphalt or "quiet pavement" to reduce road noise for new roadway segments, roadways in which widening or other modifications require re-pavement, or normal reconstruction of roadways where re-pavement is planned – Use equipment and trucks with the best available noise control techniques (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds, wherever feasible) for project construction.	

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Impact and Mitigation Measure	Applicability to the Project
– Use techniques such as grade separation, buffer zones, landscaped berms, dense plantings, sound walls, reduced-noise paving materials, and traffic calming measures. u) Include large buffers between sensitive uses and freeways. v) Create wildlife corridor redundancy to help retain functional connectivity and resilience. w) To the extent practicable, avoid construction during dawn and dusk, when wildlife activity is highest. x) If protected terrestrial wildlife enter work areas during construction, temporarily halt work to allow wildlife to move through the work area unharmed. A qualified biologist may relocate non-listed wildlife species out of the work area.	
Impact BIO-5 Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. See PMM BIO-1 through PMM BIO-4, above. **PMM BIO-5:** In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce conflicts with local policies and ordinances protecting biological resources. Such measures may include the following or other comparable measures identified by the lead agency: a) Consult with the appropriate local agency responsible for the administration of the policy or ordinance protecting biological resources. b) Prioritize retention of trees on-site consistent with local regulations. Provide adequate protection during the construction period for any	**Consistent.** See consistency analysis for PMM BIO-1, PMM BIO-2, PMM BIO3, and PMM BIO-4 under BIO-1, BIO-2, BIO-3, and BIO-4, respectively. The Project would not be developed on existing open space or sensitive habitat. The Project Site is in an urbanized area and contains ornamental landscaping and street trees. Based on the Arborist Report prepared for this SCEA, a total of 70 trees were identified within Project Site and all would require removal. Of the 70 trees, 33 trees have a minimum trunk diameter of eight inches and fall under the City's Tree Preservation Regulations contained in Section 12-110 through 12-127 of the City's Municipal Code. The protected trees will be replaced per City's Municipal Code Section 12-113. Including replacement trees, the Project would plant approximately 300 trees, featuring a diverse range of species, and incorporate them into various locations of the Project. The removal and placement of new and replacement trees would be subject to the review and approval of the City. As such, the Project would not conflict with any local policies or ordinances protecting biological resources, such as a tree

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Impact and Mitigation Measure	Applicability to the Project
trees that are to remain standing, as recommended by an International Society of Arboriculture (ISA) certified arborist. c) If specific project area trees are designated as "Protected Trees," "Landmark Trees," or "Heritage Trees," obtain approval for encroachment or removals through the appropriate entity, and develop appropriate mitigation measures at that time, to ensure that the trees are replaced. Mitigation trees shall be locally sourced native species, as directed by a qualified biologist. d) Appoint an ISA certified arborist to monitor construction activities that may occur in areas where trees are designated as "Protected Trees," "Landmark Trees," or "Heritage Trees," to avoid resources not permitted for impact. Before the start of any clearing, excavation, construction or other work on the site, securely fence off every protected tree deemed to be potentially endangered by said site work. Keep such fences in place for duration of all such work. Clearly mark all trees to be removed. e) Establish a scheme for the removal and disposal of logs, brush, earth, and other debris that will avoid injury to any protected tree. Where proposed development or other site work could encroach upon the protected perimeter of any protected tree, incorporate special measures to allow the roots to breathe and obtain water and nutrients. Minimize any excavation, cutting, filing, or compaction of the existing ground surface within the protected perimeter. Require that no change in existing ground level occur from the base of any protected tree at any time. Require that no burning or use of equipment with an open flame occur near or within the protected perimeter of any protected tree. f) No storage or dumping of oil, gas, chemicals, or other substances that may be harmful to trees to occur from the base of any protected trees, or any other location on the site from which such substances might enter the protected perimeter. No heavy	preservation policy or ordinance. The Project would be consistent with this mitigation measure.

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Impact and Mitigation Measure	Applicability to the Project
construction equipment or construction materials to be operated or stored within a distance from the base of any protected trees. Wires, ropes, or other devices not to be attached to any protected tree, except as needed for support of the tree. Require that no sign, other than a tag showing the botanical classification, be attached to any protected tree. g) Thoroughly spray the leaves of protected trees with water periodically during construction to prevent buildup of dust and other pollution that would inhibit leaf transpiration, as directed by the certified arborist. h) If any damage to a protected tree should occur during or as a result of work on the site, the appropriate local agency will be immediately notified of such damage. If such tree cannot be preserved in a healthy state, as determined by the certified arborist, replace any tree removed with another tree or trees on the same site deemed adequate by the local agency to compensate for the loss of the tree that is removed. Remove all debris created as a result of any tree removal work from the property within two weeks of debris creation or as determined by the local jurisdictions, and such debris shall be properly disposed of in accordance with all applicable laws, ordinances, and regulations. Design projects to avoid conflicts with local policies and ordinances protecting biological resources. i) Where avoidance is determined to be infeasible, develop sufficient conservation measures to fulfill the requirements of the applicable policy or ordinance, such as to support issuance of a tree removal permit. The consideration of conservation measures may include: --Avoidance strategies --Contribution of in-lieu fees --Planting of replacement trees	

Table 43: Applicability of 2024-2050 RTP/SCS Final EIR Mitigation Measures

Impact and Mitigation Measure	Applicability to the Project
--Re-landscaping areas with native vegetation post-construction --Other comparable measures developed in consultation with local agency and certified arborist.	
Impact BIO-6 Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. See PMM BIO-1 through PMM BIO-5, above. **PMM BIO-6:** In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects on HCPs and NCCPs. Such measures may include the following or other comparable measures identified by the lead agency: a) Consult with the appropriate federal, state, and/or local agency responsible for the administration of HCPs or NCCPs. b) Wherever practicable and feasible, the project shall be designed to avoid lands preserved under the conditions of an HCP or NCCP. c) Where avoidance is determined to be infeasible, develop sufficient conservation measures to fulfill the requirements of the HCP and/or NCCP, which would include but not be limited to applicable authorization for incidental take pursuant to Section 7 or 10(a) of the federal Endangered Species Act and/or Section 2081(b) or 2080.1 of the California Fish and Game Code, to support issuance of an incidental take permit or any other permissions required for development within the HCP/NCCP boundaries. The consideration of additional conservation measures would include the measures outlined in SMM-BIO-2, where applicable.	**Not applicable.** See consistency analysis for PMM BIO-1 under Impact BIO-1. This mitigation measure does not apply to the Project because the Project Site is not subject to any provisions of any Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan. Thus, this mitigation measure is not applicable to the Project**.**
CULTURAL RESOURCES	

Table 43: Applicability of 2024-2050 RTP/SCS Final EIR Mitigation Measures

Impact and Mitigation Measure	Applicability to the Project
Impact CUL-1 Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5. **PMM CUL-1:** In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to historical resources. Such measures may include the following or other comparable measures identified by the lead agency: a) Pursuant to CEQA Guidelines Section 15064.5, conduct a record search during the project planning phase at the appropriate Information Center to determine whether the Plan area has been previously surveyed and whether historical resources were identified. b) During the project planning phase, retain a qualified architectural historian, defined as an individual who meets the Secretary of the Interior's Professional Qualification Standards (PQS) in Architectural History, to conduct historic architectural surveys if a built environment resource greater than 45 years in age may be affected by the project or if recommended by the Information Center. c) Comply with Section 106 of the National Historic Preservation Act (NHPA) including, but not limited to, projects for which federal funding or approval is required for the individual project. This law requires federal agencies to evaluate the impact of their actions on resources included in or eligible for listing in the National Register. Federal agencies must coordinate with the State Historic Preservation Officer in evaluating impacts and developing mitigation. These mitigation measures may include, but are not limited to the following: – Employ design measures to avoid historical resources and undertake adaptive reuse where appropriate and feasible. If	**This Mitigation Measure is incorporated through implementation of project specific mitigation measures which are equal to or more effective than this Mitigation Measure.** The Morningside High School Site Upgrade and Woodworth Elementary School Demolition Project Mitigated Negative Declaration (MND) (prior MND) incorporated mitigation measures to be implemented by the IUSD to reduce direct impacts related to demolition of portions of the Morningside High School and campus to less than significant. The prior MND sufficiently addressed direct impacts as a result of demolition of the recreational facilities and fields and Woodworth Elementary School that are part of the current Project Site. As such, the proposed Project would not cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5 Regarding archaeological resources, the archaeological sensitivity of the Project area is low. Nevertheless, ground-disturbing activities have the potential to reveal buried deposits not observed on the surface during previous surveys. To mitigate such impacts, the Project would be required to implement Project Specific Mitigation Measures, MM CUL-1, MM CUL-2, MM TCR-1, and MM TCR-2 which set forth procedures for the retention of a qualified archaeologist, a Native American monitor representing the Gabrieleno Band of Mission Indians – Kizh Nation, and inadvertent discovery of archaeological resources, respectively. **MM CUL-1 Retention of a Qualified Archaeologist:** Prior to start of ground-disturbing activities, a Qualified Archaeologist (defined as meeting the Secretary of the Interior's Professional Qualification Standards for archaeology) shall be retained to prepare cultural resources sensitivity training for construction personnel. The Qualified Archaeologist, or their designee, shall instruct all onsite construction personnel on the types of archaeological resources that may be encountered and the procedures to follow in the event of an inadvertent discovery of

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Impact and Mitigation Measure	Applicability to the Project
resources are to be preserved, as feasible, carry out the maintenance, repair, stabilization, rehabilitation, restoration, preservation, conservation or reconstruction in a manner consistent with the Secretary of the Interior's Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings. If resources would be impacted, impacts should be minimized to the extent feasible. – Where feasible, noise buffers/walls and/or visual buffers/landscaping should be constructed to preserve the contextual setting of significant built resources. d) If a project requires the relocation, rehabilitation, or alteration of an eligible historical resource, the Secretary of the Interior's Standards for the Treatment of Historic Properties should be used to the maximum extent feasible to ensure the historical significance of the resource is not impaired. The application of the standards should be overseen by an architectural historian or historic architect meeting the Secretary of the Interior's PQS. Prior to any construction activities that may affect the historical resource, a report, meeting industry standards, should identify and specify the treatment of character-defining features and construction activities and be provided to the lead agency for review and approval. e) If a project would result in the demolition or significant alteration of a historical resource eligible for or listed in the National Register of Historic Places (NRHP), California Register of Historical Resources (CRHR), or local register, recordation should take the form of Historic American Buildings Survey (HABS), Historic American Engineering Record (HAER), or Historic American Landscape Survey (HALS) documentation, and should be performed by an architectural historian or historian who meets the Secretary of the Interior's PQS. Recordation should meet the Secretary of the Interior's Standards and Guidelines for Architectural and Engineering, which defines the products acceptable for inclusion in	archaeological resources or human remains. The Applicant shall ensure that construction personnel are made available for and attend the training and retain documentation demonstrating attendance. **MM CUL-2 Inadvertent Discovery of Cultural Resources:** In the event that any subsurface cultural resources are encountered at the project site during construction or the course of any ground disturbance activities, all such activities shall halt immediately within 50 feet. The applicant shall notify the City and consult with a Secretary of Interior qualified archaeologist who shall evaluate the find in accordance with Federal, State, and local guidelines, including those set forth in the California Public Resources Code Section 21083.2 and shall determine the necessary findings as to the origin and disposition to assess the significance of the find. If any find is determined to be significant, appropriate avoidance measures recommended by the consultant and approved by the City must be followed unless avoidance is determined to be unnecessary or infeasible by the City. If avoidance is unnecessary or infeasible, other appropriate measures (e.g., data recovery, excavation) shall be instituted. For any resources of Native American origin, the City shall also contact the Tribes that elected to consult on the Project to identify its potential as a Tribal Cultural Resource (TCR). Should the resource, in consultation between the City and Tribe(s), be determined a TCR, the City shall also consult with Tribes regarding avoidance or other measures recommended by the consultant. All identified cultural resources will be recorded on appropriate California Department of Parks and Recreation (DPR) 523 series forms and evaluated for significance. All records will be submitted to the City of Inglewood, Consulting Tribe(s), and South Central Coastal Information Center (SCCIC).

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Impact and Mitigation Measure	Applicability to the Project
the HABS/HAER/HALS collection at the Library of Congress. The specific scope and details of documentation should be developed at the project level in coordination with the lead agency. f) During the project planning phase, obtain a qualified archaeologist, defined as one who meets the Secretary of the Interior's PQS for archaeology, to conduct a record search at the appropriate Information Center of the California Historical Resources Information System (CHRIS) to determine whether the Plan area has been previously surveyed and whether resources were identified. g) Contact the NAHC to request a Sacred Lands File search and a list of relevant Native American contacts who may have additional information. h) During the project planning phase, obtain a qualified archaeologist or architectural historian (depending on applicability) to conduct archaeological and/or historic architectural surveys as recommended by the qualified professional, the lead agency, or the Information Center. In the event the records indicate that no previous survey has been conducted, the qualified professional or Information Center will make a recommendation on whether a survey is warranted based on the sensitivity of the Plan area for archaeological resources. i) If potentially significant archaeological resources are identified through survey, and impacts to these resources cannot be avoided, a Phase II Testing and Evaluation investigation should be performed by a qualified archaeologist prior to any construction-related ground-disturbing activities to determine significance. If resources are determined significant or unique through Phase II testing, and avoidance is not feasible, appropriate resource-specific mitigation measures should be established by the lead agency and undertaken by qualified personnel. These might include a Phase III data recovery program implemented by a qualified archaeologist and	**MM TCR-1: Retain a Native American Monitor Prior to Commencement of Ground-Disturbing Activities.** The project applicant/lead agency shall retain a Native American Monitor from or approved by the Gabrieleño Band of Mission Indians – Kizh Nation. The monitor shall be retained prior to the commencement of any "ground-disturbing activity" for the subject project at all project locations (i.e., both on-site and any off-site locations that are included in the project description/definition and/or required in connection with the project, such as public improvement work). "Ground-disturbing activity" shall include, but is not limited to, demolition, pavement removal, potholing, auguring, grubbing, tree removal, boring, grading, excavation, drilling, and trenching. A copy of the executed monitoring agreement shall be submitted to the lead agency prior to the earlier of the commencement of any ground-disturbing activity, or the issuance of any permit necessary to commence a ground-disturbing activity. The monitor will complete daily monitoring logs that will provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of ground-disturbing activities, soil types, cultural-related materials, and any other facts, conditions, discovered TCRs, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., (collectively, tribal cultural resources, or "TCR"), as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs will be provided to the project applicant/lead agency upon written request to the Tribe. On-site tribal monitoring shall conclude upon one of the following (1) written confirmation to the Kizh from a designated point of contact for the project applicant/lead agency that all ground-

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Impact and Mitigation Measure	Applicability to the Project
performed in accordance with the OHP's Archaeological Resource Management Reports (ARMR): Recommended Contents and Format and Guidelines for Archaeological Research Designs. Additional options can include 1) interpretative signage, or 2) educational outreach that helps inform the public of the past activities that occurred in this area. Archaeological materials collected from a significant resource should be curated with a recognized scientific or educational repository. j) If a record search or archaeological assessment indicates that the project is located in an area sensitive for archaeological resources, as determined by the lead agency in consultation with a qualified archaeologist, retain an archaeological monitor to observe ground disturbing operations, including but not limited to grading, excavation, trenching, or removal of existing features of the subject property. The archaeological monitor should be supervised by an archaeologist meeting the Secretary of the Interior's PQS. k) Conduct construction activities and excavation to avoid cultural resources (if identified). If avoidance is not feasible, further work may be needed to determine the importance of a resource. Retain a qualified archaeologist, and/or as appropriate, a qualified architectural historian who should make recommendations regarding the work necessary to assess significance. If the cultural resource is determined to be significant undr state or federal guidelines, impacts to the cultural resource will need to be mitigated. l) Stop construction activities and excavation in the area where cultural resources are found until a qualified archaeologist can determine whether these resources are significant. If the archaeologist determines that the discovery is significant, it should be curated with a recognized scientific or educational repository.	disturbing activities and phases that may involve ground-disturbing activities on the project site or in connection with the project are complete; or (2) a determination and written notification by the Kizh to the project applicant/lead agency that no future, planned construction activity and/or development/construction phase at the project site possesses the potential to impact Kizh TCRs. **MM TCR-2: Unanticipated Discovery of Tribal Cultural Resource Objects (Non-Funerary/Non-Ceremonial).** Upon discovery of any TCRs, all construction activities in the immediate vicinity of the discovery shall cease (i.e., not less than the surrounding 50 feet) and shall not resume until the discovered TCR has been fully assessed by the Kizh monitor and/or Kizh archaeologist. The Kizh will recover and retain all discovered TCRs in the form and/or manner the Tribe deems appropriate, in the Tribe's sole discretion, and for any purpose the Tribe deems appropriate, including for educational, cultural and/or historic purposes.

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Impact and Mitigation Measure	Applicability to the Project
Impact CUL-2 Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5. See PMM CUL-1, above.	**Substantially conforms through regulatory compliance.** See discussion under PMM CUL-1 above.
Impact CUL-3 Disturb human remains, including those interred outside of dedicated cemeteries. **PMM CUL-2:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to human remains. Such measures may include the following or other comparable measures identified by the lead agency: a) In the event of discovery or recognition of any human remains during construction or excavation activities associated with the project, in any location other than a dedicated cemetery, cease further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent human remains until the coroner of the county in which the remains are discovered has been informed and has determined that no investigation of the cause of death is required. b) If any discovered remains are of Native American origin: – Contact the County Coroner to contact the NAHC to designate a Native American Most Likely Descendant (MLD). The MLD should make a recommendation to the landowner or the person responsible for the excavation work, for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods. This may include obtaining a qualified archaeologist or team of archaeologists to properly excavate the human remains.	**This Mitigation Measure is incorporated through implementation of project-specific mitigation measures which are equal to or more effective than this Mitigation Measure.** Given that the Project Site has been subject to extensive disruption, the potential to disturb or impact any human remains is unlikely. However, there is always a possibility that human remains could be interred beneath the Project Site. If human remains are found, those remains would require proper treatment in accordance with applicable laws. PRC Section 5097, *et seq*., and California Health and Safety Code (HSC) Sections 7050.5-7055 describe the general provisions regarding human remains, including the requirements if any human remains are accidentally discovered during excavation of a site. Adherence with **MM CUL-3** and **MM TCR-3** would ensure the proper treatment of human remains should they be encountered. **MM CUL-3 Inadvertent Discovery of Human Remains**: In the event that human skeletal remains are encountered at the project site during construction or the course of any ground disturbance activities, all such activities shall halt immediately within 100 feet, pursuant to State Health and Safety Code Section 7050.5 which requires that no further ground disturbance shall occur until the County Coroner has made the necessary findings as to the origin and disposition pursuant to California Public Resources Code Section 5097.98. Additionally, the following procedures shall be followed: Contact the County Coroner: 1104 N. Mission Road

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Impact and Mitigation Measure	Applicability to the Project
– If the NAHC is unable to identify a MLD, or the MLD fails to make a recommendation within 48 hours after being notified by the commission, or the landowner or his representative rejects the recommendation of the MLD and the mediation by the NAHC fails to provide measures acceptable to the landowner, obtain a culturally affiliated Native American monitor, and an archaeologist, if recommended by the Native American monitor, and rebury the Native American human remains and any associated grave goods, with appropriate dignity, on the property and in a location that is not subject to further subsurface disturbance.	Los Angeles, CA 90033 (323) 343-0512 (8 a.m. to 5 p.m. Monday through Friday) or (323) 343-0714 (After Hours, Saturday, Sunday, and Holidays) If the remains are determined to be of Native American descent, the Coroner has 24 hours to notify the Native American Heritage Commission (NAHC). The NAHC will immediately notify the person they believe to be the Most Likely Descendent (MLD) of the ancestral remains. The MLD has 48 hours to make recommendations to the owner, or representative, for the treatment or disposition, with proper dignity, of the human remains and grave goods. If the owner does not accept the descendant's recommendations, the owner or the descendent may request mediation by the NAHC. **MM TCR-3: Unanticipated Discovery of Human Remains and Associated Funerary or Ceremonial Objects.** Native American human remains are defined in PRC 5097.98 (d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, called associated grave goods in Public Resources Code Section 5097.98, are also to be treated according to this statute. If Native American human remains and/or grave goods are discovered or recognized on the project site, then Public Resource Code 5097.9 as well as Health and Safety Code Section 7050.5 shall be followed. Human remains and grave/burial goods shall be treated alike per California Public Resources Code section 5097.98(d)(1) and (2). Preservation in place (i.e., avoidance) is the preferred manner of treatment for discovered human remains and/or burial goods. Any discovery of human remains/burial goods shall be kept confidential to prevent further disturbance.
ENERGY	

Table 43: Applicability of 2024-2050 RTP/SCS Final EIR Mitigation Measures

Impact and Mitigation Measure	Applicability to the Project
Impact ENR-1 Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation. See PMM AQ-1, PMM GHG-1, PMM TRA-1, and PMM UTIL-1.	**Substantially conforms through regulatory compliance and project specific mitigation measures.** See discussion for PMM AQ-1, PMM GHG-1, PMM TRA-1, and PMM UTIL-1.
Impact ENR-2 Conflict with or obstruct a state or local plan for renewable energy or energy efficiency. See PMM AQ-1, PMM GHG-1, PMM TRA-1, and PMM UTIL-1.	**Substantially conforms through regulatory compliance and project specific mitigation measures.** See discussion for PMM AQ-1, PMM GHG-1, PMM TRA-1, and PMM UTIL-1.
GEOLOGY AND SOILS	
Impact GEO-1 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; (ii) strong seismic ground shaking; (iii) seismic-related ground failure, including liquefaction; (iv) landslides. **PMM GEO-1:** In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to minimize the potential for adverse effects associated with surface fault rupture, seismic ground shaking, seismic-related ground failure, liquefaction, and landslides for projects located on sites with unusual geologic conditions, the following measures shall be considered: • Use interim precautionary steps during construction to maintain ground surface and slope stability;	**Not applicable.** The Project Site is not located within an Alquist-Priolo Earthquake Fault Zone. No active faults are known to pass through the immediate Project vicinity. Additionally, the Project Site is not within an area potentially susceptible to liquefaction or in an earthquake-induced landslide zone. The Geotechnical Engineering Exploration prepared for the Project recommended that the fill and disturbed native soils be removed and recompacted to create a compacted fill cap for support of the Project's foundations, slabs, and pavements and Project construction would comply with those recommendations. Due to the presence of over-consolidated earth materials at the Project Site and deep groundwater levels, the potential for liquefaction at the Project Site is low, and the Project would not cause potential adverse effects involving seismic-related ground failure, including liquefaction. The Project would be required to comply with the existing building, grading, and seismic regulations of the 2022 California Building Code (CBC) and City Building Code.

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Impact and Mitigation Measure	Applicability to the Project
• Incorporate design and structural features that exceed the requirements of the applicable building code(s) as appropriate; and • Utilize innovative design techniques for buildings and other structural elements located on sites with unique geologic conditions to ensure that projects do not exacerbate risks associated with existing conditions.	
Impact GEO-2 Result in substantial soil erosion or the loss of topsoil. **PMM GEO-2:** In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to geologic hazards. Such measures may include the following or other comparable measures identified by the Lead Agency: a) While compliance with the various municipal regional stormwater permits (MS4) is required by law, not all areas are necessarily covered. For those areas that are not covered under a municipal stormwater permit (MS4), consistent with the requirements of the SWRCB and local regulatory agencies with oversight of development associated with the Plan, ensure that project designs provide adequate slope drainage and appropriate landscaping to minimize the occurrence of slope instability and erosion. Design features should include measures to reduce erosion caused by stormwater. Road cuts should be designed to maximize the potential for revegetation.	**Substantially conforms through regulatory compliance.** The Project would be consistent with this mitigation measure because the Project would be required to comply with existing regulatory requirements pertaining to erosion and stormwater control. For example, the Project would be required to obtain and comply with the Construction General Permit from the State Water Resources Control Board (SWRCB). Stormwater best management practices (BMPs) would be implemented to limit erosion, minimize sedimentation, and control stormwater runoff water quality during construction activities. The Project would also be required to obtain a National Pollutant Discharge Elimination System (NPDES) Construction General Permit (CGP) from the State Water Resources Control Board (SWRCB) and prepare a Stormwater Pollution Prevention Plan (SWPPP) which would include best management practices (BMPs) to reduce water quality impacts, including various measures to control on-site erosion.
Impact GEO-3 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. See PMM GEO-1, above.	**Substantially conforms through regulatory compliance.** See discussion under PMM GEO-1 above.

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Impact and Mitigation Measure	Applicability to the Project
Impact GEO-4 Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property. See PMM GEO-1, above.	**Substantially conforms through regulatory compliance.** See discussion under PMM GEO-1 above.
Impact GEO-5 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. No mitigation measures required.	**No mitigation applies.** No mitigation measures related to this issue were identified, and no mitigation measures apply to the Project.
Impact GEO-6 Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature. **PMM GEO-3:** In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to paleontological resources. Such measures may include the following or other comparable measures identified by the Lead Agency: a) For sites where the presence of paleontological resources is considered possible, as appropriate obtain review by a qualified paleontologist (meets the SVP standards for a Principal Investigator or Project Paleontologist or the Bureau of Land Management (BLM) standards for a Principal Investigator), to determine if the project has the potential to require ground disturbance of parent material with potential to contain unique paleontological or resources, or to require the substantial alteration of a unique geologic feature. The assessment should include museum records searches, a review of geologic mapping and the scientific literature, geotechnical studies	**This Mitigation Measure is incorporated through implementation of project specific mitigation measures which are equal to or more effective than this Mitigation Measure.** No paleontological resources were identified within the Project area as a part of the Paleontological Resources Assessment prepared for the Project. However, the age and composition of soils and sediments across the Project area, combined with the knowledge of paleontological resources identified within similar sediment deposits in California, indicate a moderate to high sensitivity for paleontological resources. As such, in order to mitigate potential impacts to paleontological resources, the Project would incorporate project specific MM GEO-1 through MM GEO-4, which address procedures regarding the unanticipated discovery of paleontological resources during ground-disturbing activities. **MM GEO-1 Retention of Qualified Paleontologist.** The Applicant shall retain a paleontologist who meets the Society of Vertebrate Paleontology's (SVP, 2010) definition for qualified professional paleontologist (Qualified Paleontologist) to carry out all mitigation related to paleontological resources. Prior to the start of ground-disturbing activities, the Qualified Paleontologist or their

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Impact and Mitigation Measure	Applicability to the Project
(if available), and potentially a pedestrian survey, if units with paleontological potential are present at the surface. b) Avoid exposure or displacement of parent material with potential to yield unique paleontological resources. c) Where avoidance of parent material with the potential to yield unique paleontological resources is not feasible: 1) All on-site construction personnel receive Worker Education and Awareness Program (WEAP) training prior to the commencement of excavation work to understand the regulatory framework that provides for protection of paleontological resources and become familiar with diagnostic characteristics of the materials with the potential to be encountered. 2) A qualified paleontologist prepares a paleontological resources management plan (PRMP) to guide the salvage, documentation and repository of unique paleontological resources encountered during construction. The PRMP should adhere to and incorporate the performance standards and practices from the 2010 SVP Standard procedures for the assessment and mitigation of adverse impacts to paleontological resources. If unique paleontological resources are encountered during construction, use a qualified paleontologist to oversee the implementation of the PRMP. 3) Monitor ground disturbing activities in parent material, with a moderate to high potential to yield unique paleontological resources using a qualified paleontological monitor meeting the standards of SVP or BLM to determine if unique paleontological resources are encountered during such activities, consistent with the specified or comparable protocols. 4) Identify where ground disturbance is proposed in a geologic unit having the potential for containing fossils and specify the need for a paleontological monitor to be present during ground disturbance in these areas.	designee shall conduct construction worker paleontological resources sensitivity training for all construction personnel. Construction personnel shall be informed on how to identify the types of paleontological resources that may be encountered, the proper procedures to be enacted in the event of an inadvertent discovery of paleontological resources, and safety precautions to be taken when working with paleontological monitors. The Applicant shall ensure that construction personnel are made available for and attend the training and retain documentation demonstrating attendance. **MM GEO-2** Paleontological Monitoring. Paleontological Monitoring. Paleontological monitoring shall be conducted during ground-disturbing activities below 10 feet in Quaternary alluvium. Monitoring shall be conducted by a qualified paleontological monitor (SVP, 2010) working under the direct supervision of the Qualified Paleontologist. Monitoring shall consist of visually inspecting fresh exposures of rock for larger fossil remains and, where appropriate, collecting sediment samples to wet or dry screen to test promising horizons for smaller fossil remains. If the Qualified Paleontologist determines that full-time monitoring is no longer warranted, based on the specific geologic conditions at the surface or at depth, the Qualified Paleontologist may recommend that monitoring be reduced to periodic spot-checking or cease entirely. **MM GEO-3** **Paleontological Resource Discovery.** If a potential fossil is found, the paleontological monitor shall be allowed to temporarily divert or redirect grading and excavation activities in the area of the exposed fossil to facilitate evaluation of the discovery. An appropriate buffer area shall be established around the find where construction activities shall not be allowed to continue. Work shall be allowed to continue outside of the buffer area. At the monitor's discretion, and to reduce any construction

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Impact and Mitigation Measure	Applicability to the Project
d) Avoid routes and project designs that would permanently alter unique geological features. e) Salvage and document adversely affected resources sufficient to support ongoing scientific research and education. f) Significant recovered fossils should be prepared to the point of curation, identified by qualified experts, listed in a database to facilitate analysis, and deposited in a designated paleontological curation facility. g) Following the conclusion of the paleontological monitoring, the qualified paleontologist should prepare a report stating that the paleontological monitoring requirement has been fulfilled and summarize the results of any paleontological finds. The report should be submitted to the CEQA lead agency and the repository curating the collected artifacts and should document the methods and results of all work completed under the PRMP, including treatment of paleontological materials, results of specimen processing, analysis, and research, and final curation arrangements.	delay, the grading and excavation contractor shall assist in removing rock/sediment samples for initial processing and evaluation. If a fossil is determined to be significant, the Qualified Paleontologist shall implement a paleontological salvage program to remove the resources from their location, following the guidelines of the SVP (2010). Any fossils encountered and recovered shall be prepared to the point of identification, catalogued, and curated at a public, non-profit institution with a research interest in the material and with retrievable storage, such as the Natural History Museum of Los Angeles County, if such an institution agrees to accept the fossils. If no institution accepts the fossil collection, they shall be donated to a local school in the area for educational purposes. Accompanying notes, maps, and photographs shall also be filed at the repository and/or school. If construction personnel discover any potential fossils during construction while the paleontological monitor is not present, regardless of the depth of work or location, work at the discovery location shall cease in a 50-foot radius of the discovery until the Qualified Paleontologist has assessed the discovery and recommended and implemented appropriate treatment as described earlier in this measure. **MM GEO-4 Monitoring Report**. At the conclusion of paleontological monitoring and prior to the release of the grading bond, the Qualified Paleontologist shall prepare a report summarizing the results of the monitoring and salvage efforts, the methodology used in these efforts, as well as a description of the fossils collected and their significance. The report shall be submitted to the District, the Natural History Museum of Los Angeles County, and representatives of other appropriate or concerned agencies to signify the satisfactory completion of the project and required mitigation measures.

Table 43: Applicability of 2024-2050 RTP/SCS Final EIR Mitigation Measures

Impact and Mitigation Measure	Applicability to the Project
GREENHOUSE GAS EMISSIONS	
Impact GHG-1 Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment. **PMM GHG-1:** In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to greenhouse gas emissions. Such measures may include the following or other comparable measures identified by the lead agency: a) Integrate green building measures consistent with CALGreen (California Building Code Title 24), local building codes and other applicable laws, into project design including: i. Use energy efficient materials in building design, construction, rehabilitation, and retrofit. ii. Install energy-efficient lighting, heating, and cooling systems (cogeneration); water heaters; appliances; equipment; and control systems. iii. Reduce lighting, heating, and cooling needs by taking advantage of light-colored roofs, trees for shade, and sunlight. iv. Incorporate passive environmental control systems that account for the characteristics of the natural environment. v. Use high-efficiency lighting and cooking devices. vi. Incorporate passive solar design. vii. Use high-reflectivity building materials and multiple glazing. viii. Use no gas-powered landscape maintenance equipment. ix. Install alternative fuel (i.e., electric, hydrogen-fueled, etc.) vehicle charging and fueling stations. x. Reduce wood burning stoves or fireplaces.	**Substantially conforms through regulatory compliance and Project features.** The Project would be required to comply with similar regulations that are equal or more effective than this mitigation measure. The City's Energy and Climate Action Plan (ECAP) presents strategies for reducing energy consumption and GHG emissions and promoting energy conservation and environmental initiatives. In order to determine consistency with the ECAP, the City of Inglewood has developed Climate-Ready Development Standards to aid in measuring the value of certain design and construction measures incorporated into proposed development projects toward emission reduction goals. The Project would incorporate several of the ECAP measures that would result in reduced GHG emissions including the following: • The Project would be constructed in accordance with Title 24 of the California Building Standards Code – Energy Efficiency Standards as well as the appliance energy efficiency standards in Title 20 of the California Code of Regulations. • All residential units will be EV capable and two on-site EV Charging stations would be provided at each of the clubhouse buildings. • The Project would include solar panels which would generate power to meet at least 50 percent of the Project's energy demand. • The Project would incorporate a variety of strategies for sustainability and water conservation. Plant species will be predominantly low and moderate water use specific to the local climate. The irrigation system would include a variety of water conservation features including the incorporation

Table 43: Applicability of 2024-2050 RTP/SCS Final EIR Mitigation Measures

Impact and Mitigation Measure	Applicability to the Project
xi. Provide bike lanes accessibility and parking at residential developments. xii. Encourage projects to reduce natural gas infrastructure in buildings and/or reduce the use of natural gas appliances, with exceptions for limited uses. b) Reduce emissions resulting from projects through implementation of project features, project design, or other measures, such as those described in Appendix F of the State CEQA Guidelines. c) Include off-site measures to mitigate a project's emissions. d) Measures that consider incorporation of Best Available Control Technology (BACT) during design, construction, and operation of projects to minimize GHG emissions, including but not limited to: i) Use energy and fuel-efficient vehicles and equipment; ii) Deployment of zero- and/or near zero emission technologies; iii) Use lighting systems that are energy efficient, such as LED technology; iv) Use the minimum feasible amount of GHG-emitting construction materials; v) Use cement blended with the maximum feasible amount of flash or other materials that reduce GHG emissions from cement production; vi) Incorporate design measures to reduce GHG emissions from solid waste management through encouraging solid waste recycling and reuse; vii) Incorporate design measures to reduce energy consumption and increase use of renewable energy; viii) Incorporate design measures to reduce water consumption; ix) Use lighter-colored pavement where feasible; x) Recycle construction debris to maximum extent feasible;	of Smart Water Application Technology (SWAT) that will allow it to automatically adjust run times based on local weather conditions. Furthermore, the Project would be consistent with the strategies of the ECAP (Strategy 2: Increase Energy Efficiency, Strategy 3: Support Renewable Energy Generation, Strategy 4: Improve Transportation Options: Strategy 5: Reduce Consumption and Waste, and Strategy 6: Adapt to the Potential Impacts of Climate Change). The Project would be an infill development located near transit, and near residential, commercial, entertainment and service uses. Additionally, because the Project is consistent with the ECAP, the Project would not conflict with an applicable plan, policy, or regulation of an agency developed for the purpose of reducing GHG emissions. Collectively, these Project features and the Project's required regulatory compliance (e.g., Title 24 and CalGreen compliance) would result in reduced energy consumption, reduced vehicle miles traveled (VMT), and corresponding reduction in GHG emissions, consistent with the Project-related mitigation identified by SCAG. Thus, application of this mitigation measure is not required due to compliance with regulatory compliance measures and Project features.

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Impact and Mitigation Measure	Applicability to the Project
xi) Plant shade trees in or near construction projects where feasible; and xii) Solicit bids that include concepts listed above. e) Measures that encourage transit use, carpooling, bike-share and car-share programs, active transportation, and parking strategies, including, but not limited to the following: i) Promote transit-active transportation coordinated strategies; ii) Increase bicycle carrying capacity on transit and rail vehicles; iii) Improve or increase access to transit; iv) Increase access to common goods and services, such as groceries, schools, day care, and medical care; v) Incorporate housing, including affordable housing, into the project; vi) Incorporate a neighborhood electric vehicle network; vii) Orient the project toward transit, bicycle, and pedestrian facilities; viii) Improve pedestrian or bicycle networks, or transit service; ix) Provide traffic calming measures; x) Provide bicycle parking; xi) Limit or eliminate park supply; xii) Unbundle parking costs; xiii) Provide parking cash-out programs; xiv) Implement or provide access to commute reduction program; f) Incorporate bicycle and pedestrian facilities into project designs, maintain these facilities, and provide amenities incentivizing their use; and plan for and construct local bicycle projects that connect with the regional network;	

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Impact and Mitigation Measure	Applicability to the Project
g) Improve transit access to rail and bus routes by incentives for construction of transit facilities within developments, and/or providing dedicated shuttle service to transit stations; h) Adopt employer trip reduction measures to reduce employee trips such as vanpool and carpool programs, provide end-of-trip facilities, and telecommuting programs including but not limited to measures that: i) Provide car-sharing, bike sharing, and ride-sharing programs; ii) Provide transit passes; iii) Shift single occupancy vehicle trips to carpooling or vanpooling, for example by providing ride-matching services; iv) Provide incentives or subsidies that increase use of modes other than single-occupancy vehicle; v) Provide on-site amenities at places of work, such as priority parking for carpools and vanpools, secure bike parking, and showers and locker rooms; vi) Provide employee transportation coordinators at employment sites; vii) Provide a guaranteed ride home service to users of non-auto modes. i) Designate a percentage of parking spaces for ride-sharing vehicles or high-occupancy vehicles, and provide adequate passenger loading and unloading for those vehicles; j) Land use siting and design measures that reduce GHG emissions, including: i) Developing on infill and brownfields sites; ii) Building compact and mixed-use developments near transit; iii) Retaining on-site mature trees and vegetation, and planting new canopy trees;	

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Impact and Mitigation Measure	Applicability to the Project
iv) Measures that increase vehicle efficiency, encourage use of zero and low emissions vehicles, or reduce the carbon content of fuels, including constructing or encouraging construction of alternative fuel (e.g., electric, hydrogen-fueled, etc.) vehicle charging and fueling stations or neighborhood alternative fuel vehicle networks, or charging for electric bicycles; v) Measures to reduce GHG emissions from solid waste management through encouraging solid waste recycling and reuse; and vi) Establish methane recovery in Landfills and Wastewater Treatment Plants, where applicable. k) Consult the SCAG Equity Resources for Action (ERA) Toolbox available on SCAG's Environmental Justice webpage for potential measures to address impacts to low-income and/or communities of color. l) Require at least five percent of all new vehicle parking spaces include alternative fuel (e.g., electric, hydrogen-fueled, etc.) vehicle charging and fueling stations, or at a minimum, install the appropriate infrastructure to facilitate sufficient electric charging for passenger vehicles and trucks to plug-in. Encourage electric vehicle capable (branch circuit and raceway) or ready (charging outlet) spaces to accommodate future growth in electric vehicles. m) Encourage telecommuting and alternative work schedules, such as: i) Staggered starting times ii) Flexible schedules iii) Compressed work weeks n) Implement commute trip reduction marketing, such as: i) New employee orientation of trip reduction and alternative mode options ii) Event promotions	

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Impact and Mitigation Measure	Applicability to the Project
iii) Publications o) Implement preferential parking permit program p) Implement school pool and bus programs q) Price workplace parking, such as: i) Explicitly charging for parking for its employees; ii) Implementing above market rate pricing; iii) Validating parking only for invited guests; iv) Not providing employee parking and transportation allowances; and v) Educating employees about available alternatives.	
Impact GHG-2 Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases. See PMM GHG-1, above.	**Substantially conforms through regulatory compliance and Project features.** See discussion for PMM GHG-1 under GHG-1 for discussion of the Project's consistency with this mitigation measure.
HAZARDS AND HAZARDOUS MATERIALS	
Impact HAZ-1 Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. **PMM HAZ-1:** In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to the routine transport, use, or disposal of hazardous materials and hazardous materials releases, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Reduce train speeds when train cars contain hazardous material to 40 miles per hour when passing through urbanized areas of any size.	**Substantially conforms through regulatory compliance.** Construction of the Project would involve the temporary use of hazardous substances in the form of paint, adhesives, surface coatings and other finishing materials, and cleaning agents, fuels, and oils typically used in construction. However, all such substances and materials would be used, stored, and disposed of in accordance with applicable laws and regulations and manufacturers' instructions and are not expected to cause risk to the public or nearby schools. In addition, all construction work would be performed consistent with applicable federal and California Occupational Safety and Health Administration (OSHA) Safety and Health Standards and

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Impact and Mitigation Measure	Applicability to the Project
b) Limit storage of crude oil tank cars in urbanized areas of any size and provide appropriate security in storage yards for all shipments. c) Notify in advance county and city emergency operations offices of all crude oil rail transports, including a contact number that can provide real-time information in the event of an oil train derailment or accident. d) Report quarterly hazardous commodity flow information, including classification and characterization of materials being transported, to all first response agencies (49 Code Fed. Regs. 15.5) along the mainline rail routes used by trains carrying crude oil identified. e) Fund training and outfitting emergency response crews that includes the cost of backfilling personnel while in training. f) Undertake annual emergency responses scenario/field-based training including Emergency Operations Center Training activations with local emergency response agencies.	California OSHA (Cal/OSHA) requirements to ensure the safety and well-being of construction workers. The types of potentially hazardous substances and materials that would be used during Project operation would include those typical of residential developments, such as small quantities of cleaning solvents, painting supplies, pesticides for landscaping, and pool maintenance. However, such substances and materials would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. Therefore, operation of the project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials, and the Project is consistent with this mitigation measure. Thus, application of this mitigation measure is not required.
Impact HAZ-2 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. See PMM HAZ-1, above.	**Substantially conforms through regulatory compliance.** See consistency analysis for PMM HAZ-1 under HAZ-1. Due to the age of the existing vacant school buildings on-site (constructed in 1960), there is a potential for asbestos-containing materials (ACMs) and lead-based paint (LBP) to be present on-site. Additionally, suspect ACM was observed in the form of floor tiles and ceiling tiles in the existing vacant school buildings on-site, and paint coating of the structures appeared in fair condition at the time of the site reconnaissance conducted for the Project Site. With compliance with the applicable regulatory requirements, impacts pertaining to the release of or exposure to hazardous substances would be minimized and the Project would be consistent with this mitigation measure.

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Impact and Mitigation Measure	Applicability to the Project
Impact HAZ-3 Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. See PMM HAZ-1, above. **PMM HAZ-2:** In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to the release of hazardous materials within 0.25 miles of schools, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Where the construction and operation of projects involves the transport of hazardous materials, avoid transport of such materials within 0.25 miles of schools, when school is in session, wherever feasible. b) Where it is not feasible to avoid transport of hazardous materials, within 0.25 miles of schools on local streets, provide notifications of the anticipated schedule of transport of such materials.	**Substantially conforms through regulatory compliance.** Schools within one quarter mile of the Project Site include Morningside High School, IUSD Child Development Center and Woodworth-Monroe TK-8 Academy. All potentially hazardous materials used on the Project Site during Project construction and operations would be contained, stored, and used in accordance with manufacturer's instructions and handled in compliance with applicable federal and State standards and regulations. Operation of the Project would use minor amounts of hazardous materials and would be limited to those similar to any other residential urban development (cleaning solutions, pool chemicals, pesticides, fertilizers and other landscaping supplies). However, such substances and materials would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. Therefore, construction and operation of the Project would not create a significant risk of exposure to hazardous materials for the public or the environment, including schools. Thus, application of this mitigation measure is not required due to regulatory compliance.
Impact HAZ-4 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. **PMM HAZ-3:** In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to projects that are located on a site that is included on the Cortese List of hazardous waste and substances sites, as applicable and	**Not Applicable.** Government Code Section 65962.5 refers to the Hazardous Waste and Substances Site List, commonly known as the Cortese List, maintained by the California Department of Toxic Substances Control (DTSC). The Cortese list contains hazardous waste and substance sites including public drinking water wells with detectable levels of contamination, sites with known underground storage tanks having a reportable release, solid waste disposal facilities from which there is a known migration, hazardous substance sites selected for remedial action, historic Cortese sites, and sites with known toxic material identified through the abandoned site assessment program.

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Impact and Mitigation Measure	Applicability to the Project
feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) For any listed sites or sites that have the potential for residual hazardous materials as a result of historic land uses, complete a Phase I Environmental Site Assessment, including a review and consideration of data from all known databases of contaminated sites, during the process of planning, environmental clearance, and construction for projects. b) If warranted by the Phase I report, submit to the appropriate agency responsible for hazardous materials/wastes oversight a Phase II Environmental Site Assessment report for the project site. The reports should make recommendations for remedial action, if appropriate, and be signed by a Professional Geologist or Professional Engineer. c) Implement the recommendations provided in the Phase II Environmental Site Assessment report, where such a report was determined to be necessary for the construction or operation of the project, for remedial action. d) Submit a copy of all applicable documentation required by local, state, and federal environmental regulatory agencies, including but not limited to permit applications, Phase I and II Environmental Site Assessments, human health and ecological risk assessments, remedial action plans, risk management plans, soil management plans, and groundwater management plans. e) Conduct soil sampling and chemical analyses of samples, consistent with the protocols established by the USEPA to determine the extent of potential contamination beneath all underground storage tanks, elevator shafts, clarifiers, and subsurface hydraulic lifts when on-site demolition or construction activities would potentially affect a particular development or building.	According to the Phase I ESA, several environmental risk sites were found to exist, including off-site, cross-gradient portions of Morningside High School and Woodworth-Monroe TK-8 Academy (formerly Monroe Middle School)According to the Phase I ESA, none of these listings are an environmental concern for the Project Site because no recorded violations or previous leaks or spills have been documented at any of the listings in the vicinity of the Project Site. Project Site is not in and of itself on the Cortese List. -Other nearby listed sites are also unlikely to impact the Project Site due to their distance from the Project Site and their cross-gradient locations. Thus, PMM HAZ-4 is not appliable.

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Impact and Mitigation Measure	Applicability to the Project
f) Consult with the appropriate local, state, and federal environmental regulatory agencies to ensure sufficient minimization of risk to human health and environmental resources, both during and after construction, posed by soil contamination, groundwater contamination (including dewatering effluent), or other surface hazards including, but not limited to, underground storage tanks, fuel distribution lines, waste pits and sumps. g) Obtain and submit written evidence of approval for any remedial action if required by a local, state, or federal environmental regulatory agency. h) Cease work if soil, groundwater (including dewatering effluent), or other environmental medium with suspected contamination is encountered unexpectedly during construction activities (e.g., identified by odor or visual staining, or if any underground storage tanks, abandoned drums, or other hazardous materials or wastes are encountered), in the vicinity of the suspect material. Secure the area as necessary and take all appropriate measures to protect human health and the environment, including but not limited to, notification of regulatory agencies and identification of the nature and extent of contamination. Stop work in the areas affected until the measures have been implemented consistent with the guidance of the appropriate regulatory oversight authority. i) Soil generated by construction activities should be stockpiled on-site in a secure and safe manner. All contaminated soils determined to be hazardous or non-hazardous waste must be adequately profiled (sampled) prior to acceptable reuse or disposal at an appropriate off-site facility. Complete sampling and handling and transport procedures for reuse or disposal, in accordance with applicable local, state, and federal laws and policies. j) Groundwater (including dewatering effluent) pumped from the subsurface should be contained on-site in a secure and safe	

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Impact and Mitigation Measure	Applicability to the Project
manner, prior to treatment and disposal, to ensure environmental and health issues are resolved pursuant to applicable laws and policies. Utilize engineering controls, which include impermeable barriers to prohibit groundwater and vapor intrusion into the building. k) As needed and appropriate, prior to issuance of any demolition, grading, or building permit, submit for review and approval by the Lead Agency (or other appropriate government agency) written verification that the appropriate federal, state and/or local oversight authorities, including but not limited to the Regional Water Quality Control Board, have granted all required clearances and confirmed that the all applicable standards, regulations, and conditions have been met for previous contamination at the site. l) Develop, train, and implement appropriate worker awareness and protective measures to assure that worker and public exposure is minimized to an acceptable level and to prevent any further environmental contamination as a result of construction. m) If asbestos-containing materials (ACM) are found to be present in building materials to be removed, submit specifications signed by a certified asbestos consultant for the removal, encapsulation, or enclosure of the identified ACM in accordance with all applicable laws and regulations, including but not necessarily limited to: California Code of Regulations Title 8; Business and Professions Code; Division 3; California Health and Safety Code Section 25915–25919.7; and other local regulations. n) Where projects include the demolitions or modification of buildings constructed prior to 1978, complete an assessment for the potential presence or lack thereof of ACM, LBP, and any other building materials or stored materials classified as hazardous waste by state or federal law.	

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Impact and Mitigation Measure	Applicability to the Project
o) Where the remediation of LBP has been determined to be required, provide specifications to the appropriate agency, signed by a certified Lead Supervisor, Project Monitor, or Project Designer for the stabilization and/or removal of the identified lead paint in accordance with all applicable laws and regulations, including but not necessarily limited to: California Occupational Safety and Health Administration's Construction Lead Standard, CCR Title 8 Section 1532.1 and Department of Health Services Regulation 17 CCR Sections 35001–36100, as may be amended. If other materials classified as hazardous waste by state or federal law are present, the project sponsor should submit written confirmation to the appropriate local agency that all state and federal laws and regulations should be followed when profiling, handling, treating, transporting, and/or disposing of such materials.	
Impact HAZ-5 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. See PMM NOI-1, below.	**This Mitigation Measure is incorporated through regulatory compliance and project specific mitigation measures which are equal to or more effective than this Mitigation Measure.** The Project Site is located approximately 1.0-mile north of the Hawthorne Municipal Airport and approximately 2.5 miles east of the Los Angeles International Airport (LAX). The Project Site is not located within the Airport Influence Area for the Hawthorne Municipal Airport. However, the northwestern corner of the Project Site falls within the Airport Influence Area and 65 db CNEL noise exposure contour for LAX. According to the Los Angeles County Airport Land Use Plan, residential uses within the 65 dBA noise contour shall review noise insulation needs. While a portion of the housing within the Project Site is within the noise contours, any new housing that is built within the LAX Influence Area would be required to comply with the City's development standards and regulations to reduce the impact of aircraft noise impacts on the residences. New housing must be properly insulated to meet Title 24 requirements and Inglewood

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Impact and Mitigation Measure	Applicability to the Project
	Municipal Code requirements requiring a 45 dB interior noise standard. Federal Aviation Administration (FAA) 14 CFR Part 77.9 requires that all structures exceeding 200 feet above ground level (AGL) be submitted to the FAA so that an aeronautical study can be conducted. The FAA's objective in conducting aeronautical studies is to ensure that proposed structures do not have an effect on the safety of air navigation and the efficient utilization of navigable airspace by aircraft. The Project would not construct any buildings or structures to a height that would interfere with or obstruct any local airport operations. The height of each proposed residence would be approximately 35 feet, not to exceed a height of 40 feet/3 stories. The two recreation clubhouse buildings would each be two stories; one would be 29 feet and the other 28 feet and 5 inches in height. Any construction cranes would be less than 80 feet in height and would not be subject to 14 CFR Part 77.9 because they do not exceed 200 feet. The Inglewood 2021-2029 Housing Element implements a Residential Sound Insulation Program, which includes sound insulation utilizing grant funds from the Federal Aviation Administration and Los Angeles World Airports. Project specific mitigation measure MM NOISE-3 requires the verification that all internal living spaces achieve a 45 dBA noise level as well as meet exterior standards in the Municipal Code. With implementation of MM NOISE-3, the Project would not result in excessive noise for people residing within the Project Site. Nearby residential, schools, and other noise sensitive land uses near the Project area would also be subject to exterior noise standards contained in the Municipal Code.
Impact HAZ-6 Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.	**This Mitigation Measure is incorporated though regulatory compliance and incorporation of a project specific mitigation measure that is equal to or more effective than this Mitigation**

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Impact and Mitigation Measure	Applicability to the Project
See PMM HAZ-1 through PMM HAZ-3, above. **PMM HAZ-4:** In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects that may substantially impair implementation of an adopted emergency response plan or emergency evacuation plan, as applicable and feasible. Such measures may include the following or other comparable measures identified by the lead agency: • Continue to coordinate locally and regionally based on ongoing review and integration of projected transportation and circulation conditions. • Develop new methods of conveying projected and real time information to citizens using emerging electronic communication tools including social media and cellular networks; • Continue to evaluate lifeline routes for movement of emergency supplies and evacuation. • Prior to construction, project implementation agencies can and should ensure that all necessary local and state road and railroad encroachment permits are obtained. The project implementation agency can and should also comply with all applicable conditions of approval. As deemed necessary by the governing jurisdiction, the road encroachment permits may require the contractor to prepare a traffic control plan in accordance with professional engineering standards prior to construction. Traffic control plans can and should include the following requirements: – Identification of all roadway locations where special construction techniques (e.g., directional drilling or night construction) would be used to minimize impacts to traffic flow.	**Measure.** The Project Site is located in an established urban area that is well-served by an existing roadway network. The County of Los Angeles has an adopted Operational Area Emergency Response Plan (2023) which focuses on emergencies requiring multi-agency and/or multi-jurisdictional responses. The City of Inglewood Office of Emergency Services (OES), coordinates with local agencies and neighboring jurisdictions, as well as regional and state agencies, to prepare for, respond to, and recover from emergencies and disasters. The OES is responsible for maintaining and updating the City of Inglewood Emergency Plan, which serves as a guide to ensure optimum flexibility during emergencies. According to the City of Inglewood Safety Element adopted in 2022, Century Boulevard and Yukon Avenue, are identified as local evacuation routes. Development of the Project would not infringe on those streets and would not interfere with the City's emergency evacuation plan. During an unanticipated disaster event, City and County agencies (i.e., Police and Fire Departments) would implement operational protocols, as well as plans and programs, on a case by-case basis to facilitate emergency evacuations and/or response, which would consider traffic conditions at the time of the emergency. In such instances, traffic would be routed along the City's disaster routes, as determined appropriate, by the applicable responding City agencies. Compliance with existing regulations would ensure that implementation of the Project would not impair or physically interfere with an adopted emergency response plan or with an emergency evacuation plan. Furthermore, **MM TRAF-2** and **MM TRAF-3** will be implemented. **MM TRAF-2** includes measures to ensure pedestrian safety along the affected sidewalks and temporary walkways (e.g., use of directional signage, maintaining continuous and unobstructed pedestrian paths). **MM TRAF-3**, provides measures to ensure the haul route scheduling would be

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Impact and Mitigation Measure	Applicability to the Project
– Development of circulation and detour plans to minimize impacts to local street circulation. This may include the use of signing and flagging to guide vehicles through and/or around the construction zone. – Scheduling of truck trips outside of peak morning and evening commute hours. – Limiting of lane closures during peak hours to the maximum extent feasible. – Usage of designated haul routes to minimize truck traffic on local roadways to the maximum extent feasible. – Inclusion of detours for bicycles and pedestrians in all areas potentially affected by project construction. – Installation of traffic control devices as specified in the California Department of Transportation Manual of Traffic Controls for Construction and Maintenance Work Zones. – Development and implementation of access plans for highly sensitive land uses such as police and fire stations, transit stations, hospitals, and schools. The access plans would be developed with the facility owner or administrator. To minimize disruption of emergency vehicle access, affected jurisdictions can and should be asked to identify detours for emergency vehicles, which will then be posted by the contractor. Notify in advance the facility owner or operator of the timing, location, and duration of construction activities and the locations of detours and lane closures. – Storage of construction materials only in designated areas. – Coordination with local transit agencies for temporary relocation of routes or bus stops in work zones, as necessary. – Ensure the rapid repair of transportation infrastructure in the event of an emergency through cooperation among public	sequenced to minimize conflicts with pedestrians, school buses and cars at the arrival and dismissal times of the school day.

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Impact and Mitigation Measure	Applicability to the Project
agencies and by identifying critical infrastructure needs necessary for: a) emergency responders to enter the region, b) evacuation of affected facilities, and c) restoration of utilities. – Enhance emergency preparedness awareness among public agencies and with the public at large.	
Impact HAZ-7 Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires. See PMM WF-1, below.	**Not applicable.** See discussion of the applicability of PMM WF-1 under Impact WF-2, below. The Project Site is in a fully urbanized area and it is not adjacent to any wildland. Additionally, according to the California Department of Forestry and Fire Protection (CAL FIRE), the Project Site is not within a State Responsibility Area or a very high fire hazard severity zone (VHFHSZ). Thus, this mitigation measure is not applicable to the Project.
HYDROLOGY AND WATER QUALITY	
Impact HYD-1 Potential to violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality. **PMM HYD-1:** In accordance with provisions of CEQA Guidelines Sections 15091(a)(2) and 15126.4(a)(1)(B), a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects from violation of any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality, as applicable and feasible. While compliance with the various municipal regional stormwater permits (MS4s) is required by law, not all areas are necessarily covered under a permit. For those areas that are not covered under a municipal stormwater permit (MS4), such measures may include the following or other comparable measures identified by the lead agency:	**Substantially complies through regulatory compliance.** The Project would be required to comply with existing regulatory requirements pertaining to water quality standards and waste discharge requirements during construction and operation, as governed by the Los Angeles Regional Water Quality Control Board (LARWQCB) and the City. The Project would be required to obtain and comply with the Construction General Permit from the State Water Resources Control Board (SWRCB). Stormwater best management practices (BMPs) would be implemented to limit erosion, minimize sedimentation, and control stormwater runoff water quality during construction activities. The Project would disturb more than 1 acre of soil, and therefore, would require the preparation of a SWPPP as part of the Construction General Permit requirements. Construction BMPs included in the SWPPP would include, but are not limited to, erosion control measures, sediment control measures, and hazardous materials, storage, disposal, and spill measures

Table 43: Applicability of 2024-2050 RTP/SCS Final EIR Mitigation Measures

Impact and Mitigation Measure	Applicability to the Project
a) Implement best management practices to reduce the peak stormwater runoff from the project site to the maximum extent practicable. b) Complete, and have approved, a Standard Urban Stormwater Management Plan, prior to occupancy of residential or commercial structures. c) Ensure adequate capacity of the surrounding stormwater system to support stormwater runoff from new or rehabilitated structures or buildings. d) Where feasible, restore or expand riparian areas such that there is no net loss of impervious surface as a result of the project. e) Install structural water quality control features, such as drainage channels, detention basins, oil and grease traps, filter systems, and vegetated buffers to prevent pollution of adjacent water resources by polluted runoff where required by applicable urban stormwater runoff discharge permits, on new facilities. f) Provide operational best management practices for street cleaning, litter control, and catch basin cleaning are implemented to prevent water quality degradation in compliance with applicable stormwater runoff discharge permits; and ensure treatment controls are in place as early as possible, such as during the acquisition process for rights-of-way, not just later during the facilities design and construction phase. g) Incorporate as appropriate treatment and control features such as detention basins, infiltration strips, and porous paving, other features to control surface runoff and facilitate groundwater recharge into the design of new transportation projects early on in the process to ensure that adequate acreage and elevation contours are provided during the right-of-way acquisition process. h) Upgrade stormwater drainage facilities to accommodate any increased runoff volumes. These upgrades may include the	The Project would implement a combination of raised and surface-level biofiltration stormwater planters and underground detention basins to accommodate the 85th percentile, 24-hour storm, as required by the County's LID Standards Manual. Additionally, Project operation itself would not result in discharges that would cause regulatory standards to be violated in the Los Angeles River Watershed. Thus, incorporation of this mitigation measure is not required due to regulatory compliance**.**

Table 43: Applicability of 2024-2050 RTP/SCS Final EIR Mitigation Measures

Impact and Mitigation Measure	Applicability to the Project
construction of detention basins or structures that will delay peak flows and reduce flow velocities, including expansion and restoration of wetlands and riparian buffer areas. System designs shall be completed to eliminate increases in peak flow rates from current levels. i) Encourage low-impact development and incorporation of natural spaces that reduce, treat, infiltrate, and manage stormwater runoff flows in all new developments, where practical and feasible.	
Impact HYD-2 Potential to substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin. **PMM HYD-2**: In accordance with provisions of CEQA Guidelines Sections 15091(a)(2) and 15126.4(a)(1)(B), a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects from violation of any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Avoid designs that require continual dewatering where feasible. For projects requiring continual dewatering facilities, implement monitoring systems and long-term administrative procedures to ensure proper water management that prevents degrading of surface water and minimizes adverse impacts on groundwater for the life of the project. Construction designs comply with appropriate building codes and standard practices including the CBC. b) Maximize, where practical and feasible, permeable surface area to protect water quality and allow for groundwater recharge.	**Not applicable.** Regarding Project construction, no water supply wells are located within or in the vicinity of the Project Site. Additionally, groundwater was not encountered in any of the exploratory borings performed on-site to the maximum depth of 30 feet and dewatering is not anticipated for the Project. The Project would not include the construction of any water supply wells, nor would the Project impact any existing water supply wells. The Project Site is also not within a groundwater recharge area or facility, nor does it represent a source of groundwater recharge. Thus, this mitigation measure is not applicable to the Project.

Table 43: Applicability of 2024-2050 RTP/SCS Final EIR Mitigation Measures

Impact and Mitigation Measure	Applicability to the Project
Minimize new impervious surfaces, including the use of in-lieu fees and off-site mitigation. c) Avoid construction and siting on groundwater recharge areas, where feasible, to prevent conversion of those areas to impervious surface.	
Impact HYD-3a Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river through the addition of impervious surfaces, in a manner that would result in substantial erosion or siltation on or off site. See PMM HYD-1, above.	**Substantially complies through regulatory compliance.** See discussion for PMM HYD-1 under Impact HYD-1 for discussion of the Project's consistency with this mitigation measure.
Impact HYD-3b Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river through the addition of impervious surfaces, in a manner that would result in flooding on site or off site. See PMM HYD-1 and PMM HYD-2, above.	**Substantially complies through regulatory compliance.** See discussion for PMM HYD-1 and PMM HYD-2 under Impacts HYD-1 and HYD-2, respectively, for discussion of the Project's consistency with this mitigation measure.
Impact HYD-3c 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 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. See PMM HYD-1 and PMM HYD-2, above.	**Substantially complies through regulatory compliance.** See discussion for PMM HYD-1 and PMM HYD-2 under Impacts HYD-1 and HYD-2, respectively, for discussion of the Project's consistency with this mitigation measure.
Impact HYD-3d Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river	**Substantially complies through regulatory compliance.** See discussion for PMM HYD-1 and PMM HYD-2 under Impacts HYD-1

Table 43: Applicability of 2024-2050 RTP/SCS Final EIR Mitigation Measures

Impact and Mitigation Measure	Applicability to the Project
or through the addition of impervious surfaces, in a manner which would impede or redirect flood flows. See PMM HYD-1 and PMM HYD-2, above.	and HYD-2, respectively, for discussion of the Project's consistency with this mitigation measure.
Impact HYD-4 In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation. **PMM HYD-3**: In accordance with provisions of CEQA Guidelines Sections 15091(a)(2) and 15126.4(a)(1)(B), a Lead Agency for a project can and should consider mitigation measures capable of avoiding or reducing the potential impacts of locating structures that would impede or redirect flood flows, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Ensure that all roadbeds for new highway and rail facilities be elevated at least one foot above the 100year base flood elevation. In areas affected by coastal flooding, new projects should be designed for resilience against 3.5 feet of sea-level rise, as per California Ocean Protection Council's strategic guidance. Since alluvial fan flooding is not often identified on FEMA flood maps, the risk of alluvial fan flooding should be evaluated and projects should be sited to avoid alluvial fan flooding. Delineation of floodplains and alluvial fan boundaries should attempt to account for future hydrologic changes caused by global climate change.	**Not applicable.** According to the Federal Emergency Management Agency (FEMA), the Project Site is located within Zone X, which is defined as an area of minimal flood hazard and outside of the 0.2 percent (500-year) annual chance floodplain. Additionally, there are no dams located within or in the vicinity of the Project Site, and the Project Site is not within a dam inundation area. Therefore, the Project would not impede or redirect flood flows. Thus, this mitigation measure is not applicable to the Project.
Impact HYD-5 Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. See PMM HYD-2, above.	**Not applicable.** See discussion of the applicability of PMM HYD-2 above.
LAND USE AND PLANNING	

Table 43: Applicability of 2024-2050 RTP/SCS Final EIR Mitigation Measures

Impact and Mitigation Measure	Applicability to the Project
Impact LU-1 Potential to physically divide an established community. **PMM LU-1:** In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects that physically divide a community, as applicable and feasible. Such measures may include the following or other comparable measures identified by the lead agency: a) Facilitate connections in communities that have been physically divided through land use projects that build upon and improve existing circulation patterns. b) Encourage implementing agencies to orient transportation projects to minimize impacts on existing communities by: --Selecting alignments within or adjacent to existing public rights of way. --Design sections above or below-grade to maintain viable vehicular, cycling, and pedestrian connections between portions of communities where existing connections are disrupted by the transportation project. c) Wherever feasible incorporate direct crossings, overcrossings, or under crossings at regular intervals for multiple modes of travel (e.g., pedestrians, bicyclists, vehicles). - Where it has been determined that it is infeasible to avoid creating a barrier in an established community, consider other measures to reduce impacts, including but not limited to: - Alignment shifts to minimize the area affected. - Reduction of the proposed right-of-way take to minimize the overall area of impact.	**Not applicable.** The Project does not contain features or new infrastructure that would cause a permanent disruption in the physical arrangement of an established community. Thus, this mitigation measure is not applicable to the Project.

Table 43: Applicability of 2024-2050 RTP/SCS Final EIR Mitigation Measures

Impact and Mitigation Measure	Applicability to the Project
- Provisions for bicycle, pedestrian, and vehicle access across improved roadways.	
Impact LU-2 Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. **PMM LU-2:** In accordance with provisions of CEQA Guidelines Sections 15091(a)(2) and 15126.4(a)(1)(B), a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects that are due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect, as applicable and feasible. When an inconsistency with the adopted general plan policy or land use regulation (adopted for the purpose of avoiding or mitigating an impact) is identified, measures may include the following or other comparable measures identified by the lead agency: a) Modify the transportation or land use project to eliminate or reduce the conflict; or, determine if the environmental, social, economic, and engineering benefits of the project warrant an amendment to the general plan or land use regulation and process said amendment.	**Not applicable.** The Project would be substantially consistent with all applicable plans, policies and regulations adopted for the purpose of avoiding or mitigating an environmental effect associated with development of the Project Site. The Inglewood General Plan Land Use Element (1980, amended 1986, 2009, 2016) sets forth goals and policies to guide day-to-day land use policies and to meet the existing and future needs and desires of the community. The Project would include a request to amend the Project Site's General Plan land use designation from Low Density to Medium Density and to change its associated zoning from R-1 to R-3. The R-3 zones permits one-family dwellings, one or more one-family dwellings per lot, and multi-family dwellings. The Project would be consistent with the density and land use designations of the R-3 zone. In addition, the Project would be consistent with the goals and policies of the City of Inglewood General Plan Land Use Element, Environmental Justice Element, Housing Element or the SCAG 2020-2045 RTP/SCS or the 2024 RTP/SCS. More specifically, the Project would support goals and policies of these documents, as it is an infill development in an urban area that is near transit that would contribute toward the City's long-term housing needs. The Project would provide a modern new development and associated landscaping within the City's existing urban fabric, creating architectural diversity among the City's older and newer housing stock. The Project would provide new housing, including affordable housing, near existing services, transit and infrastructure would contribute to the orderly development of new housing in the City. New landscaping and trees would encourage pedestrian circulation at the street level. Therefore, the Project would not result in a conflict with any applicable land use plan,

Table 43: Applicability of 2024-2050 RTP/SCS Final EIR Mitigation Measures

Impact and Mitigation Measure	Applicability to the Project
	policy, or regulation of an agency with jurisdiction over the Project, and the Project as a whole ensures consistency. Thus, this mitigation measure is not applicable to the Project.
MINERAL RESOURCES	
Impact MIN-1 Potential to 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. **PMM MIN-1:** In accordance with provisions of CEQA Guidelines Sections 15091(a)(2) and 15126.4(a)(1)(B), a Lead Agency for a project can and should consider mitigation measures to reduce the use of mineral resources that could be of value to the region, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Provide for the efficient use of known aggregate and mineral resources or locally important mineral resource recovery sites, by ensuring that the consumptive use of aggregate resources is minimized and that access to recoverable sources of aggregate is not precluded, as a result of construction, operation and maintenance of projects. b) Where avoidance is infeasible, minimize impacts to the efficient and effective use of recoverable sources of aggregate through measures that have been identified in county and city general plans, or other comparable measures such as: 1) Recycle and reuse building materials resulting from demolition, particularly aggregate resources, to the maximum extent practicable. 2) Identify and use building materials, particularly aggregate materials, resulting from demolition at other construction sites in	**Not applicable.** According to the California Geological Survey, the Project Site is not located in Mineral Resource Zone (MRZ) 2, which is defined as a MRZ where adequate information indicates that significant mineral deposits are present or a likelihood of their presence and development should be controlled. As noted in the Phase I ESA, there are three oil wells located within 2,000 feet of the Project Site. However, all three wells are listed as dry wells that are plugged, and none are within the boundaries of the Project Site. Additionally, according to the California Department of Conservation's Mines Online database, there are no mines within the vicinity of the Project Site. Furthermore, no mineral extraction operations currently occur on the Project Site. Thus, this mitigation measure is not applicable to the Project.

Table 43: Applicability of 2024-2050 RTP/SCS Final EIR Mitigation Measures

Impact and Mitigation Measure	Applicability to the Project
the SCAG region, or within a reasonable hauling distance of the project site. 3) Design transportation network improvements in a manner (such as buffer zones or the use of screening) that does not preclude adjacent or nearby extraction of known mineral and aggregate resources following completion of the improvement and during long-term operations. 4) Avoid or reduce impacts on known aggregate and mineral resources and mineral resource recovery sites through the evaluation and selection of project sites and design features (e.g., buffers) that minimize impacts on land suitable for aggregate and mineral resource extraction by maintaining portions of MRZ-2 areas in open space or other general plan land use categories and zoning that allow for mining of mineral resources.	
Impact MIN-2 Potential to 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. See PMM MIN-1, above.	**Not applicable.** See discussion for PMM MIN-1 under Impact MIN-1.
NOISE	
Impact NOI-1 Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. **PMM NOI-1:** In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce ambient noise levels in the vicinity of the project, as applicable and feasible. Such measures may	**This Mitigation Measure is incorporated through project design features, compliance with regulatory compliance measures, and implementation of project-specific Mitigation Measures which are equal to or more effective than this Mitigation Measure**. The City permits construction activities between the hours of 7:00 a.m. and 8:00 p.m. Monday through Friday. The Project would limit all construction activity to permitted hours, consistent with PMM NOISE-1(c).

Table 43: Applicability of 2024-2050 RTP/SCS Final EIR Mitigation Measures

Impact and Mitigation Measure	Applicability to the Project
include the following or other comparable measures identified by the Lead Agency: a) Install temporary noise barriers during construction between noise sources and noise-sensitive land uses and species. b) Include permanent noise barriers and sound-attenuating features as part of the project design between noise sources and noise-sensitive land uses and species. Barriers could be in the form of outdoor barriers, sound walls, buildings, landscaped berms, dense planting, or earth berms to attenuate noise at adjacent sensitive uses. Sound-attenuating features could be in the form of grade separation, buffer zones, reduced-noise paving materials, and traffic calming measures. c) Schedule construction activities consistent with the allowable hours pursuant to applicable general plan noise element or noise ordinance. d) Post procedures and phone numbers at the construction site for notifying the Lead Agency staff, local Police Department, and construction contractor (during regular construction hours and off-hours), along with permitted construction days and hours, complaint procedures, and who to notify in the event of a problem. e) Notify neighbors and occupants within 300 feet of the project construction area at least 30 days in advance of anticipated times when noise levels are expected to exceed limits established in the noise element of the general plan or noise ordinance. f) Designate an on-site construction complaint and enforcement manager for the project. g) Ensure that construction equipment is properly maintained per manufacturers' specifications and fitted with the best available noise suppression devices (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds silencers, wraps). All	Project design feature PDF NOISE-1 requires noise shielding and muffling, consistent with PMM NOISE-1(g). Project-Specific Mitigation Measure NOISE-1 requires temporary noise barriers, consistent with PMM NOISE-1(a) and (b). With regards to operational noise, PDF NOISE-2 limits the allowable hours for amplified sound at outdoor clubhouse areas and requires that speakers be directed toward the center of the pool area, away from sensitive uses. Compliance with regulatory measures in combination with project-specific PDFs and MMs, noise related to construction and operation of the Project would not exceed applicable thresholds and no substantial temporary or permanent increase in ambient noise levels in excess of established standards would occur. **PDF NOISE-1**: Noise Shielding and Muffling. Power construction equipment (including combustion engines), fixed or mobile, will be equipped with noise shielding and muffling devices consistent with manufacturers' standards or the Best Available Control Technology. All equipment will be properly maintained, and the Applicant or Owner will require any construction contractor to keep documentation on-site during any earthwork or construction activities demonstrating that the equipment has been maintained in accordance with manufacturer's specifications. **PDF NOISE -2** Operation of permanently wired amplified sound systems at outdoor club house space pool areas shall be limited to the hours of 7:00 a.m. to 10:00 p.m. and shall not exceed a volume of 80 dBA measured at 3 feet from any speaker. In addition, all speakers shall be designed and installed to direct sound toward the center of the Project pool area. **MM NOISE-1:** Temporary Walls. Noise barriers, such as temporary walls (minimum ½-inch thick plywood) or sound blankets (minimum

Table 43: Applicability of 2024-2050 RTP/SCS Final EIR Mitigation Measures

Impact and Mitigation Measure	Applicability to the Project
intake and exhaust ports on power equipment shall be muffled or shielded. h) Use hydraulically or electrically powered tools (e.g., jack hammers, pavement breakers, and rock drills) for project construction to avoid noise associated with compressed air exhaust from pneumatically powered tools. However, where use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust should be used; this muffler can lower noise levels from the exhaust by up to about 10 dBA. External jackets on the tools themselves should be used, if such jackets are commercially available, and this could achieve a further reduction of 5 dBA. Quieter procedures should be used, such as drills rather than impact equipment, whenever such procedures are available and consistent with construction procedures. i) Where feasible, design projects so that they are depressed below the grade of the existing noise-sensitive receptor, creating an effective barrier between the roadway and sensitive receptors. j) Where feasible, improve the acoustical insulation of dwelling units where setbacks and sound barriers do not provide sufficient noise reduction. k) Using rubberized asphalt or "quiet pavement" to reduce road noise for new roadway segments, roadways in which widening or other modifications require re-pavement, or normal reconstruction of roadways where re-pavement is planned. l) Projects that require pile driving or other construction noise above 90 dBA in proximity to sensitive receptors, should reduce potential pier drilling, pile driving and/or other extreme noise generating construction impacts greater than 90 dBA; a set of site-specific noise attenuation measures should be completed under the supervision of a qualified acoustical consultant.	STC 25 rating), that are a minimum of eight feet tall, shall be erected along the western, eastern, and southern Project boundaries such that the line-of-sight between noise-sensitive uses and construction activities are blocked. Should instruction be terminated at Morningside High School while the Project is undergoing construction, temporary walls shall not be required along the western Project boundary provided that the school remains vacant or noise-sensitive uses do not utilize the space.

Table 43: Applicability of 2024-2050 RTP/SCS Final EIR Mitigation Measures

Impact and Mitigation Measure	Applicability to the Project
m) Monitor the effectiveness of noise reduction measures by taking noise measurements and installing adaptive mitigation measures to achieve the standards for ambient noise levels established by the noise element of the general plan or noise ordinance. n) Use equipment and trucks with the best available noise control techniques (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds, wherever feasible) for project construction. o) Stationary noise sources can and should be located as far from adjacent sensitive receptors and species to the maximum extent feasible and they should be muffled and enclosed within temporary sheds, incorporate insulation barriers, or use other measures as determined by the Lead Agency (or other appropriate government agency) to provide equivalent noise reduction. p) Use of portable barriers in the vicinity of sensitive receptors during construction. q) Implement noise control at the receivers by temporarily improving the noise reduction capability of adjacent buildings (for instance by the use of sound blankets), and implement if such measures are feasible and would noticeably reduce noise impacts. r) Monitor the effectiveness of noise attenuation measures by taking noise measurements. s) Maximize the distance between noise-sensitive land uses and new roadway lanes, roadways, rail lines, transit centers, park-and-ride lots, and other new noise-generating facilities.	
Impact NOI-2 Generation of excessive groundborne vibration or groundborne noise levels.	**This Mitigation Measure is incorporated through compliance with regulatory compliance measures and implementation of project-specific mitigation measures which are equal to or more effective than this Mitigation Measure**. See above for discussion of consistency with PMM NOISE-1 under Impact NOISE-1.

Table 43: Applicability of 2024-2050 RTP/SCS Final EIR Mitigation Measures

Impact and Mitigation Measure	Applicability to the Project
See PMM NOI-1, above. **PMM NOI-2:** In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to groundborne vibration. Such measures may include the following or other comparable measures identified by the Lead Agency: a) For projects that require pile driving or other construction techniques that result in excessive vibration, such as blasting, determine the potential vibration impacts to the structural integrity of the adjacent buildings within 50 feet of pile driving locations. b) For projects that require pile driving or other construction techniques that result in excessive vibration, such as blasting, determine the threshold levels of vibration and cracking that could damage adjacent historic or other structure, and design means and construction methods to not exceed the thresholds. c) For projects where pile driving would be necessary for construction due to geological conditions, utilize quiet pile driving techniques such as predrilling the piles to the maximum feasible depth, where feasible. Predrilling pile holes will reduce the number of blows required to completely seat the pile and will concentrate the pile driving activity closer to the ground where pile driving noise can be shielded more effectively by a noise barrier/curtain and reduce the vibration occurrences and magnitude. d) Perform construction activities within permitted hours in accordance with local jurisdiction regulation. e) Properly maintain construction equipment and outfit construction equipment with the best available noise suppression devices (e.g., mufflers, silences, wraps).	Construction activities would be performed in accordance with all applicable state and federal laws and City Codes and policies governing building construction and activities. Construction is expected to occur between 7:00 a.m. and 8:00 p.m., Monday through Friday, and would comply with the City of Inglewood Municipal Code limits regarding construction activity (Municipal Code Section 5-41). Construction of the Project would not require high-impact construction methods such as pile driving or blasting. As such, groundborne vibration during Project construction would be generated from conventional heavy construction equipment, such as bulldozers and excavators. Project-Specific MM NOISE-2 requires that specific vibratory equipment be operated at minimum distances from adjacent structures to reduce potential vibration impacts, consistent with PMM NOISE-2. **MM NOISE-2:** The use of large bulldozers and loaded trucks shall be a minimum of 15 feet away from any adjacent structure. The use of a vibratory compactor/roller shall be a minimum of 26 feet away from any adjacent structure. Any activity requiring a compactor or roller within 26 feet of an adjacent structure shall be conducted using a non-vibratory/static roller or a walk-behind roller.

Table 43: Applicability of 2024-2050 RTP/SCS Final EIR Mitigation Measures

Impact and Mitigation Measure	Applicability to the Project
Impact NOI-3 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. See PMM NOI-1, above.	**This Mitigation Measure is incorporated through compliance with regulatory compliance measures and implementation of project-specific mitigation measure which are equal to or more effective than this Mitigation Measure.** The Project Site is located approximately 2.5 miles east of the LAX and one mile north of the Hawthorne Municipal Airport. The Project Site is not located within the Planning Boundary/Influence Area for Hawthorne Municipal Airport. According to the latest quarterly noise contours for LAX, the Project Site is located within the 65 dBA CNEL noise contour, which is consistent with the existing daytime ambient noise levels within the Project area. According to the Los Angeles County Airport Land Use Plan, residential uses within the 65 dBA noise contour "shall review noise insulation needs" and impacts are presumed to be potentially significant, requiring implementation of mitigation. The Inglewood 2021-2029 Housing Element implements a Residential Sound Insulation Program, which includes sound insulation utilizing grant funds from the Federal Aviation Administration and Los Angeles World Airports. **MM NOISE-3:** Areas of the Project that includes residential uses within 65 CNEL noise contour of LAX shall be designed to meet the City's interior noise standard of 45 CNEL, as well as meet exterior standards for the applicable zoning designation in outdoor areas, as provided by Inglewood Municipal Code, Section 5-30. Measures include, but are not limited to, the installation of upgraded heating and cooling mechanical systems that allow residents to keep windows closed and the installation of noise insulation features such as noise walls, glass noise barriers, double pane windows, insulated doors, roofing and siding, and landscaping. Upon receipt of a development application that includes residential uses, such as the Proposed Project, within the 65 dB CNEL noise contour of LAX, the City Planning Division shall conduct a review of

Table 43: Applicability of 2024-2050 RTP/SCS Final EIR Mitigation Measures

Impact and Mitigation Measure	Applicability to the Project
	noise generation in the proposed development area and project features to be included to reduce noise levels to meet the City's Municipal Code requirements.
POPULATION AND HOUSING	
Impact POP-1: Induce substantial unplanned population growth to areas of the region either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., by extending roads and other infrastructure). No project-level mitigation measures were identified for this issue.	**Not applicable**. Growth forecasts prepared by SCAG contained in the 2024-2050 RTP/SCS indicate that the number of households within the City will increase from 37,500 in 2019 to 61,600 in 2050, an increase of 24,100 households. The Project would include 571 units, which represents 2.4 percent of the anticipated increase for the City by 2050. Furthermore, the City's General Plan Housing Element for the 2021-2029 planning period has an objective of constructing 7,439 new units by 2029. The Project's proposed 571 units would represent approximately 8 percent of the number of new units planned to be constructed by the City per the Housing Element. Thus, this mitigation measure is not applicable to the Project because it does not exceed the City's residential growth forecasts
Impact POP-2 Displace substantial amounts of existing housing, necessitating the construction of replacement housing elsewhere. **PMM POP-1**: In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce the displacement of existing housing, as applicable and feasible. Such measures may include the following or other comparable measures identified by the lead agency: a) Evaluate alternate route alignments and transportation facilities that minimize the displacement of homes and businesses. Use an iterative design and impact analysis where impacts to homes or businesses are involved to minimize the potential of impacts on housing and displacement of people.	**Not applicable.** The Project would not displace any existing housing, as it would replace an existing commercial building at the Project Site. Furthermore, the Project would develop 116 DU at the Project Site, including 24 Low Income units. Accordingly, development of the Project would not necessitate the construction of replacement housing and this mitigation does not apply. Thus, this mitigation measure is not applicable to the Project.

Table 43: Applicability of 2024-2050 RTP/SCS Final EIR Mitigation Measures

Impact and Mitigation Measure	Applicability to the Project
b) Prioritize the use of existing ROWs, wherever feasible. c) Develop a construction schedule that minimizes potential neighborhood deterioration from protracted waiting periods between ROW acquisition and construction. d) Review capacities of available urban infrastructure and augment capacities as needed to accommodate demand in locations where growth is desirable to the local lead agency and encouraged by the SCS (primarily TPAs, where applicable). e) When General Plans and other local land use regulations are amended or updated, use the most recent growth projections and RHNA allocation plan.	
PUBLIC SERVICES	
Impact PS-1 Result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities, need for new or physically altered fire protection facilities, the construction of which could cause significant environmental impacts in order to maintain acceptable service ratios, response times, or other performance objectives. See PMM AES-1, PMM AQ-1, PMM AQ-2, PMM BIO-1, PMM BIO-2, PMM BIO-4, PMM BIO-5, PMM CUL-1, PMM CUL-2, PMM GEO-1, PMM GEO-2, PMM GHG-1, PMM HAZ-2 through PMM HAZ-4, PMM NOI-1, PMM NOI-2, PMM TCR-1, PMM UTIL-1, and PMM WF-2. **PMM PSP-1:** In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects of constructing new or physically altered fire and police facilities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the lead agency:	**Substantially conforms through regulatory compliance.** The Project would be required to comply with Municipal Code Chapter 6, Fire Prevention, which requires that there is adequate fire flow serving the Project Site, fire prevention and suppression measures, fire access, and a sufficient number of hydrants. The Project would also comply with LACFD requirements for emergency access, fire lanes, fire protection and building standards, and fire flow and requirements set forth in the 2022 California Fire Code and 2022 CBC. The Project Applicant would be required to submit site plans to LACFD and incorporate LACFD fire protection and suppression features that are appropriate for the Project. Compliance with the local, regional, and State regulations and requirements would ensure that Project operations would not require the expansion of other fire stations within the City. In addition, in the event of temporary rerouting of traffic fronting the Project Site, MM TRAF-2 will be implemented. MM TRAF-2 includes measures to ensure adequate vehicle access and

Table 43: Applicability of 2024-2050 RTP/SCS Final EIR Mitigation Measures

Impact and Mitigation Measure	Applicability to the Project
a) Coordinate with fire and police protection services agencies to ensure that there are adequate facilities to maintain acceptable service ratios, response times or other performance objectives for fire and police protection services and that any required additional construction of buildings is incorporated into the project description. b) Where current levels of services at the project site are found to be inadequate, provide fair share contributions towards infrastructure improvements for fire and police protection services facilities, as appropriate and applicable, to mitigate identified CEQA impacts.	pedestrian access during construction periods and would include temporary traffic control during all construction activities encroaching on public rights of way to improve traffic flow and safety on public roadways. Therefore, compliance with existing requirements would ensure conformance with this mitigation measure.
Impact PS-2 Result in substantial adverse physical impacts associated with the provision of new or physically altered police facilities, need for new or physically altered police facilities, the construction of which could cause significant environmental impacts in order to maintain acceptable service ratios, response times, or other performance objectives. See PMM AES-1, PMM AQ-1, PMM AQ-2, PMM BIO-1, PMM BIO-2, PMM BIO-4, PMM BIO-5, PMM CUL-1, PMM CUL-2, PMM GEO-1, PMM GEO-2, PMM GHG-1, PMM HAZ-2 through PMM HAZ-4, PMM NOI-1, PMM NOI-2, PMM TCR-1, PMM UTIL-1, and PMM WF-2.	**Substantially conforms through regulatory compliance.** The Inglewood Police Department (IPD) provides police protection services to the City. IPD is headquartered in City Hall, located approximately two miles northwest of the Project Site at 1 West Manchester Boulevard. In accordance with existing City regulations, the Project would implement appropriate temporary security features during construction (such as installing fencing and security lighting around the Project Site). Project operations would feature several security features. During Project operations, the Project Site would be fenced. Entryways into the community via West 104th Street and Lemoli Avenue would be controlled via vehicular gates. The gates would be activated electronically for residents and would include a callbox for visitor and delivery access. Access to each home would be provided via private driveways and alleys. Additionally, community and recreational rooms would be open for a limited number of hours each day for residents and guests, and residents would have access via an electronic key fob. Security design measures for semi-public and private spaces, which may include but not be limited to, the use of security cameras, and well-illuminated public and semi-public space designed with a minimum of dead

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Impact and Mitigation Measure	Applicability to the Project
	space to eliminate areas of concealment and to locate building entrances in high-foot traffic areas. These security features would minimize the Project's demand for police services. As such, the Project would not require the addition of a new police facility or the expansion, consolidation, or relocation of an existing police station to maintain service ratios. Therefore, compliance with existing regulations would ensure conformance with this mitigation measure.
Impact PS-3 Result in substantial adverse physical impacts associated with the provision of new or physically altered educational facilities, need for new or physically altered educational facilities, the construction of which could cause significant environmental impacts in order to maintain acceptable service ratios, response times, or other performance objectives. See PMM AES-1, PMM AQ-1, PMM AQ-2, PMM BIO-1, PMM BIO-2, PMM BIO-4, PMM BIO-5, PMM CUL-1, PMM CUL-2, PMM GEO-1, PMM GEO-2, PMM GHG-1, PMM HAZ-2 through PMM HAZ-4, PMM NOI-1, PMM NOI-2, PMM TCR-1, PMM UTIL-1, and PMM WF-2. **PMM PS-2**: In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects of constructing new or physically altered school facilities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the lead agency: • Where construction or expansion of school facilities is required to meet public school service ratios, support expansion of such facilities, for example by ensuring safe routes to schools.	**Substantially conforms through regulatory compliance.** The Project would substantially conform to this mitigation measure due to its compliance with existing regulatory requirements. Specifically, pursuant to the California Government Code Section 65995/California Education Code Section 17620, mandatory payment of the school fees established by the IUSD in accordance with existing regulations regarding the calculation and payment of such fees would, by law, fully address any indirect impacts to schools as a result of the Project. Therefore, pursuant to existing regulatory requirements, the Project would be consistent with this mitigation measure.
Impact PS-4 Result in substantial adverse physical impacts associated with the provision of new or physically altered library facilities, need for new or	**Substantially conforms through regulatory compliance.** The Project Site is located in an urbanized area of the City that is already

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Impact and Mitigation Measure	Applicability to the Project
physically altered library facilities, the construction of which could cause significant environmental impacts in order to maintain acceptable service ratios, response times, or other performance objectives. See PMM AES-1, PMM AQ-1, PMM AQ-2, PMM BIO-1, PMM BIO-2, PMM BIO-4, PMM BIO-5, PMM CUL-1, PMM CUL-2, PMM GEO-1, PMM GEO-2, PMM GHG-1, PMM HAZ-2 through PMM HAZ-4, PMM NOI-1, PMM NOI-2, PMM TCR-1, PMM UTIL-1, and PMM WF-2.	served by the Inglewood Public Library system, with the nearest library being the Crenshaw Imperial Branch Library located approximately 0.3-mile south of the Project Site at 1141 Crenshaw Boulevard. While the Project's residential population could result in an increased 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. Upon Project development, the Project would contribute to the financing of library services through property taxes and utility user taxes, which would mitigate the need for new or physical altered library facilities.
Impact PS-5 Result in substantial adverse physical impacts associated with the provision of new or physically altered park facilities, need for new or physically altered park facilities, the construction of which could cause significant environmental impacts in order to maintain acceptable service ratios, or other performance objectives. See PMM REC-1, PMM AQ-2, and PMM NOI-1, above.	**Substantially conforms through regulatory compliance.** Several existing parks and recreational facilities are located in the vicinity of the Project Site. The Project would include common open space and would include landscaped common areas between buildings and resident-serving dog and pocket parks that would offset some use of existing park facilities. In addition, the Project would be required to pay for the development of park land outlined in Section 12-105.9 of the Municipal Code to compensate for the increased demand on recreational facilities due to the new residential development. Additionally, pursuant to Section 9-106 of the Municipal Code, the Project would be imposed a new dwelling unit construction tax, which would be deposited into the Park Fund to finance park and recreational facilities within the City. Furthermore, it is unlikely that the Project would house a large enough number of people to substantially deteriorate these types of facilities. Therefore, the Project would not require new or physically altered park facilities and would not result in adverse physical impacts in this regard.
RECREATION	

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Impact and Mitigation Measure	Applicability to the Project
Impact REC-1 Potential to 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. **PMM REC-1**: In accordance with provisions of CEQA Guidelines Sections 15091(a)(2) and 15126.4(a)(1)(B), a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects on the use of existing neighborhood and regional parks or other recreational facilities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the lead agency: a) Prior to the issuance of permits, where projects require the construction or expansion of recreational facilities or the payment of equivalent Quimby fees, consider increasing the accessibility to natural areas and lands for outdoor recreation from the proposed project area, in coordination with local and regional open space planning and/or responsible management agencies. b) Prior to the issuance of permits, where projects require the construction or expansion of recreational facilities or the payment of equivalent Quimby fees, encourage patterns of urban development and land use which reduce costs on infrastructure and make better use of existing facilities, using strategies such as: i. Increasing the accessibility to natural areas for outdoor recreation ii. Utilizing "green" development techniques iii. Promoting water-efficient land use and development iv. Encouraging multiple uses, such as the joint use of schools v. Including trail systems and trail segments in General Plan recreation standards.	**Substantially conforms through regulatory compliance.** Several existing parks and recreational facilities are located in the vicinity of the Project Site. The Project would include common open space such as landscaped common areas between buildings and resident-serving dog and pocket parks that would offset some use of existing park facilities. In addition, the Project would be required to pay for the development of park land outlined in Section 12-105.9 of the Municipal Code to compensate for the increased demand on recreational facilities due to the new residential development. Additionally, pursuant to Section 9-106 of the Municipal Code, the Project would be imposed a new dwelling unit construction tax, which would be deposited into the Park Fund to finance park and recreational facilities within the City.
Impact REC-2 Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.	**Substantially conforms through regulatory compliance and project design features.** See discussion of applicability of PMM REC-1, PMM AQ-2, and PMM NOI-1 above.

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Impact and Mitigation Measure	Applicability to the Project
See PMM REC-1, PMM AQ-2, and PMM NOI-1, above.	
TRANSPORTATION	
Impact TRA-1 Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. **PMM TRA-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to transportation impacts. Such measures may include the following or other comparable measures identified by the lead agency: For future land use development projects, lead agencies shall encourage the incorporation of transit, bicycle, pedestrian, and micro-mobility facilities, features, and services in project designs, as well as encourage developers to provide information regarding the availability of these facilities and services to residents, tenants, and owners in order to facilitate increased access to and utilization of transit and active transportation services and facilities.	**Substantially conforms through project design features.** The Project would provide access for multiple modes of travel, including vehicles, pedestrians and cyclists. The Project Site is planned to promote pedestrian and bicycle use via internal connections within the Project Site. The walkways minimize the extent of pedestrian and bicycle interaction with vehicles at the Project Site and provide a comfortable, convenient, and safe environment which in turn can encourage use of active transportation modes. The Project Site is further planned to provide bicycle parking within clubhouses for visitors and residents, minimizing traffic on local roadways. The Project is located within a one-half mile of two existing transit stops along a high-quality transit corridor. The Project is also with one-half mile of a high-quality transit corridor (Crenshaw Boulevard). The Project's close proximity to transit, pedestrian-oriented development and bicycle infrastructure would allow for safe and convenient connections to local destinations. Therefore, the Project would be developed to facilitate increased access to and utilization of transit and active transportation services and facilities.
Impact TRA-2 Conflict or be inconsistent with CEQA Guidelines section 15064.3(b). **PMM TRA-2:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects	**This Mitigation Measure is incorporated through incorporation of a project specific mitigation measure.** The City has developed a VMT Calculator tool used to estimate Project-specific daily vehicle trips, daily VMT, residential VMT per capita, and employment VMT per employee metrics for land use development projects. The City of Inglewood's VMT Calculator tool

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Impact and Mitigation Measure	Applicability to the Project
related to transportation impacts. Such measures may include the following or other comparable measures identified by the lead agency: • Transportation demand management (TDM) strategies should be incorporated into individual land use and transportation projects and plans, as part of the planning process. Local jurisdictions should incorporate strategies identified in the Federal Highway Administration's publication: Integrating Demand Management into the Transportation Planning Process: A Desk Reference (August 2012) into the planning process (FHWA 2012). For example, the following strategies may be included to encourage use of transit and non-motorized modes of transportation and reduce vehicle miles traveled on the region's roadways: – Include TDM mitigation requirements for new developments; – Incorporate supporting infrastructure for non-motorized modes, such as, bike lanes, secure bike parking, sidewalks, and crosswalks; – Provide incentives to use alternative modes and reduce driving, such as, universal transit passes, road and parking pricing; – Implement parking management programs, such as parking cash-out, priority parking for carpools and vanpools; – Develop TDM-specific performance measures to evaluate project-specific and system-wide performance; – Incorporate TDM performance measures in the decision-making process for identifying transportation investments; – Implement data collection programs for TDM to determine the effectiveness of certain strategies and to measure success over time; and – Set aside funding for TDM initiatives.	results indicate that the unmitigated residential VMT per capita for the proposed project is 14.68 which exceeds the City's threshold of 9.66 VMT per capita. A significant VMT impact would occur without mitigation. To address this impact, a range of Transportation Demand Management (TDM) strategies was added into the Project. These measures, when modeled through the City of Inglewood VMT Calculator tool, result in a mitigated residential VMT per capita of 9.66, which meets the threshold of no significant impact. **MM TRAF-1:** A comprehensive Transportation Demand Management (TDM) Plan will be implemented by the Applicant with the objective of reducing VMT by encouraging the use of alternative transportation modes and decreasing reliance on single-occupancy vehicles. The TDM Plan would include the following strategies as VMT measures: • Unbundled Parking: Residential parking will be unbundled from the cost of housing and offered through separate agreements or lease addenda. At the time of certificate of occupancy, implementation may be formalized via covenant and included as a condition of approval. This strategy may help incentivize households to reduce vehicle ownership, promoting use of shared mobility, walking, biking, and transit. The Project will charge a monthly parking fee consistent with market rates. • Reduced Parking Supply. The Project proposes a parking supply reduction from the City's parking code. Based on the City of Inglewood parking code, the parking requirement for the Project is 1,332 parking spaces. The proposed parking supply for the Project is 1,122 parking spaces, resulting in a reduction of 210 parking spaces. A

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Impact and Mitigation Measure	Applicability to the Project
	reduction in parking supply incentivizes residents to use other modes of transportation such as transit. The reduced supply may be feasible due to the Project's proximity to transit and supportive measures such as car-share, bike-share, and improved pedestrian connectivity. • Promotions and Marketing. The Project would provide marketing and promotional material to at least 95% of residents to promote nearby transit routes and facilities and nearby multi-model infrastructure (bike lanes and sidewalks) to encourage residents to use multi-modal facilities and reduce VMT. This program may include: o Educational materials such as pamphlets provided to all residents during move-in o Ongoing email and mobile communications promoting car-share, bike-share, and transit o Incentives for new residents • Car-Share. The Project would promote a phone application (app) for the community that allows residents to share information with regards to similar travel destinations to encourage residents to carpool to those similar destinations instead of using single-occupancy vehicles (SOV), thus reducing VMT. • Bike-Share. The Project would provide a communal bike rack with communal bikes that residents can use to encourage bike riding to nearby destinations and would reduce VMT. • Pedestrian Network Enhancements. The Project provides sidewalks to all residences and connects to the off-site sidewalk network, which encourages multi-modal

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Impact and Mitigation Measure	Applicability to the Project
	transportation, as opposed to using vehicles, and thus reducing VMT. Impacts would be less than significant with mitigation.
Impact TRA-3 Substantially increase hazards due to geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment). **PMM TRA-3:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to transportation impacts. Such measures may include the following or other comparable measures identified by the lead agency: Prepare a sight distance analysis as needed for locations where sight lines could be impeded. The sight distance analysis to be prepared according to the jurisdiction's applicable Municipal Code requirements and the Caltrans Highway Design Manual (HCM) standards and guidelines, and should recommend safety improvements as appropriate such as limited use areas (e.g., low-height landscaping), on-street parking restrictions (e.g., red curb), and any turning restrictions (e.g., right-in/right-out).	**Substantially conforms through regulatory compliance.** The designs and dimensions of the driveways and internal roadways would be designed to comply with the City's current design requirements. The Project would not be placing incompatible uses such as farm equipment at the Project Site. The Project would not have the potential to increase hazards due to geometric design. Thus, the Project does not propose any improvements with the potential to increase hazards due to incompatible uses. The Project would not substantially increase hazards due to a geometric design feature or incompatible uses.
Impact TRA-4 Result in inadequate emergency access. See PMM HAZ-1 through PMM HAZ-4, above.	**Substantially conforms through regulatory compliance and project specific mitigation measure.** See consistency analysis for PMM HAZ-1 through PMM HAZ-4 under Impacts HAZ-1 through HAZ-3 and HAZ-6 above. **MM TRAF-2** and **MM TRAF-3** will be implemented. **MM TRAF-2** includes measures to ensure pedestrian safety along the affected sidewalks and temporary walkways (e.g., use of directional signage, maintaining continuous and unobstructed pedestrian paths). **MM TRAF-3**, provides measures to ensure the haul route scheduling would be sequenced to minimize conflicts with pedestrians, school buses and cars at the arrival and

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Impact and Mitigation Measure	Applicability to the Project
	dismissal times of the school day. Implementation of the **MM TRAF-2** and **MM TRAF-3** would ensure that vehicle and emergency vehicle access would be maintained throughout the course of construction activities. **MM TRAF-2:** The Applicant shall prepare a detailed Construction Management Plan that shall include, but not be limited to, the following elements, as appropriate: • Requiring workers and construction trucks to generally travel outside of the peak hours • Prohibition of construction worker parking on nearby residential streets • Temporary traffic control during all construction activities encroaching on public rights of way to improve traffic flow and safety on public roadways • Scheduling of construction activities to reduce the effect on traffic flow on surrounding arterial streets • Safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers as appropriate • Scheduling of construction-related deliveries so as to generally occur outside the commuter peak hours • Installation of appropriate traffic signs around the Project Site to ensure pedestrian, bicycle, and vehicle safety • Haul route scheduling (see MM TRAF-3) • Maintenance of pedestrian access during construction **MM TRAF-3:** Haul route scheduling shall be sequenced to minimize conflicts with pedestrians, school buses and cars at the arrival and dismissal times of the school day. Haul route trucks shall not be routed past the school during periods when school is in session,

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Impact and Mitigation Measure	Applicability to the Project
	especially when students are arriving or departing from the campus. Haul route scheduling will be included in the detailed Construction Management Plan noted in MM TRAF-1.
TRIBAL CULTURAL RESOURCES	
Impact TCR-1 Cause a substantial adverse change in the significance of a tribal cultural resource defined in Public Resources Code section 21074 that is: *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.*** See PMM CUL-1, above. **PMM TCR-1:** In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects on tribal cultural resources. Such measures may include the following or other comparable measures identified by the lead agency: a) Avoid and/or preserve the resources in place, including, but not limited to, planning and construction to avoid the resources and protect the cultural and natural context, or planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria. b) Treat the resource with culturally appropriate dignity taking into account the tribal cultural values and meaning of the resource,	**Substantially conforms through regulatory compliance and project specific mitigation measures which are equal to or more effective than this Mitigation Measure.** See consistency analysis for PMM CULT-1 under Impact CULT-1. The Project would be required to implement MM CUL-1, MM CUL-2, MM TCR-1, and MM TCR-2 which set forth procedures for the retention of a qualified archaeologist, a Native American monitor representing the Gabrieleno Band of Mission Indians – Kizh Nation, and inadvertent discovery of archaeological resources that are TCRs, respectively. In addition, the Project would require adherence to MM CUL-3 and MM TCR-3 related to the proper treatment of human remains, should they be encountered. Implementation of the measures would reduce Project impacts to TCRs to a less than significant level. **MM TCR-1: Retain a Native American Monitor Prior to Commencement of Ground-Disturbing Activities.** The project applicant/lead agency shall retain a Native American Monitor from or approved by the Gabrieleño Band of Mission Indians – Kizh Nation. The monitor shall be retained prior to the commencement of any "ground-disturbing activity" for the subject project at all project locations (i.e., both on-site and any off-site locations that are included in the project description/definition and/or required in connection with the project, such as public improvement work). "Ground-disturbing activity" shall include, but is not limited to, demolition, pavement removal, potholing, auguring, grubbing, tree removal, boring, grading, excavation, drilling, and trenching. A copy of the executed monitoring agreement shall be submitted to the

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Impact and Mitigation Measure	Applicability to the Project
including, but not limited to, the following: protecting the cultural character and integrity of the resource; protecting the traditional use of the resource; and protecting the confidentiality of the resource; c) Provide permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places; and protecting the resource. d) If tribal cultural resources are found, then the lead agency should consider tribal construction monitoring.	lead agency prior to the earlier of the commencement of any ground-disturbing activity, or the issuance of any permit necessary to commence a ground-disturbing activity. The monitor will complete daily monitoring logs that will provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of ground-disturbing activities, soil types, cultural-related materials, and any other facts, conditions, discovered TCRs, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., (collectively, tribal cultural resources, or "TCR"), as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs will be provided to the project applicant/lead agency upon written request to the Tribe. On-site tribal monitoring shall conclude upon the latter one of the following (1) written confirmation to the Kizh from a designated point of contact for the project applicant/lead agency that all ground-disturbing activities and phases that may involve ground-disturbing activities on the project site or in connection with the project are complete; or (2) a determination and written notification by the Kizh to the project applicant/lead agency that no future, planned construction activity and/or development/construction phase at the project site possesses the potential to impact Kizh TCRs. **MM TCR-2**: **Unanticipated Discovery of Tribal Cultural Resource Objects (Non-Funerary/Non-Ceremonial**). Upon discovery of any TCRs, all construction activities in the immediate vicinity of the discovery shall cease (i.e., not less than the surrounding 50 feet) and shall not resume until the discovered TCR has been fully assessed by the Kizh monitor and/or Kizh archaeologist. The Kizh will recover and retain all discovered TCRs in the form and/or manner the Tribe deems appropriate, in the Tribe's sole discretion, and for any

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Impact and Mitigation Measure	Applicability to the Project
	purpose the Tribe deems appropriate, including for educational, cultural and/or historic purposes. **MM TCR-3: Unanticipated Discovery of Human Remains and Associated Funerary or Ceremonial Objects.** Native American human remains are defined in PRC 5097.98 (d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, called associated grave goods in Public Resources Code Section 5097.98, are also to be treated according to this statute. If Native American human remains and/or grave goods are discovered or recognized on the project site, then Public Resource Code 5097.9 as well as Health and Safety Code Section 7050.5 shall be followed. Human remains and grave/burial goods shall be treated alike per California Public Resources Code section 5097.98(d)(1) and (2). Preservation in place (i.e., avoidance) is the preferred manner of treatment for discovered human remains and/or burial goods. Any discovery of human remains/burial goods shall be kept confidential to prevent further disturbance.
UTILITIES AND SERVICE SYSTEMS	
Impact UTIL-1 Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects. ***Impact UTIL-2 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.*** See PMM HYD-1, above.	**Not Applicable.** Regardless of the non-applicability of this mitigation measure, the project will comply with it through regulatory measure compliance. See discussion for PMM HYD-1 under HYD-1 for discussion of the Project's consistency with this mitigation measure. Wastewater from the Project Site would be treated at Joint Water Pollution Control Plant (JWPCP) in the City of Carson. The JWPCP currently provides primary and secondary treatment for a design capacity of 400 mgd of wastewater, and an average flow of approximately 243.1 mgd. To accommodate the anticipated wastewater generation, the Project would install a new on-site 10-inch sewer pipe with a minimum slope of 0.32 percent. This new sewer pipe would have a half-full capacity of 0.58 cfs, which is greater than the projected peak sewer flow rate generated

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Impact and Mitigation Measure	Applicability to the Project
PMM UTIL-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects on utilities and service systems, particularly for construction of wastewater facilities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency. • During the design and CEQA review of individual future projects, implementing agencies and projects sponsors shall determine whether sufficient wastewater capacity exists for the proposed projects. The proposed development can and should be served by its existing or planned treatment capacity. If adequate capacity does not exist, project sponsors shall coordinate with the relevant service provider to ensure that adequate public services and utilities could accommodate the increased demand, and if not, infrastructure improvements for the appropriate public service or utility shall be identified in each project's CEQA documentation. The relevant public service provider or utility shall be responsible for undertaking project-level review as necessary to provide CEQA clearance for new facilities. **PMM UTIL-2:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to ensure sufficient water supplies, as applicable and feasible. Such measures may include the following or other comparable measures identified by the lead agency: a) Reduce exterior consumptive uses of water in public areas, and promote reductions in private homes and businesses, by shifting to drought-tolerant native landscape plantings, using weather-based irrigation systems, educating other public agencies about water use, and installing related water pricing incentives. b) Promote the availability of drought-resistant landscaping options and provide information on how these can be obtained. Use of	by the Project. Therefore, the proposed on-site 10-inch sewer pipe at minimum slope would have enough capacity to convey wastewater from the Project Site. The Project would also be required to pay connection fees in compliance with the California Health and Safety Code. Additionally, the Project's projected wastewater generation of approximately 371,150 gpd, or 0.37 mgd, would represent a minimal portion of the maximum capacity of the regional South Inglewood-Orange Avenue Trunk Sewer in Doty Avenue (approximately 12.4 percent), the regional South Inglewood-Orange Avenue Trunk Sewer in Yukon Avenue (approximately 7.9 percent), and the JWPCP (approximately 0.09 percent). Therefore, the Project would well be within the capacity of public wastewater treatment infrastructure and would not require the relocation or construction of such facilities. Further, the Project developer would be required to pay standard utility connection fees. Therefore, payment of standard utilities connection fees and ongoing user fees would offset the Project's impacts on existing sewer and stormwater collection services. The City's electrical power is provided by SCE, and natural gas is provided by SoCalGas. The City's telecommunications are provided by various companies. SCE, SoCalGas, and local telecommunications companies operate and maintain transmission and distribution infrastructure throughout the City. The Project would include on-site connections to existing telecommunication services. The Project would not require or result in the relocation or construction of new or expanded off-site electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects According to the Water Supply Assessment (WSA), prepared for the Project, there is sufficient water supplies to serve the Project. To accommodate the anticipated increased water demand, the Project

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Impact and Mitigation Measure	Applicability to the Project
reclaimed water especially in median landscaping and hillside landscaping can and should be implemented where feasible. c) Implement water conservation best practices such as low-flow toilets, water-efficient clothes washers, water system audits, and leak detection and repair. d) For projects located in an area with existing reclaimed water conveyance infrastructure and excess reclaimed water capacity, use reclaimed water for non- potable uses, especially landscape irrigation. For projects in a location planned for future reclaimed water service, projects should install dual plumbing systems in anticipation of future use. Large developments could treat wastewater onsite to tertiary standards and use it for non-potable uses onsite.	would construct new internal 8- and 10-inch domestic waterlines that would connect to the existing water main along West 104th Street. The Project would also install new fire water line systems that would connect to existing mainlines. Furthermore, the Project would incorporate a variety of strategies for water conservation based on state and local guidelines including compliance with the Model Water Efficient Landscape Ordnance (MWELO) and all additional local requirements. Plant species will be predominantly low and moderate water use specific to the local climate. Plants will be grouped in hydrozones based on similar water use demands and planting design with respond to specific site conditions. The irrigation system would include a variety of water conservation features including the use of a flow sensor at the point of connection that can detect possible leaks and shut the system down so system integrity can be ensured. The irrigation controller will incorporate Smart Water Application Technology (SWAT) that will allow it to automatically adjust run times based on local weather conditions. The controller would also utilize a rain shut off device. Shrubs and ground cover will be irrigated with drip tubing which reduces evaporation and eliminates wasteful overspray and trees will receive supplemental water from high efficiency micro spray nozzles. The combination of these factors will ensure a sustainable landscape in the community that maximizes the use of limited water resources. Further, the Project developer would be required to pay standard utility connection fees.
Impact UTIL-3 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.	**Substantially conforms through project design features.** See discussion for PMM UTIL-2 under Impact UTIL-2 for discussion of the Project's consistency with this mitigation measure.

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Impact and Mitigation Measure	Applicability to the Project
See PMM UTIL-2, above.	
Impact UTIL-4 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. **PMM UTIL-3:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce the generation of solid waste, as applicable and feasible. Such measures may include the following or other comparable measures identified by the lead agency: Integrate green building measures consistent with CALGreen (California Building Code Title 24) into project design including, but not limited to the following: a) Reuse and minimize construction and demolition (C&D) debris and diversion of C&D waste from landfills to recycling facilities. b) Include a waste management plan that promotes maximum C&D diversion. c) Source reduction through (1) use of materials that are more durable and easier to repair and maintain, (2) design to generate less scrap material through dimensional planning, (3) increased recycled content, (4) use of reclaimed materials, and (5) use of structural materials in a dual role as finish material (e.g., stained concrete flooring, unfinished ceilings, etc.). d) Reuse existing structure and shell in renovation projects. e) Develop indoor recycling program and space. f) Discourage the siting of new landfills unless all other waste reduction and prevention actions have been fully explored. If landfill siting or expansion is necessary, site landfills with an adequate landfill-owned, undeveloped land buffer to minimize the	**Substantially conforms through regulatory compliance.** The Project would comply with applicable provisions of this mitigation measure through existing regulations. Disposal and recycling of the demolition and construction debris would be required to comply with all federal, State, and local regulations. All construction activities would be subject to conformance with relevant federal, State, and local requirements related to solid waste disposal. The Project would be required to comply with the California Integrated Waste Management Act of 1989 (AB 939), which requires that at least 50 percent of waste produced is recycled, reduced, or composted and is included in Section 7-50 of the Municipal Code, Solid Waste Ordinance and Section 7-53 of the Municipal Code, Mandatory Organic Waste Disposal Reduction Ordinance, which would achieve compliance with State law. The annual amount of solid waste generated by the Project would represent a minor amount of the estimated 137 million tons of remaining disposal capacity at the County's Class III landfills. As such, the solid waste generated by the Project would be accommodated by the County's landfills that serve the Project Site. During operation, the Project would be required to comply with CalRecycle's waste diversion rate target of 50 percent of the waste stream. The Project would also be subject to AB 1826, which requires businesses to provide separate recycling bins for organic waste. Therefore, the Project would be subject to compliance with the CALGREEN Code, other State regulations, and City regulations regarding solid waste management and reduction. As such, the Project would not 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.

Table 43: Applicability of 2024-2050 RTP/SCS Final EIR Mitigation Measures

Impact and Mitigation Measure	Applicability to the Project
potential adverse impacts of the landfill in neighboring communities. g) Discourage exporting of locally generated waste outside of the SCAG region during the construction and implementation of a project. Encourage disposal within the county where the waste originates as much as possible. Promote green technologies for long-distance transport of waste (e.g., clean engines and clean locomotives or electric rail for waste-by-rail disposal systems) and where appropriate and feasible. h) Encourage waste reduction goals and practices and look for opportunities for voluntary actions to exceed the 80 percent state waste diversion target. i) Encourage the development of local markets for waste prevention, reduction, and recycling practices by supporting recycled content and green procurement policies, as well as other waste prevention, reduction, and recycling practices. j) Develop ordinances that promote waste prevention and recycling activities such as: requiring waste prevention and recycling efforts at all large events and venues; implementing recycled content procurement programs; and developing additional opportunities to divert food waste away from landfills and toward food banks and composting facilities. k) Develop and site composting, recycling, and conversion technology facilities that have minimum environmental and health impacts. l) Integrate reuse and recycling into residential industrial, institutional, and commercial projects. m) Provide education and publicity about reducing waste and available recycling services. n) Implement or expand city or county-wide recycling and composting programs for residents and businesses. This could include extending	

Table 43: Applicability of 2024-2050 RTP/SCS Final EIR Mitigation Measures

Impact and Mitigation Measure	Applicability to the Project
the types of recycling services offered (e.g., to include food and green waste recycling) and providing public education and publicity about recycling services.	
Impact UTIL-5 Comply with federal, state, and local management and reduction statutes and regulations related to solid waste. See PMM UTIL-3, above.	**Substantially conforms through regulatory compliance.** See discussion for PMM UTIL-3 under Impact UTIL-4 for discussion of the Project's consistency with this mitigation measure.
WILDFIRE	
Impact WF-1 Substantially impair an adopted emergency response plan or emergency evacuation plan. See PMM HAZ-1 through PMM HAZ-4, above.	**Substantially conforms through regulatory compliance.** See consistency analysis for PMM HAZ-1 through PMM HAZ-4 under Impacts HAZ-1 through HAZ-3 and HAZ-6 above.
Impact WF-2 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. See PMM HAZ-5, above. **PMM WF-1:** In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce wildfire risk, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Launch fire prevention education for local cities and counties such that local fire agencies, homeowners, as well as commercial and industrial businesses are aware of potential sources of fire ignition	**Not applicable.** The Project Site is located in a highly urbanized area of the City and is not located within a Very High Fire Hazard Severity Zone. Therefore, the Project Site is not subject to a wildland fire hazard. Thus, this mitigation measure is not applicable to the Project.

Table 43: Applicability of 2024-2050 RTP/SCS Final EIR Mitigation Measures

Impact and Mitigation Measure	Applicability to the Project
and the related procedures to curb or lessen any activities that might initiate fire ignition. b) Ensure structures in high fire risk areas are built to current state and federal standards which serve to greatly increase the chances the structure will survive a wildfire and also allow for people to shelter-in-place. c) Improve road access for emergency response and evacuation so people can evacuate safely and timely when necessary. d) Improve, and educate regarding, local emergency communications and notifications with residents and businesses. e) Enforce defensible space regulations to keep overgrown and unmanaged vegetation, accumulations of trash and other flammable material away from structures. f) Provide public education about wildfire risk and fire prevention measures, and safety procedures and practices to allow for safe evacuation and/or options to shelter-in-place. g) Include external sprinklers with an independent water source to reduce flammability of structures. h) Include local solar power paired with batteries to reduce power flow in electricity lines. i) For developments in high fire-prone areas, have a fire protection plan for residents and businesses. j) Provide fire hazard and fire safety education for homeowners in or near fire hazard areas. k) Developments in fire-prone areas should have fire-resistant features, such as: - Ember-resistant vents - Fire-resistant roofs - Surrounding defensible space	

Table 43: Applicability of 2024-2050 RTP/SCS Final EIR Mitigation Measures

Impact and Mitigation Measure	Applicability to the Project
- Proper maintenance and upkeep of structures and surrounding area l) Explore and implement new strategies and better roadway easement management to minimize fire ignitions along roadways. m) Coordinate with CAL FIRE, local Fire Safe Councils, and homeowners' associations to implement FireWise Communities, implement restoration projects that remove highly flammable non-native grasses, and improve habitat via restoration projects at the Wildland Urban Interface.	
Impact WF-3 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 risks or that may result in temporary or ongoing impacts to the environment. See PMM HAZ-4, above. **PMM WF-2:** In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to wildfire risk, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) New development or infrastructure activity within very high hazard severity zones or SRAs to: 1) Submit a fire protection plan including the designation of fire watch staff; 2) Maintain water and other fire suppression equipment designated solely for firefighting on site for any construction and maintenance activities;	**Not applicable.** See consistency analysis for PMM HAZ-4 under Impact HAZ-6 for discussion of the Project's consistency with this mitigation measure. As the Project Site is not located within a Very High Fire Hazard Severity Zone, PMM WF-2 is not applicable to the Project.

Table 43: Applicability of 2024-2050 RTP/SCS Final EIR Mitigation Measures

Impact and Mitigation Measure	Applicability to the Project
3) Locate construction and maintenance equipment in designated "safe areas" such that they do not discharge combustible materials; and 4) Designate trained fire watch staff during project construction to reduce risk of fire hazards.	
Impact WF-4 Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope stability, or drainage changes. See PMM WF-1, PMM WF-2, PMM HYD-1, and PMM HAZ-4, above.	**Not applicable.** See consistency analysis for PMM WF-1, PMM WF-2, PMM HYD-1, and PMM HAZ-4 under Impacts WF-2, WF-3, HYD-1, and HAZ-6, respectively, for discussion of the Project's consistency with these mitigation measures.
Source: SCAG, Connect SoCal 2024 Final Program Environmental Impact Report, Exhibit A: Mitigation Monitoring and Reporting Program, Certified April 4, 2024. Available at https://scag.ca.gov/sites/main/files/file-attachments/exhibit_a_mmrp_508_final.pdf?1712003625. Accessed February 25, 2025.	

6.2 Mitigation and Monitoring Program

6.2.1 INTRODUCTION

This Mitigation Monitoring Program (MMP) has been prepared pursuant to Public Resources Code Section 21081.6, which requires a Lead Agency to adopt a "reporting or monitoring program for changes to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment." In addition, Section 15097(a) of the State CEQA Guidelines requires that a public agency adopt a program for monitoring or reporting mitigation measures and project revisions, which it has required to mitigate or avoid significant environmental effects. This MMP has been prepared in compliance with the requirements of CEQA, Public Resources Code Section 21081.6 and Section 15097 of the State CEQA Guidelines.

The City of Inglewood is the Lead Agency for the proposed project and therefore is responsible for administering and implementing the MMP. A public agency may delegate reporting or monitoring responsibilities to another public agency or to a private entity that accepts the delegation; however, until mitigation measures have been completed, the Lead Agency remains responsible for ensuring that implementation of the mitigation measures occurs in accordance with the program.

A Sustainable Communities Environmental Assessment (SCEA) has been prepared to address the potential environmental impacts of the Project. The evaluation of the Project's impacts in the SCEA takes into consideration the project design features (PDF) and applies mitigation measures (MM) as necessary to avoid or reduce potentially significant environmental impacts. This MMP is designed to monitor implementation of the PDFs and MMs identified for the Project.

As shown on the following pages, each identified project design feature and mitigation measure for the proposed project is listed and categorized by environmental impact area, with accompanying identification of the following:

- Implementing Party: the agency with the power to enforce the PDF or MM.
- Monitoring Party: the agency to which reports involving feasibility, compliance, implementation, and development are made.
- Timing: the frequency at which the PDF or MM shall be monitored.
- Compliance: the action by which the agency indicates that compliance with the identified PDF or required MM has been implemented.

6.2.2 ADMINISTRATIVE PROCEDURES AND ENFORCEMENT

This MMP shall be enforced throughout all phases of the proposed project. The Applicant shall be responsible for implementing each PDF and MM and shall be obligated to provide certification, as identified below, to the appropriate monitoring and enforcement agencies that each PDF and MM has been implemented. The Applicant shall maintain records demonstrating compliance with each PDF and MM. Such records shall be made available to the City upon request. During the construction phase and prior to the issuance of building permits, the Applicant shall retain an independent Construction Monitor (either via the City or through a third-party consultant), approved by the Development Services Department who shall be responsible for monitoring implementation of PDFs and MMs during construction activities consistent with the monitoring phase and frequency set forth in this MMP.

The Construction Monitor shall also prepare documentation of the Applicant's compliance with the PDFs and MMs during construction every 90 days in a form satisfactory to the Development Services Department. The documentation must be signed by the Applicant and Construction Monitor and be included as part of the Applicant's Compliance Report. The Construction Monitor shall be obligated to report to the Enforcement Agency of any non-compliance with the PDFs and MMs within two businesses days if the Applicant does not correct the non-compliance within a reasonable time of notification to the Applicant by the monitor or if the non-compliance is repeated. Such non-compliance shall be appropriately addressed by the Enforcement Agency.

6.2.3 MMP COMPONENTS

The components below contain applicable mitigation measures and project design features, are included below.

Mitigation Measure or Project Design Features	Implementing Party	Monitoring Party	Timing/Compliance
PDF AQ-1 Prior to the issuance of demolition permits, signage containing the complaint number of SCAQMD will be installed.	Applicant	City of Inglewood Development Services Department	Prior to the issuance of permits
MM AQ-1 The installation of wood-burning and natural gas fireplaces shall be prohibited. The purpose of this measure is to limit emissions of ROG, CO, particulate matter, and visible emissions from wood-burning and natural gas devices used for supplemental heat, or ambiance and does not apply to natural gas HVAC equipment. This prohibition shall be noted on the deed and/or lease agreements for future property owners/tenants to comply with.	Applicant	City of Inglewood Development Services Department	Prior to the issuance of permits

Mitigation Measure or Project Design Features	Implementing Party	Monitoring Party	Timing/Compliance
MM AQ-2 Off-Road Diesel-Powered Construction Equipment. All off-road diesel-powered construction equipment greater than 25 horsepower must meet California Air Resources Board Tier 4 Final off-road emissions standards. Requirements for Tier 4 Final equipment will be included in applicable bid documents and successful contractor(s) must demonstrate the ability to supply such equipment. A copy of each unit's Best Available Control Technology (BACT) documentation (certified tier specification or model year specification), and CARB or SCAQMD operating permit (if applicable) will be provided to the City upon request.		City of Inglewood Development Services Department	
MM CUL-1 Retention of a Qualified Archaeologist: Prior to start of ground-disturbing activities, a Qualified Archaeologist (defined as meeting the Secretary of the Interior's Professional Qualification Standards for archaeology) shall be retained to prepare cultural resources sensitivity training for construction personnel. The Qualified Archaeologist, or their designee, shall instruct all onsite construction personnel on the types of archaeological resources that may be encountered and the procedures to follow in the event of an inadvertent discovery of archaeological resources or human remains. The Applicant shall ensure that construction personnel are made available for and attend the training and retain documentation demonstrating attendance.	Applicant	City of Inglewood Development Services Department	Monitoring training shall be conducted prior to the start of ground disturbing activities; additional training shall be conducted for new construction personnel during construction, as needed.
MM CUL-2 Inadvertent Discovery of Cultural Resources: In the event that any subsurface cultural resources are encountered at the project site during	Applicant	City of Inglewood Development Services Department; Consulting Tribes	Prior to the start of ground disturbing activities; ongoing during construction. If resources are found, recordation of

Mitigation Measure or Project Design Features	Implementing Party	Monitoring Party	Timing/Compliance
construction or the course of any ground disturbance activities, all such activities shall halt immediately within 50 feet. The applicant shall notify the City and consult with a Secretary of Interior qualified archaeologist who shall evaluate the find in accordance with Federal, State, and local guidelines, including those set forth in the California Public Resources Code Section 21083.2 and shall determine the necessary findings as to the origin and disposition to assess the significance of the find. If any find is determined to be significant, appropriate avoidance measures recommended by the consultant and approved by the City must be followed unless avoidance is determined to be unnecessary or infeasible by the City. If avoidance is unnecessary or infeasible, other appropriate measures (e.g., data recovery, excavation) shall be instituted. For any resources of Native American origin, the City shall also contact the Tribes that elected to consult on the Project to identify its potential as a Tribal Cultural Resource (TCR). Should the resource, in consultation between the City and Tribe(s), be determined a TCR, the City shall also consult with Tribes regarding avoidance or other measures recommended by the consultant. All identified cultural resources will be recorded on appropriate California Department of Parks and Recreation (DPR) 523 series forms and evaluated for significance. All records will be submitted to the City of Inglewood, Consulting Tribe(s), and South Central Coastal Information Center (SCCIC).			all identified cultural resources on appropriate CA DPR series forms.
MM CUL-3 Inadvertent Discovery of Human Remains: In the event that human skeletal	Applicant	City of Inglewood Development Services Department; County	Prior to the start of ground disturbing activities; ongoing during

Mitigation Measure or Project Design Features	Implementing Party	Monitoring Party	Timing/Compliance
remains are encountered at the project site during construction or the course of any ground disturbance activities, all such activities shall halt immediately within 100 feet, pursuant to State Health and Safety Code Section 7050.5 which requires that no further ground disturbance shall occur until the County Coroner has made the necessary findings as to the origin and disposition pursuant to California Public Resources Code Section 5097.98. Additionally, the following procedures shall be followed: Contact the County Coroner: 1104 N. Mission Road Los Angeles, CA 90033 (323) 343-0512 (8 a.m. to 5 p.m. Monday through Friday) or (323) 343-0714 (After Hours, Saturday, Sunday, and Holidays) If the remains are determined to be of Native American descent, the Coroner has 24 hours to notify the Native American Heritage Commission (NAHC). The NAHC will immediately notify the person they believe to be the Most Likely Descendent (MLD) of the ancestral remains. The MLD has 48 hours to make recommendations to the owner, or representative, for the treatment or disposition, with proper dignity, of the human remains and grave goods. If the owner does not accept the descendant's recommendations, the owner or the descendent may request mediation by the NAHC.		Coroner; Native American Heritage Commission	construction. If resources are encountered, the County Coroner must be contacted. The County Coroner has 24 hours to notify the NAHC if the remains are determined to be of Native American descent. Compliance shall be demonstrated through a letter from the County Coroner to the City.
MM GEO-1 Retention of Qualified Paleontologist. The Applicant shall retain a paleontologist who meets the Society of Vertebrate Paleontology's (SVP, 2010) definition for qualified professional paleontologist (Qualified	Applicant	City of Inglewood Development Services Department	Prior to the start of ground disturbing activities; ongoing during construction.

Mitigation Measure or Project Design Features	Implementing Party	Monitoring Party	Timing/Compliance
Paleontologist) to carry out all mitigation related to paleontological resources. Prior to the start of ground-disturbing activities, the Qualified Paleontologist or their designee shall conduct construction worker paleontological resources sensitivity training for all construction personnel. Construction personnel shall be informed on how to identify the types of paleontological resources that may be encountered, the proper procedures to be enacted in the event of an inadvertent discovery of paleontological resources, and safety precautions to be taken when working with paleontological monitors. The Applicant shall ensure that construction personnel are made available for and attend the training and retain documentation demonstrating attendance.			
MM GEO-2 Paleontological Monitoring. Paleontological Monitoring. Paleontological monitoring shall be conducted during ground-disturbing activities below 10 feet in Quaternary alluvium. Monitoring shall be conducted by a qualified paleontological monitor (SVP, 2010) working under the direct supervision of the Qualified Paleontologist. Monitoring shall consist of visually inspecting fresh exposures of rock for larger fossil remains and, where appropriate, collecting sediment samples to wet or dry screen to test promising horizons for smaller fossil remains. If the Qualified Paleontologist determines that full-time monitoring is no longer warranted, based on the specific geologic conditions at the surface or at depth, the Qualified Paleontologist may recommend that monitoring	Applicant	City of Inglewood Development Services Department	Prior to the start of ground disturbing activities; ongoing during construction.

Mitigation Measure or Project Design Features	Implementing Party	Monitoring Party	Timing/Compliance
be reduced to periodic spot-checking or cease entirely.			
MM GEO-3 Paleontological Resource Discovery. If a potential fossil is found, the paleontological monitor shall be allowed to temporarily divert or redirect grading and excavation activities in the area of the exposed fossil to facilitate evaluation of the discovery. An appropriate buffer area shall be established around the find where construction activities shall not be allowed to continue. Work shall be allowed to continue outside of the buffer area. At the monitor's discretion, and to reduce any construction delay, the grading and excavation contractor shall assist in removing rock/sediment samples for initial processing and evaluation. If a fossil is determined to be significant, the Qualified Paleontologist shall implement a paleontological salvage program to remove the resources from their location, following the guidelines of the SVP (2010). Any fossils encountered and recovered shall be prepared to the point of identification, catalogued, and curated at a public, non-profit institution with a research interest in the material and with retrievable storage, such as the Natural History Museum of Los Angeles County, if such an institution agrees to accept the fossils. If no institution accepts the fossil collection, they shall be donated to a local school in the area for educational purposes. Accompanying notes, maps, and photographs shall also be filed at the repository and/or school. If construction personnel discover any potential fossils during construction while the paleontological monitor is not	Applicant	City of Inglewood Development Services Department	Prior to the start of ground disturbing activities; ongoing during construction.

Mitigation Measure or Project Design Features	Implementing Party	Monitoring Party	Timing/Compliance
present, regardless of the depth of work or location, work at the discovery location shall cease in a 50-foot radius of the discovery until the Qualified Paleontologist has assessed the discovery and recommended and implemented appropriate treatment as described earlier in this measure.			
MM GEO-4 Monitoring Report. Monitoring Report. At the conclusion of paleontological monitoring and prior to the release of the grading bond, the Qualified Paleontologist shall prepare a report summarizing the results of the monitoring and salvage efforts, the methodology used in these efforts, as well as a description of the fossils collected and their significance. The report shall be submitted to the District, the Natural History Museum of Los Angeles County, and representatives of other appropriate or concerned agencies to signify the satisfactory completion of the project and required mitigation measures	Applicant	City of Inglewood Development Services Department; the Natural History Museum of Los Angeles County; Inglewood Unified School District	Prior to the start of ground disturbing activities; ongoing during construction.
MM NOISE-1: Temporary Walls. Noise barriers, such as temporary walls (minimum ½-inch thick plywood) or sound blankets (minimum STC 25 rating), that are a minimum of eight feet tall, shall be erected along the western, eastern, and southern Project boundaries such that the line-of-sight between noise-sensitive uses and construction activities are blocked. Should instruction be terminated at Morningside High School while the Project is undergoing construction, temporary walls shall not be required along the western Project boundary provided that the school remains vacant or noise-sensitive uses do not utilize the space.	Applicant	City of Inglewood Development Services Department and Public Works Department	During construction

Mitigation Measure or Project Design Features	Implementing Party	Monitoring Party	Timing/Compliance
MM NOISE-2: The use of large bulldozers and loaded trucks shall be a minimum of 15 feet away from any adjacent structure. The use of a vibratory compactor/roller shall be a minimum of 26 feet away from any adjacent structure. Any activity requiring a compactor or roller within 26 feet of an adjacent structure shall be conducted using a non-vibratory/static roller or a walk-behind roller.	Applicant	City of Inglewood Development Services Department and Public Works Department	During construction
MM NOISE-3: Areas of the Project that includes residential uses within 65 CNEL noise contour of LAX shall be designed to meet the City's interior noise standard of 45 CNEL, as well as meet exterior standards for the applicable zoning designation in outdoor areas, as provided by Inglewood Municipal Code, Section 5-30. Measures include, but are not limited to, the installation of upgraded heating and cooling mechanical systems that allow residents to keep windows closed and the installation of noise insulation features such as noise walls, glass noise barriers, double pane windows, insulated doors, roofing and siding, and landscaping. Upon receipt of a development application that includes residential uses, such as the Proposed Project, within the 65 dB CNEL noise contour of LAX, the City Planning Division shall conduct a review of noise generation in the proposed development area and project features to be included to reduce noise levels to meet the City's Municipal Code requirements.	Applicant	City of Inglewood Development Services Department	Plan check
MM TRAF-1: A comprehensive Transportation Demand Management (TDM) Plan will be implemented by the Applicant with the objective of reducing VMT	Applicant	City of Inglewood Development Services Department and Public Works Department	Plan check. The final TDM Plan shall be recorded at the LA County Assessor's Office.

Mitigation Measure or Project Design Features	Implementing Party	Monitoring Party	Timing/Compliance
by encouraging the use of alternative transportation modes and decreasing reliance on single-occupancy vehicles. The TDM Plan would include the following strategies as VMT measures: • Unbundled Parking: Residential parking will be unbundled from the cost of housing and offered through separate agreements or lease addenda. At the time of certificate of occupancy, implementation may be formalized via covenant and included as a condition of approval. This strategy may help incentivize households to reduce vehicle ownership, promoting use of shared mobility, walking, biking, and transit. The Project will charge a monthly parking fee consistent with market rates. • •Reduced Parking Supply. The Project proposes a parking supply reduction from the City's parking code. Based on the City of Inglewood parking code, the parking requirement for the Project is 1,332 parking spaces. The proposed parking supply for the Project is 1,122 parking spaces, resulting in a reduction of 210 parking spaces. A reduction in parking supply incentivizes residents to use other modes of transportation such as transit. The reduced supply may be feasible due to the Project's proximity to			

Mitigation Measure or Project Design Features	Implementing Party	Monitoring Party	Timing/Compliance
transit and supportive measures such as car-share, bike-share, and improved pedestrian connectivity. • Promotions and Marketing. The Project would provide marketing and promotional material to at least 95% of residents to promote nearby transit routes and facilities and nearby multi-model infrastructure (bike lanes and sidewalks) to encourage residents to use multi-modal facilities and reduce VMT. This program may include: o Educational materials such as pamphlets provided to all residents during move-in o Ongoing email and mobile communications promoting car-share, bike-share, and transit o Incentives for new residents • Car-Share. The Project would promote a phone application (app) for the community that allows residents to share information with regards to similar travel destinations to encourage residents to carpool to those similar destinations instead of using single-occupancy vehicles (SOV), thus reducing VMT. • Bike-Share. The Project would provide a communal bike rack with communal bikes that residents can use to encourage bike riding to			

Mitigation Measure or Project Design Features	Implementing Party	Monitoring Party	Timing/Compliance
nearby destinations and would reduce VMT. • Pedestrian Network Enhancements. The Project provides sidewalks to all residences and connects to the off-site sidewalk network, which encourages multi-modal transportation, as opposed to using vehicles, and thus reducing VMT.			
MM TRAF-2: The Applicant shall prepare a detailed Construction Management Plan that shall include, but not be limited to, the following elements, as appropriate: • Requiring workers and construction trucks to generally travel outside of the peak hours • Prohibition of construction worker parking on nearby residential streets • Temporary traffic control during all construction activities encroaching on public rights of way to improve traffic flow and safety on public roadways • Scheduling of construction activities to reduce the effect on traffic flow on surrounding arterial streets • Safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers as appropriate • Scheduling of construction-related deliveries so as to generally occur outside the commuter peak hours	Applicant	City of Inglewood Development Services Department and Public Works Department	Construction; pre-construction

Mitigation Measure or Project Design Features	Implementing Party	Monitoring Party	Timing/Compliance
• Installation of appropriate traffic signs around the Project Site to ensure pedestrian, bicycle, and vehicle safety • Haul route scheduling (see MM TRAF-3) • Maintenance of pedestrian access during construction			
MM TRAF-3: Haul route scheduling shall be sequenced to minimize conflicts with pedestrians, school buses and cars at the arrival and dismissal times of the school day. Haul route trucks shall not be routed past the school during periods when school is in session, especially when students are arriving or departing from the campus. Haul route scheduling will be included in the detailed Construction Management Plan noted in MM TRAF-1	Applicant	City of Inglewood Development Services Department and Public Works Department	Construction; pre-construction
MM TCR-1: Retain a Native American Monitor Prior to Commencement of Ground-Disturbing Activities. The project applicant/lead agency shall retain a Native American Monitor from or approved by the Gabrieleño Band of Mission Indians – Kizh Nation. The monitor shall be retained prior to the commencement of any "ground-disturbing activity" for the subject project at all project locations (i.e., both on-site and any off-site locations that are included in the project description/definition and/or required in connection with the project, such as public improvement work). "Ground-disturbing activity" shall include, but is not limited to, demolition, pavement removal, potholing, auguring, grubbing, tree removal, boring, grading, excavation, drilling, and trenching. A copy of	Applicant	City of Inglewood Development Services Department and Gabrieleño Band of Mission Indians – Kizh Nation	Prior to commencement of ground-disturbing activities

Mitigation Measure or Project Design Features	Implementing Party	Monitoring Party	Timing/Compliance
the executed monitoring agreement shall be submitted to the lead agency prior to the earlier of the commencement of any ground-disturbing activity, or the issuance of any permit necessary to commence a ground-disturbing activity. The monitor will complete daily monitoring logs that will provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of ground-disturbing activities, soil types, cultural-related materials, and any other facts, conditions, discovered TCRs, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., (collectively, tribal cultural resources, or "TCR"), as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs will be provided to the project applicant/lead agency upon written request to the Tribe. On-site tribal monitoring shall conclude upon one of the following (1) written confirmation to the Kizh from a designated point of contact for the project applicant/lead agency that all ground-disturbing activities and phases that may involve ground-disturbing activities on the project site or in connection with the project are complete; or (2) a determination and written notification by the Kizh to the project applicant/lead agency that no future, planned construction activity and/or development/construction phase at the project site possesses the potential to impact Kizh TCRs.			
MM TCR-2: Unanticipated Discovery of Tribal Cultural Resource Objects (Non-	Applicant	City of Inglewood Development Services Department and	Construction

Mitigation Measure or Project Design Features	Implementing Party	Monitoring Party	Timing/Compliance
Funerary/Non-Ceremonial). Upon discovery of any TCRs, all construction activities in the immediate vicinity of the discovery shall cease (i.e., not less than the surrounding 50 feet) and shall not resume until the discovered TCR has been fully assessed by the Kizh monitor and/or Kizh archaeologist. The Kizh will recover and retain all discovered TCRs in the form and/or manner the Tribe deems appropriate, in the Tribe's sole discretion, and for any purpose the Tribe deems appropriate, including for educational, cultural and/or historic purposes.		Gabrieleño Band of Mission Indians – Kizh Nation	
MM TCR-3: Unanticipated Discovery of Human Remains and Associated Funerary or Ceremonial Objects. Native American human remains are defined in PRC 5097.98 (d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, called associated grave goods in Public Resources Code Section 5097.98, are also to be treated according to this statute. If Native American human remains and/or grave goods are discovered or recognized on the project site, then Public Resource Code 5097.9 as well as Health and Safety Code Section 7050.5 shall be followed. Human remains and grave/burial goods shall be treated alike per California Public Resources Code section 5097.98(d)(1) and (2). Preservation in place (i.e., avoidance) is the preferred manner of treatment for discovered human remains and/or burial goods. Any discovery of human remains/burial goods shall be kept confidential to prevent further disturbance.	Applicant	City of Inglewood Development Services Department and Native American Heritage Commission	Construction